Canadian Nuclear Laboratories | Laboratoires Nucléaires Canadiens

Whiteshell Laboratories WR-1 Reactor Decommissioning Indigenous Engagement Report

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Revision 8

Approved by: Kerry Rod

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K. Rod
WL General Manager

Date

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1. Introduction

Canadian Nuclear Laboratories (CNL) recognizes Indigenous Engagement as a critical component of the Whiteshell Laboratories Closure Project (WLCP). CNL also acknowledges the continued need for open, honest, and transparent communication and engagement with all potentially impacted communities for the Whiteshell Reactor 1 (WR-1) Decommissioning Project.

CNL's relationships with the Manitoba Métis Federation and the First Nations and near the Whiteshell Laboratories (WL) project have aided tremendously in understanding the rich historical and contemporary interests of Indigenous communities in the Project area. Our Indigenous engagement efforts, including the validation process, has given us confidence that our program and learnings have positively evolved since the outset of the Project.

1.1 Purpose

The purpose of CNL's Indigenous Engagement Report (IER) is to provide details on CNL's approach to First Nation and the Manitoba Métis Federation communication and engagement specific to the environmental impact review process for the proposed decommissioning of WR-1, as well as a detailed account of the Indigenous engagement that has occurred to date.

The IER provides background information related to Indigenous engagement, provides a record of engagement, and summarizes these interactions and relationships, recognizing that it is a difficult task to properly convey the meaning and significance of personal interactions. The IER will be updated on an annual basis and will be submitted to the Canadian Nuclear Safety Commission (CNSC) and Indigenous communities.

1.2 Scope

This report is current to September 30, 2022. The WR-1 IER is prepared in accordance with the CNSC Indigenous Engagement Regulatory Document REGDOC-3.2.2 [1]. Per the REGDOC-3.2.2, this report outlines identification of Indigenous Nations (identified through consultation with the CNSC), planned engagement activities, First Nation and the Manitoba Métis Federation engagement activities that have taken place up to the date of writing, and a proposed schedule for interim reporting on these activities to the CNSC.

Additionally, CNL has enhanced the scope of the IER by adding the following:

- A section demonstrating compliance with regulatory requirements.
- An enhanced summary of each identified Indigenous Nations or organization demonstrating CNL's understanding of the historical, legal, socio-economic, traditional use and other characteristics including documenting (where available) their interests near the Project area.
- A section providing a discussion and summary of the engagement results.
- A section describing a summary of interest and concerns from each Indigenous Nation.
- A section describing CNL's approach to long-term relationships with Indigenous Peoples.

With these enhancements, CNL has prepared a more comprehensive document with respect to Indigenous Peoples.

1.3 Background

CNL is Canada's premier nuclear science and technology organization. It is under contract with Atomic Energy of Canada Limited (AECL) for the management of AECL's sites under a Government-owned, Contractor-operated model. Since the early 1950s, CNL and AECL have been recognized as world leaders in developing peaceful and innovative applications from nuclear technology through expertise in physics, metallurgy, chemistry, biology and engineering.

In May 2016, CNL initiated a licence amendment for the decommissioning approach to the WR-1 reactor. The process requires obtaining regulatory approval from the CNSC. The new strategy, In Situ Disposal (ISD) is recognized on the world stage as a safe and viable option. The below grade reactor systems and structure along with their associated radiological and non-radiological hazards will be permanently disposed in situ within the existing robust concrete structure along with new engineered containment barriers, include filling the below grade areas with a structurally stable concrete grout. The above grade structures will be demolished and removed for waste disposal off-site. An engineered cover will then be constructed over the below grade structure. ISD is a permanent, passive decommissioning end state that ensure effective containment and isolation of the waste.

The WR-1 project is one important aspect of the WLCP. The objective of the WLCP is to safely and efficiently decommission the entire WL site to an appropriate final end-state. CNL is responsible for the planning and execution of all decommissioning and demolition activities for the WLCP, which is to be completed by 2027.

CNL has sought to establish an open, honest, and transparent line of communication and meaningful engagement in order to help foster strong working relationships with the Manitoba Métis Federation and each First Nation. CNL recognizes each community has a unique set of cultural beliefs, key interests, and concerns related to this Project. Therefore, CNL has sought feedback and direction on how they want to be engaged by CNL on this Project. CNL hopes to establish long-term, mutually beneficial working relationships with Indigenous communities in proximity to the sites we manage.

2. Regulatory Requirements

Project information distribution and Indigenous participation are important aspects of the environmental assessment process. Canadian Nuclear Laboratories' approach to Indigenous engagement complies with the regulatory documents *REGDOC-3.2.1, Public Information and Disclosure* [2] and *REGDOC-3.2.2, Public and Indigenous Engagement* [1]. Additional information on REGDOC-3.2.1 is provided in Section 5.1.2 Regulatory Requirements. REGDOC-3.2.2 notes that when a licensee's activities could adversely affect potential or established Indigenous and/or treaty rights, that the licensee shall identify and engage with potentially affected First Nations and the Red River Métis, and develop/maintain any Indigenous Engagement Reports to support Project activities.

Consideration was also given to CNSC's *Generic Guidelines for the Preparation of an Environmental Impact Statement* pursuant to the *Canadian Environmental Assessment Act, 2012* [3], along with *REGDOC-2.9.1, Environmental Protection: Environmental Principles, Assessments and Protection Measures* [4], which explains that the CNSC determines the requirements for public and Indigenous engagement on a case-by-case basis, including consideration of:

- interests of the public, the Red River Métis, and the First Nations;
- the complexity of the facility or activity and its potential interactions with the environment and the public; and
- additional factors such as other jurisdictional mandates or types of decisions.

Regulatory requirements related to these activities are summarized in Table 1. The *Canadian Environmental Assessment Act, 2012* [5] provides a clear description of the environmental effects on Indigenous peoples that are to be taken into account. The CNSC REGDOC 3.2.2 [1] provides more detailed information and sets out the "requirements and guidance for licensees" with respect to engagement.

As the CNSC REGDOC-3.2.2 provides specific requirements and guidance on consideration of rights and activities (i.e., hunt, trap, fish, gather, or conduct ceremonies), results of CNL's review are specifically addressed in the IER and Environmental Impact Statement (EIS) [6]. In accordance with REGDOC-3.2.2, the scope of CNL's Indigenous engagement includes:

- Build list of Indigenous Nations (through consultation with the CNSC);
- Gather information on Indigenous engagement activities that have taken place up to the date of writing and a proposed schedule for interim reporting on these activities to the CNSC; and
- Plan Indigenous engagement activities through closure and post closure of the Project and continue to engage with Indigenous peoples.

CNL also enhanced the scope of Section 4.0 - Indigenous Engagement in the EIS [6] by adding the following:

- a section demonstrating compliance with regulatory requirements;
- a narrative of engagement activities for each First Nation and the Manitoba Métis Federation;
- an enhanced summary of each First Nation and the Red River Métis to demonstrate CNL's understanding of the historical, legal, socio-economic, traditional use, and other characteristics, including documenting (where available) their interests in the vicinity of the Project;
- a section providing a summary of engagement outcomes;
- a description of CNL's approach to long-term relationships with Indigenous peoples; and
- a section describing the influence of Traditional Knowledge on the environmental assessment.

Interests and concerns raised through the Indigenous engagement process were considered for inclusion in the environmental assessment process. For example, the Winnipeg River was identified by every Indigenous Nations as a critically important feature of their traditional rights and culture. As such, CNL created the Winnipeg River Valued Component (VC). Indigenous concerns and interests are described in tabular format at the outset of subsections of Section 6.0 Environmental Effects (Sections 6.2 Atmospheric Environment through 6.9 Socio-economic Environment) and a compiled summary table is provided in Section 4.3.3 of the revised draft EIS [6]. The table also identifies the corresponding section of the EIS that was changed or altered as a result of the Indigenous input.

All the requirements to the knowledge of the CNL team are outlined in Table 1 and a column provided that indicates the section of the EIS and/or IER that address the issue.

Table 1: Summary of Guideline Requirements and Concordance

Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and/or IER
CEAA 2012 [5]	**5. (1)** For the purposes of this Act, the environmental effects that are to be taken into account in relation to an act or thing, a physical activity, a designated project or a project are: **c)** with respect to Aboriginal peoples, an effect occurring in Canada of any change that may be caused to the environment on: i. health and socio-economic conditions; ii. physical and cultural heritage; iii. the current use of lands and resources for traditional purposes; iv. any structure, site or thing that is of historical, archaeological paleontological or architectural significance.	**Health Conditions:** EIS Section 6.7 (Human and Ecological Health), subsection: • 6.7.1 Human Health **Socio-economic Conditions:** EIS Section 6.9 (Socio-economic Health), subsections: • 6.9.5.2.3, Employment and Income, subheading Indigenous Communities (existing conditions) • 6.9.5.2.5.2, Water Supply, subheading Indigenous Communities – Water Supply (existing conditions) • 6.9.5.2.5.3, Community Facilities, subheading Indigenous Communities (existing conditions) • 6.9.5.2.5.4, Housing, subheading Indigenous (existing conditions)

Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and/or IER
		• 6.9.5.2.5.5, Services, subheading Indigenous (existing conditions) • 6.9.5.2.6.2, Community Wellbeing Index, subheading Indigenous Communities (existing conditions) • 6.9.4.2.6.4, Indigenous Health (existing conditions) • 6.9.6.2.2, Secondary Pathways (assessment of potential effects) **Current Use of Lands and Resources for Traditional Purposes:** EIS Section 6.8 (Land and Resource Use), subsections: • EIS subsection 6.8.1.5.2.2, Traditional Land and Resource Use by Indigenous Peoples **Physical and Cultural Heritage, Archaeological, Paleontological, Architectural Sites:** EIS Section 6.8 (Land and Resource Use), subsections: • 6.8.1.5.2.1, Archaeological and Cultural Sites (existing conditions) • 6.8.1.6.2.1, No Linkage Pathway (assessment of potential effects) • 6.8.1.6.2.2, Secondary Pathways (assessment of potential effects)
CNSC (2016a)	The proponent will provide Indigenous groups with opportunities to learn about the project and its potential effects, to communicate their	**Communication and Engagement Opportunities:** IER Section 3 (Indigenous

Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and/or IER
[3] **Part 1: Section 2.4**	concerns about the project's potential effects, and to discuss measures to mitigate those effects. The proponent will make reasonable efforts to consider traditional Indigenous knowledge into the assessment of environmental impacts.	Engagement) and EIS Section 4.0 (Indigenous Engagement): • IER subsection 3.4, Summary of Engagement • IER subsection 3.5, Future Engagement Activities Planned • EIS subsection 4.2.4, Summary of Engagement **Specific Consideration of Indigenous Traditional Knowledge:** EIS Section 6.3 (Geological and Hydrogeological Environment), Section 6.4 (Surface Water Environment), Section 6.5 (Aquatic Environment), Section 6.6 (Terrestrial Environment), Section 6.7 (Human and Ecological Health), Section 6.8 (Land and Resource Use), Section 6.9 (Socio-economic Environment), subsections: • 6.3.2.3, Valued Components • 6.4.1.3, Valued Components • 6.4.2.3, Valued Components • 6.4.2.5.2.3, Indigenous Knowledge • 6.5.3, Valued Components • 6.5.5.2.6, Indigenous Knowledge • 6.6.3, Valued Components • 6.6.5.7, Indigenous Knowledge • 6.7.1.7.1.1, Methods, subheadings Receptor Selection and Characterization, Exposure Pathways • 6.7.1.7.2.1, Methods, subheading Receptor Selection and Characterization • 6.8.1.3, Valued Components

Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and/or IER
		• 6.9.3, Valued Components
CNSC (2016a) [3] **Part 1: Section 3.3.2**	The EIS will document the following: • traditional knowledge gathered; • how the traditional knowledge information was gathered (e.g., interviews with key community leaders and elders, collaborative field research, Indigenous traditional knowledge studies, etc.); • the source of the traditional knowledge information; and • how the traditional knowledge information gathered was taken into consideration by the proponent in the assessment, including both methodology (e.g., identifying [Valued Components] VCs, establishing spatial and temporal boundaries, defining significance criteria) and analysis (e.g., baseline characterization, effects prediction, development of mitigation measures).	**Traditional Knowledge Gathered:** EIS Section 4.0 (Indigenous Engagement), Section 6.8 (Land and Resource Use), subsections: • EIS subsection 4.2.4.X.2, Interests and Concerns • EIS subsection 6.8.1.5.2.2, Traditional Land and Resource Use by Indigenous Peoples **Traditional Knowledge Gathering Methods:** EIS Section 6.8 (Land and Resource Use), subsections: • EIS Subsection 6.8.1.5.1.1, Literature Review • EIS Subsection 6.8.1.5.1.3, Indigenous Engagement **Traditional Knowledge Sources:** EIS Section 4.0 (Indigenous Engagement), subsection: • EIS Section 4.5, (Traditional Knowledge, Land Use and Occupancy Studies) **Consideration of Traditional Knowledge EIS Subsections:** EIS Section 6.2 (Atmospheric Environment), Section 6.3 (Geological and Hydrogeological Environment), Section 6.4 (Surface Water Environment), Section 6.5 (Aquatic Environment), Section 6.6 (Terrestrial Environment),

Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and/or IER
		Section 6.7 (Human and Ecological Health), Section 6.8 (Land and Resource Use), Section 6.9 (Socio-economic Environment), subsections: • 6.2.1.3, Valued Components • 6.3.1.3, Valued Components • 6.3.2.3, Valued Components • 6.4.1.3, Valued Components • 6.4.2.3, Valued Components • 6.4.2.5.2.3, Indigenous Knowledge • 6.5.3, Valued Components • 6.5.5.2.6, Indigenous Knowledge • 6.6.3, Valued Components • 6.6.5.7, Indigenous Knowledge • 6.7.1.7.1.1, Methods, subheadings Receptor Selection and Characterization, Exposure Pathways • 6.7.1.7.2.1, Methods, subheading Receptor Selection and Characterization • 6.8.1.3, Valued Components • 6.8.1.6.2.2, Secondary Pathways • 6.9.3, Valued Components • 6.9.6.2.2, Secondary Pathways

Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and/or IER
CNSC (2016a) [3] **Part 2: Section 2**	The [EIS executive] summary will include the following: • a summary of the consultation conducted with Indigenous groups, the public, and government agencies, including a summary of the issues raised and the proponent's responses	EIS Executive Summary
CNSC (2016a) [3] **Part 2: Section 3.2**	The EIS will contain a description of the geographical setting where the project will take place. This description should include those aspects of the project and its setting that are key to understanding the project's potential adverse environmental effects, including: • description of local and Indigenous communities; • traditional Indigenous territories, treaty lands, and Indian reserve lands and Métis harvesting regions and/or settlements.	**Geographic Setting Figures located in the EIS:** EIS Section 6.8 (Land and Resource Use), subsection: • Spatial Boundaries for the Land and Resource Use Assessment, Figure 6.8.1-1 • Treaty Areas, Figure 6.8.1-2 • Recognized Areas for Métis Natural Resource Harvesting, Figure 6.8.1-3 • Expansion of the Recognized Métis Natural Resource Harvesting, Figure 6.8.1-4 **Descriptions located in the EIS:** Section 6.8 (Land and Resource Use), Section 6.9 (Socio-economic Environment), subsections: • 6.8.1.4.1, Spatial Boundaries – Traditional Land and Resource Use • 6.8.2.4.1, Spatial Boundaries – Other Land and Resource Use • 6.8.1.5.2.2 – Traditional Land and Resource Use by Indigenous People (includes historic and present-day traditional land use) • 6.8.2.5.2 – Results – Other Land and Resource Use • 6.9.5.2.3, Employment and Income, subheading

Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and/or IER
		Indigenous Communities (existing conditions) • 6.9.5.2.5.2, Water Supply, subheading Indigenous Communities – Water Supply (existing conditions) • 6.9.5.2.5.3, Community Facilities, subheading Indigenous Communities (existing conditions) • 6.9.5.2.5.4, Housing, subheading Indigenous Communities (existing conditions) • 6.9.5.2.5.5, Services, subheading Indigenous Communities (existing conditions) • 6.9.5.2.6.2, Community Wellbeing Index, subheading Indigenous Communities (existing conditions) • 6.9.4.2.6.4, Indigenous Health (existing conditions)
CNSC (2016a) [3] **Part 2: Section 3.3**	The EIS should identify: • any treaty or self-government agreements with Indigenous groups that are pertinent to the project and/or Environmental Assessment (EA).	EIS Section 4.0 (Indigenous Engagement), Section 6.8 (Land and Resource Use), subsections: • 4.2.4, Summary of Engagement • Spatial Boundaries for the Traditional Land and Resource Use Assessment, Figure 6.8.1-1 • Treaty Areas, Figure 6.8.1-2 • Recognized Areas for Métis Natural Resource Harvesting, Figure 6.8.1-3 • Expansion of the Recognized Métis Natural Resource Harvesting, Figure 6.8.1-4

Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and/or IER
		• 6.8.5.2.2, Traditional Land and Resource Use by Indigenous Peoples
CNSC (2016a) [3] **Part 2: Section 4.2**	The proponent will complete the following procedural steps for addressing alternative means: • Identify the effects of each technically and economically feasible alternative means: • the effects referred to above include both environmental effects and potential adverse impacts on potential or established Indigenous and Treaty rights and related interests.	EIS Section 2.0 (Alternative Means Assessment), subsections: • 2.6.3.2, Public Safety • 2.6.4, Environmental Effects • 2.8, Sagkeeng's Alternative Means Assessment – Approach and Findings
CNSC (2016a) [3] **Part 2: Section 5.2.1**	The final list of VCs to be presented in the EIS will be completed according to the evolution and design of the project and reflect the knowledge on the environment acquired through public consultation and Indigenous engagement. The EIS will identify those VCs, processes, and interactions that were identified to be of concern during any workshops or meetings held by the proponent, or that the proponent considers likely to be affected by the project. In doing so, the EIS will indicate to whom these concerns are important and the reasons why, including environmental, Indigenous, social, economic, recreational, and aesthetic considerations.	EIS Section 6.1 (Environmental Assessment Approach), 6.2 (Atmospheric Environment) Section 6.3 (Geological and Hydrogeological Environment), Section 6.4 (Surface Water Environment), Section 6.5 (Aquatic Environment), Section 6.6 (Terrestrial Environment), Section 6.7 (Human and Ecological Health), Section 6.8 (Land and Resource Use), Section 6.9 (Socio-economic Environment), subsections: • 6.1.2 – Valued Components (how they were generally developed including input from First Nations and Métis) • Valued Components Selected for the Effects Assessment, Table 6.1.2-1 • 6.2.1.3, Valued Components • 6.3.1.3, Valued Components

Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and/or IER
		• 6.3.2.3, Valued Components • 6.4.1.3, Valued Components • 6.4.2.3, Valued Components • 6.5.3, Valued Components • 6.6.3, Valued Components • 6.7.1.3, Valued Components • 6.7.2.3, Valued Components • 6.8.1.3, Valued Components • 6.8.2.3, Valued Components • 6.9.3, Valued Components
CNSC (2016a) [3] **Part 2: Section 5.2.2**	The proponent is encouraged to consult with the CNSC, federal and provincial government departments and agencies, local government and Indigenous groups, and take into account public comments when defining the spatial boundaries used in the EIS. Spatial boundaries will be defined by taking into account, but not limited to, the following criteria: g) community and Indigenous traditional knowledge, ecological, and technical considerations Community and Indigenous traditional knowledge should factor into decisions around temporal boundaries.	EIS Section 4.0 (Indigenous Engagement), Section 5.0 (Public Engagement), Section 6.8 (Land and Resource Use) Section 6.9 (Socio-economic Environment), subsections: • 4.4, Summary of Issues Raised During Engagement Activities that Influence the Scope of the Environmental Assessment • 5.3 – Summary of Stakeholder Feedback and Responses • 6.8.1.4.1, Spatial Boundaries – Traditional Land and Resource Use • 6.8.2.4.1, Spatial Boundaries – Other Land and Resource Use • 6.9.4.1, Spatial Boundaries **EIS Figures:** • Spatial Boundaries for the Traditional Land and Resource Use Assessment, Figure 6.8.1-1 • Treaty Areas, Figure 6.8.1-2

Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and/or IER
		• Recognized Areas for Métis Natural Resource Harvesting, Figure 6.8.1-3
CNSC (2016a) [3] **Part 2: Section 7**	The EIS will describe the proponent's engagement activities with potentially affected Indigenous groups. The EIS will include, and the proponent should consider engaging with potentially affected Indigenous groups to obtain their views on, the following: • the objectives of and the methods used for Indigenous engagement activities; • each Indigenous group's potential or established rights including geographical extent, nature, frequency, timing and maps and data sets (e.g., fish catch numbers) when this information is provided by a group to the proponent or available through public records; • comments, specific issues and concerns raised by Indigenous groups and how the key concerns were responded to or addressed; • the potential adverse impacts of the project on potential or established Indigenous or treaty rights • effects of changes to the environment on Indigenous peoples (health and socioeconomic conditions; physical and cultural heritage, including any structure, site or thing that is of historical, archaeological, paleontological or architectural significance; and current use of lands and resources for traditional purposes) pursuant to paragraph 5(1)(c) of the CEAA 2012;	**Engagement Activities:** IER and EIS Section 4.0 (Indigenous Engagement): • IER, Section 3 (Indigenous Engagement) • EIS subsection 4.2.4, Summary of Engagement • EIS Appendices A.1-1, A.2-1, A.3-1, A.4-1, A.5-1, A.6-1, A.7-1, A.8-1 **Engagement Methods:** EIS Section 4.0 (Indigenous Engagement), subsection: • 4.2.3, Engagement Methods **Potential or Established Rights:** EIS Section 4.0 (Indigenous Engagement), Section 6.8 (Land and Resource Use), subsections: • 4.4, Summary of Issues Raised During Engagement Activities that Influence the Scope of the Environmental Assessment • Appendices A.1-2, A.2-2, A.3-2, and A.4-2: Tables of Interests and Concerns of each First Nation and the Red River Métis • 6.8.1.5.2.2, Traditional Land and Resources use by Indigenous Peoples

Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and/or IER
	• VCs suggested by Indigenous groups for inclusion in the EIS, whether they were included, and the rationale for any exclusions; and • measures identified to mitigate or accommodate potential adverse impacts of the project on the potential or established Indigenous or treaty rights and effects of changes to the environment on Indigenous peoples, including suggestions raised by Indigenous groups. A suggested format for providing the information above is the creation of a tracking table of key issues raised by each Aboriginal group, including the concerns raised related to the project, proposed mitigation options, and where appropriate, a reference to the proponent's analysis in the EIS	**Comments, Specific Issues and Concerns (Tracking Tables):** IER and EIS Section 4.0 (Indigenous Engagement), subsections: • IER Appendix B, Full Tables of Indigenous Comments and CNL's Responses • EIS 3.4.X.2, Interests and Concerns • EIS Appendices A.1-2, A.2-2, A.3-2, and A.4-2: Tables of Interests and Concerns of each First Nation and the Red River Métis **Potential Impact on Indigenous or Treaty Rights:** EIS Section 6.8 (Land and Resource Use) and Section 6.9 (Socio-economic Environment), subsections: • 6.8.1.6.2.2, Secondary Pathways • 6.9.5.2.1.1, Indigenous Community Perspectives on and Observations of the Whiteshell Laboratories Site • 6.9.6.2.2, Secondary Pathways **Effects of Changes to the Environment:** EIS Section 6.7 (Human and Ecological Health), Section 6.8 (Land and Resource Use), Section 6.9 (Socio-economic Environment), subsections: • 6.7.1, Human Health (effects on human health) • 6.7.2, Ecological Health (effects on plants and animals

Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and/or IER
		of significance to Indigenous peoples) • 6.8.1.6, Project Interactions and Mitigations (assessment of potential effects on land use) • 6.9.6.2.2, Secondary Pathways (assessment of potential socio-economic effects) **Valued Components in the EIS:** EIS Section 6.2 (Atmospheric Environment), Section 6.3 (Geological and Hydrogeological Environment), Section 6.4 (Surface Water Environment), Section 6.5 (Aquatic Environment), Section 6.6 (Terrestrial Environment), Section 6.7 (Human and Ecological Health), Section 6.8 (Land and Resource Use), Section 6.9 (Socio-economic Environment), subsections: • 6.2.1.3, Valued Components • 6.3.1.3, Valued Components • 6.3.2.3, Valued Components • 6.4.1.3, Valued Components • 6.4.2.3, Valued Components • 6.5.3, Valued Components • 6.6.3, Valued Components • 6.7.1.3, Valued Components • 6.7.2.3, Valued Components • 6.8.1.3, Valued Components • 6.9.3, Valued Components **Mitigation Measures:** EIS Section 6.7 (Human and Ecological Health), Section 6.8 (Land and Resource Use), Section 6.9 (Socio-economic Environment), subsections:

Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and/or IER
		• 6.7.2.6.2, Results (Table 6.7.2-5 presents a mitigations column) • 6.8.1.6.2, Results (Table 6.8.1.6-1 presents a mitigations column) • 6.9.6.2, Results (Table 6.9.6-1 presents a mitigations column)
CNSC (2016a) [3] **Part 2: Section 12**	The EIS should provide discussion on the follow-up program's requirements, and include: • roles and responsibilities to be played by the proponent, regulatory agencies, Indigenous people, local and regional organizations and others in the design, implementation and evaluation of the program results; • possible opportunities for the proponent to include the participation of the public and Indigenous groups, during the development and implementation of the program.	**Roles and Responsibilities:** • EIS Section 11.1 (Environmental Assessment Follow-up Program) **Opportunities for Indigenous and Public Participation:** EIS Section 11.0 (Summary of Monitoring and Follow-up Programs), subsections: • 11.2, Adaptive Management • 11.4, Indigenous Engagement and Participation in Environmental Monitoring
REGDOC 2.9.1 [4] **Section 2.4**	Participation opportunities for the public and for Indigenous groups are an important component of the CNSC's licensing process. CNSC determines the appropriate level of participation opportunities on a case-by-case basis. The criteria include: • interests of the public and Indigenous groups; • the complexity of the facility or activity and its potential interactions with the environment and the public; • additional factors such as other jurisdictional mandates or type of decision.	IER and EIS Sections 4.0 (Indigenous Engagement), Section 5.0 (Public Engagement): • IER Section 3 (Indigenous Engagement) • EIS subsection 4.2.4, Summary of Engagement • EIS Appendices A.1-1, A.2-1, A.3-1, A.4-1, A.5-1, A.6-1, A.7-1, A.8-1 • EIS Section 5.0 (Public Engagement)

Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and/or IER
REGDOC 2.9.1 [4] **Appendix A**	An EA under CEAA 2012 includes information prepared by the applicant and CNSC staff, as well as comments received from Indigenous groups and the public.	IER and Section 5.0 (Public Engagement): • IER Appendix B, Full Tables of Indigenous Comments and CNL's Responses • EIS Section 5.0 (Public Engagement) EIS Section 4.0 (Indigenous Engagement), subsections: • 3.4.X.2, Interests and Concerns Section 4.0 (Indigenous Engagement), • Section 4.0 Appendices A.1-2, A.2-2, A.3-2, and A.4-2: Tables of Interests and Concerns of each First Nation and the Red River Métis
REGDOC 2.9.1 [4] **Appendix A.2**	Indigenous consultation activities are integrated in the EA process to the extent possible.	EIS Section 4.0 (Indigenous Engagement), subsections: • 3.4.X.2, Interests and Concerns • Section 4.0 Appendices A.1-2, A.2-2, A.3-2, and A.4-2, Tables of Interests and Concerns of each First Nation and the Red River Métis • Section 4.4, Summary of Issues Raised During Indigenous Engagement Activities that Influenced the Environmental Impact Statement IER Section 3 (Indigenous Engagement) **EIS Sections that were influenced by Indigenous consultation:** EIS Section 6.2 (Atmospheric Environment), Section 6.3 (Geological and Hydrogeological

Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and/or IER
		Environment), Section 6.4 (Surface Water Environment), Section 6.5 (Aquatic Environment), Section 6.6 (Terrestrial Environment), Section 6.7 (Human and Ecological Health), Section 6.8 (Land and Resource Use), Section 6.9 (Socio-economic Environment), subsections: • 6.2.1.3, Valued Components • 6.3.1.3, Valued Components • 6.3.2.3, Valued Components • 6.4.1.3, Valued Components • 6.4.2.3, Valued Components • 6.4.2.5.2.3, Indigenous Knowledge • 6.5.3, Valued Components • 6.5.5.2.6, Indigenous Knowledge • 6.6.3, Valued Components • 6.6.5.7, Indigenous Knowledge • 6.7.1.7.1.1, Methods, subheadings Receptor Selection and Characterization, Exposure Pathways • 6.7.1.7.2.1, Methods, subheading Receptor Selection and Characterization • 6.8.1.3, Valued Components • 6.8.1.6.2.2, Secondary Pathways • 6.9.3, Valued Components • 6.9.6.2.2, Secondary Pathways
REGDOC 2.9.1 [4] **Appendix A.3.8**	Subsection 19(3) of CEAA 2012 states that community and Indigenous traditional knowledge may be considered in the EA. CNSC staff will provide guidance to the applicant at the earliest possible stage in the EA process concerning the extent to which community and Aboriginal traditional knowledge shall be	**Consideration of Traditional Knowledge:** EIS Section 4.0 (Indigenous Engagement), Section 6.2 (Atmospheric Environment), Section 6.3 (Geological and Hydrogeological Environment),

Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and/or IER
	considered in the EA.	Section 6.4 (Surface Water Environment), Section 6.5 (Aquatic Environment), Section 6.6 (Terrestrial Environment), Section 6.7 (Human and Ecological Health), Section 6.8 (Land and Resource Use), Section 6.9 (Socio-economic Environment), subsections: • 4.4, Summary of Issues Raised During Indigenous Engagement Activities that Influenced the Environmental Impact Statement • 6.2.1.3, Valued Components • 6.3.1.3, Valued Components • 6.3.2.3, Valued Components • 6.4.1.3, Valued Components • 6.4.2.3, Valued Components • 6.4.2.5.2.3, Indigenous Knowledge • 6.5.3, Valued Components • 6.5.5.2.6, Indigenous Knowledge • 6.6.3, Valued Components • 6.6.5.7, Indigenous Knowledge • 6.7.1.7.1.1, Methods, subheadings Receptor Selection and Characterization, Exposure Pathways • 6.7.1.7.2.1, Methods, subheading Receptor Selection and Characterization • 6.8.1.3, Valued Components • 6.8.1.6.2.2, Secondary Pathways • 6.9.3, Valued Components • 6.9.6.2.2, Secondary Pathways
REGDOC 2.9.1 [4]	Identify the lands, water and resources of specific social, economic, archaeological, cultural or spiritual value to Indigenous people, including	EIS Section 4.0 (Indigenous Engagement), Section 6.3 (Geological and Hydrogeological

Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and/or IER
Appendix B.8	established and asserted Indigenous or treaty rights that may be affected by the facility or activity.	Environment), Section 6.4 (Surface Water Environment), Section 6.5 (Aquatic Environment), Section 6.6 (Terrestrial Environment), Section 6.7 (Human and Ecological Health), Section 6.8 (Land and Resource Use), Section 6.9 (Socio-economic Environment), subsections: • Section 4.2.4, Summary of Engagement (Indigenous or Treaty Rights) • 6.3.1.3, Valued Components • 6.3.2.3, Valued Components • 6.4.1.3, Valued Components • 6.4.2.3, Valued Components • 6.5.3, Valued Components • 6.6.3, Valued Components • 6.7.1.3, Valued Components • 6.7.2.3, Valued Components • 6.8.1.3, Valued Components • 6.8.1.5.2.2, Traditional Land and Resource Use by Indigenous Peoples • 6.9.3, Valued Components
	Describe Indigenous land and resource use at the site and in the local and regional study areas.	IER and EIS Section 6.8 (Land and Resource Use), subsection: • IER Appendix C, Background Information on Traditional Territories and Indigenous Communities and Organizations • EIS Section 6.8.1.5.2.2, Traditional Land and Resources use by Indigenous Peoples
	Identify traditional activities, including activities for food, social, ceremonial and other cultural purposes, in relation to such lands, waters and resources with a focus on the current use of	IER and EIS Section 6.8 (Land and Resource Use), subsections:

Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and/or IER
	lands, waters and resources for traditional purposes.	• IER Appendix C, Background Information on Traditional Territories and Indigenous Communities and Organizations • EIS subsection 6.8.1.5.2.2, Traditional Land and Resources use by Indigenous Peoples
	Describe the traditional dietary habits and dependence on country foods and harvesting for other purposes, including harvesting of plants for medicinal purposes. The analysis should focus on the identification of potential adverse effects of the facility or activity on the ability of future generations of Indigenous people to pursue traditional activities or lifestyle.	EIS Section 6.7 (Human and Ecological Health), Section 6.8 (Land and Resource Use), Section 6.9 (Socio-economic Environment), subsections: • 6.7.1, Human Health (effects on Indigenous harvester health) • 6.7.2, Ecological Health (effects on plants and animals of significance to Indigenous peoples) • 6.8.1.5.2.2, Traditional Land and Resources use by Indigenous Peoples • 6.8.1.6, Project Interactions and Mitigations (assessment of potential effects on Indigenous land use) • 6.9.6.2.2, Secondary Pathways (assessment of potential socio-economic effects)
REGDOC 2.9.1 [4] **Appendix C.6**	To support the assessment of human health (see section 3.2.7), the licencee should provide information on radiation levels to which members of the public may be exposed, including consideration of consumers of country food whose exposure pathways may differ due to cultural norms; for example, any dietary characteristics of Indigenous peoples.	EIS Section 6.7 (Human and Ecological Health), subsections: • 6.7.1, Human Health (effects on Indigenous harvester health) • 6.7.2, Ecological Health (effects on plants and animals of significance to Indigenous peoples)

Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and/or IER
REGDOC 2.9.1 [4] **Appendix C.7**	The licencee should describe the potential effects of the facility or activity on the physical well-being of Indigenous groups and other people resulting from biophysical effects, including the effects of the facility or activity on all environmental components (for example, atmospheric environment) and the resulting effects on human health.	EIS Section 6.7 (Human and Ecological Health), Section 6.8 (Land and Resource Use), Section 6.9 (Socio-economic Environment), subsections: • 6.7.1, Human Health (effects on Indigenous harvester health) • 6.7.2, Ecological Health (effects on plants and animals of significance to Indigenous peoples) • 6.8.1.6, Project Interactions and Mitigations (assessment of potential effects on Traditional land use) • 6.8.2.6, Project Interactions and Mitigations (assessment of potential effects on Other land use) • 6.9.6.2.2, Secondary Pathways (assessment of potential socio-economic effects)
REGDOC 2.9.1 [4] **Appendix C.8**	Identify any change that the facility or activity is likely to cause in the environment and any effect of any such change on the health and socio-economic conditions, physical and cultural heritage and on the current use of lands and resources for traditional purposes by any Indigenous group including effects on hunting, trapping, fishing and gathering.	**EIS subsections that describe the changes to the environment:** EIS Section 6.2 (Atmospheric Environment), Section 6.3 (Geological and Hydrogeological Environment), Section 6.4 (Surface Water Environment), Section 6.5 (Aquatic Environment), Section 6.6 (Terrestrial Environment), subsections: • 6.2-6.6 for “change that the facility or activity is likely to cause in the environment” **EIS Sections that describe the effects of biophysical changes:** EIS Section 6.7 (Human and Ecological Health), Section 6.8

Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and/or IER
		(Land and Resource Use), Section 6.9 (Socio-economic Environment), subsections: • 6.7.1, Human Health (effects on Indigenous harvester health) • 6.7.2, Ecological Health (effects on plants and animals of significance to Indigenous peoples) • 6.8.1.6, Project Interactions and Mitigations (assessment of potential effects on Traditional Land and Resource Use) • 6.8.2.6, Project Interactions and Mitigations (assessment of potential effects on Other Land and Resource Use) • 6.9.6.2.2, Secondary Pathways (assessment of potential socio-economic effects)
	Identify any concerns raised by Indigenous people about the facility or activity in relation to any Aboriginal or treaty rights.	IER and EIS Section 4.0 (Indigenous Engagement), subsections: • IER 3.4.X.2, Interests and Concerns • IER Appendix B, Full Tables of Indigenous Comments on the EIS and CNL's Responses • EIS Section 4.0 Appendices A.1-2, A.2-2, A.3-2, and A.4-2, Tables of Interests and Concerns of each First Nation and the Red River Métis • EIS Section 4.4, Summary of Issues Raised During Indigenous Engagement Activities that Influenced the Environmental Impact Statement

Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and/or IER
REGDOC-3.2.2 [1] Section 4.1	Licensees shall conduct research to identify Indigenous groups whose potential or established Indigenous and/or treaty rights may be adversely affected by the activity described in their licence application, and determine the appropriate level or scope of engagement activities to be conducted with each identified group. Key factors to consider when determining which Indigenous groups to engage include: • historic or modern treaties in the region of the regulated facility • potential impacts to the health and safety of the public, the environment and any potential or established Indigenous and/or treaty rights and related interests • proximity of the regulated facility to Indigenous communities • existing relationships between Indigenous groups and licensees or the CNSC • traditional territories • traditional and current use of lands • settled or ongoing land claims • settled or ongoing litigation related to a potentially impacted group • membership in a broader Indigenous collective or tribal council or Indigenous umbrella group	IER and EIS Section 4.0 (Indigenous Engagement) and Section 6.8 (Land and Resource Use), subsections: • IER subsection 3.2, Identified First Nations and the Red River Métis • EIS subsection 4.2.2, Identified First Nations and the Red River Métis • EIS subsection 6.8.1.5.2.2, Traditional Land and Resources use by Indigenous Peoples
REGDOC-3.2.2 [1] Section 4.2	The Indigenous engagement report shall include: 1. a list of Indigenous groups identified for engagement 2. a summary of any Indigenous engagement activities conducted to date 3. a description of planned Indigenous engagement activities 4. the proposed schedule for interim reporting to the CNSC	**A list of Indigenous Nations Identified for Engagement:** IER and EIS Section 4.0 (Indigenous Engagement), subsections: • IER subsection 3.2, Identified First Nations and the Red River Métis • EIS subsection 4.2.2, Identified First Nations and the Red River Métis

Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and/or IER
		A Summary of any Indigenous Engagement Activities Conducted to Date: IER and EIS Section 4.0 (Indigenous Engagement), subsections: • IER subsection 3.4, Summary of Engagement • EIS subsection 4.2.4, Summary of Engagement **A Description of Planned Indigenous Engagement Activities:** IER and EIS Section 4.0 (Indigenous Engagement), subsections: • IER subsection 3.5, Future Engagement Activities Planned • EIS subsection 4.3, Future Engagement Activities Planned **The Proposed Schedule for Interim Reporting to the CNSC:** • IER subsection 3.5, Future Engagement Activities Planned
	The Indigenous engagement report shall be submitted: 1. as part of a licence application, or 2. as part of a project description if an EA decision under CEAA 2012 is being sought prior to a licensing decision	IER
REGDOC-3.2.2 [1] Section 4.2.1	Licensees should provide the methodology and rationale used to develop the list of identified Indigenous groups.	IER and EIS Section 4.0 (Indigenous Engagement), subsections: • IER subsection 3.2, Identified First Nations and the Red River Métis

Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and/or IER
		• EIS subsection 4.2.2, Identified First Nations and the Red River Métis
REGDOC-3.2.2 [1] Section 4.2.2	Licensees should document all Indigenous engagement activities to track issues and concerns raised as well as any steps taken to minimize impacts or to address issues.	IER and EIS Section 4.0 (Indigenous Engagement), subsections: • IER subsection 3.4.X.2, Interests and Concerns • IER Appendix B, Full Tables of Indigenous Comments on the EIS and CNL's Responses • EIS Section 4.0 Appendices A.1-2, A.2-2, A.3-2, and A.4-2, Tables of Interests and Concerns of each First Nation and the Red River Métis • EIS subsection 4.4, Summary of Issues Raised During Indigenous Engagement Activities that Influenced the Environmental Impact Statement
REGDOC-3.2.2 [1] Section 4.2.3	The Indigenous engagement report shall include a high-level outline of proposed engagement activities.	IER and EIS Section 4.0 (Indigenous Engagement), subsections: • IER subsection 3.5, Future Engagement Activities Planned • EIS subsection 4.3, Future Engagement Activities Planned
CEA Agency (2015) [5]	Once an EA has commenced, the approach and level of effort applied to addressing alternative means is established on a project-by-project basis, taking into consideration: • the level of concern expressed by Indigenous groups or the public.	EIS Section 2.0 (Alternative Means Assessment), Section 4.0 (Indigenous Engagement), subsections: • 2.8, Sagkeeng's Alternative Means Assessment – Approach and Findings • 4.2.4.1.3, Sagkeeng's Alternative Means Assessment

Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and/or IER
		• Section 4.0 Appendices A.1-2, A.2-2, A.3-2, and A.4-2, Tables of Interests and Concerns of each First Nation and the Red River Métis

3. Indigenous Engagement

This section summarizes CNL's engagement objectives and includes a brief description of the First Nations and the Manitoba Métis Federation that CNL has engaged with. It also includes the methods used to meet CNL's Indigenous engagement goals and objectives. This section documents engagement activities that have been undertaken between 2016 and up to September 30, 2022 and was subject to verification efforts with the First Nations and the Manitoba Métis Federation.

Table 2 below quantitatively describes and summarizes the various Indigenous engagement activities undertaken for the Project. The table is intended to demonstrate two key points:

- CNL has utilized a wide assortment of engagement tools including, information sharing, formal two-way dialogue, supporting detailed investigative studies, providing capacity funding, and the consideration of long-term Relationship Agreements. The engagement activities in the columns reflect the increasing degree of engagement.
- CNL has reached out to and/or engaged all the First Nations and the Manitoba Métis Federation and organizations on the list below in the manner as demonstrated. At the same time, CNL has engaged more extensively with those First Nations, the Red River Métis through the Manitoba Métis Federation, and organizations that live and practice traditional activities in closest proximity to the WL site, and that have identified an interest to be involved. Each First Nation and the Red River Métis has their specific interest in the type and depth of engagement on the Project. CNL has adapted its engagement activities accordingly.

Table 2: WR-1 Project Identified First Nations and the Manitoba Métis Federation Engagement and Involvement

WR-1 Project Identified Indigenous Nations and Organizations	Comments submitted via EA (2017 Draft EIS)	CNSC Participant Funding Issued	MOUs & Contribution Agreements[1] (CNL Funding)	TKLUS or Other Studies	Reviewed the 2019 Revised Draft EIS	Relationship Agreements or similar agreements
Sagkeeng First Nation	YES	YES	YES	• TKLUS, • Harvest Foods Study, • Alternative Means Assessment, • Psychosocial Assessment	YES	Drafted[2]
Manitoba Métis Federation	YES	YES	YES	• TKLUS • Harvest Foods Study	YES	Drafted
Black River First Nation	YES	YES	YES	• TKLUS	YES	Signed
Brokenhead Ojibway Nation	YES	YES	YES	• TKLUS • Technical Review of the WR-1 EIS	YES	Not requested
Hollow Water First Nation	YES	YES	YES	• TKLUS	YES	Signed

1 CNL has also funded a number of workshops and community engagement meetings with all First Nations and the Manitoba Métis Federation.

2 A long-term relationship agreement with Sagkeeng First Nation is contemplated in the Technical Working Group and Sagkeeng First Nation, CNL, and AECL have signed an agreement that supports its development and the development on other key initiatives to help address Sagkeeng's interests and concerns related to the project.

WR-1 Project Identified Indigenous Nations and Organizations	Comments submitted via EA (2017 Draft EIS)	CNSC Participant Funding Issued	MOUs & Contribution Agreements[1] (CNL Funding)	TKLUS or Other Studies	Reviewed the 2019 Revised Draft EIS	Relationship Agreements or similar agreements
Wabaseemoong Independent Nations	YES	YES	Not requested	• TK and Environmental Impact Assessment	No comments received	Not requested
Shoal Lake No. 40 (Treaty No. 3)	None received	Not requested	Not requested	Not requested	No comments received	Not requested
Iskatewizaagegan No. 39 Independent First Nation (Shoal Lake No. 39 First Nation) (Treaty No. 3)	None received	Not requested	Not requested	Not requested	None received	Not requested
Northwest Angle No. 33 (Treaty No. 3)	None received	Not requested	Not requested	Not requested	None received	Not requested
Grand Council Treaty #3	None received	Not requested	Not requested	Not requested	None received	Not requested

EA = Environmental Assessment.
MOU = Memorandum of Understanding.
TKLUS = Traditional Knowledge and Land Use Study.

3.1 Engagement Objectives

As part of its corporate, environmental and social responsibility, CNL recognizes and encourages the ongoing engagement of the First Nations and the Manitoba Métis Federation, the National Government of the Red River Métis through the course of the environmental assessment process for the Project. Through information sharing and engagement activities, CNL seeks to build Project awareness and learn about interests and concerns to strengthen mutual understanding, opportunities for collaboration and long-term relationships. CNL engages with First Nation and Red River Métis leadership, representatives, and members on the potential effects of the Project on the environment and on Indigenous and/or treaty rights including rights to trap, hunt, fish, gather or conduct cultural ceremonies.

CNL has five overarching Indigenous engagement goals:

- **Build awareness and mutual understanding**, and by supporting and facilitating opportunities for mutual learning, including current and traditional use, and values and perspectives on nuclear decommissioning, environmental remediation and radioactive waste management, demonstrate CNL's long-term commitment and approach to safe and responsible management of AECL's radioactive waste and decommissioning liabilities (e.g., through Project and site monitoring activities).
- **Share information on the Project, including the potential effects on the environment**. This includes developing meaningful, user-friendly information and communication products for the First Nations and the Red River Métis, and provide accessible and current information on Project activities.
- **Seek input and feedback from the Manitoba Métis Federation and the First Nations** regarding Project related activities, and traditional and current uses of the land surrounding the WL site. Initiate early and meaningful two-way communication channels between CNL and the First Nations and the Manitoba Métis Federation to determine the best methods for sharing information and to provide opportunities for Indigenous peoples to provide input on project considerations including design, the environmental assessment process, and assessment of effects. This includes exploring opportunities for Indigenous economic participation on the Project.
- **Develop long lasting relationships with the First Nations and the Manitoba Métis Federation** to support continued involvement in the Project, community healing and reconciliation. This will extend beyond the scope of the environmental assessment process for the Project.
- **Meet or where possible exceed all regulatory-based communication and engagement requirements** and facilitate engagement that reflects current memorandums of understanding and Contribution Agreements, and that considers the interests, needs and schedule of each Indigenous Nation.

In addition, CNL applied CNSC's guidance on engaging with First Nations and the Manitoba Métis Federation, and appropriate methodologies for assessing effects and impacts on Indigenous peoples and their rights. While it is recognized that determination of impacts to

rights is a Crown responsibility, CNL recognizes that Indigenous engagement activities may give rise to a legal duty to consult.

As the CNSC REGDOC-3.2.2 [1] provides specific requirements and guidance on consideration of rights and activities (i.e., hunt, trap, fish, gather, or conduct ceremonies), results of CNL's review are specifically addressed in this IER and the EIS [6]. The potential effects that were considered in the EIS included both adverse and positive effects to the current use of land and resources for traditional purposes, physical and cultural heritage, and environmental, health, social, and economic conditions of Indigenous Peoples potentially affected by the designated Project, including interferences of the Project with the following:

- quantity and quality of resources available for harvesting (e.g., species of cultural importance, traditional and medicinal plants);
- access to culturally important harvesting areas or resources of importance;
- experiences of being on the land (e.g., changes in air quality, noise exposure, effects of vibrations from blasting or other activities);
- current and future availability and quality of country foods (traditional foods);
- the use of travel ways, navigable waterways, and water bodies;
- commercial and non-commercial fishing, hunting, trapping and gathering, and cultural or ceremonial activities and practices;
- commercial, non-commercial, and trade economies; and
- cultural heritage, and structures, sites or things of historical, archaeological, paleontological or architectural significance to the First Nations or the Red River Métis, including, but not limited to:
  - the loss or destruction of physical and cultural heritage;
  - changes to access to physical and cultural heritage;
  - changes to the cultural value, spirituality, or importance associated with physical and cultural heritage;
  - changes to sacred, ceremonial or culturally important places, objects, or things, including languages, stories, and traditions; and
  - changes to visual aesthetics over the life of the Project and post-project abandonment or decommissioning.

To meet these objectives, CNL has developed specific strategies to increase the effectiveness of the program so Indigenous engagement requirements for the Project are met. These strategies include:

- presenting information in easy to understand formats (e.g., webinars, infographics, one-pager summary documents);
- engaging technical experts to communicate information through a variety of formats;
- accomplishing all required activities in a timely manner;

- providing various means for the First Nations and the Red River Métis to access information (i.e., presentations, infographics, site tours, website information, and community visits);
- support and capacity funding for meaningful and timely engagement and the development of longer-term Relationship Agreements with the First Nations and the Manitoba Métis Federation; and
- support the First Nations and the Manitoba Métis Federation's review of the EIS documentation to allow them to validate if CNL has documented their interests and concerns accurately.

3.2 Identified First Nations and the Red River Métis

A list of the Indigenous Nations with a potential interest in the Project was identified by CNL and included in this IER. Identification of the First Nations and the Red River Métis was based on consultation with the CNSC, through CNL's previous Indigenous engagements, and through the use of publicly available sources of information including:

- First Nation and the Red River Métis and organization websites;
- the Aboriginal and Treaty Rights Information System (ATRIS; Government of Canada and INAC 2016) [7]; and
- Crown-Indigenous Relations and Northern Affairs Canada First Nation community profiles.

The list was based on the identified potential or established Indigenous or treaty rights of the First Nations and the Red River Métis in the vicinity of the Project and is provided in Table 3 along with a brief rationale for inclusion. The inclusion of specific Nations considers the nature of the established and/or claimed rights and potential effects on those rights caused by the proposed Project based on a preliminary assessment of existing and available information. As such, the working list is subject to change based on information and dialogue with the identified First Nations, the Red River Métis, and Indigenous organizations. A map of the First Nations and treaty areas is provided on Figure 1, while Figure 6 shows recognized areas for Red River Métis' natural resource harvesting, and Figure 7 shows the expansion of the recognized Métis harvesting area.

Table 3: The Indigenous Nations Identified as Having Potential Interest in the Project

First Nations, the Red River Métis and/or Representative Organizations	Identification Rationale and Proximity to the WL Site*
Sagkeeng First Nation (Treaty No. 1 and 3)	• Asserted and/or established Aboriginal and Treaty rights exist in the vicinity of the WL site. • Occupy one reserve located 52 kilometres (km) north of the WL site, and downstream along the Winnipeg River. • Existing relationship and interest in the WL site. • The WL site is within the boundaries of the area over which Sagkeeng claims unsurrendered Aboriginal title, a proceeding for which is ongoing in the Manitoba Court of King's Bench.
Brokenhead Ojibway Nation (Treaty No. 1)	• Asserted and/or established Aboriginal and Treaty rights exist in the vicinity of the WL site. • Occupy three reserves: 44 km northwest, 55 km northwest and 73 km southwest of the WL site respectively. • Interest expressed comments on Project Description.
Red River Métis represented by the Manitoba Métis Federation (MMF)	• The MMF is the official democratic and self-governing political representative for the Red River Métis Community. The MMF is considered the government of the Red River Métis. • Potential asserted and/or established Métis harvesting rights in the vicinity of the WL Site. • Interest expressed comments on Project Description.
Black River First Nation (Treaty No. 5)	• Asserted and/or established Aboriginal and Treaty rights exist in the vicinity of the WL site. • Occupy one reserve 75 km north of the WL site.
Hollow Water First Nation (Anishinaabe (Ojibwa)) (Treaty No. 5)	• Asserted and/or established Aboriginal and Treaty rights exist in the vicinity of the WL site. • Occupy one reserve, 113 km north of the WL site.
Shoal Lake No. 40 (Treaty No. 3)	• Potential asserted and/or established Aboriginal and Treaty rights exist in the vicinity of the WL site. • Treaty No. 3 territory includes parts of eastern Manitoba, including the WL site. • Occupy three reserves: 94 km southeast, 110 km southeast and 140 km southeast of the WL site, respectively.

First Nations, the Red River Métis and/or Representative Organizations	Identification Rationale and Proximity to the WL Site*
Iskatewizaagegan No. 39 Independent First Nation (Shoal Lake No. 39 First Nation) (Treaty No. 3)	• Potential asserted and/or established Aboriginal and Treaty rights exist in the vicinity of the WL site. • Treaty No. 3 territory includes parts of eastern Manitoba, including the WL site. • Occupy four reserves: 93 km southeast, 102 km southeast, 110 km southeast and 140 km southeast of the WL site, respectively.
Northwest Angle No. 33 (Treaty No. 3)	• Potential asserted and/or established Aboriginal and Treaty rights exist in the vicinity of the WL site. • Treaty No. 3 territory includes parts of eastern Manitoba, including the WL site. • Occupy three reserves: 111 km southeast, 140 km southeast and 176 km southeast of the WL site, respectively.
Wabaseemoong Independent Nations (also known as Wabaseemoong Independent Nations of One Man Lake, Swan Lake and White Dog) (Treaty No. 3)	• Potential asserted and/or established Aboriginal and Treaty rights exist in the vicinity of the WL site. • Treaty No. 3 territory includes parts of eastern Manitoba, including the WL site. • Occupy four reserves: 80 km east, 85 km east, 95 km east and 140 km southeast of the WL site, respectively.
Grand Council of Treaty 3 (specific to this Project includes: Shoal Lake No. 40 First Nation, Iskatewizaagegan No. 39 Independent First Nation (Shoal Lake No. 39 First Nation), Northwest Angle No. 33, Wabaseemoong Independent Nations, and Sagkeeng First Nation)	• Umbrella treaty organization which represents 28 First Nations and 5 with potential interest in the Project. • Treaty 3 territory includes parts of eastern Manitoba, including the WL site.
Chiefs of Ontario (specific to this Project includes: Shoal Lake No. 40 First Nation, Iskatewizaagegan No. 39 Independent First Nation (Shoal Lake No. 39 First Nation), Northwest Angle No. 33, and Wabaseemoong Independent Nations)	• First Nations umbrella organization that represents 133 First Nations and 4 with potential interest in the Project.

* Two applications were used in the calculation of distances (Arc GIS 10.4 and Google Earth Pro). Distances were measured as a straight line from the WL site to the approximate centre of each reserve.

Each of the Nations listed in Table 3 were provided written notification regarding the Project and efforts were made to follow up with each via telephone to determine their relative interest in participating in engagement activities. A record of communication with regional Indigenous Nations is provided in Appendix A (Contact Tracker) and a summary narrative of engagement with each identified First Nation and the Manitoba Métis Federation is provided in Section 3 of this IER.

Although efforts were placed on reaching out to all of the Indigenous Nations and Indigenous organizations identified, particular effort was placed on outreach to the Nations and organizations who expressed interest or provided comments during the federal Project Description process. These Nations were Sagkeeng First Nation (Sagkeeng), Black River First Nation, Brokenhead Ojibway Nation, Hollow Water First Nation, Wabaseemoong Independent Nations and the Red River Métis.

In the fall of 2020, CNL received two verbal confirmations from Brokenhead Ojibway Nation that they were no longer available to engage with CNL on this Project due to other community priorities. CNL offered to fund a community liaison position to enable ongoing engagement, but the community declined. CNL will continue to keep Brokenhead Ojibway Nation informed about the Project and is prepared to re-engage as desired by the community. While there was limited feedback from Shoal Lake No. 40, Iskatewizaagegan No. 39 Independent First Nation, and Northwest Angle No. 33, in our initial outreach on the Project, CNL has contacted them in February 2021 to provide a Project status update and to determine their interest in meeting to discuss the Project further.

The IER provides background information on the First Nations, the Red River Métis, and/or representative organizations with a potential interest in the Project and includes, where possible, reference to the individual community's elected council, geographic location, population, and associations or memberships. The IER will be revised as these First Nations, the Manitoba Métis Federation, and organizations provide additional information as the Project progresses. The information summarized in this EIS reflects a summary of information available to CNL as of September 30, 2022.

3.3 Engagement Methods

Section 3.4 describes the engagement that CNL has undertaken with the identified Indigenous Nations: Sagkeeng, the Manitoba Métis Federation, Black River First Nation, Brokenhead Ojibway Nation, Hollow Water First Nation, Wabaseemoong Independent Nations, Shoal Lake 40, Iskatewizaagegan No. 39, Northwest Angle No. 33, and Grand Council Treaty #3. CNL recognizes the importance of seeking direction from the First Nations and the Red River Métis, through engagement with the Manitoba Métis Federation, on how they want to engage on this Project. CNL also recognizes and respects that each Indigenous Nation is unique and may have different approaches, needs, and interests for engagement on this Project.

For example, some Nations have indicated they would prefer to establish funding agreements in the form of Contribution Agreements (CAs) that outline specific engagement activities of interest to the Nation.

The CAs signed by CNL and the First Nations or the Manitoba Métis Federation have supported participation in environmental monitoring activities, funding for community liaison positions, and further participation in the environmental assessment process, including technical reviews of CNL's responses to the Nation's comments on the draft EIS. Contribution Agreements have also funded Traditional Knowledge studies conducted by the First Nations and the Manitoba Métis Federation, food intake studies, and an Alternative Means Assessment that incorporated Sagkeeng's community values, alternative weighting, and additional criteria for consideration. These efforts have assisted CNL in understanding the potential impacts of this Project to Aboriginal and Treaty rights. The CNSC provided funding for the Manitoba Métis Federation and Wabaseemoong Independent Nations to conduct their Traditional Knowledge studies. The CNSC has also provided funding to Sagkeeng to conduct a Psychosocial Impact Assessment to help inform the CNSC's rights impact assessment and to inform the CNSC assessment of effects of the EIS.

Various engagement methods were designed to share information with and receive input while fulfilling CNL's corporate and regulatory objectives. The methods CNL has utilized to date or plans to undertake, are highly diverse and vary based on expressed community need and desired methods. This includes general information activities focused on community meetings, workshops and long-term relationship building. Section 3.4 describes engagement activities for each community, in general using the methods summarized in Table 4 below. Project-specific examples are included, however, relationship-building engagements and funding are also key activities.

As CNL is undertaking closure of the WL site in addition to the Project, it is important to the First Nations and the Red River Métis and CNL that these relationships endure, grow, and adapt to future activities. As such, CNL is currently working in collaboration with AECL, the MMF, and local First Nations to establish an Indigenous Advisory Committee. The Indigenous Advisory Committee is an additional mechanism for engagement and does not replace or impede ongoing bilateral engagements with each First Nation or the Manitoba Métis Federation. For more information on the Indigenous Advisory Committee, refer to Section 3.5.2 Long-term Initiatives and Engagements. CNL is also developing and executing Relationship Agreements, that include liaison positions, to help address each Nation's unique interests and concerns related to the Project and the WLCP overall

Starting in 2020 March, the COVID-19 pandemic impacted in-person engagement activities. CNL has followed public health requirements and guidance throughout, and adapted to restrictions providing online platforms for virtual meetings with First Nations and the Manitoba Métis Federation. In accordance with local health authorities, CNL has held some in-person meetings and workshops. CNL remains committed to an ongoing engagement program in alignment with current pandemic restrictions.

Table 4: Engagement Methods and Example Activities

Engagement Method	Example Activities

Contribution Agreements and Relationship Agreements	• Project-specific Agreements (i.e., CAs)
	  - Provision of funding to assist in resource capacity development, including peer review studies and engagements with Indigenous organization consultants and staff, review of the draft EIS and review of CNL's responses to community comments on the EIS, community liaison positions
	  - Capacity assistance, as appropriate, including costs to support meetings such as hall rental or production of printed materials, in-kind access to the technical expertise of CNL staff, reimbursement for some expenses to participate in engagement activities such as site visits, and tours.
	• Broader relationship agreement discussions with CNL

Meetings and Workshops *(Learning, dialogue and engagement)*	• Virtual and/or in-person meetings/workshops • Community meetings/open houses • Presentations to representatives • Targeted community initiatives (e.g., environmental monitoring and youth event) • Technical meetings to provide an opportunity to discuss more detailed information concerning the Project • WL site visits, including WR-1 tours • Benchmarking trip to a site that underwent a similar disposal technique
Communications Activities and Information Sharing	• Letters to First Nations and the Red River Métis, through the Manitoba Métis Federation, and/or organization representatives (accompanied by follow-up calls) • E-mail correspondence and/or phone • Distributing the IER for review prior to submission • Distribution of specific sections of the EIS for review • Distributing copies of maps, technical studies or reports upon request • Invitations to attend informational webinars • Distribution of community newsletter on the Project • Project notifications and newspaper advertisements • Public information sessions, including display materials and handouts • Media notifications/releases • Webpage content • Participation and presentation on environmental monitoring on site • Indigenous Ceremony on site

3.3.1 CNL's Long-term Relationship with Indigenous Peoples

CNL recognizes First Nations and the Red River Métis as stewards of the land and CNL is working towards developing long-term meaningful relationships with each Nation that occupies and have traditional territories and modern-day interests near its operations. CNL recognizes each Nation has its own unique set of interests and concerns associated with both the Project and WLCP and CNL is committed to taking a distinctions-based approach to engagement to ensure each Nation's interests and concerns are addressed. CNL also takes a holistic, relationship-based approach to engagement with each Nation, working closely with AECL, to help address interests and concerns regarding all aspects of the Project and WLCP. As a federal Crown corporation and site owner, AECL is committed to taking meaningful actions to support healing and to advance reconciliation through nation-to-nation dialogue and relationship-building.

This shift in CNL's Indigenous engagement approach from project based engagement to a holistic, relationship, and distinction-based approach will support meaningful actions to build foundations for trust, understanding, and mutually beneficial relationships, including addressing broader issues and concerns such as the historical siting of the WL site.

CNL is currently working with each Nation on formalizing these relationships through relationship-building and corresponding agreements. These agreements are intended to help enable greater integration of Traditional Knowledge, ceremony, and cultural and stewardship practices in the decommissioning, monitoring, and closure of the Project and the WL site. These agreements will also enable dialogue and participation through the development of monitoring programs, culturally appropriate communications, and trauma-informed engagement. In addition, they help to enhance community engagement, building trust, and strengthen relationship-building, as well as setting up mechanisms to facilitate Indigenous participation and input into CNL's environmental monitoring program, economic development and procurement opportunities, future land use, and other areas of collaboration.

CNL has signed a Relationship Agreement with Black River First Nation and Hollow Water First Nation, and is currently discussing a Relationship Agreement with the Manitoba Métis Federation. CNL intends to pursue a long-term Relationship Agreement with Sagkeeng after other priority areas are addressed[3]. CNL is committed to ongoing engagement and enhancing our relationships with these Nations.

CNL continues to build relationships with local First Nations and the Manitoba Métis Federation to support overall decommissioning of the WL site, including the Project. CNL is committed to learning about Indigenous values through ceremony and on-going dialogue, and discussing, incorporating, and addressing concerns to the extent possible.

[3] At the time of submission, CNL, AECL, and Sagkeeng are preparing a press release and organizing a signing ceremony to announce a long-term Sagkeeng-led Community Environmental Monitoring Program. Once the monitoring program is implemented, Sagkeeng and CNL will continue addressing priority areas of concern for Sagkeeng, which may in the future include a long-term relationship agreement.

3.4 Summary of Engagement

This section provides a summary of engagement that CNL has undertaken with each First Nation and the Manitoba Métis Federation. The engagement activities captured in this section cover engagements as of September 30, 2022. For each Nation, the following subsections are discussed:

- **Engagement.** This subsection summarizes the engagement CNL has had with the First Nation and the Manitoba Métis Federation or organization.
- **Interests and Concerns.** This subsection addresses each of the interests/concerns identified under feedback. CNL has also provided a narrative discussion that describes:
  - CNL's understanding of the interest or concern raised, a summary of CNL's response to the interest/concern and discussions on the topic;
  - where CNL has verified or has attempted to verify, with the First Nations and the Manitoba Métis Federation that their interest/concern has been addressed; and
  - where CNL is as of September 30, 2022, with each First Nation, the Manitoba Métis Federation or organization and how CNL plans to address outstanding interests and concerns (i.e., next steps), including identification of commitments.

  Supporting this narrative section, CNL has also included within the EIS Section 4.0 (Appendix 4.0-1) the Tables of Interests. The Tables of Interests describe how CNL is addressing the interest/ concern (Column 3) and impacts on the EIS (Column 4).
- **Verification.** The purpose of the verification section is to describe the steps taken to confirm CNL has correctly characterized the Nation's interests and concerns. The purpose of the verification process at this stage is to confirm that CNL has documented all the interests and concerns, VCs, information provided by the Nation, and the Nation's position are correctly described and captured in the revised EIS and supporting documents. CNL has and is continuing to work with the First Nations and the Manitoba Métis Federation to verify that their interests and concerns have been addressed. This work will continue after the submission of the revised draft EIS. Verification means that CNL has received verbal or written confirmation from the First Nation, Manitoba Métis Federation, or organization that how CNL has addressed or responded to the Nation's or organization's interests or concerns have either been accepted or in cases where CNL is unable to fully address interests or concerns, this is understood and acknowledged by the First Nation, the Manitoba Métis Federation or organization. Based on the CNSC's guidance, as well as practices commonly employed in EIS work by other proponents, verification includes:
  - Consolidating all interests and/or concerns raised to confirm accuracy in reporting and tracking. Where applicable this has been done through sharing a summary of interests and concerns with each First Nation, the Manitoba Métis Federation or organization.
  - Providing a summary of how interests or concerns has led to an EIS change, and providing an opportunity to review the consolidated material in the context of the EIS. Specific sections of the EIS where Traditional Knowledge was incorporated or

where changes occurred due to a particular interest and/or concern were provided to each Nation for their review and feedback.

  - Responding to all comments on the 2017 draft EIS and/or the 2020 draft EIS and sharing responses to the respective First Nation, the Manitoba Métis Federation, or organization. In some cases, the interest/concern raised has been resolved. However, there are also other issues where there may be a difference in opinion and the First Nation, the Manitoba Métis Federation, or organization may have not confirmed that the response by CNL is deemed acceptable. In this case, the acceptable verification is an acknowledgement and understanding of the differing positions of CNL and the First Nation, the Manitoba Métis Federation or organization.
  - Where direct submissions or comments from specific First Nations, the Manitoba Métis Federation, and organizations were received, including targeted technical comments on the 2017 draft EIS and comments on the 2020 revised draft EIS, CNL has provided written responses to the First Nations, the Manitoba Métis Federation, and organizations indicating where changes have been incorporated in the EIS.
  - CNL requested feedback from all identified First Nations, the Manitoba Métis Federation, and organizations on assumptions CNL had made in the EIS with respect to traditional land use around the WL site. CNL has incorporated information from traditional land use and knowledge studies that have been completed by Sagkeeng, the Manitoba Métis Federation, Black River First Nation, Brokenhead Ojibway Nation, Hollow Water First Nation, and Wabaseemoong Independent Nations and has asked these Indigenous Nations for verification that the studies were reflected accurately in the EIS.
  - CNL provided the tables of interests and concerns to all First Nations and the Manitoba Métis Federation that have voiced interests and concerns related to the Project and requested feedback (1) that CNL had captured accurately the interests and concerns, and (2) where possible, verification that the Nation or organization was satisfied with how the interests or concerns have been addressed by CNL. CNL incorporated proposed changes that were recommended by the First Nations and the Manitoba Métis Federation to the table of interests and concerns.

- **Next Steps.** This subsection describes the key next steps for engagement both from a relationship building and environmental assessment perspective. It also discusses how CNL plans to address outstanding issues of concern and interest. CNL is aware that not all issues can be quickly or easily resolved as some issues go beyond the scope of the Project or there remain a difference of opinion on certain issues. CNL will continue to listen, respond to, and, where possible, address all issues raised.

CNL has developed a system to gather, document, and verify information in the EIS [6] for the Manitoba Métis Federation and each First Nation. In general, CNL followed the below process:

Process Step #1 – Receive feedback identifying particular interests or concerns from a First Nation, Manitoba Métis Federation, or organization through one or more of the following sources:

- Ongoing engagement and information sharing with the First Nations and the Manitoba Métis Federation.
- Comments on the 2016 Project Description or any draft revision of the EIS.
- Traditional Knowledge and Land Use Studies (Sagkeeng, the Red River Métis, Black River First Nation, Brokenhead Ojibway Nation, Hollow Water First Nation, and Wabaseemoong Independent Nations).
- Additional studies completed concerning the Project (i.e., Sagkeeng First Nation's Psychosocial Impact Assessment [9], and Alternative Means Assessment [12]; and two harvester consumption surveys).

Process Step #2 – Share the EIS (directing to applicable sections informed by Indigenous engagement), asked for additional feedback, offered support to assist the process, and offered to meet to discuss how Indigenous interests and concerns have been incorporated:

a) If the offer to meet with CNL was accepted, where applicable, CNL completed one or more of the following: targeted engagement on a particular interest or concern, shared draft responses to comments provided, supported additional studies, incorporated additional feedback, and supported further participation in the environmental assessment process.

b) If CNL did not receive a response from the Nation or the offer for further discussions on a topic or interest was declined, CNL shared draft responses to comments on the EIS or specific topic of interest, and outlined future opportunities to engage should the community like to re-engage in the future.

Process Step #3 – Acknowledgement that CNL had adequately documented the Nation's position, interest, or concern. Where applicable, CNL incorporates any additional feedback from the Nation by revising responses and/or EIS documentation. Where applicable, CNL provides a rationale for any feedback CNL could not incorporate.

Process Step #4 – Share each finalized summary of interests and concerns and verification status (as understood by CNL) for confirmation by each First Nation, Manitoba Métis Federation, or organization to confirm whether CNL had adequately captured their interest or concern:

a) If the First Nation, the Manitoba Métis Federation, or organization responds and confirms that the summary was a sufficient representation of their interests and concerns and wished to further discuss how interests and concerns have been incorporated, and/or clarified/revised summary of interests and concerns. Alternatively, acknowledgement and understanding that CNL has not adequately addressed an interest/concern and an agreement on the difference of opinion.

b) If no response or no confirmation of summary of interests and concerns was received, CNL offered further discussion on how to revise summary of interests and concerns with the First Nation, the Manitoba Métis Federation, or organization.

Process Step #5 – Finalized the draft EIS.

One of the key outcomes of the engagement verification process is the development of tables that summarize interests and concerns for each Nation. These tables of interests and concerns identify the specific comments that have been formally submitted as part of the engagement process or identify the concerns and comments that have been raised orally or in direct submissions to CNL. These tables are dynamic and continue to reflect the latest identification of interests concerns and their status. These tables identify CNL's response to the feedback and document next steps. CNL continues to engage with each Nation and is working to develop commitments to address concerns. The tables are located in Appendix 4.0-1 of Section 4.0 of the EIS [6], and also provides a list of engagements and identifies engagements relevant to the EIS.

In addition to the summary of engagement for each Nation in the sections below, EIS Section 4.3 provides an overview of how Traditional Knowledge has influenced the environmental assessment, and Section 4.4 provides a specific list of all the changes to the EIS based on feedback from First Nations and the Manitoba Métis Federation.

3.4.1 Sagkeeng First Nation

Sagkeeng, formerly the Fort Alexander Band No. 262, is an Anicinabe First Nation, and signatory to Treaty No. 1, with land cessions within the settlement boundary. Sagkeeng has potential, asserted and/or established Aboriginal and Treaty rights in the vicinity of the Project (beyond Treaty No. 1), is within proximity to the WL site, and has an existing relationship and expressed interest in the WL site.

A map of Sagkeeng is provided in Appendix D.

Sagkeeng occupies one area of reserve lands: Fort Alexander 3 Reserve No. 06362. The Reserve is situated approximately 52 km north of the WL site, at the southeastern tip of Lake Winnipeg, and along the shores of the Winnipeg River. The reserve covers an area of 8,771.3 ha. Sagkeeng has a total registered population of 8,037 (as of September 2019). Roughly 56 percent of the registered population resides off-reserve lands (4,471) [8].

Since 2016 when CNL started engaging with Sagkeeng on the proposed Project, Sagkeeng's position has remained that complete removal and remediation (i.e., CNL's Alternative #2) of WR-1 should be selected as the decommissioning method for WR-1.

Throughout the environmental assessment process, CNL has engaged Sagkeeng to share information and build awareness about the proposed ISD of WR-1, and understand Sagkeeng's Aboriginal and Treaty rights and main concerns and interests regarding the Project to determine how CNL and Sagkeeng can work collaboratively to address Sagkeeng's concerns. A main component of this engagement is to identify Sagkeeng's concerns and potential impacts from the Project on their rights and identify ways to help address the community's concerns.

Sagkeeng has asserted their Aboriginal rights based on the location of the Project in their traditional territory, where their members use the land around the site for hunting, fishing and other cultural purposes.

Over time, CNL has increased and strengthened engagement with Sagkeeng on the Project to better understand Sagkeeng's concerns, potential impacts, collaborate on ways to help address these concerns, and to build a lasting working relationship. CNL continues to learn and adapt its approaches based on feedback and direction from the community. In 2021, CNL has worked closely with AECL and has shifted towards a relationship-based engagement approach to support addressing Sagkeeng's concerns related to the Project, the Whiteshell Laboratories Closure Project, and the historical siting and operations of the WL site.

CNL, AECL, and Sagkeeng have established a technical working group table to identify, develop, and implement initiatives that will help to address Sagkeeng's interests and concerns related to the WL site. From this working group, Sagkeeng, CNL, and AECL have signed an agreement to support an independent Sagkeeng Community Environmental Monitoring Program that considers monitoring for country foods and community risk communications plan. Sagkeeng, CNL, and AECL have also established a community liaison committee to enhance community engagement, build trust, and strengthen relationship-building.

With these initiatives in place and others in development, the relationship with Sagkeeng is positive and positioned for success. Future discussions with Sagkeeng will include participation and input into CNL's environmental monitoring program, economic development and procurement opportunities, future land use, the development of a Long-Term Relationship Agreement, and other areas of collaboration and interest to the community. Sagkeeng has expressed its interest in continuing to develop the relationship along these terms, and has emphasized that for engagement to be meaningful, it must be ongoing. CNL understands and appreciates Sagkeeng's desire for engagement to be sustained and substantive.

CNL will continue to work closely with AECL and Sagkeeng through the technical working group table to strengthen their relationship and implement the initiatives to help address Sagkeeng's concerns.

3.4.1.1 Engagement

In relation to this Project, engagement began in April 2016, when CNSC initiated a teleconference with Sagkeeng, CNL, and AECL to discuss the proposed decommissioning of WR-1. In May of that year CNL and Sagkeeng had an introductory meeting to discuss the preliminary concerns of Sagkeeng and how they would like to be engaged moving forward. In August 2016, CNL sent out formal letters to identified First Nations and the Manitoba Métis Federation requesting their input on the proposed Project.

In 2017, CNL continued to engage with Sagkeeng, meeting with community representatives in January to present an overview of the WR-1 decommissioning as well as hosting an open house that Sagkeeng representatives attended. In May, CSNC led a meeting with Sagkeeng, Wabaseemoong Independent Nations, CNL, and AECL, to discuss engagement and to present on

CNSC's role as regulator and the WR-1 Project. Later in July, Sagkeeng participated in a site tour followed by a dialogue on site activities.

In September 2017, CNL provided an opportunity for five members from each First Nation community and the MMF to attend a full day workshop to both learn and share on how CNL and the First Nations and the Manitoba Métis Federation collectively protect and care for the environment. The goal was to provide some hands-on experience coupled with ample discussion, learning and dialogue on opportunities moving forward both as a career option and as a relationship between the site and the First Nations and the Manitoba Métis Federation. On October 31, 2017, CNL's Annual Safety Reports were distributed to each First Nation community including the *Environmental Monitoring in 2016 at Whiteshell Laboratories* report, and the *2016 Progress Report on the Environmental Assessment Follow-up Program for Whiteshell Laboratories*. CNL also provided an invitation to engage on these documents. In November 2017, CNL mailed hard copies of community specific reports along with the draft EIS Executive Summary and had a teleconference with Sagkeeng representatives to discuss how to move forward with the community.

On January 3, 2018, CNL and Sagkeeng signed a Memorandum of Understanding (MOU) and entered into a participation funding agreement in support of Sagkeeng conducting aTraditional Knowledge Land Use Study. The agreement also was supportive of Sagkeeng's review and community engagement of the environmental assessment for the Project. As outlined in the MOU, CNL also committed to continuing to work with Sagkeeng in the development of a CA. In early 2018, Sagkeeng's Chief and Council, other Sagkeeng representatives, CNL, and CNSC met to discuss Sagkeeng's comments on the draft EIS and requests for additional engagement on the Alternative Means Assessment, concerns about potential psychosocial impact, and other key issues. In April, CNL supported representatives from all participating First Nations and the Manitoba Métis Federation, including Sagkeeng, to participate in a benchmarking trip to Hallam, Nebraska, the site of a reactor that underwent ISD in 1969. The trip was intended to provide First Nations and the Manitoba Métis Federation with additional information on ISD and provide them with the opportunity to see what a site could look like after in situ disposal. Sagkeeng members were invited but did not attend; however, Sagkeeng's consultant attended the trip and reported back to the community.

In August 2018, CNL met with Sagkeeng to discuss Sagkeeng's Traditional Knowledge Land Use Study [10] and also invited Chief Henderson to dine with CNL's Board of Directors. In the fall of 2018, CNL met with Sagkeeng to discuss their comments on the 2017 draft EIS. Following this, CNL had a subsequent meeting with Sagkeeng to discuss action items. CNL also partnered with Sagkeeng to conduct a food consumption survey of their members. The results of the survey were compiled in a summary memo that was shared with Sagkeeng in November 2018. The survey helped validate the assumptions for the Harvester receptor modelled in the human health risk assessment of the EIS (Section 6.7 Human and Ecological Health).

In response to concerns expressed by Sagkeeng on the draft EIS Alternative Means, CNL and Sagkeeng met in January 2019 for two preparatory meetings for a three-day Alternative Means Workshop planned for February. In February, CNL and Sagkeeng met to conduct the Alternative Means Workshop where Sagkeeng was to present their community perspectives on the Project

and alternatives considered. CNSC and AECL participated as observers at this workshop; however, due to poor weather, CNSC participated by teleconference. The workshop's purpose was to provide an opportunity for Sagkeeng to present their community values and preferred weighting of criteria with respect to the WR-1 decommissioning alternatives, and for CNL to present the proponent's four assessed alternatives and associated weighting and assessment. The workshop was also an opportunity for parties to openly share their thoughts and seek a path forward. Day one started with a cultural water ceremony and traditional drum following which both CNL and Sagkeeng's consultant presented on their respective Alternative Means Assessment and weighting criteria. After lunch on day two, Chief Henderson informed participants that there would be a change in the agenda. Sagkeeng ended the workshop, citing the need to take a cultural pause, and invited all the participants to attend a ceremony at Turtle Lodge prior to continuing this discussion. An Elder also addressed the participants at the workshop before it ended and spoke to the importance of ceremony to help guide the process.

As requested, CNL, AECL, CNSC, and Sagkeeng convened in March 2019, at Turtle Lodge, an internationally recognized Indigenous education and wellness center, located in Sagkeeng for a ceremony. Turtle Lodge also provided a presentation on radioactive waste issues to the participants. CNL also hosted Turtle Lodge on site in July 2019 for a tour of the WL, to discuss Project updates, and plan for a ceremony on the WL site.

CNL provided a Project update to Sagkeeng and the CNSC in September 2019 and hosted a ceremony on the WL site. The ceremony was an opportunity to reconnect with the land and to conduct ceremony of importance to Sagkeeng. A sacred fire was lit on the site. The ceremony included Chief Henderson, Sagkeeng Councillors, Elders from Sagkeeng and other invited First Nations. A traditional drum group performed and water and smudging ceremonies were conducted. CNL staff participated and observed the ceremony, providing an important opportunity for growth and cultural learning. Representatives from CNSC and AECL participated in the day's events. CNL continued to engage with Sagkeeng by participating in a meeting in September 2019 where CNL provided an overview of Whiteshell's Licencing Renewal, the Project, and radiation protection.

On December 11, 2019, CNL and Sagkeeng met in Winnipeg to discuss feedback Sagkeeng provided through the site licence intervention, in-person meetings, e-mail, and submitted comments on the draft EIS. In addition, this meeting was to explore what the possibility of a long-term Relationship Agreement could look like as well as discuss establishing an Indigenous Advisory Committee, and other areas of interests (e.g., environmental monitoring and end state planning). The purpose was to develop concrete actions to address items of interest to both Sagkeeng and CNL and continue to grow their relationship. Sagkeeng's Chief and full Council attended the meeting. Key topics that were discussed included the EIS, Indigenous Advisory Committee, Indigenous Liaison position, environmental monitoring, capacity building, end state engagement, and asset donations. Several action items were identified and continue to be reviewed and updated by Sagkeeng and CNL.

In February 2020, CNL received a letter from Sagkeeng regarding their position on the Alternative Means Assessment and providing Sagkeeng's opinion on the adequacy of the

revised draft EIS and identifying specific opportunities in the EIS for improvements. In the letter, Sagkeeng clearly stated that:

- Sagkeeng's position remains that the assessment of alternatives has not been adequately completed since it did not incorporate Sagkeeng's specific views and community values, and
- Sagkeeng is opposed to leaving the WR-1's radioactive materials in the ground, and focused on finding the most preferred alternative that can be consented to by Sagkeeng.

The letter also clarified that Sagkeeng's position will remain as stated above unless and until CNL is able to demonstrate that ISD is objectively better than full removal, including when considered against Sagkeeng's priorities and criteria. Accompanying the letter was a comment table, in which Sagkeeng raised specific concerns and asked specific questions about the EIS, along with a number of other supporting technical documents, reflecting Sagkeeng's position on the then-draft EIS. In reply to the e-mail accompanying that letter, CNL requested a meeting with the Sagkeeng consultation team on February 19, 2020.

In March 2020, CNL and Sagkeeng met to discuss the February letter from Chief Henderson. CNL had also intended to discuss the long-term Relationship Agreement. However, despite best efforts, CNL and Sagkeeng did not align on the purpose of the meeting and this matter was postponed. CNL responded to the questions during the meeting and also provided detailed responses in a letter to Sagkeeng the following month.

In response to the numerous discussions with Sagkeeng regarding the Alternative Means Assessment, CNL and Sagkeeng signed an MOU in June 2020 where CNL supported the completion of Sagkeeng's Independent Alternative Means Assessment that would incorporate Sagkeeng's community values, alternative weight criteria and other key elements. CNL has included details of Sagkeeng's final report in the EIS package.

CNL and Sagkeeng continued to meet monthly from June to August to discuss topics of interest to Sagkeeng, including the Project, environmental monitoring, an Indigenous Liaison position, and the long-term Relationship Agreement.

In September 2020, Sagkeeng and CNL signed another MOU to fund a Sagkeeng Community Liaison position. CNL provided on-site training to the Liaison and met with Sagkeeng to review and discuss action items. Sagkeeng also participated in a tree survey on the WL site and a workshop to initiate the development of a work plan for Sagkeeng's Liaison. CNL and Sagkeeng's Liaison have been in discussions and are working towards completing a work plan.

On October 19, 2020, CNL received Sagkeeng's Alternative Means Assessment report outlining criteria and their weights as developed by Sagkeeng. Their alternatives assessment incorporated Sagkeeng's values and included additional independent technical tests and weighting provided by Sagkeeng's technical Consultant. More information on Sagkeeng's Alternative Means Assessment is provided in Section 4.2.4.1.3 Sagkeeng's Alternative Means Assessment. The report is also discussed in Section 2.8 of the EIS and is included as a supporting document to the IER.

CNL hosted a multi-community event at the WL site on October 20, 2020. The purpose of the half-day site visit was to discuss CNL's environmental protection program and to observe CNL's fish processing, which is part of CNL's routine environmental monitoring program. Participants included Sagkeeng's Liaison Officer, a representative from MMF, and two representatives from Black River and Hollow Water First Nations. A presentation was provided by CNL's environmental specialist on CNL's environmental protection program. Participants also made a number of recommendations on how to incorporate species of interest to the First Nations and the Manitoba Métis Federation into CNL's monitoring program. Afterwards, CNL and the participants made their way to the environmental lab where participants observed CNL processing fish they had caught that morning. Participants asked CNL's environmental technicians a number of questions about where the fish were caught and the method for catching them. A workshop report was produced and circulated to participants for review and comment. CNL did not receive any feedback on the report from the participants.

On October 20, 2020, CNL and Sagkeeng also signed an MOU to support Sagkeeng's consultant's review of CNL's responses to Sagkeeng's comments on the 2017 and 2020 draft EIS. Later that month, on October 28, 2020, CNL received Sagkeeng's Psychosocial Assessment report. The report describes the historic and intergenerational trauma that Sagkeeng experienced from a variety of sources including Residential schools, Child and Family Services, the former upstream pulp mill and the WL site, including WR-1. The report also described potential psychological, social, and cultural impacts of each alternative means of decommissioning WR-1. The assessment was conducted to inform CNSC's Indigenous rights impact assessment and the overall environmental assessment. Further information on the study is provided in Section 3.4.1.4 Sagkeeng's Psychosocial Impact Assessment [9]. CNL had a brief check-in with Sagkeeng's Liaison Officer on November 2, 2020, and discussed a few potential engagement initiatives. The next step was to seek Chief and Council's direction on these engagement initiatives.

On November 3, 2020, CNL provided Sagkeeng with a briefing note highlighting monthly engagement activities with Sagkeeng. The monthly briefing notes are designed to provide Project and engagement updates to Sagkeeng's Chief and Council. This briefing note highlighted engagement activities that took place in September and October, provided Project updates, as well as a detailed Project timeline.

CNL, the CNSC, and Sagkeeng met on November 12, 2020, to discuss Sagkeeng's Psychosocial Assessment [9]. During the meeting, Sagkeeng and Narratives Inc. presented an overview of their psychosocial assessment and highlighted key findings and recommendations from the report.

CNL received Sagkeeng's feedback on CNL's responses to Sagkeeng's comments on the draft EIS on November 16, 2020. CNL began their review of Sagkeeng's feedback and worked with Sagkeeng to schedule a time to discuss the comments on the EIS. Sagkeeng presented the Alternative Means Assessment on November 19, 2020, to CNSC and CNL. CNL and Sagkeeng's Liaison Officer met on November 25, 2020, to discuss future engagement initiatives. Meeting notes were provided to Sagkeeng's Liaison Officer.

Later that month, on November 26 and December 1, 2020, Sagkeeng's consultation engagement team met with CNL to review and discuss Sagkeeng's comments on the EIS in order to seek clarification and discuss CNL's proposed next steps for addressing Sagkeeng's comments. AECL and the CNSC were present at both meetings as observers. As part of the evolution and learning from our earlier engagement, CNL and Sagkeeng discussed Sagkeeng's comments on the EIS by theme. Each theme was associated with several comments from Sagkeeng. These themes included: psychosocial effects; consent for in situ disposal; the Alternative Means Assessment and alignment with International Atomic Energy Agency (IAEA) guidance; community engagement; considering the Project under Impact Assessment Act (IAA) 2019 versus CEAA 2012; consideration for historical land use and past grievances; and future land use. For each theme, CNL indicated its perspective on what was in scope of the EIS and what was out of scope of the EIS, and provided a summary of CNL's understanding of Sagkeeng's concern to verify they understood Sagkeeng's concern correctly. CNL also provided for each theme, a summary of activities CNL has undertaken in an effort to address Sagkeeng's concern, and outlined proposed next steps to test with Sagkeeng. During the meetings, Sagkeeng raised concerns about fear and stigma not being considered as a primary pathway in the EIS.

On November 30, 2020, CNL had a teleconference with the CNSC and Sagkeeng's lawyer to discuss Sagkeeng's funding needs going forward to continue with environmental assessment involvement.

On December 22, 2020, CNL sent a letter in response to Sagkeeng's Alternative Means Assessment report and a letter of response to Sagkeeng's Psychosocial Impact Assessment report. These letters propose recommended next steps on how CNL could work to address Sagkeeng's concerns. CNL also requested a meeting with the Chief and Council to better understand their concern and discuss CNL's recommendations.

On January 13, 2021, CNL sent Sagkeeng responses to Sagkeeng's comments on the draft EIS. On January 18, CNL sent a copy of the new sections of the EIS that discussed the considerations given to Sagkeeng's Alternative Means Assessment and psychosocial assessment reports. CNL followed up from the response letters on February 2, 2021. CNL will re-engage Sagkeeng to finalize these responses after submission of the draft EIS.

In February 2021, AECL hosted a leadership teleconference with representatives from Sagkeeng, CNL and the CNSC to discuss the principle of Free, Prior and Informed Consent (FPIC) in relation to the Project. During the meeting, Sagkeeng clearly expressed that according to its Anishinaabe law, and its understanding of international law, its consent is required for the Project to proceed. CNL and AECL acknowledged Sagkeeng's perspective but disagreed, and indicated their willingness to work collaboratively with Sagkeeng, understanding that while consent is the preferred outcome, the Project will benefit from greater collaboration even where consent is not achieved. CNL and AECL believe that meaningful engagement and participation in decisions that affect Sagkeeng members, their community, and territory is critical to fostering understanding and identifying mutually acceptable opportunities in respect of the Project. The meeting led to further discussions between CNL and Sagkeeng in March 2021 regarding capacity funding to support more direct engagement with Sagkeeng members.

On February 20, 2021, CNL provided Sagkeeng with updated versions of Sagkeeng's Alternative Means Assessment write up in Section 2 of the EIS that incorporated Sagkeeng's feedback (see Section 2.8 of the EIS for more information). On February 26, 2021, Sagkeeng provided additional feedback on the write up, which CNL incorporated into the revised copy for their review. On the same day, Sagkeeng also provided feedback on the Psychosocial Impact Assessment summary that is in Section 4.2.4.1.4 of the EIS and Section 3.4.1.3 of this IER. CNL incorporated Sagkeeng's feedback in both the Psychosocial Impact Assessment write-up of the EIS and this IER.

In March 2021, CNL met with Sagkeeng's Chief and Council via teleconference to review Sagkeeng's engagement proposal to establish a community Liaison committee made up of select Sagkeeng members to be involved in the environmental assessment process for the Project.

In April 2021, senior leadership from CNL, AECL, and Sagkeeng's Chief and Council met to discuss Sagkeeng's Psychosocial Impact Assessment Report. The meeting marked a turning point in CNL's and Sagkeeng's relationship as both CNL and AECL recognized the findings of the Sagkeeng Psychosocial Impact Assessment Report and the trauma experienced by members in relation to the historical siting of the WL site. CNL, AECL, and Sagkeeng's leadership agreed to work collaboratively to develop and implement key initiatives recommended by Sagkeeng to help address the Nation's concerns regarding the Project and the Whiteshell Laboratories Closure Project. Sagkeeng recommended a Technical Working Group be developed to oversee the development of these initiatives.

Later in the month of April, Sagkeeng's Liaison's Officer visited the WL site to pick up new infographics regarding the Project for distribution around Sagkeeng's community. During the site visit, Sagkeeng's Liaison's Officer also participated in a refresher course on the Project. The infographics were distributed in central locations in Sagkeeng. On April 20, 2021, CNL invited Sagkeeng to participate in a WR-1 information webinar focused on the protection of the environment before, during, and after the WR-1 decommissioning.

In June 2021, Sagkeeng's consultation team and representatives from CNL and AECL participated in the first Technical Working Group meeting. The purpose of the Technical Working Group is to identify, develop, and implement initiatives that will help to address Sagkeeng's interests and concerns in a way that is meaningful to Sagkeeng. Four initiatives were identified including establishing a community liaison committee; a healing and resiliency action plan to address recommendations in Sagkeeng's Psychosocial Impact Assessment Report; an Indigenous-led environmental monitoring program; and a formal leadership table between Sagkeeng, AECL, and CNL. Sagkeeng, CNL, and AECL also anticipate developing a long-term Relationship Agreement through the Technical Working Group. Through the Technical Working Group, Sagkeeng, CNL, and AECL drafted a Contribution Agreement to support the development of these initiatives. CNL and Sagkeeng also developed a subcommittee to work together to review and update EIS-related documents to accurately reflect Sagkeeng's position, interests, and concerns.

On June 24, 2021, CNL provided Sagkeeng with the summary table of Sagkeeng's interests and concerns and a list of the community's VCs on the Project. Sagkeeng provided feedback on July 14, 2021, on the list of VCs and July 16, 2021, on the summary of interest and concerns table. After sending Sagkeeng a revised table, which incorporated their feedback, Sagkeeng provided additional feedback on July 26, 2021, on the summary of interests and concerns table. CNL met with Sagkeeng on July 28, 2021, to review their summary of interest and concerns table and list of VCs. CNL incorporated Sagkeeng's feedback and sent the updated summary of interests and concerns table, the updated VCs table, and resent the Psychosocial Impact Assessment write-up to reflect sentiments shared at the leadership meeting discussion. Specifically, CNL recognizes that Sagkeeng has experienced a great deal of trauma and that the alienation between Sagkeeng and their traditional territory caused by the siting of the WL site and subsequent lack of engagement through the operations of the site has contributed to that trauma. Sagkeeng provided feedback on all three documents on August 23, 2021.

On the same day, Sagkeeng also provided substantial feedback on Section 2.0. After receiving this information, CNL and Sagkeeng met via teleconference on August 24, and September 7, 2021, to discuss Sagkeeng's comments on the reviewed EIS documentation. On August 31, 2021, CNL provided Sagkeeng with a marked-up copy of Section 2.0, at Sagkeeng's request. The first review meeting, on August 24, 2021, focused on discussing Sagkeeng's feedback on the Summary of Interests and Concerns table and the list of Sagkeeng's VCs. During the meeting, CNL demonstrated to Sagkeeng that CNL had incorporated all of Sagkeeng's recommended changes to the list of VCs. Sagkeeng did not have any additional edits to make on the list of VCs. Sagkeeng also recommended the VCs list be a topic of discussion with their liaison committee once established. CNL will engage with the Sagkeeng Community Liaison Committee, once established, on Sagkeeng's list of related species and topics of interests. Any revisions to this table will be reported in future updates of the IER for the public record. The second meeting focused on discussing Sagkeeng's feedback on the Psychosocial Impact Assessment Write-up and general feedback on Section 2.0.

On September 14, 2021, Sagkeeng's Consultation Team and representatives from AECL and CNL held a Technical Working Group meeting to establish next steps to develop the priority initiatives to help address Sagkeeng's concerns on the Project. These initiatives include a Healing and Resiliency Plan, a Community Environmental Monitoring Program that includes country foods monitoring and is closely tied to a community-driven risk communications program, and a community liaison committee.

On September 20, 2021, following the discussion with Sagkeeng's consultation team on the EIS sections, CNL provided an updated copy of the summary of interests and concerns table and Psychosocial Impact Assessment write-up that reflected Sagkeeng's additional feedback from the meetings on August 24 and September 7, 2021.

As a precursor to developing a Healing and Resiliency Plan, CNL, AECL, a representative from the CNSC, and Sagkeeng's Liaison Officer participated in a two-day trauma-informed engagement training session on September 22 and September 23, 2021. The training was hosted by Narratives Inc., the author of Sagkeeng's Psychosocial Impact Assessment Report, and took place in Winnipeg. The training in trauma-informed principles and methods of

engagement included overview of the types of trauma(s). This included an understanding of the types of traumas, the symptoms of trauma, the impacts of trauma, the relationship between trauma and neurobiology, and responding to expressions of trauma. The training also highlighted the importance of being trauma-informed as well as trauma-informed principles, tools, and strategies. The training was customized to the unique needs of CNL, AECL, CNSC, and Sagkeeng. By taking this training, CNL, AECL, and the CNSC broadened their lens of what trauma means, gained a deeper understanding of the prevalence of trauma and its impact on Indigenous Nations, as well as understanding the importance of being trauma-informed and its relevance in organizational policies and procedures. Eleven participants from CNL, four participants from AECL, one participant from the CNSC, and Sagkeeng's Liaison officer participated in the training. Participants included Senior Site Officials, Engagement and Communication Officers, Managers, and Directors.

Afterwards, CNL hosted a debrief (November 1, 2021) on the trauma-informed engagement training with Sagkeeng, and the trainer and principle from Narratives Inc. After Narratives Inc. provided an overview of the training, CNL and Sagkeeng discussed how to use these teaching to develop a Healing and Resiliency Action Plan.

On September 29, 2021, Sagkeeng recommended, via e-mail, that CNL proceed with submitting the revised draft EIS with this version of the summary of interests and concerns table assuming CNL incorporated Sagkeeng's last feedback of the table. On October 6, 2021, CNL sent final copies for the summary of interest and concerns table and the list of VCs to Sagkeeng's leadership for their information and thanked Sagkeeng for their participation in validating CNL had accurately documented Sagkeeng's interest and concerns and list of VCs.

Through the months of October through December, CNL continued to verify information in the EIS related to Sagkeeng was adequately documented and a path forward is clearly defined. On October 13, 2021, Sagkeeng's consultation team confirmed that the latest version of CNL's write-up of Sagkeeng's Psychosocial Impact Assessment adequately captured Sagkeeng's position to the extent possible at this time. Sagkeeng confirmed that their findings and suggestions were incorporated. On the same day, CNL provided Sagkeeng and consultation with a final version of EIS Section 11.0 for their review. Sagkeeng provided their feedback on Section 6.7 and Section 11.0 on November 1, 2021.

General engagement and outreach activities continued with Sagkeeng. On October 14, 2021, CNL provided Sagkeeng's Liaison Officer with a copy of Sagkeeng's fall engagement newsletter for review prior to sending it to Sagkeeng leadership. In addition, CNL provided Sagkeeng with a revised version of EIS Section 6.7 for review and verification that CNL had adequately incorporated Sagkeeng's interests and concerns related to environmental and human health.

During this time, CNL, AECL, and Sagkeeng began discussing and developing a Technical Working Group; a mechanism where the parties can discuss and resolve issues of mutual interest and concern. On October 20, 2021, CNL provided Sagkeeng with a copy of the Contribution Agreement that was developed to support the Technical Working Group, for their review and feedback. CNL also sent Sagkeeng's leadership a fall engagement update newsletter on October 20, 2021.

On November 3, 2021, CNL provided Sagkeeng with a copy of the revised Section 2.0 to show how CNL had incorporated Sagkeeng's feedback. Where integration was not possible, CNL provided a detailed explanation for why CNL was not able to incorporate Sagkeeng's comment. On November 4, 2021, CNL received confirmation from Sagkeeng to proceed with incorporating Section 2.0 into CNL's submission package. For the record, Sagkeeng has not endorsed all of Section 2.0 and has indicated that Sagkeeng will review and comment on the whole refiled EIS, including on the adequacy of incorporation of Sagkeeng inputs, when it comes out formally, and report Sagkeeng's findings to the Federal Provincial Indigenous Review Team.

A meeting of the Technical Working Group was convened on November 10, 2021, and the focus was on environmental monitoring. CNL delivered a presentation on the site's environmental protection program and Sagkeeng delivered a presentation on the proposed Sagkeeng Community Environmental Monitoring Program.

The EIS review continued through this period. On November 15, 2021, Sagkeeng and CNL met with the EIS subcommittee of the Technical Working Group to discuss Sagkeeng's comments on Section 6.7 and Section 11.0. On November 18, 2021, CNL asked Sagkeeng to review Section 6.8 to make sure that CNL had documented Sagkeeng's information correctly. CNL sent Section 4.0 on November 26, 2021 and requested that Sagkeeng review to confirm CNL had documented Sagkeeng's interests and concerns correctly. CNL provided Sagkeeng with Section 6.9 on November 30, 2021 and requested Sagkeeng review to confirm CNL had documented Sagkeeng's information correctly.

On November 30, 2021, CNL, AECL, and Sagkeeng signed an MOU, which supported the development of a liaison committee, the development of scopes of work for a Community Environmental Monitoring Program, a Healing and Resiliency Action Plan, and a leadership table.

December focused on receipt of EIS feedback and further discussion and exploration of an independent Sagkeeng Community Environmental Monitoring Program. On December 8, 2021, Sagkeeng provided feedback on Section 6.8 and on December 14, 2021, CNL received feedback from Sagkeeng on Section 6.9. On December 15, 2021, Sagkeeng presented on Guardianship programs and how CNL and Sagkeeng could incorporate similar elements into monitoring at the WL site.

A teleconference was held by CNL on January 5, 2022, to go over Sagkeeng's comments on Section 4.0 and to confirm that the list of interests and concerns was complete. On January 31, 2022, CNL sent Sagkeeng a revised copy of Section 4.0 and Section 6.7. Both copies were provided in track changes with detailed responses to each of Sagkeeng's comments.

CNL sent the Indigenous Advisory Committee terms of reference to Sagkeeng's consultation team for their review and input. On that same day, Sagkeeng provided CNL with drafts of Sagkeeng's Community Environmental Monitoring Program and their Healing and Resiliency Action Plan. The development of the Monitoring Program would become a priority for CNL and Sagkeeng for coming months. On February 22, 2022, the Technical Working Group discussed Sagkeeng's scope of work for a Sagkeeng-led monitoring program and on March 2, 2022, Sagkeeng provided an overview of the Healing and Resiliency Action Plan. On March 3, 2022,

CNL and AECL provided Sagkeeng with written feedback on the Community Environmental Monitoring Program scope of work.

On March 9, 2022, CNL, AECL, and Sagkeeng held further discussions on Sagkeeng's scope of work for the Monitoring Program. CNL and AECL provided Sagkeeng with formal written feedback on the Sagkeeng Community Environmental Monitoring Program scope of work on March 15, 2022. Meanwhile, on March 22, 2022, two CNL representatives met with Sagkeeng's community liaison committee to get to know each other and learn a bit more about the WR-1 Project.

The period of April, May, and June 2022 focused on EIS updates to the interests and concerns tables and further understanding and development of the Sagkeeng's Community Environmental Monitoring Program. On April 6, 2022, CNL and Sagkeeng discussed Sagkeeng's scope for the Community Environmental Monitoring Program and repackaging of Sagkeeng's interest and concerns table. On April 11, 2022, CNL sent Sagkeeng their repackaged interests and concerns table for review. On May 10, 2022, CNL and Sagkeeng went through Sagkeeng's revised interest and concerns table and discussed the upcoming in-person workshop (Community Environmental Monitoring Program). On May 20, 2022, CNL and Sagkeeng met to discuss the logistics of the Community Environmental Monitoring Program workshop. On June 9, 2022, CNL and Sagkeeng discussed the interest and concerns table as well as the agenda for the Monitoring Program Workshop. On June 13, 2022, CNL asked Sagkeeng to confirm that they have reviewed and verified their interest and concerns table.

The efforts to develop a Sagkeeng Community Environmental Monitoring Program were further explored in a workshop held on June 15 and 16, 2022, in Winnipeg. CNL and Sagkeeng representatives met in-person to negotiate a monitoring program that would increase Sagkeeng's role (and the role of Anicinabe Traditional Knowledge) in monitoring of the WL site and surrounding areas, supporting the reduction of fear and stigma at and around the site. The two-day meeting culminated with an agreement in principle to support the development and execution of a Sagkeeng Community Environmental Monitoring Program over the next 5 years. The parties determined that they would implement workshop action items and reconvene the Technical Working Group in the fall. On June 16, 2022, Sagkeeng confirmed during the workshop, that the interests and concerns table reflects the community's interest and concerns as well as the status of those concerns.

On July 11, 2022, CNL provided a draft copy of the Contribution Agreement for the Sagkeeng Community Environmental Monitoring Program and Olthuis Kleer Townshend LLP, Sagkeeng's lawyers, provided a revised copy of the draft Contribution Agreement for CNL and AECL's review. CNL continued to develop their relationship with Sagkeeng's Community Liaison Committee by hosting an on-site tour of the WR-1 facility and the WL site, lunch, and a general discussion. CNL followed up with material requested by the Committee. Subsequently, the parties continue to refine the Contribution Agreement for the Sagkeeng Community Environmental Monitoring Program.

In August and early September, CNL held teleconferences with Sagkeeng to discuss the renewal of the Technical Working Group budget and develop a path forward for invoicing. On August 20,

2022, Sagkeeng asked CNL if they would have any objections to Sagkeeng communicating to community members that an agreement in principle has been reached on the Sagkeeng Community Environmental Monitoring Program. CNL responded that day, supporting sharing this news with the community. On August 25, 2022, CNL met with Sagkeeng representatives to discuss Sagkeeng's revised Technical Working Group Budget and specifically Line Item 9, the Negotiation of a trauma informed action plan. At that time, CNL expressed an interest to defer discussions on this until it was better understood, and focus efforts on the Sagkeeng Community Environmental Monitoring Program. Sagkeeng representatives believed that this was a community priority. The parties agreed to discuss the earlier provided Healing and Resiliency Plan with fresh eyes at an upcoming Technical Working Group meeting. CNL sent a copy of CNL's environmental monitoring program schedule on August 30, 2022, and requested Sagkeeng to identify any potential activities they want to participate in.

CNL held teleconferences with Sagkeeng in August and September 2022 to discuss the renewal of the Technical Working Group budget and develop a path forward for invoicing. CNL and Sagkeeng discussed invoicing at the Technical Working Group meeting on September 7, 2022, and agreed that CNL would provide seed funding to support execution of the Contribution Agreements, and that Sagkeeng would invoice subsequently. On a phone call on September 27, 2022, CNL and Sagkeeng resolved finance/invoicing concerns. CNL would provide upfront payments, with follow-up invoices submitted from Sagkeeng triggering further payments. The parties went through a discussion of outstanding agreement payments.

September focused on finalizing Sagkeeng's Community Environmental Monitoring Program. On September 6, 2022, CNL sent Sagkeeng the revised Contribution Agreement to support Sagkeeng's Community Environmental Monitoring Program for their review and feedback. Discussion of the Monitoring Program Budget and supporting scope of work document also occurred at the Technical Working Group meeting on September 7, 2022, where clauses of the agreement and funding structure were discussed. On September 13, 2022, CNL transmitted their final comments and changes to Sagkeeng on the scope of work and Contribution Agreements for Sagkeeng's Community Environmental Monitoring Program. On September 20, 2022, CNL received an e-mail from Sagkeeng indicating their acceptance of CNL tracked changes and providing notification that the document will be forwarded to Chief and Council for execution. As of September 30, 2022, the parties are preparing a joint 3-party press release to announce this exciting initiative. The Monitoring Program was initiated to help reduce Sagkeeng's fear and the stigma associated with the WL site.

3.4.1.2 Interests and Concerns

Sagkeeng and CNL have been engaging on the Project since 2016, which has led to the identification of the interests and concerns held by Sagkeeng. This subsection is a summary of the interests and concerns, and describes CNL's understanding based on written submissions and oral discussions with Sagkeeng. Sagkeeng provided 38 formal comments on the 2017 and 2019 draft EIS. Sagkeeng also provided feedback during engagements including the Technical Working Group where Sagkeeng has shared their position on topics related to the Project and the Whiteshell Laboratories Closure Project and through the subcommittee where Sagkeeng

shared feedback on sections of the EIS. Sagkeeng has also provided feedback via their Traditional Knowledge and Land Use and Occupancy Study [10], the harvester consumption survey [11], their Alternative Means Assessment Report [12], and their Psychosocial Impact Assessment Report [9]. CNL has made its best efforts to document and verify Sagkeeng's interests, concerns and perspectives.

Relationship Building

Sagkeeng and CNL are working together to develop a positive and lasting relationship.

Sagkeeng requested a meeting with CNL and AECL leadership to discuss concerns regarding CNL's response to Sagkeeng's Psychosocial Impact Assessment Report. This meeting took place on April 6, 2021. During the call, CNL offered a sincere apology for its approach and response to the report. CNL and AECL recognized the findings of Sagkeeng's Psychosocial Impact Assessment Report and the trauma experienced by Sagkeeng members in relation to the historical siting and operations of the WL site. CNL and AECL also recognized Sagkeeng as stewards of the land and waters and committed to working with Sagkeeng to develop and implement recommendations arising from the report and the April 6, 2021, dialogue.

CNL received a follow-up letter from Chief Henderson on April 22, 2021, stating the leadership meeting was productive, and the apology and acknowledgements provided in the meeting were meaningful to Sagkeeng. The letter reiterated Sagkeeng's preferred path forward for working together with CNL and AECL. This included establishing a Technical Working Group between AECL, CNL, and Sagkeeng to implement the following initiatives:

- Development of a community advisory committee;
- Development of a healing and resiliency action plan;
- Development of a leadership table among Sagkeeng, AECL and CNL; and
- Development of a meaningful Sagkeeng Indigenous monitoring program at and around the WL site.

The Technical Working Group meets monthly to support ongoing, constructive dialogue to develop and implement the above initiatives. The Technical Working Group has also formalized a Contribution Agreement to provide funding for the first year of activities that will form the basis of a long-term Relationship Agreement.

CNL expects that the relationship will continue to grow and improve after the submission of the EIS and implementation of Sagkeeng's Community Environmental Monitoring Program and other initiatives.

Site Management Structure/Roles and Responsibilities

In their review on the 2017 and 2020 draft EIS, Sagkeeng requested CNL provide information on the nature of the contractual relationship between Canada and Canadian National Energy Alliance (CNEA), and the financial terms between Canada and CNEA, with emphasis on any incentives or penalties related to the schedule and budget of the proposed undertaking. Sagkeeng also requested information on the respective responsibilities of Canada, CNL, CNEA,

and other parties for the environmental liabilities at the WL site, both now and in the future, and the respective responsibilities of Canada, CNL, CNEA, and other parties to fulfill the fiduciary obligations of Canada to Sagkeeng as they pertain to the proposed undertaking.

Sagkeeng expressed the position that the current application fails to meet both of these requirements and is inconsistent with the federal government's commitment to meaningful reconciliation with Indigenous peoples. Sagkeeng indicated that Canada cannot waive its fiduciary duties to a) honour its prior commitment to remove the radioactive wastes from Sagkeeng lands; and b) ensure Indigenous interests and Aboriginal and Treaty rights are fully considered and protected. Sagkeeng expressed an interest in the history of CNL and how CNL relates to AECL and the WL site.

CNL has shared formal responses to these questions and concerns in January 2020, October 2020, and January 2021. In those responses, CNL explained that information on the financial terms of the CNEA contract could not be shared, as it is commercially sensitive. At this time, Sagkeeng does not accept CNL's position that the financial terms of the CNEA contract cannot be disclosed.

CNL provided an overview of the history of the WL site and explained that Whiteshell Laboratories is a government-owned and contractor-operated facility. The site, including all assets and liabilities, is owned by AECL, a federal government Crown corporation. AECL contracted CNL to operate the facility and perform the decommissioning work. While the ownership of CNL may change (CNEA is the current owner of CNL), CNL will remain the operator and licensee for all AECL sites. For questions related to the duty to consult and reconciliation, CNL referred Sagkeeng to the CNSC and Crown who hold the duty to consult.

CNL has taken steps to address this area of interest to the extent it believes is possible. Should this matter remain a priority area of concern for Sagkeeng, CNL would be prepared to re-engage to provide any further clarifications on their perspective.

Engagement

Sagkeeng had expressed concerns with the lack of meaningful and responsive engagement by CNL in January 2018 and requested a greater role in reviewing draft documentation related to the EIS. Sagkeeng also requested greater involvement in the implementation of the decommissioning plans for WR-1 and into the institutional control period. The community noted that technical results are difficult to understand and that CNL should consider methods to ensure that future updates about the Project will be understandable to community members. Sagkeeng suggested that CNL work with the Chief and Council to promote future engagement activities with the community. In addition, it would make sense to invite on-reserve members by going door to door.

Sagkeeng requested CNL commit funding to support the development and implementation of an Indigenous-led risk communication program designed to improve Indigenous understanding of the site and vicinity risk to the health and edibility of country food and water sources (including radiation, impact pathway identification, monitoring results, and plain language

reporting about the safety of country food and water sources), as well as sharing CNL's annual reports with the community.

To help facilitate greater engagement with Sagkeeng, CNL, Sagkeeng, and AECL have established a Technical Working Group to resolve outstanding concerns and work collaboratively on areas of interest by developing and implementing initiatives that will help address Sagkeeng's concerns on the Project. An agreement was drafted to support Sagkeeng's continued engagement on the Project. CNL will continue to engage meaningfully with Sagkeeng Chief and Council, community members, their engagement team, and their Liaison through the lifecycle of this Project.

During the COVID-19 pandemic, CNL continued to engage Sagkeeng through their consultation team using teleconferences. As circumstances permit, CNL has expanded its engagement focusing on engaging with more of Sagkeeng's membership. CNL and Sagkeeng have also engaged through a subcommittee focused on verifying that EIS documentation accurately reflects Sagkeeng's interests and position.

Sagkeeng acknowledges that CNL has substantively and meaningfully engaged with it on the WR-1 Project, and expects that engagement to continue.

Historical Siting and Operations of the Whiteshell Laboratories Site

Sagkeeng identified concerns regarding the lack of engagement during the siting and operations of the WL site. Sagkeeng has also expressed concern that CNL does not adequately consider associated cumulative effects in the EIS. More specifically, Sagkeeng has asked CNL to integrate into the baseline, information on the pre-existing cumulative effects context, especially for Sagkeeng rights, cultural practices, and traditional land and resource use, Sagkeeng believes that cumulative effects should include historical changes to their territory and potential impacts to Sagkeeng's rights.

CNL and Sagkeeng are working through a subcommittee to review EIS documentation to incorporate Sagkeeng's feedback as much as possible. Regarding Sagkeeng's concern on historical cumulative effects, the issue remains outstanding and unresolved as Sagkeeng disagrees that adequate steps have been taken on this issue. From CNL's perspective, this concern is out of scope of the environmental assessment but commits to supporting a dialogue on the matter of historical siting of the WL site between AECL and Sagkeeng through the Technical Working Group.

Free Prior and Informed Consent (FPIC)

Sagkeeng's view is that the Project must adhere to FPIC and requested that CNL agree to incorporate community consent into the Project, which could be provided in the form of a community vote or other form of consent provision process to be determined by the Sagkeeng community. Sagkeeng's position is that Article 29(2) of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) creates a legally binding requirement to secure Sagkeeng's free, prior and informed consent prior to proceeding with the proposed Project, which will convert the WR-1 site to a permanent hazardous waste disposal facility.

In February 2021, AECL hosted a leadership teleconference with representatives from Sagkeeng, CNL and the CNSC to discuss the principle of FPIC in relation to the Project. During the meeting, CNL and AECL acknowledged Sagkeeng's perspective and indicated their willingness to work collaboratively with Sagkeeng, understanding that while consent is the preferred outcome, the Project will benefit from greater collaboration even where consent is not achieved. CNL and AECL believe that meaningful engagement and participation in decisions that affect Sagkeeng members, their community, and territory is critical to fostering understanding and identifying mutually acceptable opportunities in respect of the Project. The meeting led to further discussions between CNL and Sagkeeng in March 2021 regarding capacity funding to support more direct engagement with Sagkeeng members.

CNL shared with Sagkeeng that while their consent is not required, CNL is working towards achievement of that principle to the extent possible. CNL and Sagkeeng have signed a Contribution Agreement to support Sagkeeng's engagement in the environmental assessment process. CNL continues to seek direction from the community, and work closely with the Liaison, to strengthen engagement with Sagkeeng community members. CNL has made efforts to address this area of interest to the extent possible. CNL is prepared to continue discussing and responding to Sagkeeng's concerns on this issue.

This issue remains outstanding as Sagkeeng continues to maintain its position that Article 29(2) of UNDRIP creates a requirement to secure Sagkeeng's free, prior and informed consent prior to proceeding with the proposed Project.

Rights Impact Assessment

Sagkeeng expressed concern that there was a lack of assessment of potential impacts on Aboriginal and Treaty rights, and their ability to practice their rights in the future. CNL has documented Sagkeeng's concerns and preferred method of decommissioning the WR-1 and defers to the results of CNSC's rights impact assessment for a conclusion on whether Aboriginal and Treaty rights are impacted by this Project. The next step is to engage with Sagkeeng through the Technical Working Group to resolve outstanding concerns and work collaboratively on areas of interest.

Sagkeeng's position remains that the EIS and the approach to engagement should be held to the highest current standard of impact assessment, which is now the Impact Assessment Act.

Psychosocial Impact Assessment

Sagkeeng has expressed in their Psychosocial Impact Assessment Report [9] that the WR-1 ISD option is likely to have incremental adverse psychosocial effects on Sagkeeng's membership, greater than those from other alternative decommissioning means. Sagkeeng's Psychosocial Impact Assessment Report states that CNL must address impacts resulting from past trauma, including the 1960s construction of the WL site, the perception of environmental effects, and the perception that illnesses may be connected with environmental effects.

CNL's leadership held a teleconference with leadership from Sagkeeng and AECL to discuss Sagkeeng's Psychosocial Impact Assessment Report. During the call, CNL offered a sincere apology for its approach and response to the report. CNL and AECL recognized the findings of

Sagkeeng's Psychosocial Impact Assessment Report; more specifically, that the current proposal for ISD is Sagkeeng's least preferred option from a psychosocial impact perspective. In addition, both parties recognized the trauma experienced by Sagkeeng members in relation to the historical siting and ongoing presence of the WL site. Finally, CNL and AECL recognized and acknowledged Sagkeeng as stewards of the land and waters and committed to working with Sagkeeng to develop and implement recommendations arising from the report and the April 6 dialogue. CNL has summarized the psychosocial impact assessment write-up in Section 3.4.1.4.

CNL is committed to working collaboratively with Sagkeeng on developing and implementing the initiatives that will help address Sagkeeng's concerns. These initiatives include the development of a healing and resiliency action plan, which can include or be closely tied to a community-driven risk communication program focused on the health of country foods and waters; an independent Sagkeeng Community Environmental Monitoring Program; a community liaison committee; and a leadership table. CNL, AECL, and Sagkeeng have an agreement in place to support the development of these initiatives. CNL, AECL, the CNSC, and Sagkeeng's Liaison Officer took trauma-informed engagement training as a precursor to developing a Healing and Resiliency Action Plan. Through the Technical Working Group, CNL has agreed to fund the development of the Healing and Resiliency Action Plan to resolve outstanding concerns and work collaboratively on areas of interest.

Sagkeeng remains concerned that the results of the Psychosocial Impact Assessment Report have not been adequately integrated into the effects assessment for human health, well-being and current use of lands and resources for traditional purposes.

Valued Components

Sagkeeng suggests that the draft EIS has neglected to consider the full scope of Sagkeeng's VCs within its assessment, which are necessary for the continued practice of Sagkeeng culture and livelihoods.

The VCs identified within the Sagkeeng Traditional Knowledge and Land Use Study (TKLUS) [10] are: water; medicine, berries and other food plants; hunting and trapping; and Anicinabe Pimatiziwin. As detailed in the TKLUS in Section 3.1 (p. 22), "the VCs were chosen to represent the critical conditions or elements that must be present for the continued practice of Sagkeeng culture and livelihoods, and that may be impacted by the Project. As such, VCs can range from the direct presence of traditionally hunted animals and gathered plants, to continued habitation, travel, and cultural activities on the land."

CNL collected Sagkeeng species and topics of interest from their TKLUS, Alternative Means Assessment, Psychosocial Impact Assessment, general engagement, and verification discussions. The collected information regarding VCs helped CNL assess whether they had considered the effect pathway to those specific VCs in the assessment for the Project. CNL worked with Sagkeeng to verify the list of VCs below accurately captures, to the extent possible, Sagkeeng's species and topics of interest. Sagkeeng provided two rounds of feedback and met with CNL on July 28 and August 24, 2021, to revise the list based on Sagkeeng's feedback. CNL will engage with the Sagkeeng Community Liaison Committee once established

on Sagkeeng's list of related species and topics of interests. Any revisions to this table will be reported in this IER for the public record.

The following list is CNL's understanding of related Sagkeeng species and topics of interest:

- grouse, geese;
- food (e.g., wild rice, wild ginger, blueberries, plums, raspberries, strawberries, pin cherries, Saskatoon berries, low-bush cranberries, gooseberries, chokecherries) and Traditional Medicines (names not included at Sagkeeng's request);
- furbearers, marten, rabbit, squirrel, weasel;
- white-tailed deer, moose, elk;
- sturgeon and sturgeon spawning grounds, sucker, catfish, pickerel, goldeye, sunfish, whitefish, perch, carp, pike, bass, and fish habitat including the Winnipeg River;
- water resources and the Winnipeg River;
- beaver, muskrat, otter;
- groundwater and groundwater interaction with surface waters in the Winnipeg River;
- water resources; drinkable water (i.e., Sagkeeng willingness to drink water directly from the land); Winnipeg River;
- employment and business opportunities; community psychological well-being; environmental and community safety; sense of safety and security on the lands and waters; risk perception regarding the consumption of country foods;
- hunting and trapping; Sagkeeng Anicinabe governance and stewardship, including in relation to protecting and monitoring the land, land tenure and future use; culture and archaeological sites; Anicinabe Pimatiziwin (a complex value which includes tangible, semi-tangible and intangible elements including but not limited to connectedness to land and waters; spirit and spiritual practices/ceremony, knowledge of Sagkeeng territory, inter-generational knowledge transfer, among other cultural continuity factors); Winnipeg River; traditional harvesting of country foods; and
- traditional harvesting of country foods.

CNL has revised each subsection of Section 6.0 of the EIS to clearly reflect how VCs from First Nations and the Manitoba Métis Federation were considered for each effects assessment, where applicable.

Business and Employment Opportunities

Sagkeeng expressed an interest to know more about CNL's procurement policies and potential economic participation opportunities associated with the Whiteshell Laboratories Closure Project, including qualifications. Priority employment and contracts were identified as an important concern and area of interest for Sagkeeng. Sagkeeng also raised the possibility of a certain percentage of the work going to Indigenous companies.

Sagkeeng requested first preference for new or vacant positions and requested a commitment for training to enhance the skills of community members.

CNL adjusted the evaluation criteria for competitive bids to encourage economic participation by contractors that are Indigenous owned or have Indigenous employees or subcontractors. CNL has also sent job postings to Sagkeeng since approximately the mid-1990s. Sagkeeng has provided new contact information (December 12, 2019) and this has been provided to CNL Human Resources for use effective immediately. CNL would welcome applicants from Sagkeeng and will work with Sagkeeng to see how CNL can improve interest and success in recruiting. CNL sent a listing of current and potential future external vacancies as well as criteria for security clearances to Sagkeeng. To help facilitate information sharing, capabilities and opportunities, CNL also supported three "Industry Days" events to connect businesses with invited First Nations and the Manitoba Métis Federation. The industry days were held in Winnipeg, another at the WL site, and a third at the Sagkeeng First Nation Arena. CNL is developing an Indigenous Procurement Strategy to support and enable Indigenous owned business to economically participate in the Whiteshell Laboratories Closure Project.

CNL remains open to procuring Indigenous owned businesses for Project supply chain and enabling involvement in Project work by Indigenous companies. CNL and Sagkeeng will also discuss the current evaluation criteria once Sagkeeng has had an opportunity to review the information. CNL, Sagkeeng, and AECL have established a Technical Working Group to resolve outstanding concerns and work collaboratively on areas of interest such as Business and Employment Opportunities.

Future Land Use and Tenure (End State Planning for the Whiteshell Laboratories Site)

Sagkeeng requested more information regarding future compensation for the Local Government District of Pinawa and the First Nation since portions of the WL site is in Treaty 1 territory. Sagkeeng also requested that all site clean-up and release criteria and deviation of the desired end-state(s) for the Whiteshell Reactor Disposal Facility be developed collaboratively with Sagkeeng. Sagkeeng confirmed their interest in participating in a WL end-state workshop. Sagkeeng asked what impact small modular reactors might have on the site. Sagkeeng reinforced the importance of an Indigenous Liaison or Monitor to provide information back to the community on what will remain in the trenches.

In addition, Sagkeeng requested to be more involved in the drafting and implementation of plans for the duration of decommissioning and into the institutional control period, including the participation in the development and/or review of documents such as the Environmental Risk Assessment, Detailed Decommissioning Plans and final safety assessment for the remediation of the trenches, as well as an appropriate institutional control framework.

CNL explained that the liability and land remain under the ownership of AECL. CNL and AECL will engage Sagkeeng to discuss potential future uses of the WL site.

CNL also provided information on the community regeneration partnership that was formed to develop both nuclear and non-nuclear opportunities for the WL site after the site is decommissioned. CNL participates in and supports the partnership and has invited Indigenous communities to join. Sagkeeng began sending representatives to these meetings.

CNL committed to engaging bilaterally with Sagkeeng and other First Nations, the Manitoba Métis Federation, local communities and stakeholders to co-develop future land use objectives, as well as engage on the end-state of the W site as part of the Whiteshell Laboratories Closure Project. CNL, Sagkeeng, and AECL have established a Technical Working Group to resolve outstanding concerns and work collaboratively on areas of interest. CNL will continue to engage meaningfully with Sagkeeng Chief and Council, community members, their engagement team, and their Liaison through the lifecycle of this Project.

Waste Management

Sagkeeng raised concerns and questions regarding how much radioactive waste would remain on the WL site and where and how that radioactive waste was being transported off-site. In response, CNL informed Sagkeeng that all waste materials (radioactive and non-radioactive) are sorted, verified, and transported using licensed containers, depending on the waste type, to a licensed hazardous waste management facility. CNL expects that approximately 2000 truckloads will need to be shipped throughout the Whiteshell Laboratories Closure Project. CNL explained that the used fuel baskets contained in the concrete canisters will be placed in a transportation flask and transported by truck. CNL also explained that radioactive material has been transported between CNL's WL site and Chalk River Laboratories site for many decades without a single radiological incident. Transportation of radioactive materials is a highly regulated activity that must meet the stringent requirements of both Transport Canada (Transportation of Dangerous Goods) [13] and the Canadian Nuclear Safety Commission (Packaging and Transport of Nuclear Substances Regulations) [14] prior to approval. CNL's approved Radioactive Material Transportation Program [15] is in place to protect persons, property, and the environment from the effects of radiation during the transport of radioactive material. CNL also provided details on site waste management and waste characterization in response to Sagkeeng's comments on the 2017 and 2020 draft EIS.

Sagkeeng expressed that it would be best if all waste from WR-1 were removed from the WL site. In general, Sagkeeng expressed substantial and consistent concerns regarding deviation from the Comprehensive Study Report (CSR) completed in 2001, which proposed full removal of WR-1 [16].

CNL has taken steps to address this area of interest to the extent possible. Sagkeeng and CNL disagree on the preferred approach to decommissioning for WR-1, based on the findings of their respective Alternative Means Assessments. CNL, Sagkeeng, and AECL have established a Technical Working Group to resolve outstanding concerns and work collaboratively on areas of interest. CNL will continue to engage meaningfully with Sagkeeng Chief and Council, community members, their engagement team, and their Liaison through the lifecycle of this Project.

Future Monitoring

Sagkeeng expressed an interest in learning about future monitoring of the site, including the duration of monitoring activities and where monitoring would occur. In particular, Sagkeeng thought that there should be monitoring at locations where members fish, and monitoring locations closer to the community. Sagkeeng also expressed concern that a lack of Traditional

knowledge informed environmental monitoring and explained that Indigenous environmental monitoring was a critical element of Sagkeeng stewardship and Indigenous-led risk communication with members. Sagkeeng requested a commitment from CNL regarding an independent, long-term future monitoring program to be designed and led by Sagkeeng (a Community Environmental Monitoring Program).

CNL and Sagkeeng have both agreed that Sagkeeng's involvement in monitoring could help address other concerns including reducing fear and stigma of the site regarding the proposed ISD for WR-1, and improved faith in country foods and understanding of the environment and effects from the WL site, through collection of baseline and trend-over-time Traditional Knowledge in a dedicated, continuous fashion. CNL committed to establishing a Community Environmental Monitoring Program with Sagkeeng. CNL has agreed to work with Sagkeeng through a Technical Working Group to establish this environmental monitoring program that will include Indigenous-led risk communication and country foods monitoring with Sagkeeng members. These commitments are also referenced in Section 11.4 (Indigenous Engagement and Participation in Environmental Monitoring) of the EIS.

In addition, CNL sent Sagkeeng CNL's 2020 summer and fall monitoring schedule and supported Sagkeeng's Liaison Officer's participation in on-site environmental monitoring activities. In June 2022, Sagkeeng, CNL and AECL agreed in principle to support Community Environmental Monitoring Program. The parties have developed a budget and agreed on a scope of work, and in the fall of 2022, Sagkeeng will begin execution of the monitoring work plan.

Fish, Fish Habitat, and the Winnipeg River

Sagkeeng expressed concern about the perceived deterioration of fish quality in the Winnipeg River. This included the observation of unusual sores on some fish. Sagkeeng also expressed an interest in being more involved in water quality and fish monitoring on site.

In late 1994, the Winnipeg River Task Force was created. Representatives from Indian and Northern Affairs Canada, Environment Canada, Health Canada, and Sagkeeng took part in the Task Force. The objective of the Task Force was to look at potential sources of Winnipeg River water quality degradation near the community of Sagkeeng. The Task Force report concluded that the drinking water quality met Canadian guidelines and that it was unlikely that the WL site had ever posed or would pose a significant threat to the health of Sagkeeng community members.

CNL has committed to the development and execution of an independent Sagkeeng Community Environmental Monitoring Program. CNL has agreed to work with Sagkeeng through a Technical Working Group to establish this community environmental monitoring program that will include Indigenous-led risk communication and country foods monitoring with Sagkeeng members. These commitments are outlined in Section 11.4 of the EIS.

Regulatory Process

Sagkeeng expressed concern regarding limited funding provided by CNSC for review and participation in the Project. In addition, Sagkeeng expressed an interest in further opportunities for involvement in the Project.

In order to ensure meaningful engagement on the Project, CNL provided capacity funding and support to Sagkeeng beyond the funding provided by CNSC and committed to providing funding to Sagkeeng as needed throughout the environmental assessment process.

CNL considers this concern addressed to the extent possible at this time and will work with Sagkeeng should funding concerns arise.

In Situ Disposal Design of WR-1

Sagkeeng expressed that they are not confident that the proposed decommissioning method for the Project is adequate or preferable. Sagkeeng's position is that WR-1 should be dismantled as described in the 2001 CSR [16]. Sagkeeng expressed an interest in understanding how the grouted encapsulation would maintain its integrity into the future. Topics of interest to Sagkeeng included the potential for climate change and natural disasters to affect the integrity of the grouted encapsulation and how it would be constructed to ensure that it is safe. Participants at the community open house were interested in various aspects of the Project. Questions were asked regarding the existence of similar projects, the differences in costs between the original removal decommissioning plan and the ISD and the safety of ISD in connection with the environment. CNL discusses the cost of all the alternatives in more detail in Section 2.6.2 (Economic Feasibility) of the EIS.

CNL provided a detailed response on how the different barriers of the in situ design ensure the waste is properly contained and isolated from the environment. This was done through written responses, in January 2020, October 2020, and January 2021, to Sagkeeng's draft EIS comments, through presentations to community members and consultants, and through dialogue at community and leadership meetings. CNL also provided additional information on the safety case as well as the grout formulation and process.

CNL supported Sagkeeng to undertake their own Alternative Means Assessment; on e that assessed and measured the alternatives based on Sagkeeng values. On October 19, 2020, Sagkeeng provided a copy of their Alternative Means Assessment [12]. Sagkeeng's Alternative Means Assessment is discussed below in this section, and in Section 3.4.1.3.

This issue remains outstanding. CNL respects that Sagkeeng has a different opinion on the most suitable decommissioning approach for WR-1. CNL will continue to submit the EIS for the Project through the environmental assessment process while supporting Sagkeeng's continued participation in the environmental assessment process. CNL and Sagkeeng recognize this difference of perspectives, and have committed to work collaboratively with each other to mitigate outstanding concerns related to this topic, to the extent possible.

Traditional Knowledge and Land Use and Cultural Heritage

Sagkeeng expressed an interest in conducting a traditional use study as they identified specific traditional uses in proximity to the Project study area and the larger WL site. Specifically, Sagkeeng identified that wild rice and medicinal plants are collected by Sagkeeng members in the area near the WL site. CNL and CNSC agree that a Traditional Knowledge study is an important input to the EIS and the Rights Impact Assessment (led by CNSC and Sagkeeng). Therefore, CNL supported Sagkeeng's TKLUS and incorporated findings into the revised draft

EIS. CNL also partnered with Sagkeeng to complete a traditional food consumption study of which 35 members of the community responded, helping CNL confirm that the Harvester model is a conservative model for modern day Indigenous people that rely on harvesting for some of their food.

Sagkeeng suggested that the draft EIS was inadequate based on a lack of meaningful engagement with Sagkeeng in establishing a baseline or conducting an effects assessment or in considering Sagkeeng VCs. Sagkeeng noted that the way the draft EIS was completed was not in keeping with the expectations for acceptable practice established by the Crown in the manner of assessing traditional land use and the assessment should have considered historic/cumulative issues. Sagkeeng expressed the position that the spatial boundaries of the assessment are inappropriate for assessing potential impacts to the current use of lands and resources for traditional purposes. Sagkeeng expressed the position that CNL effectively ignored critical factors that influence decisions by land users, relying entirely on biophysical factors while ignoring Indigenous observations and perceptions critical to use (and loss of use) of areas of traditional territory.

In response to Sagkeeng's above feedback, CNL collected Sagkeeng species and topics of interest from their TKLUS [10], Alternative Means Assessment [12], Psychosocial Impact Assessment [9], general engagement and verification discussion. The collected information regarding VCs helped CNL assess whether they had considered the impact pathway to those specific VCs in the assessment for the Project. CNL worked with Sagkeeng to verify the list of VCs accurately captures, to the extent possible, Sagkeeng's species and topics of interest. Sagkeeng provided two rounds of feedback and met with CNL on July 28 and August 24, 2021, to revise the list based on Sagkeeng's feedback. CNL will engage with the Sagkeeng Community Liaison Committee, once established, on Sagkeeng's list of related species and topics of interests. Any revisions to Sagkeeng's VCs will be reported in future updates for the public record. CNL has revised each subsection of Section 6.0 to clearly reflect how VCs from Indigenous communities were considered for each effects assessment. CNL has also revised Section 6.8 of the EIS to include information from Sagkeeng's TKLUS.

In Sagkeeng's review of Section 6.8(Land and Resource Use) of the EIS, Sagkeeng stated the use of a "Base Case" tied to current damaged conditions rather than prior conditions or a desired condition set for decommissioning, led CNL to find no adverse effects pathways. Sagkeeng also is concerned in regard to Section 6.7 (Human and Ecological Health) of the EIS, stating the use of a damaged baseline and the lack of any reference to the proper base case to compare the Project against, which is the commitment made by Canada to remove all the radioactive components from WR-1, as per the CSR [16]. In Sagkeeng's review of Section 6.9 (Socio-economic Environment) of the EIS, Sagkeeng raised concerns regarding the socio-economic assessment, including but not limited to how CNL defines community well-being in a way that leaves out quite a number of elements that Sagkeeng use to characterize community well-being.

Sagkeeng also noted that CNL defined spatial areas by administrative boundaries as opposed to where impacts are expected; the clearest example of this is that the people of Fort Alexander are among the populations most likely to be subject to adverse socio-economic effects, and

most deserving (through the principle of impact equity) of benefits from the Project, but Sagkeeng is put only in the regional study area for the socio-economic assessment, not the local study area. Sagkeeng stated this is inappropriate as the distance of residence is not the sole defining element of local and regional study areas for socio-economic assessment, especially for Indigenous peoples with Treaty rights in the immediate Project affected area. Indigenous peoples have the right to travel to, through, and use, all areas of their traditional territories. Specifically, CNL's assessment does not disaggregate down into sub-populations and/or differential effects on different groups within communities. Sagkeeng expressed concern that CNL only consider Sagkeeng members in Fort Alexander, not off-reserve populations.

Sagkeeng stated that CNL's baseline on Sagkeeng perspective and observations lacks depth and that CNL's assessment on the socio-economic environment does not capture Sagkeeng's psychosocial concerns or the results of Sagkeeng's psychosocial impact assessment [9]. For more information on Sagkeeng's psychosocial impact assessment report refer to Section 4.2.4.1.4 of the EIS [6]. More specifically Sagkeeng stated the absence of Indigenous indicators of well-being, even when some of those factors were clearly mapped in the Sagkeeng psychosocial impact assessment, is highly problematic.

Sagkeeng expressed concern that the absence of trend-over-time data for a variety of indicators makes it impossible to determine whether the "health" of an indicator is getting better or worse over time in CNL's socio-economic environment assessment. Sagkeeng did not find it acceptable for CNL not to have identified Indigenous determinants of health and verified them with Sagkeeng.

In response to Sagkeeng's feedback on the sections of the EIS, CNL revised the sections of the EIS to incorporate Sagkeeng's feedback, prior to submission of the draft EIS. CNL provided detailed responses to each of Sagkeeng's comments and provided an explanation if their comments were not incorporated into the EIS.

This issue remains outstanding as Sagkeeng has indicated that CNL's EIS does not adequately capture all impact pathways (primary and secondary) on Sagkeeng traditional use and cultural values in the environmental assessment.

Alternative Means Assessment

Sagkeeng continues to have strong reservations with ISD and the way in which CNL conducted its Alternative Means Assessment. Sagkeeng states that ISD is not preferred over the previous full removal plan, and has called for CNL to re-engage Sagkeeng on Alternative Means Assessment in a collaborative forum. This concern remains outstanding. Sagkeeng's most preferred decommissioning method for WR-1 is immediate full removal and Sagkeeng's least preferred decommissioning method is ISD, based on community input and the findings of Sagkeeng's Alternatives Means Assessment [12] and Psychosocial Impact Assessment [9]. Sagkeeng's position is that as a result of Article 29(2) of UNDRIP and customary international law, the Project is not permitted to go forward without Sagkeeng's free, prior and informed consent.

This issue remains outstanding. CNL, Sagkeeng, and AECL have established a Technical Working Group to resolve outstanding concerns and work collaboratively on areas of interest. CNL will continue to engage meaningfully with Sagkeeng Chief and Council, community members, their engagement team, and their Liaison through the lifecycle of this Project.

3.4.1.3 Sagkeeng's Alternative Means Assessment

Below is a brief summary of CNL's engagement with Sagkeeng with respect to Sagkeeng's Alternative Means Assessment. A complete description of CNL's considerations of Sagkeeng's Alternative Means Assessment [12] is included in Section 2.8 of the EIS.

Sagkeeng submitted 22 comments on the draft EIS on the Alternative Means Assessment conducted by CNL and has indicated the importance of engaging on Project alternatives in a meaningful way. Additional comments were submitted at the Sagkeeng Alternative Means workshop in February 2019, in a letter in June 2019, a letter from Sagkeeng in February 2020, and reinforced during a meeting in March 2020. Sagkeeng remains critical of the approach taken under CEAA 2012 by CNL to evaluate Project alternatives, particularly concerning a lack of Sagkeeng's perspectives included in the Alternative Means Assessment. CNL respects the importance of this issue to Sagkeeng and subsequently supported Sagkeeng to undertake their own Alternative Means Assessment; one that assessed and measured the alternatives based on Sagkeeng values.

On October 19, 2020, Sagkeeng provided a copy of their Alternative Means Assessment [12]. The Sagkeeng assessment draws the conclusion that based on results of their assessment, the ISD option ranked lower than the other alternatives for 7.5 of the 8 tests they conducted, and that it "…brings into question the appropriateness of CNL's preferred alternative for remediation of WR-1". In the document, Sagkeeng is calling for CNSC to "reject the proposal to change the decommissioning plan to ISD". CNL respects the independent view of Sagkeeng on potential alternatives for the Project.

A copy of the Alternative Means Assessment is included as a separate attachment to the EIS package submitted to the CNSC. For more information on Sagkeeng's Alternative Means Assessment see Section 2.8 of the draft EIS.

3.4.1.4 Sagkeeng's Psychosocial Impact Assessment

This subsection provides an overview of CNL's understanding and considerations of Sagkeeng's Psychosocial Impact Assessment [9]. For details on CNL's engagement with Sagkeeng refer to Section 4.2.4.1 of the EIS and Section 3.4.1.1 in this report.

3.4.1.4.1 Introduction and Context

An important element of the EIS submission is documenting feedback and information supplied by Sagkeeng that is relevant to the proposed Project. While CNL defers to the results of the rights impact assessment process for a conclusion on whether Aboriginal and Treaty rights are impacted by this Project, Sagkeeng's Psychosocial Impact Assessment report is an important

contribution of technical data and Traditional knowledge that contributes to the overall body of information of interests and concerns that Sagkeeng has expressed through engagement.

To better understand Sagkeeng's concerns regarding the psychosocial impacts that Sagkeeng associates with the WL site and predicts may result from the Project, the CNSC supported Sagkeeng's preparation of a psychosocial impact assessment. Sagkeeng commissioned Narratives Inc. to conduct the Psychosocial Impact Assessment of the Project. The study includes an account of experienced historical impacts, psychosocial impacts from WL's presence in the area, and psychosocial impacts expected to occur from each alternative[4] currently in consideration. The four alternatives considered as decommissioning options for WR-1 include the four identified by CNL as technically and economically feasible: *Alternative #1 – Deferred Dismantling and Removal*; *Alternative #2 – Dismantling and Removal; Alternative #3 – In Situ Disposal; and Alternative*; *#4 – Partial Dismantling and Removal with In Situ of the Remainder.* Sagkeeng's psychosocial impact assessment gathered information through a literature review and twenty-six semi-structured interviews with community members. In addition, thirteen Sagkeeng members participated in a psychological assessment conducted by a clinical psychologist.

The interviews conducted included prompting questions about the WL site. The overwhelming sentiment shared was regarding the confusion and fear related to nuclear in general; the expressed concerns about the use of a nuclear reactor and waste in Sagkeeng's territory; and the lack of engagement with Sagkeeng on the siting and operations of the WL site [9]. One community member succinctly drew the connection between the secrecy and historic lack of consultation or engagement surrounding the WL site on the one hand, and negative feelings of self-worth, family cohesion, and traditional lifestyle on the other (Narratives, 2020) [9].

The study recommended that addressing psychosocial impacts of any of the Project Alternatives should focus not only on mitigating past harm but also on preventing future harm. It was assessed that Alternatives #1, #3, and #4 neither mitigate past harm nor prevent future harm, and thus sustain the status quo. If appropriate measures were in place and the fear associated with potential risks during the process of dismantling was addressed, Alternative #2 offers an opportunity to prevent further harm, and allow the community to start healing. Alternative #3 does offer some immediate waste removal action that would be beneficial from a psychosocial perspective, but the presence of radioactive material in the long term will continue to be a source of significant distress. Similar sentiments were expressed in the report for Alternative #4. Overall, the study found that Alternative #3 (In Situ Disposal) was the least preferable option from a future trauma reduction perspective.

The study recommended that the following actions would contribute to a reduction in Sagkeeng's psychosocial impacts:

1. building a trauma-informed decision-making model;
2. building a Healing and Resiliency Plan;

[4] For more information on CNL's Alternative Means Assessment and each of the four alternatives considered technically and economically feasible, please refer to Chapter 2.0 of the EIS.

3. building a long-term monitoring program with “extensive involvement” for Sagkeeng members;
4. providing capacity and access to independent expertise on an ongoing basis; and
5. actively investing in improving the psychological wellbeing of Sagkeeng members.

3.4.1.4.2 CNL’s Considerations of the Report

CNL has engaged Sagkeeng’s leadership, consultation team, and the psychosocial impact assessment author as well as carefully reviewed the findings of Sagkeeng’s Psychosocial Impact Assessment [9]. CNL’s understanding of potential impacts of the Project and understanding of Sagkeeng’s perspectives has evolved over time with support and guidance from Sagkeeng.

Sagkeeng’s concerns include the potential for ongoing fear and avoidance for land use if in situ decommissioning is conducted instead of full dismantling and complete removal of all waste from the land.

CNL acknowledges and accepts the findings in the report and recognizes that Sagkeeng community members have experienced psychosocial impacts that stem from the presence of the WL site in Sagkeeng’s traditional territory and other sources of trauma. Based on the study and the separate findings of Sagkeeng’s Alternative Means Assessment [12], Sagkeeng believes that the best option for community healing arises from complete and immediate removal of all waste from the site and that the proposed ISD option for WR-1 is likely to continue to contribute to psychosocial trauma for Sagkeeng members.

CNL recognizes that members of Sagkeeng are stewards of the lands and waters of their traditional territory, which includes the area now covered by the WL site, which was established by the federal government in the early 1960s. Sagkeeng states this alteration to the land reduced access and created alienation effects at and around the WL site, reducing Sagkeeng’s access to and enjoyment of portions of its traditional territory up to the present day, and impacting Sagkeeng’s Treaty and aboriginal rights. CNL also recognizes that the establishment of the WL site, while compliant with regulatory standards at that time, would not meet the engagement and consultation standards that exist today. Sagkeeng has stated this process disconnected Sagkeeng from its traditional territory and the lack of engagement throughout the operations of the site, particularly around spills into the river, perpetuated fear and stigma around the WL site. This resulted in a mistrust in the management of the site.

CNL is committed to building trust and maintaining open, transparent communication with Sagkeeng’s leadership and members, particularly around issues that arise on the WL site that may influence the water quality of the river. CNL understands that ceremony is a very important part of Anicinabe way of life and is seeking guidance from Turtle Lodge and the Sagkeeng Anincinabe First Nation on how best to incorporate ceremony into the decommissioning and engagement plans for WR-1 and for the WL site.

The study recommends that addressing psychosocial impacts of any of the alternatives for WR-1 should focus not only on mitigating past harm, but also on preventing future harm. CNL recognizes that the proposed in situ option for decommissioning WR-1 does not support

optimum healing, and that additional support to Sagkeeng is required to adequately address their concerns regarding the Project.

CNL acknowledges that its actions and engagement alone may not improve perceptions of the proposed Project and WL site, and remains committed to ongoing engagement, cultural training and learning from Sagkeeng about how best to reduce fear and stigma and address any potential impacts from the site. CNL recognizes the role it needs to play in supporting the reduction of fear and stigma associated with the nuclear industry, the WL site, and helping Sagkeeng reduce any potential trauma among its members in relation to the proposed in situ decommissioning of WR-1.

3.4.1.4.3 Addressing Sagkeeng Psychosocial Impacts

The Psychosocial Impact Assessment Report [9] attributes psychological trauma with each alternative, with the least amount of trauma associated with Alternatives #1 and #2. As stated above, the report indicates that Alternative #3 offers some immediate removal action that would be beneficial from a psychosocial perspective, however according to the report the presence of radioactive material in the long term would continue to be a source of significant distress. CNL believes Alternative #3 is the best option from a technological, practicable, safety to workers, and economic perspective; and provides protection to the public and the environment. Recognizing Alternative #3 is the least favoured option from Sagkeeng's perspective; CNL is committed to working collaboratively with Sagkeeng to develop and implement mitigation measures that are meaningful to Sagkeeng and will help to address Sagkeeng's concerns and ongoing/residual trauma.

As a starting place, Sagkeeng's consultation team, CNL, and AECL have established a Technical Working Group to work together to develop and implement initiatives that will help address Sagkeeng's concerns regarding the Project. The Technical Working Group has agreed to move forward on the following initiatives to help address Sagkeeng's concerns: a Healing and Resiliency Action Plan; a community liaison committee; a leadership table between Sagkeeng, AECL, and CNL; and development and execution of Sagkeeng's Community Environmental Monitoring Program that will include country foods monitoring, and a community-led risk communications program, that is co-developed by Sagkeeng, CNL, and AECL.

In September 2021, CNL coordinated trauma informed engagement training for Sagkeeng, CNL, AECL and CNSC representatives to support the development of a Healing and Resiliency Action Plan. Following the training, CNL shared trauma informed training materials with Sagkeeng representatives. When the parties agreed to support the development of a Sagkeeng Community Environmental Monitoring Program, Sagkeeng acknowledged that the Monitoring Program is part of a recommended approach to addressing fear and stigma[5].

[5] Just prior to submission of the EIS, on November 2, 2022, CNL and AECL agreed to fund Sagkeeng's revised Healing and Resiliency Plan.

3.4.1.5 Verification

CNL incorporated feedback through engagements with Sagkeeng on the Project, their TKLUS [10], Psychosocial Impact Assessment Report [9], Alternative Means Assessment Report [12], and country foods harvest survey [11]. To confirm CNL has adequately captured Sagkeeng's interests and concerns, position, and knowledge, CNL and Sagkeeng underwent a verification process whereby CNL provided EIS documentation, which included a summary of interests and concerns table, a list of Sagkeeng's Valued Components, and sections of the EIS, to Sagkeeng for their review and feedback. Upon receiving feedback on a document, CNL and Sagkeeng's Consultation Team met to confirm CNL's understanding of Sagkeeng's feedback, seek clarification where needed, and review CNL's proposed responses. Through this process, Sagkeeng has reviewed and provided feedback from their summary of interests and concerns table, list of VCs, Alternative Means Assessment write-up, psychosocial impact assessment write-up, Section 2.0, Section 4.0, Section 6.0, and Section 11.0. While not all of Sagkeeng's concerns were addressed by this process, CNL made every effort to verify that Sagkeeng's position, interests, and concerns were adequately characterized. Sagkeeng has indicated that it will further review the EIS when filed against comments made by Sagkeeng during this pre-filing period and will report to the CNSC thereafter. CNL continues to work with Sagkeeng to address their concerns through the Technical Working Group.

For specific engagement related information on the verification process, see EIS Section 4.2.4.1.1 – Engagement [6], or see Appendix 4.0-1.

3.4.1.6 Next Steps

CNL values how the relationship between Sagkeeng and CNL has grown and believes CNL's collective engagement efforts and collaboration through the Technical Working Group table and subcommittee have contributed positively to the environmental assessment of WR-1 and the Whiteshell Laboratories Closure Project more broadly.

CNL will continue to work with Sagkeeng on the environmental assessment for WR-1 to address their concerns in a way that is meaningful to Sagkeeng. As determined through the leadership meeting with Chief Henderson in April 2021, this included establishing a Technical Working Group between AECL, CNL, and Sagkeeng to implement the following initiatives:

- Development of a community advisory committee;
- Development of a Healing and Resiliency Action Plan;
- Development of a leadership table among Sagkeeng, AECL, and CNL; and
- Development of a meaningful Sagkeeng Indigenous monitoring program at and around the WL site.

Through the persistent efforts of the Technical Working Group, CNL, AECL, and Sagkeeng have made significant progress towards successful implementation of three of the four initiatives listed above. CNL has supported the development of the Community Liaison Committee and has now moved into a support role. On July 18, 2022, CNL hosted Sagkeeng's Community Liaison Committee for an on-site tour of the WR-1 and the WL site. CNL and Sagkeeng have

agreed to coordinate leadership tables as necessary and when key relationship milestones are reached. In September 2022, CNL and AECL agreed to provide funding support for the development and execution of a Sagkeeng Community Environmental Monitoring Program, to the development of a meaningful Sagkeeng community driven monitoring program at and around the WL site.

CNL and AECL are convening a meeting in October to further discuss the Healing and Resiliency plan, and where AECL and CNL may fit within the scope of what is proposed.

Next steps in engagement on the Project include developing a list of commitments that will be submitted to the CNSC, and re-engaging on the 2017 and 2020 EIS comments and responses table to update responses to reflect recent engagements and commitments. Once the commitments list is completed, CNL will work with Sagkeeng to also complete the final columns of the summary of interests and concerns table.

CNL will continue engagement with Sagkeeng to address or resolve outstanding issues or concerns to the extent possible regarding the Project, and has demonstrated its commitment to ongoing engagement and relationship-building to support discussions regarding the future land use of the WL site.

3.4.2 Manitoba Métis Federation

The Manitoba Métis Federation is the democratically elected self-government representative of the Manitoba Métis also known as the Red River Métis, an “Aboriginal peoples” under Section 35 of the Constitution Act, 1982 and currently includes the Manitoba Métis Federation Inc., a non-share corporation incorporated pursuant to the laws of Manitoba. Founded in 1967, the Federation has over 650 staff across the province [18].

The Manitoba Métis Federation represents and advances the interests of the Red River Métis and uses an electoral process where all formal positions are elected by Federation members in each designated Region or Local. Governance includes: a President, Board of Directors, regional associations or “Regions” and community-level “Locals”.

A map of the Manitoba Métis Federation is provided in Appendix D.

The President functions as the Federation leader, and spokesperson and Chief Executive Officer. This position oversees day-to-day Federation operations and is elected through a province-wide election every four years. A Board of Directors, comprised of 23 democratically elected members, provides guidance, leadership and management toward Federation (and its subsidiaries) policies, objectives and strategic direction. Seven Regions across Manitoba are administered by a vice-president and two executive officers, who are also of the Federation’s Board of Directors, and who administer programs and services independently to their specific geographic area. Each Region comprises various Locals. These are administered by a chairperson, a vice-chairperson and a secretary-treasurer, and have a minimum of nine members that meet at least four times a year. Each Red River Métis citizen belongs to a Local. Specific Locals determine the timing of election of their respective Local representatives, while Regional officers are elected every four years [18].

Since 2016 when CNL started engaging Manitoba Métis Federation on the proposed ISD of WR-1, Manitoba Métis Federation's position has remained that complete removal and remediation (i.e., CNL's Alternative #2) of WR-1 should be selected as the decommissioning method for WR-1.

CNL has committed to involving the Manitoba Métis Federation and its citizens in the environmental monitoring for the long-term at the WL site. CNL will be collaborating with the Manitoba Métis Federation and other Indigenous nations to ensure it aligns with the Nation's expectations and interests. CNL and the Manitoba Métis Federation held a teleconference on March 23, 2021, to discuss a Relationship Agreement including funding a Liaison position, and participation in annual environmental monitoring. CNL committed to developing a Relationship Agreement with the Manitoba Métis Federation.

Throughout the environmental assessment process for WR-1, CNL has engaged with the Manitoba Métis Federation to share information and build awareness about the proposed ISD of WR-1, understand the Manitoba Métis Federation's Aboriginal and Treaty rights, and main concerns and interests regarding the Project to determine how CNL and the Manitoba Métis Federation can work collaboratively to address the Manitoba Métis Federation's concerns.

Overtime, CNL has strengthened its relationship with the Manitoba Métis Federation, which has led to more engagements on the broader Whiteshell Laboratories Closure Project and better understanding of the Manitoba Métis Federation's concerns, potential impacts, and collaborate on ways to help address these concerns of the Project. In 2021, the Manitoba Métis Federation and CNL participated in a series of technical workshops on specific areas of interest to the Manitoba Métis Federation on the Project. Workshops included an overview of the in situ design, proposed groundwater monitoring program, the broader site's environmental protection program, the WR-1, Alternative Means Assessment, and opportunity for collaboration. The workshops facilitated greater understanding of the concerns and interest of the Manitoba Métis Federation. As a result of the workshops, CNL committed to incorporating an additional ground monitoring station between WR-1 and the river as part of their post-closure monitoring program.

CNL and the Manitoba Métis Federation have also identified initiatives that would help address the Manitoba Métis Federation's concerns of the Project and are working toward finalizing a Relationship Agreement to support the development and implementation of these initiatives. These initiatives include the development of a Liaison position and a discussion table that will meet regularly until the decommissioning of the Project is complete, and the WL site is closed. Other initiatives include a leadership table between the Manitoba Métis Federation and CNL, support to meaningfully participate in onsite monitoring, and the establishment of a communication protocol to notify the Manitoba Métis Federation of any reportable event at the WL site that may have off site impacts.

CNL and the Manitoba Métis Federation have been working collaboratively to develop and implement these initiatives as well as to continue to strengthen their relationship. At the time of submission, CNL and the Manitoba Métis Federation near executing a Relationship

Agreement that will support the resolution of outstanding Manitoba Métis Federation concerns.

3.4.2.1 Engagement

CNL first reached out directly to the Manitoba Métis Federation in November 2016, after sending a formal letter requesting their government's input on the WR-1 Decommissioning Project. The Manitoba Métis Federation and CNL had an introductory meeting in November where CNL provided an overview of their proposed change to the decommissioning of WR-1.

In 2017, CNL and the Manitoba Métis Federation continued to engage in discussions about WR-1 via teleconferences, site tours, and attending Manitoba Métis Federation's Annual General Assembly. CNL set up a booth at Manitoba Métis Federation's Annual General Assembly and spoke directly to Red River Métis citizens about the Project. CNL sent notification of the public comment period on the draft EIS and invited the Manitoba Métis Federation to engage. The Manitoba Métis Federation participated in a site tour and discussion on WR-1 decommissioning, and environmental risk assessment.

In September 2017, CNL provided an opportunity for five members from each First Nation community and the Manitoba Métis Federation to attend a full day workshop to both learn and share on how CNL and the Nation communities collectively protect and care for the environment. The goal was to provide some hands-on experience coupled with ample discussion, learning and dialogue on opportunities moving forward both as a career option and as a relationship between the site and the First Nations and the Manitoba Métis Federation. On October 31, 2017, CNL's Annual Safety Reports were distributed to each First Nation community including the *Environmental Monitoring in 2016 at Whiteshell Laboratories* [19] report, and the *2016 Progress Report on the Environmental Assessment Follow-up Program for Whiteshell Laboratories* [20]. CNL also provided an invitation to engage on these documents.

In 2018, the Manitoba Métis Federation, CNL, and CNSC set up a monthly recurring meeting to provide updates and discuss topics of interest. In 2018, there were seven update meetings. The Manitoba Métis Federation also participated in the Benchmarking trip to Hallam, Nebraska, to learn more about ISD. In March 2018, CNL and the Manitoba Métis Federation signed a Contribution Agreement to further support the Manitoba Métis Federation's continued engagement in the environmental assessment process of the Project. At the end of 2018, the Manitoba Métis Federation participated in a tour of WR-1.

In 2019, the Manitoba Métis Federation completed their Traditional Knowledge, Land Use, and Occupancy Study (TKLUOS) [21]. Also in 2019, CNL, CNSC, and the Manitoba Métis Federation met eight times as part of their monthly meeting updates. In March, CNL and the Manitoba Métis Federation discussed actions identified in the TKLUOS. In August 2019, the Manitoba Métis Federation and CNL signed a Contribution Agreement for the Manitoba Métis Federation to observe environmental monitoring activities. One of the Manitoba Métis Federation's recommendations on CNL's environmental protection program was to include mushroom collection into their sampling program. CNL has since adjusted its environmental protection program to include mushroom collection and CNL continues to look for additional ways to

improve their monitoring program. The Manitoba Métis Federation also participated in fall monitoring activities. At the Manitoba Métis Federation's 2019 Annual General Assembly, Minister Park, the Manitoba Métis Federation Minister of Energy & Infrastructure, spoke about CNL and indicated that it was an example of a positive relationship with the Manitoba Métis Federation and acknowledged CNL's work with the Manitoba Métis Federation on environmental monitoring.

In 2020, the Manitoba Métis Federation, CNL, and CNSC participated in six monthly update meetings at the start of the year, discussing interests in participating in an Indigenous Advisory Committee, environmental monitoring, and developing a long-term Relationship Agreement. In July, the Manitoba Métis Federation observed a waste shipment from pre-job to completion of loading. In August 2020, CNL provided responses to the Manitoba Métis Federation's comments on the draft 2017 and 2020 EIS.The Manitoba Métis Federation and CNL also met that month to introduce CNL's new Indigenous Engagement Officer and discuss the Manitoba Métis Federation's comments on the Indigenous Advisory Committee Participation Agreement. In September, CNL provided a list of all fall monitoring activities and invited the Manitoba Métis Federation to participate. Following this e-mail, the Manitoba Métis Federation participated in mushroom sampling on site alongside CNL's environmental technicians.

On October 14, 2020, CNL received Métis Cultural Awareness Training provided by the Louis Riel Institute. While this was not a direct engagement with the Manitoba Métis Federation, the training increased CNL, AECL and CNSC participants' knowledge on Métis history, culture, and the role of the Métis in the formation of Manitoba. Later that month, a Red River Métis representative visited the WL site and observed CNL's environmental technicians process fish. CNL's environmental specialist also provided an overview of CNL's environmental protection program.

At the end of the month on October 26, 2020, CNL hosted a teleconference with the Manitoba Métis Federation to discuss their comments on the draft EIS. The purpose of the meeting was to seek clarification on the Manitoba Métis Federation's comments and have a discussion on how CNL can address their concerns. During the meeting, a number of technical and non-technical workshops were suggested. The purpose of these workshops was to try to resolve outstanding concerns presented in the Manitoba Métis Federation's EIS comments. In the meeting notes, CNL provided draft agendas for each proposed workshop including draft participant lists, tentative dates, suggested background reading, and draft purpose statements for each workshop. Over the course of the next several months, CNL and the Manitoba Métis Federation planned a series of four workshops and one technical wrap-up meeting. The workshops focused on topics such as exploring opportunities for collaboration, in situ design and Alternative Means Assessment, ground water flow and ground water well placement, and CNL's environmental protection program. They created space for an open dialogue between the Project's technical team and Manitoba Métis Federation's technical team to ask questions and support a greater understanding of the decisions CNL made in consideration of the in-situ design.

During a teleconference on November 12, 2020, the Manitoba Métis Federation made a few suggested edits to the workshops following which CNL sent out the revised draft agendas and

scheduled a follow-up meeting to verify the changes made to the agenda. Due to scheduling issues with the Manitoba Métis Federation, the meeting was cancelled. CNL and the Manitoba Métis Federation held the first workshop to discuss the environmental initiatives and identify possible areas for collaboration, by teleconference on October 26, 2020. During this meeting, the Manitoba Métis Federation and CNL also discussed CNL's proposed communication protocol and the Manitoba Métis Federation's Resolution #8 [22].

On November 25, 2020, CNL invited the Manitoba Métis Federation to participate in CNL's 2020 virtual industry day being held December 9, 2020. The event was in partnership with the Organization of Canadian Nuclear Industries. On November 26, 2020, CNL and the Manitoba Métis Federation met via teleconference for the first workshop that was identified as an action item out of the October 26 meeting. The purpose of this workshop was to identify areas of collaboration and mutual interest. The majority of the discussion was on the Manitoba Métis Federation's environmental and monitoring initiatives.

On December 17, 2020, CNL sent the Manitoba Métis Federation a final round of responses to their EIS comments, which clearly identified any comment or concern that was out of the scope of the EIS and proposed clear next steps to help address the Manitoba Métis Federation's concerns.

On January 13 and 14, 2021, CNL had teleconferences with the Manitoba Métis Federation to plan for the upcoming workshops. On January 25, CNL sent the Manitoba Métis Federation an advanced copy of the draft EIS.

CNL had two additional planning meetings on January 27 and February 2, 2021, to discuss the goals, objectives, and agendas for the workshop which were pushed back due to scheduling issues. The ground water and ground monitoring wells workshop with the Manitoba Métis Federation was held on February 9, 2021. The main topics of this workshop include surface water and ground water movement over the WL site and the placement and number of the planned ground monitoring wells around WR-1. As a result of feedback from the Manitoba Métis Federation during the workshop, CNL included one additional ground monitoring well into their proposed follow-up monitoring program. CNL and the Manitoba Métis Federation held a follow-up teleconference on February 15 to discuss action items for the meeting and the outcomes of the workshop. CNL affirmed their commitment to adjusting the follow-up monitoring program to include an additional well closer to the reactor.

As a follow-up to the workshop held on October 26, 2020, to discuss opportunities for collaboration, CNL and the Manitoba Métis Federation met via teleconference on February 18, 2021, to explore opportunities for collaboration in areas of similar interest including environmental monitoring and environmental sustainability. During the meeting, CNL learned about the multiple green initiatives the Manitoba Métis Federation was developing and leading. CNL and the Manitoba Métis Federation created a list of long-term opportunities for collaboration specifically in site-wide tree planning, river erosion protection, and future land use. CNL and the Manitoba Métis Federation also created a list of possible short-term objectives to be completed by the end of the fiscal year. These included supporting one of the Manitoba Métis Federation's green initiatives such as the Manitoba Métis Federation's

commitment to plant 2 million trees, their environmental monitoring program, and citizen science program. Both CNL and the Manitoba Métis Federation took away the list to discuss internally.

In the meantime, the series of technical workshops continued with a workshop on the Project's Alternative Means Assessment and methodology for choosing VCs on March 2, 2021. Most of the questions posed by the Manitoba Métis Federation's technical team during the meeting centered on international and federal regulations, oversight, and guidance and how the Project considered and adhered to those documents.

On March 9, 2021, CNL and the Manitoba Métis Federation met via teleconference to discuss the development of the Relationship Agreement and liaison position for the Project. CNL and the Manitoba Métis Federation held a final workshop to discuss CNL's environmental protection program and opportunities to incorporate Traditional Knowledge into CNL's current environmental monitoring practices. As a result of the workshop, the Manitoba Métis Federation has a better understanding of the rigorous practices CNL takes to protect the environment, and CNL and the Manitoba Métis Federation created action items to discuss further opportunities for participation of Métis citizens in environmental monitoring on site and to discuss supporting the Manitoba Métis Federation's green initiatives.

As a result of all the engagement that took place over the past few months, CNL created an engagement infographic to illustrate the engagement that took place over the past few months. The infographic included a list of engagements plus a brief description about each engagement. CNL sent the infographic to the Manitoba Métis Federation on April 12, 2021.

On May 11, 2021, CNL, the Manitoba Métis Federation, and their respective technical team held a teleconference to have a wrap-up workshop. The purpose of the wrap-up workshop was to review the four technical workshops (i.e., topics covered, associated comments/concerns, action items, current commitments); discuss the status of comments/ concerns, associated commitments, and appropriate ways to address any outstanding concerns and how the information will be reflected in the EIS; and chart a path forward on remaining environmental assessment reviews and next steps. The commitments to address the Manitoba Métis Federation's concerns involved having the Manitoba Métis Federation involved in all aspects of current and future environmental monitoring on site. These include participation in CNL's annual environmental monitoring activities, the Manitoba Métis Federation's involvement in the development, implementation, and participation in post closure environmental monitoring, and additional placement of a groundwater well in closer proximity to the Project.

As a follow-up to the technical wrap-up meeting, CNL and the Manitoba Métis Federation met on May 25, 2021, to discuss their involvement in the 2021 environmental monitoring field season. During the meeting, the Manitoba Métis Federation expressed which field monitoring they would be interested in participating in and which they would want to include Métis citizen scientists as participants. CNL and the Manitoba Métis Federation also briefly discussed the types of support the Manitoba Métis Federation would need to participate in on site monitoring.

With the technical workshops complete, the Manitoba Métis Federation and CNL met on June 2, 2021, to discuss the Relationship Agreement. The Manitoba Métis Federation and CNL developed the main elements the Manitoba Métis Federation and CNL want included in the Relationship Agreement and discussed the process to help develop and implement the Relationship Agreement in a timely manner that was mutually beneficial for the Manitoba Métis Federation and CNL. On June 2, 2021, CNL sent the Manitoba Métis Federation a letter requesting their review of the summary table of interests and concerns CNL had developed based on engagements and the Manitoba Métis Federation's TKLUOS. CNL also developed a list of VCs for the Manitoba Métis Federation based on feedback from past engagement, the Manitoba Métis Federation's harvester consumption survey, and the Manitoba Métis Federation's TKLUOS. CNL asked the Manitoba Métis Federation to verify whether CNL had adequately characterized the Manitoba Métis Federation's interests and concerns. In the letter, CNL offered to provide capacity funding and to meet with the Manitoba Métis Federation to discuss the table and list of VCs.

With almost all of the engagement focused on the Project, CNL and the Manitoba Métis Federation felt it was timely to discuss the progress made for the site decommissioning. Therefore, on June 3, 2021, CNL provided the Manitoba Métis Federation with an overview of building decommissioning that had been completed to date and planned decommissioning for the next fiscal year. During the meeting, CNL asked the Manitoba Métis Federation whether they had reviewed the summary table of interests and concerns and list of VCs and whether they required any capacity support. The Manitoba Métis Federation stated they need to have an internal discussion first and would get back to CNL.

On June 8, 2021, CNL and the Manitoba Métis Federation held a teleconference to continue their discussion on their participation in CNL's environmental monitoring. The Manitoba Métis Federation identified which activities they wanted to participate in and which they would like their citizen scientists to participate in. To kick off the environmental monitoring season, on June 14, 2021, the Manitoba Métis Federation staff participated in ground water monitoring, a turtle search along the plant road, and a songbird survey. The Manitoba Métis Federation staff suggested setting up trail cameras along the plant road to better assess whether turtles were in the area. On June 22 and 23, and July 13 and 14, 2021, Manitoba Métis Federation staff and Métis citizen scientists participated in evening bat surveying for Building 100 that houses WR-1. The purpose of the survey was to help assess whether bats were roosting in the building. On June 29, 2021, the Manitoba Métis Federation and CNL signed an MOU to support the Manitoba Métis Federation's involvement in environmental monitoring on site.

On June 23, 2021, CNL and the Manitoba Métis Federation continued their progress on developing a Relationship Agreement focusing on fine tuning the language for the main initiatives identified that would help to address the Manitoba Métis Federation's concerns on the Project. During the meeting, CNL also asked whether the Manitoba Métis Federation had reviewed the interests and concerns table for the Manitoba Métis Federation and the list of VCs. CNL asked whether the Manitoba Métis Federation required capacity support to have consultants review the document. On July 6, 2021, CNL and the Manitoba Métis Federation met via teleconference to confirm the language in the revised Relationship Agreement and discuss

specific edits required to move forward. On July 12, 2021, the Manitoba Métis Federation provided feedback on the Relationship Agreement.

On July 26, 2021, the Manitoba Métis Federation sent CNL feedback on the summary of interests and concerns table and list of VCs for the Red River Métis. On the same day, CNL and the Manitoba Métis Federation signed an MOU to support the Red River Métis' technical review of the summary of interests and concerns and list of VCs. CNL accepted all track changes for both documents from the Manitoba Métis Federation and sent back the revised two documents on August 19, 2021. CNL sent a final thank you letter to the Manitoba Métis Federation on August 24, 2021, thanking the the Manitoba Métis Federation for their participation in verifying CNL had adequately captured their summary of interests and concerns and their list of VCs.

On August 9, 2021, CNL sent a revised copy of the Relationship Agreement to the Manitoba Métis Federation for their review and feedback. On August 12, 2021, the Manitoba Métis Federation participated in a tour of WR-1 and the waste management area. On August 16, 2021, the Manitoba Métis Federation came to site and observed river sediment, soil, and vegetation sampling.

On August 19, 2021, the Manitoba Métis Federation, the CNSC, and CNL participated in a trilateral meeting to discuss that status of interests and concerns and the Relationship Agreement. The Manitoba Métis Federation and the CNSC were going to meet and do a cross reference between the CNSC table of concerns and the table that CNL had developed. After submission of the revised draft EIS, CNL would assess the summary of interests and concerns and clearly state the responsible party to address the Red River Métis' concerns. On that same day, CNL and the Manitoba Métis Federation met to discuss the Relationship Agreement. CNL and the Manitoba Métis Federation finalized the major initiatives and then turned to discuss the budget for each item. CNL also met with the Manitoba Métis Federation on August 19, 2021, to discuss support for the Red River Métis' green initiative and begin to identify which green initiative project required the most support. It was identified that the Red River Métis' initiative to plant 2 million trees needed the most support and after the meeting CNL held internal discussions on how to best support the initiative.

On August 30, 2021, CNL sent the Manitoba Métis Federation a revised budget for the Relationship Agreement for their review and feedback.

After a few follow-up e-mails between the Manitoba Métis Federation and CNL, the Manitoba Métis Federation and CNL signed a MOU on September 8, 2021, to support the Red River Métis' purchase of 5,000 tree saplings. On September 9, 2021, the Manitoba Métis Federation staff came to site to participate in mushroom collection on site and in the surrounding area. The Manitoba Métis Federation recommended CNL cut the mushrooms at the stem when they collect the mushrooms so that the mushroom has an opportunity to grow up. CNL has adopted this method into their environmental practices.

On September 21, 2021, CNL and the Manitoba Métis Federation held a teleconference to discuss the draft budget, and economic participation and opportunities section in the Relationship Agreement. CNL sent a revised draft budget and Relationship Agreement to the

Manitoba Métis Federation on September 29, 2021. CNL reached out to the MMF on September 29, 2021, to provide and confirm the updates made to the budget of the Relationship Agreement based on the previous meeting.

The month of November of 2021, saw many discussions and engagement activities with the Manitoba Métis Federation. On November 15, 2021, the Manitoba Métis Federation completed a technical review of CNL's annual compliance monitoring reports for the WL site and provided CNL with a copy. CNL hosted a teleconference with the Manitoba Métis Federation on November 17, 2021, to discuss CNL's alpha targeted therapy project, which was an action from the Manitoba Métis Federation, CNL, and AECL Leadership Meeting. Active discussions on the Relationship Agreement occurred in November. On November 18, 2021, CNL revised the Relationship Agreement to include both the Manitoba Métis Federation's and CNL's legal review and sent the revised agreement to the Manitoba Métis Federation. On November 22, 2021, CNL met by teleconference with the Manitoba Métis Federation to review the changes recommend by both parties' legal counsel. CNL and the Manitoba Métis Federation discussed additional revisions that were still required related to the topic of procurement.

Verification activities continued in November 2021l. CNL sent the Manitoba Métis Federation Sections 4.0, 6.7, 6.8, and 11.0 on November 26, 2021, with the request for the Manitoba Métis Federation review of these sections and confirmation that CNL has adequately addressed the Manitoba Métis Federation's concerns and correctly captured the Manitoba Métis Federation's information. CNL sent Section 6.9 to the Manitoba Métis Federation on November 30, 2021, and asked the Manitoba Métis Federation to review to make sure that CNL had documented the Manitoba Métis Federation's information correctly.

On December 7, 2021, CNL sent a revised copy of the Relationship Agreement to the Manitoba Métis Federation. This included additional revisions from the teleconference and further revisions on the procurement language.

CNL sent the Manitoba Métis Federation a signed copy of an MOU on December 13, 2021, to support the Manitoba Métis Federation's technical review of the EIS sections. The Manitoba Métis Federation returned feedback on Sections 4.0, 6.7, 6.8, and 11.0 on December 19, 2021. On December 28, 2021, the Manitoba Métis Federation sent feedback on the draft Relationship Agreement.

A meeting with the Manitoba Métis Federation was held on January 6, 2022, to discuss the Relationship Agreement, where feedback was provided and revisions were discussed. On February 17, 2022, CNL sent a revised copy of the Relationship Agreement to the Manitoba Métis Federation for their review and feedback. On the same day, CNL sent the Manitoba Métis Federation revised copies of the sections of the EIS that the Manitoba Métis Federation reviewed and highlighted where any changes were made based on their feedback. CNL also provided a table to show how CNL addressed each of the Manitoba Métis Federation's concerns. Additional sections of the EIS were provided if they were referenced in CNL's responses. CNL highlighted specific passages in these sections to help the Manitoba Métis Federation in their review of this information.

There was much engagement completed in March 2022, with the Manitoba Métis Federation. On March 2, 2022, with a meeting between CNL and the Manitoba Métis Federation's communication director to discuss co-developing an infographic in preparation for the Manitoba Métis Federation's Annual General Assembly. On March 15, 2022, CNL informed the Manitoba Métis Federation that CNL would be repackaging their interests and concerns table and on March 16, 2022, the Manitoba Métis Federation confirmed they would review the repackaged table. On March 29, 2022, CNL held a teleconference and walked the Manitoba Métis Federation and their consultants through the repackaged interests and concerns table and discussed their review and timeline. CNL and the Manitoba Métis Federation also discussed Red River Métis rights, claims, and interests. CNL sent the Manitoba Métis Federation the repackaged interests and concerns table on March 31, 2022, for the Manitoba Métis Federation's review and feedback.

On April 16, 2022, CNL received the Manitoba Métis Federation's revised Relationship Agreement for CNL's consideration. CNL held a teleconference on April 25, 2022, with the Manitoba Métis Federation and their technical consultants to go over the Manitoba Métis Federation's repackaged interests and concerns table before their review.

On May 18, 2022, CNL walked through the Manitoba Métis Federation's interests and concerns table and the Manitoba Métis Federation's feedback on the table. CNL focused on items where they would need to revise the Manitoba Métis Federation's proposed language and provided an explanation. Later in May, on May 25, 2022, CNL and the Manitoba Métis Federation discussed the Relationship Agreement and Indigenous economic participation. On May 27, 2022, the Manitoba Métis Federation provided an additional round of feedback on the interests and concerns table. CNL sent back the revised interests and concerns table on May 30, 2022, to show that the Manitoba Métis Federation's revisions were incorporated.

On June 7, 2022, the Manitoba Métis Federation's new coordinator was welcomed to the WL site to collect mushrooms with CNL's environmental team. CNL asked the Manitoba Métis Federation on June 13, 2022, to confirm that they have completed the verification of their interests and concerns table. On June 16, 2022, the Manitoba Métis Federation provided confirmation that the table was reflective of their interests and concerns.

CNL met with the Manitoba Métis Federation on July 6, 2022, to discuss the status of the Relationship Agreement, environmental monitoring activities on site, and future engagement activities. CNL sent the revised Relationship Agreement back to the Manitoba Métis Federation on July 13, 2022, for their review and feedback. Also in July, on July 28, 2022, CNL hosted the Manitoba Métis Federation on site to participate in ground water sampling around the main campus.

August 2022, saw further focus on the Relationship Agreement. At the monthly meeting on August 8, 2022, the discussion between CNL and the Manitoba Métis Federation focused on the Relationship Agreement. CNL presented at a Manitoba Métis Federation Community Consult Meeting in Lac du Bonnet on August 10, 2022. CNL shared information on their environmental monitoring program and answered questions from the citizens. Red River Métis Citizens participated in a bat survey at the WL site in the evening of August 17, 2022. On August 30,

2022, CNL sent a copy of CNL's environmental monitoring program schedule and requested the Manitoba Métis Federation to identify any activities of interest.

On September 7, 2022, at the monthly meeting, CNL and the Manitoba Métis Federation discussed the status of the Relationship Agreement, environmental monitoring and future engagement activities on the Project. CNL provided revisions to the Relationship Agreement for the Manitoba Métis Federation's review and feedback on September 9, 2022; these revisions are believed to have addressed any outstanding issues or concerns. On September 11, 2022, CNL confirmed with the Manitoba Métis Federation that CNL will proceed with an "al la Carte sponsorship" and will participate in the trade show at the Manitoba Métis Federation Annual General Assembly from October 14-16, 2022. September 16, 2022, CNL provided formal written responses to the Manitoba Métis Federation's comments on CNL's 2020 Compliance Reports for the WL site.

On September 22, 2022, there were e-mails between the parties regarding the participation in scheduled CNL monitoring activities. On September 26, 2022, CNL sent an e-mail to the Manitoba Métis Federation inquiring on the status of the Relationship Agreement.

CNL continues to engage with the Manitoba Métis Federation to address their comments on the draft EIS, and to begin execution of the Relationship Agreement.

3.4.2.2 Interests and Concerns

The Manitoba Métis Federation and CNL have had extensive engagement on the Project. Through a variety of engagement forums including technical workshops, webinars, and meetings, the Manitoba Métis Federation has raised issues, concerns and questions that were initially focused on the 2017 and 2020 draft EIS. These engagements have led to the development of the interests and concerns table. This subsection is taken from the tables of interests and concerns from Appendix 4.0-1 of the draft EIS, and describes CNL's understanding based on written submissions and oral discussions with the Red River Métis. CNL continues to disposition the Red River Métis' 24 formal comments and feedback on the draft EIS; to date the Manitoba Métis Federation has fully accepted 14 comments and considers 9 to be partially addressed. See Appendix 4.0-1 Tables of Interests and Concerns in the draft EIS for a list of the Red River Métis' concerns. The Manitoba Métis Federation have also provided feedback during engagements including the technical workshops where the Manitoba Métis Federation and CNL and their technical experts discussed key topics of interest related to the Project including thein situ design, Alternative Means Assessment, and post closure follow-up monitoring. The Manitoba Métis Federation has also provided feedback through their Traditional Knowledge and Land Use and Occupancy Study and the harvester consumption survey. CNL has made its best efforts to document and verify the position the Manitoba Métis Federation has taken on each interest/concern. See Section 4.4 of the EIS for a summary of issues raised during engagement activities that influenced the scope of the environmental assessment.

The topics in the Table of Interests and Concerns are briefly summarized below:

Long Term Relationship

The Manitoba Métis Federation and CNL have invested in the development of a positive and collaborative relationship since 2017. A Relationship Agreement will support implementation of commitments to address the Red River Métis' interests and concerns, including providing appropriate capacity.

CNL and the Manitoba Métis Federation held a teleconference on March 23, 2021, to discuss the Relationship Agreement including funding a liaison position, participation in annual environmental monitoring, and participation in CNL's Indigenous Advisory Committee. CNL provided a revised draft of the Relationship Agreement for the Red River Métis' review and feedback on April 22, 2021. CNL and the Manitoba Métis Federation held a technical wrap-up meeting on May 11, 2021, to review outstanding concerns with the Project. During the meeting, CNL committed to funding and implementing a Manitoba Métis Federation wildlife and environmental monitoring program, recommitted to funding a liaison position and supported the Red River Métis' participation in the Indigenous Advisory Committee to address this concern. It was agreed that these initiatives would be funded through a Relationship Agreement. Throughout the summer and fall of 2021, CNL and the Manitoba Métis Federation have been working together to develop the draft multi-year Relationship Agreement that will help to mitigate the Red River Métis' concerns on the Project and ensure the Manitoba Métis Federation is involved in environmental monitoring, communication initiatives, and other key initiatives. At the time of this submission of the revised draft EIS, CNL and the Manitoba Métis Federation were close to finalizing the draft Relationship Agreement.

CNL and the Manitoba Métis Federation still need to finalize the list of binding commitments and submit that list to the CNSC, and the Manitoba Métis Federation and CNL need to complete an assessment to confirm the implemented commitments adequately address the Manitoba Métis Federation's concerns.

The Health of the Winnipeg River and Confidence in Métis Harvesting near the Whiteshell Laboratories Site

The Manitoba Métis Federation indicated that the health of the environment, plants, and wildlife relied on for harvesting activities as well as the risk to people in the area of the Project site are of great concern to the Manitoba Métis Community. The Manitoba Métis Federation also had a series of questions on the WL site's discharge to the Winnipeg River, including the potential for their discharge licence to trigger an environmental assessment and if the site's discharge has any effects on Manitoba Hydro operations. The Manitoba Métis Federation have indicated they want to be able to share factual and timely information about the WL site with Métis harvesters so they have confidence to conduct their Métis Harvest Rights. The Manitoba Métis Federation also raised concerns that the Manitoba Métis Federation be notified within 21 days of construction activities so Métis harvester's rights would not be affected as a result of construction related activities, which may disturb or displace wildlife.

During the 2020 Regulatory Oversight Report meeting, the Manitoba Métis Federation provided recommendations on how CNL can continue to progress its relationship with the Manitoba Métis Federation through more active involvement in environmental monitoring activities on

site. The Manitoba Métis Federation would like to see more opportunities for participation in environmental monitoring program development and implementation, beyond simply observation.

To help to address these concerns, CNL has committed to collaborating on a Manitoba Métis Federation wildlife and environmental monitoring program for the WL site, during a technical wrap up meeting on May 11, 2021, to address concerns regarding the health of the environment. CNL also committed (May 2021) to funding a liaison position and supported the Red River Métis' participation in the Indigenous Advisory Committee. These initiatives will improve communication about site activities and support alleviating concerns about the Project. In addition, CNL has committed to establishing a communication protocol for reportable events with the Manitoba Métis Federation so that Métis harvesters are notified in the unlikely event of any off-site effects such as noise or other activities that may impact harvesting activities. This commitment was affirmed during a workshop in November 2020.

CNL's view is that the steps CNL has taken adequately addresses this area of interest to the extent possible. The next steps are to develop a Relationship Agreement to implement these commitments, and work with the Manitoba Métis Federation to develop communication materials to mitigate fear, anxiety, and stigma associated with the Project. Engagement with the Manitoba Métis Federation is on-going, and monitoring with the Manitoba Métis Federation will continue throughout the environmental assessment process and afterwards.

The parties will consider these concerns to be fully addressed once the Manitoba Métis Federation and CNL assess the success of the implemented commitments and confirm they address the Manitoba Métis Federation's concerns.

Regulatory Process

The Manitoba Métis Federation expressed the concern that participant funding from the CNSC was lower than anticipated and covers activities following EIS submission and not before. They requested clarification on the Red River Métis' opportunities to comment on the EIS. In addition, the Manitoba Métis Federation requested a list of VCs for the Project and asked if Indigenous rights would be included as a VC. CNL has committed to and provided capacity funding to the Manitoba Métis Federation beyond the funding provided by CNSC. In general, this has included reimbursement of some out-of-pocket expenses to participate in engagement activities such as site visits, tours, regional community open houses; and basic costs to support open houses. In addition, CNL funded a food intake study by Manitoba Métis Federation citizens regarding collection and eating of harvested country foods. CNL also provided a list of VCs as requested, and asked for Manitoba Métis Federation feedback.

CNL's view is that the steps CNL has taken adequately addresses this area of interest to the extent possible. The next steps to support ongoing participation in the environmental assessment process include support for, and consideration of, any additional technical comments raised during the review process for the revised EIS to be submitted to CNSC in fall 2021; the finalizing and implementation of a Relationship Agreement; and the development and implementation of a monitoring protocol agreement for the involvement of Métis monitors in monitoring activities at the site.

In Situ Disposal Option

The Manitoba Métis Federation raised concerns about the ISD approach and have stated their preference for complete removal of the WR-1 facility from the site. The Manitoba Métis Federation has stated that the risks from ISD will still be present and would have the potential to adversely impact the Manitoba Métis Federation and their ability to exercise their rights.

CNL recognizes that the Red River Métis' preferred decommissioning approach for WR-1 is full removal. CNL's view is that the steps CNL has taken adequately addresses this area of interest to the extent possible at this time. While CNL and the Manitoba Métis Federation do not agree on the method of decommissioning, the parties have agreed to continue to work collaboratively to ensure any outstanding concerns are resolved to the extent possible.

Traditional Land Use

The Manitoba Métis Federation noted that regulators may notice and flag the absence of Traditional Knowledge in the EIS. The Manitoba Métis Federation has a catalogue of Traditional Knowledge but does not have the capacity to analyze it for gaps and relevance to the WL site. The Manitoba Métis Federation notes that a TKLUOS study should be undertaken as neither the previous Comprehensive Study Report nor the current monitoring reports consider Métis harvesting. The Manitoba Métis Federation indicates that CNL should also include monitoring and follow-up programs for potential effects to culturally important terrestrial species. The Manitoba Métis Federation recommends that CNL complete a thorough effects assessment on species of traditional importance to the Manitoba Métis Federation identified in a Project-specific TKLUOS.

To help address this concern, CNL drafted the EIS to clearly state that Red River Métis citizens conduct traditional activities and land use near the WL site. CNL funded a traditional food consumption study of which 21 citizens of the community responded. The Manitoba Métis Federation carried out the survey and the data was provided back in the community feedback report. CNL has used the data to confirm that the Harvester model is a conservative model for modern day Indigenous people that rely on harvesting for some of their food. The results confirmed that the intake rates assumed in the Harvester model in the EIS are conservative compared to the Manitoba Métis Federation survey and the post closure safety assessment is also conservative.

CNL undertook research on Red River Métis traditional land use when preparing the draft EIS, however, the Manitoba Métis Federation indicated in meetings with CNL and CNSC, Métis specific knowledge of the region does not necessarily exist in written documents and needed to be obtained first-hand. As such CNL, with support from the CNSC, funded the *Whiteshell Reactor #1 Decommissioning: Manitoba Métis Traditional Knowledge, Land Use and Occupancy Study* [21]. CNL has incorporated information from the TKLUOS into the draft EIS. CNL has subsequently revised the draft EIS and included elements of the TKLUOS in Section 6.8.1.5.2.2 Traditional Land and Resource Use by Indigenous Peoples. CNL's view is that the steps CNL has taken adequately addresses this area of interest to the extent possible.

CNL has also used the TKLUOS to verify the Project's VCs and created a list of VCs for Red River Métis. The Manitoba Métis Federation has verified that these VCs adequately capture the species and areas of interest and concern to the Red River Métis. The following list is CNL's understanding of related species and topics of interest to the Manitoba Métis Federation:

- food and medicines;
- furbearers;
- marten;
- rabbit, squirrel;
- weasel;
- white-tailed deer;
- moose;
- pike, walleye, other fish;
- grouse, geese, ducks, waterfowl;
- groundwater and groundwater interaction;
- Winnipeg River;
- land tenure and future use;
- cultural and archaeological sites;
- traditional harvesting of country foods;
- psychosocial and perceptions-based health and rights impacts; and
- employment and business opportunity, community well-being, and environmental and community safety.

CNL has partially addressed this matter within the Project context and will continue to ensure the Manitoba Métis Federation and Red River Métis values, interests, and traditional knowledge are meaningfully incorporated into the Project. The sincerity of CNL is demonstrated through the Relationship Agreement. The Manitoba Métis Federation will review and comment on this commitment when it is included as a formal commitment submitted to the CNSC.

Monitoring and Control of the Proposed WR-1 Disposal Facility and the Decommissioned WL Site

The Manitoba Métis Federation raised a concern about monitoring and control of the WL site over the long-term. Specifically, they raised issue that the rationale for ISD relies on maintenance and monitoring of the installation for 300 years and that "control" will last "indefinitely". The Manitoba Métis Federation indicates that it is not clear how CNL is prepared to make this commitment for the post-closure phase after 2126 or, in particular, after 2326. The Manitoba Métis Federation notes that environmental regulations change with each government, and it is possible that future governments may choose not to allocate funding to maintaining and monitoring the WL site. The Manitoba Métis Federation argues that there is no way to guarantee future commitment of resources. The Manitoba Métis Federation has raised concerns about the containment of waste in the disposal facility, monitoring of the ground

water in the vicinity of WR 1 and the Winnipeg River, overall. The Manitoba Métis Federation stressed the importance of ongoing monitoring and accountability for the WR-1. The Manitoba Métis Federation requested the opportunity to work alongside CNL in the development of a wildlife mortality monitoring and adaptive management program to address impacts to wildlife important to the Manitoba Métis Federation.

CNL has committed to supporting the Manitoba Métis Federation's participation in environmental monitoring and will be collaborating with the Manitoba Métis Federation to ensure CNL aligns with the Mantioba Métis Federation's expectations and interests. CNL and the Manitoba Métis Federation held a teleconference on March 23, 2021, to discuss a Relationship Agreement including funding a Liaison position, and participation in annual environmental monitoring. CNL committed to developing a Relationship Agreement with the Manitoba Métis Federation and provided a revised draft of the Relationship Agreement for the Manitoba Métis Federation's review and feedback on April 22, 2021. The Relationship Agreement would help support the Manitoba Métis Federations's continued engagement on the reactor decommissioning and site environmental monitoring activities. CNL and the Manitoba Métis Federation hosted a workshop and discussed post closure ground water monitoring February 9, 2021, and a workshop on the site wide environmental protection program. Following the workshops, CNL provided the Manitoba Métis Federation with additional information on upcoming monitoring activities at CNL and invited them to participate.

On May 11, 2021, CNL committed to establishing a Manitoba Métis Federation wildlife and environmental monitoring program on the WL site. CNL and the Manitoba Métis Federation agreed to fund this initiative through signing a Relationship Agreement. During the meeting, the Manitoba Métis Federation confirmed the implementation of this initiative would address this area of interest. CNL will also use adaptive management practices in the post closure monitoring program from WR-1.

CNL's view is that the steps CNL has taken adequately address this area of interest to the extent possible, pending the funding and implementation of the wildlife and environmental monitoring program initiative.

Whiteshell Site Environmental Remediation and incorporation of Métis Information

The Manitoba Métis Federation has expressed interest in providing Métis input into the grass seed mix proposed for site remediation areas, to ensure species of importance to the Métis are considered and to avoid species that may conflict with Métis harvest practices. The Manitoba Métis Federation expressed interest in site remediation with respect to bush and tree planting. The Manitoba Métis Federation would like to see species of importance to the Métis used on site.

To help address Red River Métis' concerns in this area, CNL shared the current seed mix with the Manitoba Métis Federation to seek their feedback on it. CNL committed to providing the Manitoba Métis Federation with the detailed site revegetation plan once it has been drafted. CNL committed to only using native seeds in our revegetation efforts. CNL held discussions in fall 2020 with the Manitoba Métis Federation on input to tree species for site re-forestation.

CNL held discussions with the Manitoba Métis Federation on potentially procuring trees and bush plants from the Red River Métis. The Manitoba Métis Federation is currently exploring the establishment of a tree nursery business.

In addition, CNL and the Manitoba Métis Federation participated in a workshop on CNL's environmental protection program on March 17, 2021. Afterwards, CNL also provided a list of environmental monitoring activities and invited the Manitoba Métis Federation to participate in monitoring. A workshop that included tree planting on site was held in late 2020. CNL will continue to engage with the Manitoba Métis Federation on input to and potential sourcing of seeds, bushes, and trees for site re-vegetation activities. During a teleconference on May 11, 2021, CNL committed to establishing a Manitoba Métis Federation wildlife and environmental monitoring program for the WL site.

CNL's view is that the steps CNL has taken adequately address this area of interest to the extent possible.

Next steps are for CNL and the Manitoba Métis Federation to finalize and begin execution of the Relationship Agreement to support the implementation of CNL's commitments.

Economic Opportunities

The Manitoba Métis Federation raised an interest in capacity building for its members and participating in the economics of the Project. The Manitoba Métis Federation expressed a desire for Métis businesses to be involved in contract work on the Project. In addition, the Manitoba Métis Federation recommends that CNL provide opportunities to the Manitoba Métis Federation to build capacity and knowledge in decommissioning activities and reclamation of project components. CNL hosted three industry days to facilitate a dialogue with interested Métis contractors. CNL worked to enhance options to better match Métis businesses' capabilities with their contracting needs, including adding provisions to its procurement process that encourages the use of Indigenous and local small and medium sized businesses. CNL introduced Métis N4 Construction to Golder Associates to provide the possibility of the organizations forming a teaming agreement to support contracting opportunities. CNL exhibited at the 2018 and 2019 Manitoba Métis Federation Annual General Assembly in order to meet Métis businesses and share employment and contracting opportunities with the Whiteshell Laboratories Closure Project.

CNL integrated these socio-economic VC considerations into the updated EIS, and provided Manitoba Métis Federation with a copy for their review and feedback to verify these concerns were addressed in the EIS. Implementation of the Relationship Agreement should result in increased economic participation in the project by Red River Métis citizens.

3.4.2.3 Verification

CNL incorporated feedback through engagements with the Manitoba Métis Federation on the Project, their TKLUOS, and Country Foods Harvest Survey. To confirm CNL has adequately captured the Red River Métis' interests and concerns, position, and knowledge, CNL and the Manitoba Métis Federation underwent a verification process whereby CNL provided EIS

documentation to the Manitoba Métis Federation for their review and feedback. Through this process, the Manitoba Métis Federation has reviewed and provided feedback from their summary of interests and concerns table, list of VCs, and Section 4.0 Indigenous Engagement of the draft EIS. While not all of the Red River Métis' concerns were mitigated by this process, CNL made every effort to verify that the Red River Métis' position, interests, and concerns were adequately characterized. CNL continues to work with the Manitoba Métis Federation to address their concerns through on-going discussions. And as stated above, CNL and Manitoba Métis Federation continue to work towards having a Relationship Agreement in place in the near term.

On June 2, 2021, CNL sent the Manitoba Métis Federation a letter requesting their review of the summary of interests and concerns CNL had developed based on engagements and Red River Métis' TKLUOS [21]. CNL also developed a list of VCs for the Manitoba Métis Federation based on feedback from past engagement, Red River Métis' harvester consumption survey, and Red River Métis' TKLUOS. CNL asked the Manitoba Métis Federation to verify whether CNL had adequately characterized Red River Métis' interests and concerns. In the letter, CNL offered to provide capacity funding and to meet with Manitoba Métis Federation to discuss the table and list of VCs.

On July 26, 2021, the Manitoba Métis Federation sent CNL feedback on the summary of interests and concerns table and list of VCs. On the same day, CNL and the Manitoba Métis Federation signed an MOU to support the Manitoba Métis Federation's technical review of the summary of interests and concerns and list of VCs. CNL accepted all track changes for both documents from the Manitoba Métis Federation and sent back the revised two documents on August 19, 2021. CNL sent a final thank you letter to the Manitoba Métis Federation onAugust 24, 2021, thanking the Manitoba Métis Federation for their participation in verifyingCNL had adequately captured their summary of interests and concerns table and list of VCs.

Further verification efforts were made to updates to the EIS. Community specific portions of Section 4.0, Engagement Logs, and Interests and Concerns Tables were sent to the Manitoba Métis Federation to review EIS updates. The Manitoba Métis Federation expressed concern for CNL to ensure they are referencing Manitoba Métis Federation and Red River Métis. The Manitoba Métis Federation confirmed in an e-mail to CNL on December 7, 2022, that they have no further comments on EIS updates.

For specific engagement related information on the verification process, please see Section 3.4.2.1 – Engagement, and Appendix 4.0-1 of the EIS.

3.4.2.4 Next Steps

During past engagements, the Manitoba Métis Federation has expressed an interest in developing a formal communications protocol between CNL and the Manitoba Métis Federation in the event there are activities/an event that has the potential to impact their rights. CNL and the Manitoba Métis Federation are working to formalize CNL's commitment to support a communication protocol and other initiatives through a Relationship Agreement between CNL and the Red River Métis. The Relationship Agreement will support key initiatives

that will help to address the Red River Métis' interests and concerns on the Project. Once the Long-Term Relationship Agreement is finalized, CNL will work with the Manitoba Métis Federation on a work plan to develop the communication protocol, along with other initiatives under the Long-Term Relationship Agreement.

CNL has committed supporting the Manitoba Métis Federations's involvement in long-term environmental monitoring at the WL site.

CNL has committed to establishing an Indigenous Advisory Committee, which will provide Indigenous advice and guidance on matters of mutual interest, but not replace Indigenous bi-lateral engagement. In addition, CNL has committed to supporting the Manitoba Métis Federation's participation in long-term environmental monitoring at the WL site. CNL plans to have further discussions to establish these initiatives. As a result of engagement with the Manitoba Métis Federation, CNL has made the following commitments:

- Establish a surface water monitoring location in closer proximity to the release point in the Winnipeg River;
- Include a ground monitoring station closer to the reactor; and
- Incorporate a water sample collection in final post-closure monitoring plan.

CNL will be compiling a list of all commitments and recommended next steps proposed in the comments and responses table and from recent engagements, and work with the Manitoba Métis Federation to finalize the list. Some of these commitments will include supporting the Manitoba Métis Federation's participation in long-term environmental monitoring at the WL site. CNL will work with the Manitoba Métis Federation to complete CNL's final responses to their comments on the EIS. CNL will also work with the Manitoba Métis Federation to complete the final columns of the summary of interests and concerns table.

CNL committed to executing and implementing the Relationship Agreement with the Manitoba Métis Federation to support key initiatives that will help to address the Red River Métis' concerns on the Project.

3.4.3 Black River First Nation, Brokenhead Ojibway Nation and Hollow Water First Nation

Black River First Nation, Hollow Water First Nation, and Brokenhead Ojibway Nation are three very unique First Nations that all have asserted or established Aboriginal and Treaty rights in the vicinity of the Project. Their reserves are also within proximity to the WL site, and the communities have expressed an interest in the Project. The three First Nation communities have worked together to submit a joint TKLUS report and have worked together to submit questions on the 2017 draft of the EIS and it is for those reasons CNL has put these communities in one section.

See Appendix C for more background information on each First Nation community.

The Black River First Nation is an Anishinaabe community and signatory to Treaty No. 5. The Black River First Nation primarily speak Ojibwe and occupy one area of reserve lands: Black River 9 Reserve No. 06360. The Reserve is situated approximately 75 km north of the WL site,

and along the eastern shore of Lake Winnipeg. The reserve covers an area of 809.3 ha. Band Membership is under Section 10 of the Indian Act.

A map of the Black River First Nation is provided in Appendix D.

The Hollow Water First Nation is an Anishinaabe (Ojibwa) First Nation and signatory to Treaty No. 5, with land cessions within the settlement boundary identified in the IER. The First Nation has potential, asserted, and/or established Aboriginal and Treaty rights in the vicinity of the Project.

A map of Hollow Water First Nation is provided in Appendix D.

The Brokenhead Ojibway Nation is an Anishinaabe (Saulteaux/Ojibwa) First Nation. The First Nation is a signatory to Treaty 1. The Brokenhead Ojibway Nation occupies three areas of reserve lands. Brokenhead 4 Reserve No. 06361 is the largest and is situated approximately 44 km northwest of the WL site. This main reserve is largely surrounded by the Rural Municipality of St. Clements and contains the settlement of Scanterbury. The land base for this reserve is 5,412.8 ha. One of two additional smaller reserves is the Birch Landing Reserve No. 09800 (272 ha) to the north of Brokenhead 4 Reserve, and 55 km northwest of the WL site.

A map of Brokenhead Ojibway First Nation is provided in Appendix D.

CNL, Black River First Nation, and Hollow Water First Nation have worked collaboratively since 2016. CNL and the two Nations have entered into a Relationship Agreement, as of April 2021, to support engagement with the broader community members. Key initiatives in the Relationship Agreement include establishing a core engagement team made up of community members from each Nation, holding community events and activities such as barbeques and community open house events. The Relationship Agreement also includes funding for a part-time Liaison position to support greater engagement with the two communities. In fall of 2020, CNL received verbal confirmation from Brokenhead Ojibway Nation that they no longer had interest in further engagement on the Project with CNL at this time. CNL respects this position and remains interested in future engagement with Brokenhead Ojibway Nation if the community chooses to re-engage. CNL continues to send project updates to Brokenhead Ojibway Nation to keep the community informed.

In October 2022, at the further urging of CNL, the Brokenhead Ojibway Nation has re-engaged with CNL. CNL will work with the Brokenhead Ojibway Nation to ensure they have the information and support necessary for their further participation.

3.4.3.1 Engagement

In August 2016, CNL sent the Brokenhead Ojibway Nation, Black River First Nation, and Hollow Water First Nation each a letter to introduce the proposed Project, which included a request for community input on any potential adverse impacts from Project activities. In December 2016, CNL invited all three communities to meet and discuss the Project. CNL met with Black River First Nation and Brokenhead Ojibway Nation to discuss how they would like to be engaged and to provide an overview of the proposed alternative to ISD.

In early February 2017, CNL and AECL held a two-day meeting with the three communities to discuss the WR-1 ISD Project and reviewed a proposed student job description. On the second day, community representatives were given a tour of WR-1 and of the WL site. CNL HR staff were also present to discuss job advertising. In June, CNL and the Brokenhead Ojibway Nation had a follow-up meeting where CNL presented their proposed ISD and addressed community concerns. In fall 2017, CNL sent a letter to all Indigenous communities notifying them of the public comment period on the draft EIS and invited them to engage. CNL also mailed hard copies of the draft EIS executive summary.

In September 2017, CNL provided an opportunity for five members from each First Nation and the Manitoba Métis Federation to attend a full day workshop to both learn and share on how CNL and Indigenous Nations collectively protect and care for the environment. The goal was to provide some hands-on experience coupled with ample discussion, learning and dialogue on opportunities moving forward both as a career option and as a relationship between the site and the First Nation and the Red River Métis.

On October 31, 2017, CNL's Annual Safety Reports were distributed to each First Nation community including the *Environmental Monitoring in 2016 at Whiteshell Laboratories* report [19], and the *2016 Progress Report on the Environmental Assessment Follow-up Program for Whiteshell Laboratories* [20]. CNL also provided an invitation to engage on these documents.

In 2018, CNL organized a trip to Hallam, Nebraska with engaged Indigenous communities to visit a site that had implemented ISD. Collectively, Black River First Nation, Brokenhead Ojibway Nation and Hollow Water First Nation sent representatives from Black River First Nation and Brokenhead Ojibway Nation. In September, CNL and Black River, Brokenhead and Hollow Water First Nations had a follow-up meeting to discuss the Hallam trip and the communities' introduced Kevin Bird as Project coordinator for the three communities.

In February 2019, CNL provided a site tour to the Southeast Resource Development Council (SERDC) and have enabled a potential collaboration with a CNL supply chain contractor for the purpose of economic benefit resulting from the WL Closure Project. The SERDC, incorporated and recognized in 1978, represents the formal unification of eight (8) member First Nations in the southeastern portion of Manitoba, including Brokenhead, Hollow Water and Black River First Nations. The Tribal Council is accountable to approximately 12,000 members under the leadership of its eight First Nation Councils.

As a political and administrative organization, the SERDC is designed and mandated to facilitate the development of local control and responsibility of programs and services to member First Nations by:

- Providing a mechanism whereby the SERDC can develop the administrative and managerial skills necessary to assist each First Nation institute and deliver local services at its own pace and in tune with each First Nation's level of development.
- Providing a mechanism whereby the SERDC can ensure that services are equitably and effectively delivered to each First Nation.

- Providing a mechanism whereby the SERDC can assist the First Nations to develop a capacity for local services, making them less dependent on Aboriginal Affairs and Northern Development Canada (AANDC) or the Tribal Council in matters of local concern and responsibility.

In March 2019, CNL supported a Councillor from Black River First Nation to attend the Waste Management Symposia in Phoenix, Arizona. The symposia is a not-for-profit organization dedicated to providing education and information exchange on global radioactive waste management. This trip was intended to provide a cooperative learning opportunity for Black River First Nation. Councillor Johnson was able to attend conference presentations and interact with regulators, government representatives and contractors. Councillor Johnson also participated on a panel session regarding Indigenous engagement in nuclear projects.

CNL also hosted the three communities for a two-day meeting in June 2019. The first day, CNL provided a site tour. On the second day, CNL provided a Project update, followed by a Traditional Knowledge study workshop with the three communities held at Brokenhead Ojibway Nation. In September, the communities invited CNL to participate in a meeting to discuss the Traditional Knowledge study wrap-up. In December, CNL, AECL, the communities, and their consultants met to discuss roll-out of a TKLUS [23].

In March 2020, CNL and Black River First Nation had a teleconference to discuss next steps as well as setting up a meeting to review the communities' thoughts on CNL's responses to the communities' comments on the EIS. In April 2020, CNL provided an update to the communities and CNSC on the decommissioning activities. In August 2020, Brokenhead Ojibway Nation confirmed they did not want to participate in the Indigenous Advisory Committee nor did they want to have an Indigenous liaison position in their community, despite CNL's offer to provide them with capacity funding. Brokenhead stated they were content to continue to engage through the regulatory process and CNL continues to respect their decision. CNL also continues to send Brokenhead updates. In September 2020, CNL, Black River First Nation, Hollow Water First Nation and their consultant met by teleconference to discuss the Indigenous Advisory Committee and Black River and Hollow Water First Nations' engagement organizational framework.

In fall of 2020, CNL received verbal confirmation from Brokenhead Ojibway Nation that they no longer had interest in further engagement on the Project. CNL respects this position and remains interested in future engagement with Brokenhead if the community chooses to re-engage.

CNL hosted a multi-community event at the WL site on October 20, 2020. The purpose of the half-day site visit was to discuss CNL's environmental protection program and to observe CNL's fish processing, which is part of CNL's routine environmental monitoring program. Participants included Sagkeeng's Liaison Officer, a representative from the Red River Métis, and two representatives from Black River and Hollow Water First Nations. A presentation was provided by CNL's environmental specialist on CNL's environmental protection program. Participants also made a number of recommendations on how to incorporate species of interest to the communities into CNL's monitoring program. Afterwards, CNL and the participants made their

way to the environmental lab where participants observed CNL processing fish they had caught that morning. Participants asked CNL's environmental technicians a number of questions about where the fish were caught and the method for catching them. A workshop report was circulated to participants for review and comment. CNL did not receive any feedback on the report from the participants.

On October 27, 2020, HTFC, consultants supporting Black River and Hollow Water First Nations, met with CNL to discuss a 2-year engagement plan that would support engagement with both communities on the Project. CNL and HTFC met via teleconference again on November 2 and November 12, 2020, to discuss HTFC's revised proposal. On November 25, 2020, CNL invited Black River and Hollow Water First Nations to participate in CNL's 2020 virtual Industry Day held December 9, 2020.

On December 14, 2020, CNL hosted a teleconference with Black River and Hollow Water First Nations and their consultants, HTFC Planning and Design, to discuss funding needs for the two communities. On January 11, 2021, CNL provided CNL's final responses on their draft EIS comments and on January 19, CNL provide a copy of their proposed Contribution Agreement. CNL also provided an advanced copy of the IER.

In February 2021, CNL met with Black River and Hollow Water First Nations' consultants to review the communities' proposed changes to the Contribution Agreement. This Contribution Agreement will fund the communities' participation in the Indigenous Advisory Committee as well as a Community Liaison to support engagement between CNL and Black River and Hollow Water First Nations. On February 8, 2021, CNL sent out a letter to Brokenhead Ojibway Nation to notify Indigenous communities who had indicated they did not wish to engage of the status of the EIS submission and to offer to meet to discuss their interest and concerns in relation to the Project. On March 11, 2021, CNL reached out to Brokenhead Ojibway Nation via telephone asking to see whether they wanted to re-engage on the Project.

On April 6, 2021, Black River First Nation, Hollow Water First Nation, and CNL signed a 2-year Relationship Agreement to support the development of a community liaison position and a community advisory committee and participation in the environmental assessment process for the Project.

On April 12, 2021, CNL provided a list of environmental monitoring activities for the 2021 field season and invited the communities to set up a meeting to discuss which activities the communities wanted to participated in. On April 20, 2021, CNL invited the communities to participate in a public webinar to learn more about the Project.

On May 11, 2021, CNL sent a letter to the communities requesting verification of the draft table of interests and concerns as well as the VCs CNL had developed from past engagements and the communities' TKLUS [23].

On May 13, 2021, CNL held a meeting to introduce the new liaison officer to the CNL team and provide some initial background information on the site and WR-1. During the meeting, the participants also discussed developing an onboarding program. On May 19, 2021, CNL met with

Black River and Hollow Water First Nation's Liaison Officer to review and finalize the onboarding process and begin to schedule the site tours and presentations.

On May 20, 2021, at the request of Black River First Nation, CNL gave a presentation on the Project to members of the Lake Winnipeg Collective.

Black River First Nation and Hollow Water First Nation's Liaison Officer visited site and took a tour of WR-1 on May 25, 2021. On June 1, 2021, the Liaison Officer participated in a radiation 101 course.

In June 2021, CNL sent out invitations to communities to participate in the Indigenous Advisory Committee.

On June 23, 2021, CNL met via teleconference with Black River First Nation and Hollow Water First Nation to discuss how they would like to participate in environmental monitoring. On July 6, 2021, CNL and the communities had a follow-up discussion on which environmental monitoring activities the communities wanted to participate in.

On July 12, 2021, CNL received feedback from Black River First Nation and Hollow Water First Nation on their summary of interests and concerns and list of species and topics raised in the TKLUS and engagement.

On July 14, 2021, the communities' Liaison Officer participated in a bat survey for Building 100, which houses WR-1.

The communities' Liaison Officer visited site and participated in a WR-1 and Waste Management Area tour on August 11, 2021. On the following day, August 12, 2021, Hollow Water First Nation participated in an exploratory discussion on the formation of an Indigenous Advisory Committee for the WL site. During the meeting the participants worked on key elements of a terms of reference for the committee.

On August 16, 2021, the communities' Liaison Officer observed river sediment sampling, soil, and vegetation surveys on site.

CNL met with HTFC Planning & Design and lead representatives from each community on August 19, 2021, to go through the feedback received on the summary of interests and concerns table and list of species and topics raised in the TKLUS and engagement. CNL incorporated the feedback and on August 26, 2021, CNL provided a revised copy to the communities to show how their feedback was incorporated. The communities provided additional feedback on September 2, 2021. CNL incorporated the additional feedback and sent the final copy back the community on September 9, 2021, along with a thank you letter, thanking the communities for participating in the verification process for their summary table of interests and concerns and list of species and topics raised in the TKLUS and engagement. CNL provided the updated copies to Brokenhead Ojibway Nation and throughout the summer of 2021 reached out by phone, e-mail and fax. CNL has not heard from the community and while CNL sent an updated copy of the summary of interests and concerns table to include specific references with Brokenhead Ojibway Nation's technical review of the 2020 draft EIS on October 6, 2021, CNL has not received a response from the community. On October 18, 2021, CNL issued a letter to the Brokenhead Ojibway Nation informing them that CNL would be

incorporating the table into the EIS and move forward with submission. In the letter, CNL informed Brokenhead Ojibway Nation that CNL would be proceeding with incorporating the summary of interests and concerns table and list of VCs but that there remained opportunities to review and provide feedback in the EIS and throughout the environmental assessment process.

On November 10, 2021, CNL, Black River First Nation, and Hollow Water First Nation held a teleconference to go over the budget for the Relationship Agreement and to set next milestones and target dates for key activities within the Relationship Agreement. In an e-mail on November 26, 2021, CNL asked Black River First Nation, Hollow Water First Nation, and Brokenhead Ojibway Nation to review Section 4.0 of the EIS to make sure that CNL had documented information correctly. On November 30, 2021, CNL followed-up via e-mail to confirm Black River First Nation, Hollow Water First Nation, and Brokenhead Ojibway Nation had received Section 4.0 and were planning to review. Further, on December 1, 2021, CNL followed-up via phone to confirm Black River First Nation, Hollow Water First Nation, and Brokenhead Ojibway Nation had received Section 4.0 and were planning to review the document. On December 8, 2021, CNL received feedback from Black River First Nation and Hollow Water First Nation on Section 4.0. In a phone conversation on December 13, 2021, Black River First Nation provided an update on the first Black River First Nation and Hollow Water First Nation Liaison Committee Meeting.

On February 8, 2022, CNL met with Black River First Nation to discuss the status of the EIS submission and next steps for engagement in the environmental assessment process. CNL also discussed priority engagement items for the community. Later, on February 16, 2022, CNL met with Black River First Nation to discuss the development of community specific communications material. Black River First Nation provided a list of topics that they would like to communicate to the community.

On March 15, 2022, CNL informed the communities that CNL would be repackaging their interests and concerns table as a result of CNSC feedback on a similar CNL project. The communities confirmed they would like to review the table prior to submission. During a teleconference on April 13, 2022, CNL, Black River First Nation, and Hollow Water First Nation discussed setting up a site tour with the core engagement team and CNL's environmental monitoring team.

CNL met with Black River First Nation and Hollow Water First Nation on May 11, 2022, to discuss the status of the EIS submission, discuss their revised interests and concerns table, environmental assessment process, development of communication materials and other areas of interest.

On May 25, 2022, CNL, Black River First Nation, and Hollow Water First Nation discussed the logistics for the upcoming site tour, and on June 9, 2022. CNL hosted the Black River First Nation and Hollow Water First Nation Core Engagement Team for their first site tour. Meanwhile on June 13, 2022, CNL requested confirmation from the communities that the table was reflective of their interests and concerns.

CNL, Black River First Nation, and Hollow Water First Nation discussed the upcoming Treaty days via teleconference on July 13, 2022, and how CNL could participate. On the same day, CNL sent out a letter of notice to Brokenhead Ojibway Nation's Chief informing them that CNL has submitted a draft EIS and requested a meeting to engage on the project. Later in July, on July 28, 2022, Black River First Nation and Hollow Water First Nation participated in berry picking near the former Underground Research Laboratory site.

August 2022, focused on further discussions regarding the Project and involvement in environmental monitoring. The monthly meeting with CNL, Black River First Nation, and Hollow Water First Nation, on August 17, 2022, focused on upcoming engagements, exploring areas of interest, and updates on the decommissioning work. On August 30, 2022, CNL sent a copy of CNL's monitoring program schedule and requested Black River First Nation and Hollow Water First Nation to identify any activities of interest.

On September 8, 2022, Black River First Nation and Hollow Water First Nation participated in mushroom collection from three locations around the WL site.

At the September 14, 2022, monthly meeting, CNL, Black River First Nation, and Hollow Water First Nation discussed extending the existing Relationship Agreement and coordinating future environmental monitoring activities. There was also an invitation extended to Black River First Nation and Hollow Water First Nation to accompany CNL to the Waste Management Symposium in Phoenix in 2023, and be a panelist to discuss risk communication matters. CNL is currently developing a letter of extension to ensure the Contribution Agreement continues. CNL forwarded an invitation to Black River First Nation, Hollow Water First Nation and Brokenhead Ojibway Nation on September 20, 2022, to join a Webinar on September 28, 2022. There was much coordination and communication during the week of September 25, 2022, culminating in a fall medicinal plant walk at the WL site with Elders and members from Black River First Nation and Hollow Water First Nation on September 29, 2022.

At the time of this submission, the relationship with Black River First Nation and Hollow Water First Nation is active and continuing to develop. CNL will continue to make efforts to engage Brokenhead Ojibway Nation as described above.

3.4.3.2 Interests and Concerns

Through a variety of engagement forums, including technical workshops, webinars, and meetings, Black River First Nation and Hollow Water First Nation have raised issues, concerns and questions that were initially focused on the 2017 and 2020 draft EIS. These engagements have led to the development of the interests and concerns table for Black River First Nation, Hollow Water First Nation, and Brokenhead Ojibway Nation. This subsection is taken from the tables of interest and concerns from Appendix 4.0-1 of the EIS, and describes CNL's understanding based on written submissions and oral discussions with the Nations. The Nations have also provided feedback through their TKLUS [23] and Brokenhead Ojibway Nation provided addition comments through their technical review of the 2020 draft EIS [24].

CNL has made its best efforts to document and verify the position the Nations have taken on each interest/concern. See Section 3.5 for a summary of issues raised during engagement activities that influenced the scope of the environmental assessment.

Business and Employment Opportunities

Brokenhead Ojibway Nation, Hollow Water First Nation and Black River First Nation raised the possibility of CNL using direct negotiated contracts with First Nations in decommissioning and overall closure processes and expressed an interest in learning more about CNL's Indigenous procurement requirements associated with the Project and employment opportunities that are currently available within the Whiteshell Laboratories Closure Project. The communities expressed concern that they would not be competitive with larger businesses in the tender process.

To help address this concern, CNL worked to enhance options to better match these First Nations capabilities with their contracting needs including adding provisions to its procurement process that encourages the use of Indigenous-owned businesses or businesses that employ Indigenous People. CNL discussed the need for better information sharing regarding the procurement and contracting opportunities and asked for specific capabilities that communities have related to the Project. CNL engaged with the SERDC as it was recommended as the best way to explore First Nation capabilities and CNL procurement opportunities. SERDC has subsequently partnered with Golder to increase their ability to contract to CNL. CNL, Black River First Nation, and Hollow Water First Nation also signed a comprehensive Relationship Agreement, on April 6, 2021, to support greater community involvement in the Project. The Relationship Agreement supports the establishment of a community committee, a community liaison position, support to participate in the Indigenous Advisory Committee and provide capacity support to ensure the communities can continue to participate in discussions on business development opportunities.

In Brokenhead Ojibway Nation's Technical Review of the Revised Environmental Impact Statement for the Project (Technical Report), Brokenhead Ojibway Nation expressed concerns that CNL had not included data on Brokenhead Ojibway Nation's labour force, employment, and income conditions into the regional baseline as well as community well-being as inherently linked to the land in the March 2020 draft of the EIS. On August 16, 2021, CNL provided responses to questions from Brokenhead Ojibway Nation's Technical Report of the Revised Environmental Impact Statement for the Project. In response to Brokenhead Ojibway Nation's request, CNL is currently working to revise the EIS with more current data in Section 6.9.5.2.6, Community Well-being, and will include data from Brokenhead Ojibway Nation, where available.

CNL will continue to engage on the matter of contracting and employment with the Nations through the Chiefs and Councils and the Black River First Nation and Hollow Water First Nation Community Liaison. CNL will continue to work to remove the barriers community members may face in applying for positions and seek opportunities to increase Indigenous participation in the project.

Future Land Use and Tenure

Black River First Nation, Hollow Water First Nation, and Brokenhead Ojibway Nation were interested in knowing if the land currently occupied by the WL site would be available for other uses in the future. The communities also noted that the site occupies a large parcel of land that was removed from Treaty 1 territory without adequate consultation and there will need to be discussions with the Federal Government about the future of the WL site and potentially accommodation. There are discussions on using the WL site to build small modular reactors and the communities wanted to know more about small modular reactors and if there will be any First Nation and Manitoba Métis Federation engagement as part of the process.

CNL explained that the liability and land remain with the federal government (i.e., AECL). Decisions on future uses of the land are not under the scope of the environmental assessment and licence amendment. However, CNL and AECL plan to begin engagement on end state and future land use in 2022. The communities will be invited to participate in that process.

CNL shared that there is a community regeneration partnership that was formed to develop both nuclear and non-nuclear opportunities for the WL site after the site is decommissioned. CNL participates and supports the partnership. CNL invited Indigenous communities to join. Some communities have attended these meetings.

CNL explained that any new project on the WL site such as a small modular reactor would need to go through a licensing process that would include Indigenous engagement.

CNL, Black River First Nation, and Hollow Water First Nation signed a Comprehensive Relationship Agreement, on April 6, 2021, to support greater community involvement in the WR-1 Project. The Relationship Agreement supports the establishment of a community committee, a community liaison position, support to participate in the Indigenous Advisory Committee and provide capacity support to ensure the communities are able to continue to participate in discussions on future land use of the WL site.

In their Technical Report, Brokenhead Ojibway Nation identified their rights and interests are to maintain a Seven Generations approach to stewardship of their lands and resources. As such, it is imperative that lands are available, healthy, and accessible to future generations. Brokenhead Ojibway Nation requested an engagement and consultation meeting with CNL and AECL to discuss future land use and tenure plans and agreements.

On August 16, 2021, CNL provided responses to questions from Brokenhead Ojibway Nation's Technical Report of the Revised Environmental Impact Statement for the Project. In response to Brokenhead Ojibway Nation's request, CNL invited Brokenhead Ojibway Nation to participate in discussions on future land use and end state when they begin. In response to Brokenhead Ojibway Nation's comments in #51a and #52b, CNL has agreed to develop the post-closure monitoring programs in collaboration with Indigenous communities to support their involvement in site environmental monitoring. CNL updated Section 11.4 Indigenous Engagement and Participation in Environmental Monitoring of the EIS to reflect these commitments.

While future land use and tenure is out of scope for the assessment for WR-1, CNL will be contacting the communities to participate in discussions on site wide end state. CNL has acknowledged the historical lack of engagement on siting the Whiteshell Laboratories and will continue to facilitate dialogue between CNL, AECL, and the Nations in this regard. CNL will continue to engage the Nations on the Project and closure of the WL site.

Accidents and Malfunctions

The communities expressed concerns about past releases to the environment from the WL site and the potential for future releases of hazardous and radioactive material into the Winnipeg River. Brokenhead Ojibway Nation, Hollow Water First Nation and Black River First Nation were interested in how releases could be contained in the soil. They were also interested in how CNL detects spills.

The history of leaks at the site makes community members even more doubtful about the certainty of predictions related to potential groundwater and environmental contamination in the future.

The communities suggest in their TKLUS that groundwater health and the Winnipeg River are of primary concern. While CNL's scientific models do not predict the levels of these nuclides to be dangerous to human health, Anishinaabe Traditional Knowledge holders identified that they have seen that when predicting hundreds or thousands of years in the future, it is difficult to be confident in scientific predictions.

CNL provided information on the topic of accidents and malfunctions in writing and at two community meetings at Brokenhead Ojibway Nation. CNL explained that radioactivity levels in WR-1 are similar to other reactors that have gone through the ISD process. When the facility was shut down in 1985, all fuel and liquids were safely removed from the reactor, and what remains in place today are the structural components of the reactor, such as the metal vessel and piping. Radioactivity in the reactor is not easily mobilized. The vast majority is trapped in the walls of tanks and pipes. With respect to the rest of the WL site, all radioactive waste at the site is safely and securely stored in the site's Waste Management Area. Any events that occurred in the past were reported to the Canadian Nuclear Safety Commission (or previously the Atomic Energy Control Board). No employees or members of the public have been negatively affected by the operation emissions of the WL site.

In addition, CNL provided fact sheets of the Winnipeg River Task Force. Previously, an independent task force was created consisting of Sagkeeng, Indian and Northern Affairs, Health Canada, and Environment Canada. The Winnipeg River Task Force released its report in 1995. The task force concluded that "it is unlikely that the AECL Whiteshell Laboratories has ever posed a significant threat to the health of Sagkeeng residents, nor is there apparently any prospect of such a threat in the future". CNL explained to the communities during engagements that, as part of the application to the CNSC for a decommissioning licence in 2001, a Comprehensive Environmental Assessment was conducted. This included an investigation of the surrounding environment and the Winnipeg River sediments to look for any radioactive contamination that may have occurred over the history of the site. River sediments were surveyed for radioactivity at hundreds of locations. The assessment concluded that "using the

most conservative dose estimation methods, doses to humans and non-human biota are below accepted guidelines." The analysis methodology and results were peer-reviewed, presented in public meetings and are available in the open publication of the Comprehensive Study Report [16]. CNL continues to monitor the river sediment near the site, and downstream. During tours of the site, CNL demonstrated how environmental monitoring detection tools work.

The CNSC conducted an independent monitoring campaign in 2017 with assistance from Sagkeeng. This independent program included collecting and analyzing fish caught near Sagkeeng. The results of the assessment conclude that the public and the environment in the vicinity of the WL site are protected and there are no expected health impacts. The results of this independent monitoring are publicly available at this link: https://nuclearsafety.gc.ca/eng/resources/maps-of-nuclear-facilities/iemp/whiteshell.cfm.

CNL, Black River First Nation, and Hollow Water First Nation signed a Comprehensive Relationship Agreement, on April 6, 2021, to support greater community involvement in the Project. The Comprehensive Relationship Agreement supports the establishment of a community committee, a community liaison position, support to participate in the Indigenous Advisory Committee, and contemplates the provision of capacity support to ensure the communities and CNL develop infographics specific to the needs of the communities.

Brokenhead Ojibway Nation expressed numerous concerns through their Technical Report pertaining to accidents and malfunctions. Questions and comments ranged from the safety, condition, and integrity of the concrete barriers, to bank stabilization and permanent erosion control measures, to the validity of CNL computer models.

Additionally, in their Technical Report Brokenhead Ojibway Nation re-enforced the importance of water and protecting it, and shared many comments and recommendations pertaining to water. Key themes included: protection of water and ensuring the integrity of the Winnipeg River; interests in monitoring and sampling of water; the potential for future groundwater contamination; recommendation for more wells for groundwater testing; concerns about proper sealing of conduits; and that the Proponent develop closure-specific runoff control measures, as well as sediment and erosion control measures, to minimize site surface water and sediment entering the river.

On August 16, 2021, CNL provided responses to questions from Brokenhead Ojibway Nation's Technical Report of the Revised Environmental Impact Statement for the Project. In response to Brokenhead Ojibway Nation's questions, CNL provide additional rational and clarity on specific topics under this theme. This did not result in any updates to the revised draft EIS.

Recognizing that accidents and malfunctions will continue to be an area of interest for the communities, with the Relationship Agreement in place, CNL has put in place a forum to discuss and further address this area of interest. Without close engagement within the communities since 2019, it is unlikely that most community members are aware of the new materials about the leaks that CNL has produced. Further work is needed to translate and share this information with community members. CNL will continue to engage the communities on this matter.

Waste Management

The communities were interested to know which material will be sent to Chalk River Laboratories for disposal and how it will be transported. The communities' TKLUS highlighted the tension that many of the community members felt about wanting the waste removed from the WL site while recognizing that this would mean moving it to the lands of other First Nations. One of the communities' questions was to find out more about what, if anything is being offered in compensation to other First Nations for storing nuclear waste material in their traditional territories.

CNL participated in community meetings where waste management was discussed and provided the following information that all waste materials are sorted, verified and transported using licensed containers, and depending on the waste type, to a licensed hazardous waste management facility. Radioactive materials will be shipped in licensed waste containers. Depending on what materials are being shipped, sometimes shielded cylinders are used. CNL expects that about 2000 truckloads will need to be shipped for the entire Whiteshell Laboratories Closure Project. A dangerous goods transportation specialization may be required for trucking companies to move some of this waste. The used fuel baskets contained in the concrete silos will be placed in a transportation flask and transported by truck along the highway. CNL explained that radioactive materials are safely shipped around Canada regularly. CNL will be hiring transportation contractors who are qualified to undertake the work and have met the necessary qualifications and have the required safe driving hours logged.

The containers used to transport waste are designed to withstand considerable impact. CNL also has a mobile response unit that can be dispatched if an accident occurred. CNL has an emergency response plan that they are trained and drilled to implement.

CNL committed to asking the closest First Nation to the Chalk River Laboratories site, Algonquins of Pikwakanagan First Nation, about their interest in being contacted by Black River and Hollow Water First Nations to discuss their collective experience with the nuclear industry. CNL committed to sharing the results of their discussion with Pikwakanagan when it occurs. After receiving permission from Pikwakanagan, CNL shared Pikwakanagan's contact information with Black River First Nation and Hollow Water First Nation.

Future Communication

The communities expressed a desire for user friendly ongoing communication. CNL continues to send Project updates to the communities and is currently discussing the opportunity to establish an Indigenous Advisory Committee and have committed to fund a community liaison position to support a dialogue between community members and CNL.

CNL, Black River First Nation, and Hollow Water First Nation signed a Comprehensive Relationship Agreement, on April 6, 2021, to support greater community involvement on the Project. The Relationship Agreement supports the establishment of a community committee, a community liaison position, supports participation in the Indigenous Advisory Committee, and provides capacity support to ensure meaningful participation and engagement throughout the environmental assessment process.

Recognizing that matters regarding future communications will continue to be an area of interest for Hollow Water First Nation and Black River First Nation, the Relationship Agreement establishes a forum to support continuing dialogue on this area of interest, and the parties are seeking to extend this agreement. In September 2020, Brokenhead Ojibway Nation notified CNL via a teleconference on two occasions that they are no longer interested in engaging with CNL on the Project. CNL followed up in an e-mail to confirm. CNL will continue their engagement outreach to ensure Brokenhead Ojibway Nation is informed as the Project proceeds, or if their interest in the project changes.

Monitoring

Brokenhead Ojibway Nation, Hollow Water First Nation and Black River First Nation requested more information about CNL's current monitoring activities, including activities related to the contamination in the riverbed of the Winnipeg River. More specifically, in their TKLUS, the communities identified an interest in further discussion related to the rationale for conducting river sediment sampling at 20-year intervals, believing that more frequent sampling is likely needed. Recommendation #2 of the TKLUS called for funding for the First Nations to contract and conduct independent monitoring of the site using technical and Traditional knowledge.

The communities also wanted further information and discussion about the vegetation, fish, and wildlife sampling taking place at the site, and specifically with respect to the Project. They expressed concern that plants, fish, and wildlife would only be sampled if other parameters raise concern and would like to discuss this further. The communities would also like to be invited to participate in future testing events on the site so that they can ask questions while the testing is in progress.

The three communities expressed an interest in learning more about future monitoring activities that will occur after the WL site is fully decommissioned. Black River First Nation expressed interest in having students involved in monitoring activities.

CNL provided the communities with a list of upcoming monitoring activities and invited them to participate. CNL will continue to send upcoming environmental monitoring activities and seek to host a workshop to discuss CNL's current environmental monitoring programs. In addition, CNL has committed to work with these communities to better understand their monitoring interest, to incorporate Traditional knowledge into existing programs, and develop approaches that encourage the building of trust in the monitoring activities. In addition, CNL has committed to developing Indigenous environmental stewardship initiative.

Through their Technical Report, Brokenhead Ojibway Nation had multiple comments and recommendations related to environmental monitoring. These ranged from concern for how CNL will monitor the performance of the grouted structure and verify that it is operating as predicted, to requests for more detail on CNL pre- and post-closure monitoring programs, from challenges to the CNL monitoring approach, to requests for direct Indigenous involvement and participation in current and post-closure monitoring.

On August 16, 2021, CNL provided responses to questions from Brokenhead Ojibway Nation's Technical Report of the Revised Environmental Impact Statement for the Project. In response to

Brokenhead Ojibway Nation's questions and recommendations, CNL has updated Section 11.0 Summary of Monitoring and Follow-Up Programs of the revised draft EIS to include a list of monitoring activities proposed for the Project, which are above and beyond the current monitoring program. The list is provided in Table 11.0-1. CNL has also revised Section 11.4 of the draft EIS to reference CNL's commitment to developing a post-closure monitoring program in collaboration with Indigenous Nations.

Recognizing that environmental monitoring will continue to be an area of interest for the communities, CNL is committed to ongoing Indigenous engagement, in the development and execution of its monitoring programs.

In Situ Disposal

Brokenhead Ojibway Nation, Hollow Water First Nation and Black River First Nation expressed interest in understanding how ISD was chosen as the preferred decommissioning method for WR-1 and wanted to know if nearby communities would have an opportunity to provide input on the chosen decommissioning method. The three communities also wanted to learn and discuss whether climate change or natural disasters could affect the integrity of the grouted encapsulation and how it would be constructed to ensure that it is safe.

The communities suggest in their TKLUS that groundwater health and the Winnipeg River are of primary concern. While CNL's scientific models do not predict the levels of these nuclides to be dangerous to human health, Anishinaabe Traditional Knowledge holders identified that they have seen that when predicting hundreds or thousands of years in the future, it is difficult to be confident in scientific predictions.

In their Technical Report, Brokenhead Ojibway Nation expressed an interest in re-evaluating decommissioning in favour of full removal of waste off-site. They also expressed concerns regarding climate change not being considered in the assessment, and the effects of climate change on VC populations now and in the future. Additionally, in their Technical Report Brokenhead Ojibway Nation re-enforced the importance of water and protecting it, and shared many comments and recommendations pertaining to water. Key themes included: protection of water and ensuring the integrity of the Winnipeg River; interests in monitoring and sampling of water; the potential for future groundwater contamination; recommendation for more wells for groundwater testing; concerns about proper sealing of conduits; and that the Proponent develop closure-specific runoff control measures, as well as sediment and erosion control measures, to minimize site surface water and sediment entering the river.

On August 16, 2021, CNL provided responses to questions from Brokenhead Ojibway Nation's Technical Report of the Revised Environmental Impact Statement for the Project. In response to Brokenhead Ojibway Nation's questions and recommendations, CNL provided additional information on studies and consideration given to the ISD design and climate change. This did not result in any updates to the revised draft EIS.

Recognizing that environmental protection and the integrity of the ISD design will continue to be an area of interest for the communities, with the Relationship Agreement in place, CNL has put in place a forum to discuss and make efforts to address residual areas of concern.

Consultation, Engagement and Regulatory Processes

Questions were raised about why communities had not been previously consulted when AECL originally chose the WL site. Specifically the communities identified that while this Project is not meant to address historical issues and that the primary duty to consult on this Project lies with the Crown (CNSC) and not CNL, that CNSC and CNL must acknowledge the history of this site, whereby a colonial government was able to establish a nuclear research facility without the permission, engagement, or knowledge of Indigenous communities; one which has created an environmental footprint and had unplanned releases to their traditional territories. They suggested that while the environmental licensing process addresses one project at a time, the dialogue and relationship with First Nations must take a broader temporal scope. The three communities also raised questions about the duty to consult. Brokenhead Ojibway Nation, Black River First Nation, and Hollow Water First Nation expressed a concern about the small amount of participant funding available. The three communities were curious about the CEAA 2012 and its requirements for soliciting information from nearby communities, and Brokenhead Ojibway Nation wanted to understand how the regulator works, and how the independent commission is selected.

In response to the three communities' interests and concerns regarding consultation, engagement, and the regulatory process, CNL confirmed that while historical grievances are outside of the scope of this Project, CNL committed to supporting an open and transparent dialogue on historical concerns between the communities, CNL, and AECL. CNL also has committed to and provided capacity funding for regional Indigenous communities beyond the funding provided by CNSC. CNL also has responded to community requests for capacity and entered into MOUs and Contribution Agreements for specific scopes of work such as the TKLUS.

CNL coordinated, and hosted a community benchmarking trip to Hallam, Nebraska, to tour an in situ reactor and CNL provided support for a member of Black River First Nation to attend the Waste Management Symposia in 2019.

CNL, Black River First Nation, and Hollow Water First Nation signed a Comprehensive Relationship Agreement, on April 6, 2021, to support greater community involvement on the Project. The Comprehensive Relationship Agreement supports the establishment of a community committee and a community liaison position, provides support to participate in the Indigenous Advisory Committee, and provides capacity support to ensure meaningful participation and engagement throughout the environmental assessment process. Talks are currently underway between the parties to extend the agreement.

The Relationship Agreement has created a forum to discuss and work to continue to resolve and address residual concerns. CNL will continue to make efforts to re-engage Brokenhead Ojibway Nation.

Traditional Knowledge

The communities have identified through the TKLUS that, over time, they have seen changes to the health of the animals that they harvest. They have also seen that hunting and trapping are getting harder to do, as many traditional areas have been converted to other land uses over

time. They suggest that the WL site is one piece of the cumulative effects of development that has slowly taken away their traditional way of life. While it is too late to change the fact that the WL site was built on this site within their traditional territory, it is not too late to continue to work with CNL and other partners to discuss their communities' interests in this area as well as the future health of the water, land, fish, and animals.

The communities also noted that some of the spiritual places they had may no longer exist because the land has changed. They emphasized that it is important to protect remaining spiritual places like the petroform sites in the Whiteshell area. Black River First Nation typically held ceremonies in the Whiteshell region in the fall around the period of the Harvest Moon. Here, they also picked wild rice, which was a dietary staple. Brokenhead Ojibway Nation and Hollow Water First Nation also noted the importance of traditional and cultural perspectives with regard to the Project. CNL has offered to Black River First Nation, Hollow Water First Nation and Brokenhead Ojibway Nation the opportunity to conduct ceremony on site in connection to the Project and the WL site.

CNL heard this feedback and ensured that the EIS properly considered wild rice. Berries were also included as part of the ecological and human health risk assessment, and their consumption, when combined with other activities such as harvesting, did not result in any adverse effects on health. CNL noted that when all of the potential pathways from the Project to traditional land and resource use were considered, such as changes to water quality, to fish, to wildlife, to vegetation, or to human health, there were no significant residual effects predicted. CNL supported the TKLUS that was conducted by the three communities and used the information from the TKLUS to revise sections of the EIS. CNL has also used the TKLUS to verify the Project's VCs and created a list of topics and species of interest and concern for the three communities. The plants, animals, and other species and topics identified below are not intended to be representative of all of the Nations' species and topics of interest but are generally representative of aspects of values that have been explicitly flagged through Traditional Knowledge Study and engagement in relation to the WR-1 Decommissioning Project. They may not reflect an exhaustive list of species and topics of interest. The following list is CNL's understanding of related species and topics of interest to the communities:

- food (e.g., blueberries, raspberries, chokecherries) and Traditional Medicines (e.g., muskeg tea, willow, seneca root, rose hips, cedar, poplar, weekay);
- rabbit, squirrel, porcupine, chipmunks;
- white-tailed deer, moose;
- fox, lynx, marten, fisher;
- sturgeon, pickerel, sunfish, catfish;
- geese, ducks, waterfowl;
- beaver, muskrat;
- wild rice;
- seagull eggs;
- groundwater and groundwater interaction;

- Winnipeg River;
- employment and business opportunity;
- community well-being;
- land tenure and future use;
- cultural and archaeological sites;
- traditional land use; traditional harvesting of country foods; and environmental and community safety.

In their Technical Report, Brokenhead Ojibway Nation made numerous comments and recommendations pertaining to Traditional Knowledge, culture, and ceremony. Comments on methodology and the need to incorporate traditional values in consideration of seed mix, monitoring and testing on harvested species, and traditional diet considerations.

On August 16, 2021, CNL provided responses to questions from Brokenhead Ojibway Nation's Technical Report of the Revised Environmental Impact Statement for the Project. In response to Brokenhead Ojibway Nation's comments and feedback, CNL has revised Section 11.0 of the draft EIS to reference CNL's commitment to use native grass species for the WR-1 cap and cover. To provide further clarity on land and resource use, CNL is revising Section 6.8.1.5.2.2 Traditional Land and Resource Use by Indigenous Peoples of the draft EIS, as well as the other subsections of Section 6.0, to include up-front tables that explicitly list the interests and concerns of each community, and identify exactly how that concern is captured and addressed within the section. These are separated by community so it should be very clear how BON feedback was included and distinguishes Indigenous Nation's feedback from public feedback.

Recognizing that Traditional Knowledge, culture and ceremony will continue to be areas of interest for the communities, with the Relationship Agreement in place with Black River First Nation and Hollow Water First Nation, CNL has put in place a forum to discuss and address any residual concerns on these matters. CNL will continue to make efforts to engage with BON.

3.4.3.3 Verification

CNL incorporated feedback through engagements with the three communities on the Project and their TKLUS. To confirm CNL has adequately captured the communities' interests and concerns, position, and knowledge, CNL and Black River First Nation and Hollow Water First Nation underwent a verification process whereby CNL provided EIS documentation to the three communities for their review and feedback. CNL and Black River First Nation and Hollow Water First Nation met to discuss their feedback on the documents and to inform how CNL incorporated the feedback into the revised draft EIS. Due to the communities' limited capacity to respond during the COVID-19 Pandemic, the information in the summary of interests and concerns table, list of species and topics raised in the TKLUS and engagement, and Section 4.0 of the draft EIS has been reviewed by Hollow Water First Nation and Black River First Nation's technical advisors and one Council representative from each community; however, they may not represent the view of the Nations as a whole. While not all of Black River and Hollow Water First Nations' concerns were mitigated by this process, CNL made every effort to verify that the

communities' position, interests and concerns were adequately characterized. CNL continues to work with the communities to address their concerns.

On July 7, 2021, technical advisors and lead representatives from Black River First Nation and Hollow Water First Nation provided feedback on the summary of interests and concerns table and list of species and topics raised in the TKLUS and engagement. CNL met with representatives and technical advisors from Black River First Nation and Hollow Water First Nation on August 19, 2021, to go through the feedback received on the summary of interests and concerns table and list of species and topics raised in the TKLUS and engagement. CNL incorporated their feedback and on August 26, 2021, CNL provided a revised copy to the communities to show how their feedback was incorporated. The representatives and technical advisors for the communities provided additional feedback on September 2, 2021. CNL incorporated the additional feedback and sent the final copy back to the communities on September 9, 2021, along with a thank you letter, thanking the communities for participating in the verification process for their summary table of interests and concerns, list of species and topics raised in the TKLUS and engagement. CNL provided the updated copies to Brokenhead Ojibway Nation and throughout the summer of 2021 reached out by phone, e-mail and fax. CNL has not heard from the community and while CNL sent an updated copy of the summary of interests and concerns table to include specific references with Brokenhead Ojibway Nation's technical review of the 2020 draft EIS on October 6, 2021, CNL has not received a response from the community. On October 18, 2021, CNL issued a letter to the Brokenhead Ojibway Nation informing them that CNL would be incorporating the table into the EIS and move forward with submission.

In addition to verifying information in the revised draft EIS with the three communities, CNL has also worked on verifying their responses to the three communities' comments on the draft EIS. CNL sent their responses to the communities' draft EIS comments on September 15, 2020, to each individual community and their consultants. In October 2020, the consultant for Black River First Nation and Hollow Water First Nation acknowledged receipt of responses to community comments on the draft EIS and provided additional comments. Prior to submitting additional responses to the communities, CNL met with the communities and their consultants to better understand their concerns and test CNL's proposed responses and next steps. Afterwards, CNL revised its responses based on the feedback received from the communities. CNL sent its responses to each of the communities.

CNL received a letter from the CNSC on August 24, 2022, indicating that three Information requests remained outstanding, including updating the Indigenous engagement narrative and tables. Community specific portions of Section 4.0, Engagement Logs, and Interests and Concerns Tables were sent to Black River First Nation, Hollow Water First Nation, and Brokenhead Ojibway Nation on October 20, 2022. On November 3, 2022, Black River First Nation and Hollow Water First Nation returned an e-mail confirming that changes to the EIS reflected current discussions and understandings. While all efforts were made to communicate changes to the EIS to Brokenhead Ojibway Nation, CNL did not receive any feedback on these latest EIS updates.

3.4.3.4 Next Steps

CNL will work with the communities to compile a list of all commitments and recommended next steps and will be reviewing all previous documents and tables to ensure al outstanding issues, concerns, or commitments are brought forward. Black River First Nation and Hollow Water First Nation have been observing and participating in some of CNL's technical on-site monitoring activities. The parties have discussed putting an annual monitoring plan in place to coordinate these activities.

CNL will also continue engagement with the three communities with the objective of addressing or resolving any outstanding issues or concerns with the WR-1 Project. CNL, Black River First Nation, and Hollow Water First Nation signed a Relationship Agreement that will help increase the communities' capacity and allow for greater participation in the environmental assessment process. The Relationship Agreement supports a liaison position and the creation of a community liaison committee (the "Core Engagement Team"), among other things.As mentioned, the parties are in talks to extend this agreement.

3.4.4 Wabaseemoong Independent Nations

The Wabaseemoong Independent Nations (also known as Wabaseemoong Independent Nations of One Man Lake, Swan Lake, and White Dog) are signatories to Treaty No. 3. The Wabaseemoong Independent Nations have potential, asserted and/or established Aboriginal and Treaty rights in the vicinity of the Project.

A map of Wabaseemoong Independent Nations is provided in Appendix D. For more background information on Wabaseemoong Independent Nations, see Appendix C.

The Wabaseemoong Independent Nations have a total registered population of 1,989 (as of September 2018). Approximately half of the community (1,012) reside off reserve lands.

The Wabaseemoong Independent Nations occupy four areas of reserve lands, all within north-western Ontario. Wabaseemoong Reserve No. 06268 has a land base of 8,480 ha. The largest of the four reserves, it is situated approximately 8 km east of the Manitoba/Ontario border and approximately 80 km east of the WL site. At its southern perimeter, the reserve encompasses the community of Whitedog. To the south is Swan Lake 29 Reserve No. 06270 with the second largest land area (2,237 ha), located on the east shore of Swan Lake and approximately 85 km east of the WL site. One Man Lake 29 Reserve No. 06269 is located to the northeast of Wabaseemoong Reserve, on the north shore of One Man Lake and 95 km east of the WL site. This reserve has a land base of 1,117.3 ha. Agency 30 Reserve No. 06240 is the fourth reserve (379 ha), well to the south of the other reserves, and situated in Lake of the Woods, approximately 140 km southeast of the WL site. This reserve is shared with twelve other First Nations, including Shoal Lake No. 40 First Nation, Northwest Angle No. 33 First Nation, and Iskatewizaagegan #39 Independent First Nation.

3.4.4.1 Engagement

In August 2016, CNL sent a letter to Wabaseemoong Independent Nations introducing the WR-1 Decommissioning Project and inviting them to engage on this Project. In May 2017, CNL, AECL,

and the CNSC met with Wabaseemoong Independent Nations to discuss the WR-1 Project. One month later, in June, Wabaseemoong Independent Nations representatives participated in a site tour at the WL site and had a follow-up discussion on the Project. CNL, CNSC, and AECL also met with Wabaseemoong Independent Nations in August 2017 to continue discussions on WR-1. In October, CNL sent a letter to Wabaseemoong Independent Nations notifying them of the public comment period for the draft EIS and invited them to review and submit comments. In November, CNL sent a hard copy of the draft EIS executive summary to the community. The same month, CNL invited the community to participate in a site tour.

In September 2017, CNL provided an opportunity for five members from each First Nation community and the Manitoba Métis Federation to attend a full day workshop to both learn and share on how CNL and the First Nations and the Manitoba Métis Federation collectively protect and care for the environment. The goal was to provide some hands on experience coupled with ample discussion, learning and dialogue on opportunities moving forward both as a career option and as a relationship between the site and the First Nations and the Manitoba Métis Federation.

On October 31, 2017, CNL's Annual Safety Reports were distributed to each First Nation community including the *Environmental Monitoring in 2016 at Whiteshell Laboratories* [19] report, and the *2016 Progress Report on the Environmental Assessment Follow-up Program for Whiteshell Laboratories* [20]. CNL also provided an invitation to engage on these documents.

In 2018, Wabaseemoong Independent Nations participated in the Hallam, Nebraska, benchmarking trip. The purpose of the trip was to provide First Nations and the Manitoba Métis Federation the opportunity to see firsthand what an in-situ disposed site looks like post-closure and to provide more information about ISD. Wabaseemoong Independent Nations also submitted a Traditional Knowledge and Environmental Impact Assessment [25], which was submitted to the CNSC on January 8, 2018.

In August 2020, CNL submitted CNL's responses to Wabaseemoong Independent Nations' comments on the EIS. CNL followed up several times via e-mail and phone requesting an opportunity to discuss CNL's responses and invited them to participate in a site tour. Although Wabaseemoong Independent Nations indicated interest in attending a tour no answer was given for whether the community would like to discuss CNL's responses to their comments. In September, CNL sent an invitation to Wabaseemoong Independent Nations inviting them to participate in CNL's fall monitoring activities. This invitation was sent out to all communities. CNL also sent Wabaseemoong Independent Nations an invitation to participate in CNL's final breakfast session. This was also sent to the First Nations and the Manitoba Métis Federation. CNL did not receive a response for either invitation.

In October 2020, CNL reached out to Wabaseemoong Independent Nations on a weekly basis requesting to meet to discuss CNL's responses to their comments. The purpose of the meeting would be to determine whether CNL's responses adequately addressed their comments and discuss next steps. Wabaseemoong Independent Nations did not respond to CNL's calls or e-mails.

On February 8, 2021, CNL sent a formal letter to the community, stating CNL was getting ready to resubmit their draft EIS for the decommissioning of WR-1 and offering to provide a Project update.

On May 11, 2021, CNL sent a letter to Wabaseemoong Independent Nations' leadership asking for their verification on whether CNL had documented the community's interest and concerns and list of VCs correctly. On June 6, 2021, CNL sent the community an invitation to participate in an exploratory discussion on developing an Indigenous Advisory Committee at Whiteshell Laboratories. On July 20, 2021, CNL and a representative from Wabaseemoong Independent Nations held a teleconference to go through the table to ensure CNL had addressed their interests and concerns. During the meeting, CNL revised the summary of interests and concerns table and sent back a copy on July 22, 2021, and the revised list of VCs on July 23, 2021. On September 9, 2021, CNL sent a thank you letter to Wabaseemoong Independent Nations, thanking them for verifying that CNL had adequately captured their interests and concerns.

A representative from Wabaseemoong Independent Nations participated in the two exploratory discussions on developing an Indigenous Advisory Committee for the WL site. The two sessions were held on August 12, 2021 and September 28, 2021.

On May 16, 2022, CNL held a teleconference with Wabaseemoong Independent Nations and walked through the revisions to the interests and concerns table and made changes based on Wabaseemoong Independent Nations' feedback during the meeting. On June 13, 2022, CNL asked Wabaseemoong Independent Nations to confirm they have completed verification of their interests and concerns table. On July 12, 2022, CNL and Wabaseemoong Independent Nations had a phone conversation and discussed current events and upcoming availability for a site tour. CNL also confirmed the contact information for the Chief. On the following day, July 13, 2022, CNL sent a letter to Wabaseemoong Independent Nations' Chief notifying him that CNL had submitted the draft EIS to the CNSC to determine completeness.

On August 26, 2022, CNL and Wabaseemoong Independent Nations discussed setting up a date for a tour. Wabaseemoong Independent Nations suggested calling in a few weeks to confirm interest in attending a tour. CNL sent a copy of CNL's monitoring program schedule on August 30, 2022, and requested Wabaseemoong Independent Nations to identify any activities of interest. CNL followed up with an e-mail on September 23, 2022, regarding recent discussions about meeting with the Wabaseemoong Independent Nations leadership team and doing a site tour. CNL reaffirmed their interest to meet and coordinate those activities. CNL also requested Wabaseemoong Independent Nations identify any specific monitoring activities that they wish to be involved with, from the list provided to them on August 30, 2022.

3.4.4.2 Interests and Concerns

Wabaseemoong Independent Nations submitted three formal comments on the 2017 draft EIS.

Through a variety of engagement forums, including webinars, meetings, and teleconferences, Wabaseemoong Independent Nations has raised a number of issues, concerns and questions that were initially focused on the 2017 and 2020 draft EIS. These engagements have led to the development of the interests and concerns table for Wabaseemoong Independent Nations. This

subsection is taken from the tables of interests and concerns from Appendix 4.0-1 of the draft EIS, and describes CNL's understanding based on written submissions and oral discussions with the Nations. The Nations have also provided feedback through their TKLUS [25]. CNL has made its best efforts to document and verify the position the Nations have taken on each interest/concern. See EIS Section 4.4 [6] for a summary of issues raised during engagement activities that influenced the scope of the environmental assessment.

The topics in the table of interests and concerns are briefly summarized below:

Regulatory Process

Wabaseemoong Independent Nations expressed concern with the communication methods used by the CNSC, noting that they were not aware of the Project until Chief Henderson from Sagkeeng mentioned it. They also wanted to understand why they were only recently contacted since the WL site was established and began operations in the 1960s. CNL responded directly to community comments and concerns about the timing and communications on the Project. CNL held an information session in the community to provide information on the Project and answer any questions directly from the community members. CNL continues to send updates on the Project. CNL will continue to notify Wabaseemoong Independent Nations about the Project and make itself available to discuss topics of interest to the community.

CNL has adequately addressed this area of interest, based on the steps taken to address this concern with the community and the attempts made to verify this area of interest.

Engaging the Community

Wabaseemoong Independent Nations expressed interest in having an engagement event in their home community with CNL, AECL and CNSC which subsequently occurred August 21, 2017. CNL has invited Wabaseemoong Independent Nations for a site tour and offered capacity funding to support their review of CNL's responses to the community's comments on the draft EIS. CNL continues to look for ways to engage with the community. CNL has adequately addressed this request and area of interest.

Business and Employment Opportunities

Wabaseemoong Independent Nations requested more details about employment opportunities at the WL site, including the availability of seasonal employment and the proportion of the workforce that is Indigenous. Wabaseemoong Independent Nations noted that employment at the WL site may be difficult for members because it is not located within commuting distance of the community. CNL hosted an Indigenous industry day to share information about employment and contracting opportunities with communities. CNL recognized that the commute from Wabaseemoong Independent Nations was long, but offered to help any job candidates find appropriate housing in the region.

CNL's procurement department also added provisions to its procurement process that encourages the use of Indigenous and local small and medium sized businesses and has reached out to engage with communities on procurement. CNL believes they have adequately

addressed this area of interest, based on the steps taken to address this concern with the community and the attempts made to verify this area of interest.

Traditional Knowledge

Wabaseemoong Independent Nations noted that animals do not obey the same sort of boundaries as humans and could come into contact with hazardous materials. They expressed an interest in conducting a traditional use study. Wabaseemoong Independent Nations submitted a CNSC funded traditional use study to the CNSC on January 18, 2018. CNL acknowledged this and explained that there were no Project activities or outcomes that would result in a residual adverse effect to wildlife, so species of importance to traditional land and resources use will not be affected.

CNL provided responses to community comments about animals within CNL boundaries limits, and incorporated elements of the traditional use study in Section 6.8.1.5.2.2 Traditional Land and Resource Use by Indigenous Peoples of the EIS to the extent possible.

By incorporating Traditional knowledge from Wabaseemoong Independent Nations into the draft EIS, CNL has adequately addressed this area of interest, recognizing that engagement is ongoing and CNL will continue to invite Wabaseemoong to be involved in environmental monitoring on site.

CNL has also used the TKLUS to verify the Project's VCs and created a list of VCs for the community. Wabaseemoong Independent Nations verified that these VCs adequately capture the species and areas of interest and concern to the community to the best of their knowledge at this time. The following list is CNL's understanding of related species and topics of interest:

- partridge;
- food and traditional medicines;
- rabbit, squirrel, porcupine, chipmunk;
- white-tailed deer, moose;
- bear, wolf;
- fish (sturgeon, whitefish, walleye, bass);
- benthic invertebrate;
- heron;
- mallards, teal, geese;
- mink, beaver, muskrat, otter;
- Winnipeg River; and
- employment and business opportunity; community well-being; environmental and community safety; land tenure and future use; cultural and archaeological sites; traditional land.

Environmental Monitoring

Wabaseemoong Independent Nations expressed an interest in knowing more about monitoring fish, including how fish are tested and if contaminants can accumulate over time. In addition, they asked about air emissions monitoring practices. The community expressed an interest in learning more about CNL's long-term monitoring plan for WR-1 due to the long-term nature of the Project.

CNL environmental protection staff engaged and presented on the Whiteshell Laboratories environmental protection program, explaining, among many other aspects, the annual monitoring campaign that has been underway since the inception of the site. This included information on fish sampling and air emissions. CNL explained where air monitoring occurs, both on and off site. CNL explained the results and the low impact. CNL pointed to where the results are available annually on their website.

CNL sent Wabaseemoong Independent Nations a list of environmental monitoring activities and invited the community to participate. CNL continues to look for ways to improve its environmental monitoring program. CNL will continue to invite Wabaseemoong Independent Nations to participate in CNL's monitoring activities. CNL has also committed to engagement with each Indigenous community on the development and implementation of a post-closure monitoring plan that will include an Indigenous-led monitoring program.

Recognizing that this is an area of ongoing interest for the community, and CNL's commitment to continued engagement on this topic, CNL believes it has adequately addressed this area of interest.

Future Land Use and Tenure

Wabaseemoong Independent Nations expressed questions about future land use of the WL site, specifically on the proportion of land that would be available post-closure of the WL site. CNL plans to engage with First Nations and the Manitoba Métis Federation on future land use and end state in 2022. CNL explained and provided information on the size and location of the site. This included posters that had a map and aerial pictures of the site. While out of scope of the environmental assessment for the Project, CNL has adequately addressed this area of interest, recognizing that engagement on future land use for the site is forth coming.

Governance Structure of the Canadian Nuclear Laboratories

Wabaseemoong Independent Nations were interested in the history of the WL site and the functional relationship between CNL and AECL. CNL provided information explaining CNL's governing structure and their relationship with AECL. AECL, CNL, and CNSC have presented on their individual roles in the regulatory process. CNL has adequately addressed this area of interest, based on the steps taken to address this concern with the community and the attempts made to verify this area of interest.

Waste Management

Wabaseemoong Independent Nations were interested in more detailed information about how much radioactive waste would remain on the WL site, where the radioactive waste would be

stored, and how it was to be transported off-site. Wabaseemoong Independent Nations also asked about the methods used to transport waste and how it will be communicated to potentially affected communities. CNL hosted Wabaseemoong Independent Nations for a tour of their waste management facilities and answered questions about waste management and transportation of waste. CNL provided information to the community on waste management at the site and proposed plans for waste transportation. CNL has adequately addressed this area of interest, based on the steps taken to address this concern with the community and the attempts made to verify this area of interest.

Accidents and Malfunctions

Wabaseemoong Independent Nations were interested in past releases and the potential for future releases of hazardous and radioactive material into the Winnipeg River. In addition, they were interested in how releases could be contained in the soil, and information on spill detection. As stewards of the land, members of Wabaseemoong Independent Nations have a responsibility to protect ecosystems and ensure ecosystem function including trophic impacts of contamination. Wabaseemoong Independent Nations expressed the view that potential adverse impacts on fisheries from the Project would negatively impact the ability of Wabaseemoong Independent Nations members to collect these fisheries resources and damage their relationship with them. Moreover, changes to concentrations of contaminants (e.g., nuclear spills) in fish tissues could have negative consequences on human health. CNL has provided updates on the decommissioning activities to the community and will continue to seek opportunity to discuss the Project with the community.

CNL responded to Wabaseemoong Independent Nations' questions regarding CNL's detection systems, past spills, and prevention of future spills. CNL developed plain language materials to support their communication of past spills. CNL has committed to involving First Nations and the Manitoba Métis Federation in the development and implementation of an Indigenous post closure monitoring program.

CNL has adequately addressed this area of interest, based on the steps taken to address this concern with the community and the attempts made to verify this area of interest.

Project Description

Wabaseemoong Independent Nations expressed a concern about the longevity of the nuclides and the long-term nature of the Project. There was discussion about whether climate change or natural disasters could affect the integrity of the grouted encapsulation and how it would be constructed to ensure that it is safe.

CNL indicated that climate change may have an impact on the site and that potential effects are being studied and reported on in the EIS. CNL also mentioned that extreme events are also being considered including flooding. Wabaseemoong Independent Nations was told that the site is located in an area that isn't prone to earthquakes. Seismic activity is extremely low in the Project area and is not expected to result in any damage to the facility. CNL will be examining potential accidents and disruptive scenarios such as a plane crash, animal intrusion, or glaciation.

CNL has adequately addressed this area of interest, based on the steps taken to address this concern with the community and the attempts made to verify this area of interest.

3.4.4.3 Verification

CNL incorporated feedback through engagements with Wabaseemoong Independent Nations on the Project and their TKLUS. To confirm CNL has adequately captured the community's interests and concerns, position, and knowledge, CNL and Wabaseemoong Independent Nations underwent a verification process whereby CNL provided EIS documentation to the community for their review and feedback. CNL and Wabaseemoong Independent Nations met to discuss the community's feedback on the documents to inform how CNL incorporated the feedback into the EIS. Through this process, the community has reviewed and provided feedback from their summary of interests and concerns table, list of VCs, and Section 4.0 of the EIS. CNL made every effort to verify that the community's interests and concerns were adequately characterized. CNL continues to work with Wabaseemoong Independent Nation to address their concerns.

In September 2020, Wabaseemoong Independent Nations acknowledged receipt of CNL's responses to their community's comments on the draft EIS. CNL has requested to meet with Wabaseemoong Independent Nations to discuss CNL's responses to their comments, however the community has not yet indicated whether they intend to review CNL's responses. CNL has also offered to provide capacity funding and to host Wabaseemoong Independent Nations for a site tour. Wabaseemoong Independent Nations showed interest in participating in a tour on site, however, no date has been set despite multiple follow-ups. CNL understands that communities have a number of other pressing concerns and priorities on their plate and will continue to patiently and respectfully invite them for a tour and to discuss the WR-1 decommissioning. A final notice for submitting additional comments was sent via e-mail to Wabaseemoong Independent Nations. CNL will continue to seek guidance on how best to engage Wabaseemoong Independent Nations in the environmental assessment process. CNL will continue to send invites and general information about the Project to Wabaseemoong Independent Nations.

On May 11, 2021, CNL sent a letter to Wabaseemoong Independent Nations' leadership asking for their verification on whether CNL had documented the community's interests and concerns and list of VCs correctly. On June 6, 2021, CNL sent the community an invitation to participate in an exploratory discussion on developing an Indigenous Advisory Committee at Whiteshell Laboratories. On July 20, 2021, CNL and a representative from Wabaseemoong Independent Nations held a teleconference to go through the table to ensure CNL had addressed their interests and concerns. During the meeting, CNL revised the summary of interests and concerns table and sent back a copy on July 22, 2021, and the revised list of VCs on July 23, 2021. On September 9, 2021, CNL sent a thank you letter to Wabaseemoong Independent Nations, thanking them for verifying that CNL had adequately captured their interests and concerns.

CNL received a letter from the CNSC on August 24, 2022, indicating that three Information requests remained outstanding, including updating the Indigenous engagement narrative and tables. Community specific portions of Section 4.0, Engagement Logs, and Interest and

Concerns Tables were sent to Wabaseemoong Independent Nations on October 20, 2022, to review for accuracy. While all efforts were made to communicate changes to the EIS to the Wabaseemoong Independent Nation, CNL did not receive any feedback on these updates. CNL will continue to make efforts to engage with Wabaseemoong Independent Nations.

3.4.4.4 Next Steps

CNL will continue engagement with the Wabaseemoong Independent Nations with the objective of addressing or resolving any outstanding issues or concerns with the Project. CNL will continue to reach out in the interest of improving the relationship between CNL and Wabseemoong Independent Nations.

CNL has committed to establishing an Indigenous Advisory Committee and to support Indigenous participation in environmental monitoring at the WL site. CNL plans to continue to involve Wabaseemoong Independent Nations in the further establishment of this initiative.

3.4.5 Shoal Lake #40 First Nation

In August 2016, CNL sent Shoal Lake #40 First Nation a Project introductory letter and requested the community's input on any potential adverse impacts from the Project activities. CNL did not receive any response from the community. In addition to sending the letter, CNL phoned Shoal Lake #40 First Nation multiple times in 2016 to determine whether the community was interested in engaging on the Project. CNL followed up with the Chief who confirmed he had received CNL's letter. In 2017, CNL followed up multiple times with the Lands and Resource Manager and in October 2017, CNL sent a letter to the Chief notifying the community that CNL had submitted the draft EIS. Until recently, February 2021, CNL did not reach out to the community; since we had not heard back after multiple attempts to communicate, we assumed the community was not interested in engaging on the Project.

Since 2017, CNL has learned a great deal from engaging with First Nations and the Manitoba Métis Federation on the Project. CNL recognizes the importance of making ongoing efforts to meaningfully engage with communities and has resumed communications with the Shoal Lake #40 First Nation. CNL sent a formal letter in February 2021 to the community, stating CNL was getting ready to resubmit their draft EIS for the decommissioning of WR-1 and offering to provide a Project update.

On July 13, 2021, CNL sent out a letter of notice to Chief Redsky informing him that CNL has submitted a draft EIS and requesting a meeting to engage on the Project. On August 3, 2022, CNL followed up with a phone call and left a detailed message with reception for Chief Redsky regarding receipt of the letter and transmittal e-mail, and regarding CNL's interest to discuss and meet. While CNL has yet to receive a response from Shoal Lake #40 First Nation on the Project, CNL will continue to make efforts to engage and provide regular Project updates.

CNL sent a follow-up e-mail on October 21, 2022, with a letter attachment, providing an update on the status of the Project application. CNL will continue to provide regular Project updates to Shoal Lake #40.

A map of Shoal Lake #40 First Nation is provided in Appendix D.

3.4.6 Iskatewizaagegan No. 39 Independent First Nation

In August 2016, CNL sent Iskatewizaagegan No. 39 Independent First Nation a Project introductory letter and requested the community's input on any potential adverse impacts from the Project activities. CNL did not receive any response from the community.

In October 2016, CNL called Iskatewizaagegan No. 39 Independent First Nation to gauge interest in the Whiteshell Laboratories Closure Project. CNL was forwarded to a community representative who requested CNL fax their introductory letter to their community. CNL sent the letter by fax in November 2016. Afterwards, CNL followed-up by phone multiple times with the community that year, with no responses.

In 2017, CNL followed-up multiple times with the community, inviting them to engage on the Project. In October 2017, CNL sent the chief a letter notifying them that CNL had submitted the draft EIS. CNL never received a response from the community and did not reach out again.

Since 2017, CNL has learned a great deal from engaging with the First Nations and the Manitoba Métis Federation on the Project. CNL recognizes the importance of making ongoing efforts to meaningfully engage with the First Nations and the Manitoba Métis Federation and has resumed communications with the Iskatewizaagegan No. 39 Independent First Nation. CNL sent a formal letter in February 2021, to the community, stating CNL was getting ready to resubmit their draft EIS for the decommissioning of WR-1 and offering to provide a Project update.

On July 13, 2022, CNL sent out a letter of notice to Chief Lewis informing him that CNL would be submitting a draft EIS and requested a meeting to engage on the Project. On August 3, 2022, CNL followed up with a phone call and left a detailed message with reception for Chief Lewis regarding receipt of the letter and transmittal e-mail, and regarding CNL's interest to discuss and meet. While CNL has yet to receive a response from Iskatewizaagegan No. 39 Independent First Nation on the Project, CNL will continue to make efforts to engage and provide regular Project updates.

CNL sent a follow-up e-mail on October 21, 2022, with a letter attachment, providing an update on the status of the Project application. CNL will continue to provide regular project updates to Iskatewizaagegan No. 39 Independent First Nation.

A map of Iskatewizaagegan No. 39 Independent First Nation is provided in Appendix D.

3.4.7 Northwest Angle No. 33 First Nation (Treaty No. 3)

After CNL sent the introductory letter to Northwest Angle No. 33 First Nation, CNL followed up multiple times with the community in 2016 to determine if the community would like to engage CNL on the Project. A community representative informed CNL they had received the letter and that it was provided to Chief and Council, but noted the community recently had an election and people were still getting used to their positions. When CNL followed up they confirmed the letter had been distributed to the Chief and Council, but cautioned that the Chief and Council were unlikely to review prior to end of December 2016.

In 2017, CNL notified the Chief of CNL's draft EIS submission and invited them to engage on the Project. After receiving no response on the initial letter or any subsequent follow-up, CNL did not attempt to reach out again. CNL recognizes the importance of making ongoing efforts to meaningfully engage with the First Nations and the Manitoba Métis Federation and has resumed communications with the Northwest Angle No. 33 First Nation. CNL sent a formal letter in February 2021, to the community stating CNL was getting ready to resubmit their draft EIS for the decommissioning of WR-1 and offering to provide a Project update.

On July 13, 2022, CNL sent out a letter of notice to Chief Comegan informing that CNL would be submitting a draft EIS and requested a meeting to engage on the Project. On August 3, 2022, CNL followed up with a phone call and left a detailed message with reception for Chief Comegan regarding receipt of the letter and transmittal e-mail and regarding CNL's interest to discuss and meet. While CNL has yet to receive a response from Northwest Angle No. 33 First Nation on the Project, CNL will continue to make efforts to engage and provide regular Project updates.

CNL sent a follow-up e-mail on October 21, 2022, with a letter attachment, providing an update on the status of the Project application. CNL will continue to provide regular project updates to Northwest Angle No. 33 First Nation.

A map of Northwest Angle No. 33 First Nation (Treaty No. 3) is provided in Appendix D.

3.5 Future Engagement Activities Planned

Canadian Nuclear Laboratories will continue to engage with First Nations and the Manitoba Métis Federation after submission of the updated draft EIS, throughout the remaining environmental assessment steps, and during the remediation of the WL site. Future activities are expected to focus on continued relationship building addressing ongoing interests and concerns, and monitoring of the site, all of which will be documented into updated revisions of this IER.

Future engagement activities are broken into short-term initiatives that will take place between now and the final EIS submission, and longer-term initiatives, some of which are relevant to the Project's environmental assessment, and others that extend beyond the scope of the Project.

3.5.1 Short-term Initiatives and Engagements

The following list outlines short-term initiatives that apply to all First Nation and the Manitoba Métis Federation that CNL will take between now and submitting the final EIS. For specific initiatives for each First Nation or the Red River Métis, see the subsection "Next Steps" in Section 3.4.

- **Informational Webinars and Online Open Houses –** CNL has been, and will be, hosting informational webinars on various topics related to the Project including follow-up monitoring, end state of WR-1, baseline conditions, etc. Some of these will be designed to directly address misperceptions and stigma associated with the Project.

- **Commitments Dialogue –** Now that CNL has verified each Nation's interests and concerns on the Project, after submission of the EIS, CNL will work with each Nation to draft a list of commitments to support addressing their concerns related to the Project.
- **Sharing of Job Postings –** CNL will continue to share job postings and opportunities for employment as they become available.
- **Community Liaison and Associated Engagement Plans –** CNL will work with the community liaison officers to develop an engagement plan and other community-specific initiatives to support engagement with community members or citizens to elevate the level of awareness and knowledge about the Project within the community.
- **Community Specific Information Sessions –** Once CNL has submitted the revised EIS, CNL will send out invitations to the Manitoba Métis Federation and the First Nations to continue engagement on the key components of the EIS, including baseline studies, WR-1 end state, follow-up monitoring, and other items of importance to that Community.
- **Participation in Environmental Monitoring Activities –** CNL will continue to invite the Manitoba Métis Federation and the First Nations to participate in monitoring activities during the upcoming field seasons.

3.5.2 Long-term Initiatives and Engagements

The following is a list of longer-term initiatives that while relevant to the Project's environmental assessment, extend beyond the scope of the Project to address WL site issues, concerns and interests:

- **Supporting Long-term Monitoring –** All the First Nations and the Manitoba Métis Federation have expressed an interest in being more involved in CNL's environmental protection program. Specifically, the Manitoba Métis Federation expressed an interest in actively participating in monitoring both in the environmental protection program and decommissioning activities (outside the scope of the environmental assessment). CNL will work closely with the First Nations and the Manitoba Métis Federation to support their involvement in environmental monitoring at the WL site. This initiative will extend beyond the timeline and scope of the environmental assessment for WR-1 and will be a part of the larger site environmental remediation Project. CNL has agreed to a scope of work with Sagkeeng to develop and execute an independent Sagkeeng Community Environmental Monitoring Program. At the time of submission, the parties have executed the agreement and are coordinating a formal signing ceremony.
- **Indigenous Advisory Committee –** CNL has received interest from three First Nations and the Manitoba Métis Federation to move forward with the establishment of an Indigenous Advisory Committee. Two workshops were held to develop a draft terms of reference and guide for the Indigenous Advisory Committee. The purpose of the Indigenous Advisory Committee includes, but is not limited to fostering a working relationship between Indigenous Nations, CNL, and AECL to collaborate and engage with CNL and AECL regarding the Whiteshell Laboratories Closure Project, and on other

topics of mutual interest and concern. The Indigenous Advisory Committee will also provide advice and guidance, and amplify the voice of Indigenous Nations to CNL and/or AECL management, to influence organizational change, and add Indigenous input into areas of the project and company including procurement, communication and engagement, long-term legacy monitoring, and integration of Traditional knowledge. CNL has taken steps to work with the First Nations and the Manitoba Métis Federation to move this initiative forward. The intent of this committee extends beyond the scope of the environmental assessment for the Project. CNL will continue to solicit interest and make efforts to put this committee in place should the Nations see value in it.

- **Relationship Agreements –** CNL will continue to discuss developing Relationship Agreements with each of the involved First Nations and the Manitoba Métis Federation. These Relationship Agreements will likely extend beyond the scope of the environmental assessment for the Project and include engagement, participation, and involvement in the Whiteshell Laboratories Closure Project. These Relationship Agreements can also include developing community risk-informed communication tools with direct input from community leaders and include reconnection to the land through access to the site for cultural and ceremony activities. CNL will also discuss implementing long-term Relationship Agreements between AECL, CNL and the Nations that will help to ensure the initiatives that are developed and implemented continue into the post-closure phase of the Project and that may also help to address broader concerns. At the time of submission, a Relationship Agreement is being discussed between the Manitoba Métis Federation and CNL.

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Appendix A Contact Tracker

WL INDIGENOUS CONTACT TRACKER

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Community	Related Activity	Date of Contact	Contact Name	Contact Information	Communication Medium	Inbound / Outbound	Reason	Employee Log	Other Comments	Follow-up required	Follow up required
Black River First Nation	Initial phone call re: Enagagement/ Relationship building	6-Oct-16	Patricia Mitchell	Phone: 204-801-3822 patricia2mitchell@gmail.com	Phone Call	Outbound	Initial phone call to guage interest in the WR-1 project	Mitch MacKay	Her group is interested in the WR-1 project. Wants a tour and community presentation. Interested in participant funding. Provided contact information for	Yes	Sent information to: 'patricia2mitchell@gmail.com'
Northwest Angle No.33	Initial phone call re: Enagagement/ Relationship building	26-Oct-16	No contact person established yet	Phone: 807-733-2200	Phone Call	Outbound	Initial phone call to guage interest in the WR-1 project	Mitch MacKay	Called no answer, no answering machine.	No	
Northwest Angle No.33	Initial phone call re: Enagagement/ Relationship building	26-Oct-16	Trying a different number. Left message on answering machine.	Phone: 807-468-8852	Phone Call	Outbound	Initial phone call to guage interest in the WR-1 project	Mitch MacKay	Called and left a message on a machine, with call back information.	No	
Northwest Angle No.33	Initial phone call re: Enagagement/ Relationship building	26-Oct-16	Trying a different number.	Phone: 807-226-2858	Phone Call	Outbound	Initial phone call to guage interest in the WR-1 project	Mitch MacKay	No answer, voicemail was full	No	
Brokenhead Ojibway Nation	Initial phone call re: Enagagement/ Relationship building	26-Oct-16	Reception	Phone: 204-766-2494	Phone Call	Outbound	Initial phone call to guage interest in the WR-1 project	Mitch MacKay	Asked if they received the letter. Was told to call Gord Bluesky.	Yes	Call Gord Bluesky
Brokenhead Ojibway Nation	Follow up phone call re: Enagagement/ Relationship building	26-Oct-16	Gord Bluesky	Phone: 204-485-5310	Phone Call	Outbound	Guage interest in the WR-1 project	Mitch MacKay	Spoke to Gord Bluesky, he is in charge of lands for the Ojibway Nation. He asked for CNL to send him the letter and he would follow-up. Very interested in the history of the site, and what is happening now. Wanted to know if he could stand by the reactor. Interested in partnering up with Black River and doing a tour. Also interested in bringing an elder and performing a ceremony.	Yes	Send Gord the project introduction letter.
Brokenhead Ojibway Nation	Enagagement/ Relationship building	26-Oct-16	Gord Bluesky	Email: gordbluesky@gmail.com	Email	Outbound	Provide additional project information	Mitch MacKay	Sent email to Gord Bluesky. Factsheet and project letter attached.	Yes	Follow in a few days
Hollow Water First Nation	Initial phone call re: Enagagement/ Relationship building	26-Oct-16	No contact person established yet	Phone: 204-363-7278	Phone Call	Outbound	Initial phone call to guage interest in the WR-1 project	Mitch MacKay	Called the Band office no answer. Left a message.	No	
Shoal Lake No.40 First Nation	Initial phone call re: Enagagement/ Relationship building	26-Oct-16	No contact person established yet	Phone: 807-733-2315	Phone Call	Outbound	Initial phone call to guage interest in the WR-1 project	Mitch MacKay	Called the Band office and was forwarded to answering machine. Left message.	No	
Iskatewizaagegan No.39 Independent First Nation	Initial phone call re: Enagagement/ Relationship building	26-Oct-16	No contact person established yet	Phone: 807-733-2560	Phone Call	Outbound	Initial phone call to guage interest in the WR-1 project	Mitch MacKay	Called the band office and was forwared to Delores. She requested a fax (807-733-3106) of the letter, to confirm with Chief if they received the letter. She explained she	Yes	Fax project introduction letter and contact information to Dolores.
Wabaseemoong Independent Nations	Initial phone call re: Enagagement/ Relationship building	26-Oct-16	No contact person established yet	Phone: 807-927-2000	Phone Call	Outbound	Initial phone call to guage interest in the WR-1 project	Mitch MacKay	Called the band office and was forwarded to council. No answer so left a message.	No	
Iskatewizaagegan No.39 Independent First Nation	Enagagement/ Relationship building	26-Oct-16	Delores Day	Fax: 807-733-3106	Fax	Outbound	Provide additional project information	Mitch MacKay	Fax of letter and contact information sent	No	
Grand Council of Treaty 3	Initial phone call re: Enagagement/ Relationship building	26-Oct-16	No contact person established yet	Phone: 807-548-4214	Phone Call	Outbound	Initial phone call to guage interest in the WR-1 project	Mitch MacKay	Called the council and spoke to reception. She was going to confirm reciept of letter and forward contact information to	Yes	Email contact information to admin staff.
Grand Council of Treaty 3	Enagagement/ Relationship building	26-Oct-16	Amanda	Email: reception@treaty3.ca	Email	Outbound	Provide additional contact information	Mitch MacKay	Emailed contact information.	No	
Manitoba Metis Federation	Initial phone call re: Enagagement/ Relationship building	26-Oct-16	Jasmine Langhan	Phone: 204-586-8474	Phone Call	Outbound	Initial phone call to guage interest in the WR-1 project	Mitch MacKay	Letter Received. Follow up by email to get the process started.	Yes	Follow up via email to set up introductory meeting
Manitoba Metis Federation	Enagagement/ Relationship building	26-Oct-16	Jasmine Langhan	Email: 'marci.riel@mmf.mb.ca' Email: 'tiffany.mankman@mmf.mb.ca'	Email	Outbound	Follow up re: setting up an apporpriate time to meet	Mitch MacKay	Emailed followup.	No	
Black River First Nation	Enagagement/ Relationship building	26-Oct-16	Patricia Mitchell	Phone: 204-801-3822	Phone Call	Outbound	Follow up re: community interest in participating in the WR-1 project	Mitch MacKay	Spoke with Patricia Mitchell. She was interested in the contracting/economic portion of the project. She was attempting to coordinate a large meeting with Brokenhead, Sagkeegn and Black River FNs. She will follow-up once she has	No	
Grand Council of Treaty 3	Enagagement/ Relationship building	26-Oct-16	Amanda	Phone: 807-548-4214	Phone Call	Inbound	Follow up re: organization interest in participating in the WR-1 project	Mitch MacKay	Grand Council #3 called back to inform that they could not find the letter.	Yes	Send introductory letter via email. Email: reception@treaty3.ca
Grand Council of Treaty 3	Enagagement/ Relationship building	26-Oct-16	Amanda	Email: reception@treaty3.ca	Email	Outbound	Follow up re: organization interest in participating in the WR-1 project	Mitch MacKay	Letter sent via email as requested.	No	
Brokenhead Ojibway Nation	Follow up phone call re: Enagagement/ Relationship building	1-Nov-16	Gord Bluesky	Phone: 204-485-5310	Phone Call	Outbound	Follow up re: organization interest in participating in the WR-1 project	Mitch MacKay	Requested follow-up re: organization's Gord wanted me to email him specific request.	Yes	Send email outlining converstion.
Brokenhead Ojibway Nation	Follow up email	1-Nov-16	Gord Bluesky	Email: gordbluesky@gmail.com	Email	Outbound	Responding to email request	Mitch MacKay	Offer of engagement.	No	

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Black River First Nation	Follow up phone call re: Enagagement/ Relationship building	1-Nov-16	Patricia Mitchell	204-801-3822	Phone Call	Outbound	Follow up re: engagement	Mitch MacKay	Patricia says that she is waiting to hear back from CNSC on funding.	No	
Grand Council of Treaty 3	Follow up phone call re: Enagagement/ Relationship building	1-Nov-16	Reception	Phone: 807-548-4214	Phone Call	Outbound	Follow up re: engagement	Mitch MacKay	Reception said she was just filling in while reception was getting the mail. Call back in 15 minutes.	Yes	
Iskatewizaagegan No.39 Independent First Nation	Follow up phone call re: Enagagement/ Relationship building	1-Nov-16	Reception	807-733-2560	Phone Call	Outbound	Follow up on Fax	Mitch MacKay	Was told that person in charge of this was away. Call back next week.	Yes	
Wabaseemoong Independent Nations	Follow up phone call re: Enagagement/ Relationship building	1-Nov-16	No contact person established yet	Phone: 807-927-2000	Phone Call	Outbound	Follow up re: engagement	Mitch MacKay	Left message on machine.	No	
Brokenhead Ojibway Nation	Email request to First Nation groups from Brokenhead	8-Nov-16	Gord Bluesky	Email: gordbluesky@gmail.com, Buddy Prince, Patricia Mitchell	Email	Inbound	Soliciting feedback on group engagement possibilities	Mitch MacKay	Gord is interested in getting Hollow Water and Black River together for a shared	No	
Black River First Nation	Email to notify CNL of next steps	8-Nov-16	Patricia Mitchell	Email: patricia2mitchell@gmail.com.	Email	Inbound	Repying to request to engage.	Mitch MacKay	I'm hoping to hear back from the Feds before setting up a mte., the Chiefs are	No	
Black River First Nation	Email to notify CNL of next steps	8-Nov-16	Patricia Mitchell	Email: patricia2mitchell@gmail.com, Gord Bluesky	Email	Inbound	Repying to request to engage.	Mitch MacKay	We are aware of your request to meet, and we will contact you as soon as our calendars allow it.	No	
Sagkeeng First Nation	Follow up phone call re: Enagagement/ Relationship building	10-Nov-16	Miles Courchene	Phone: (204) 367-2287	Phone Call	Outbound	Follow up re: engagement	Mitch MacKay	Left message on machine.	No	
Grand Council of Treaty 3	Engagement/ Relationship building	16-Nov-16	Sam	Phone: 807-548-4214 (assumption) Email: reception@treaty3.ca	Phone Call	Outbound	Follow up re: organization interest in participating in the WR-1 project	Christina Blouw	Sam remembers speaking to Mitch personally. Reception duties rotate through a number of people. Sam will take a look and see if the email with the notification letter was received. She will	No	
Grand Council of Treaty 3	Engagement/ Relationship building	16-Nov-16	Sam	Phone: 807-548-4214 (assumption) Email: reception@treaty3.ca	Phone Call	Inbound	Follow up re: organization interest in participating in the WR-1 project	Christina Blouw	Sam found the introductory letter and left a voicemail for me to call her back.	Yes - call Sam back	
Grand Council of Treaty 3	Engagement/ Relationship building	16-Nov-16	Sam	Phone: 807-548-4214 (assumption) Email: reception@treaty3.ca	Phone Call	Outbound	Follow up re: organization interest in participating in the WR-1 project	Christina Blouw	Sam is fairly certain the information letter was forwarded on to the Grand Chief's email. The email would have also gone to the Territorial Planning Unit (TPU) and Roxanne Meawasige (communications and consultations officer) would have reviewed it. Sam will forward the introductory letter on to Roxanne again. Roxanne is out of the office today but Sam will send her my contact information for		
Iskatewizaagegan No.39 Independent First Nation	Follow up phone call re: Enagagement/ Relationship building	16-Nov-16	Delores Day	Phone: 807-733-2560	Phone Call	Outbound	Initial phone call to gauge interest in the WR-1 project	Christina Blouw	Called the band office, Delores was not in the office. A relief worker was answering the phone and he suggested that I try and call her back tomorrow.	Yes	Call back tomorrow.
Northwest Angle No.33	Initial phone call re: Engagement/ Relationship building	16-Nov-16	Darlene Sandy - Admin Assistant	Phone: 807-733-2200	Phone Call	Outbound	Initial phone call to gauge interest in the WR-1 project	Christina Blouw	Spoke with Darlene Sandy in the Band office on the reserve. She checked & indicated that they did not receive a notification via fax in August. I mentioned that the letter would have been mailed out. Darlene suggested I call Nancy Blackhawk in the Kenora finance office to see if they	Yes	Call Nancy Blackhawk in the Kenora NWA #33 office.
Northwest Angle No.33	Initial phone call re: Engagement/ Relationship building	16-Nov-16	Nancy Blackhawk	Phone: 807-468-8852	Phone Call	Outbound	Initial phone call to gauge interest in the WR-1 project	Christina Blouw	Spoke with Charlene, she took a my name and number and will get Nancy to call me back. Nancy will be in the office tomorrow	No	
Shoal Lake No.40 First Nation	Initial phone call re: Engagement/ Relationship building	16-Nov-16	Samantha	Phone: 807-733-2315	Phone Call	Outbound	Initial phone call to gauge interest in the WR-1 project	Christina Blouw	Chief Erwin Redsky received the introductory letter on August 29, 2016. Samantha suggested I email Chief Redsky to see if he things the community would be interested in additional information	Yes	Email Chief Redsky - erwinredsky@hotmail.com
Iskatewizaagegan No.39 Independent First Nation	Follow up phone call re: Enagagement/ Relationship building	17-Nov-16	Delores Day	Phone: 807-733-2560	Phone Call	Outbound	Initial phone call to gauge interest in the WR-1 project	Christina Blouw	Spoke with Delores. She will double check that she received the faxed information letter from Mitch and will get back to me.	No	
Northwest Angle No.33	Initial phone call re: Engagement/ Relationship building	17-Nov-16	Nancy Blackhawk	Phone: 807-468-8852	Phone Call	Inbound	Initial phone call to gauge interest in the WR-1 project	Christina Blouw	Spoke with Nancy, she recalls getting the intro letter in August and she believes it made it to the Chiefs desk. There was an election in July so people are just getting used to their new positions within community administration. She will look into this with the Chief or her assistant	No	
Manitoba Metis Federation	Follow up on agenda feedback	21-Nov-16	Jasmine Langhan	Phone: 204-586-8474	Phone Call	Outbound	Confirming agenda for engagement	Mitch MacKay	Left message on machine.	Yes	

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Black River First Nation	Notification of Public Information Sessions	21-Nov-16	Patricia Mitchell	Email: patricia2mitchell@gmail.com	Email	Outbound	Notification of Public Information Sessions	Mitch MacKay		No	
Manitoba Metis Federation	Follow up on agenda feedback	22-Nov-16	Jasmine Langhan	Phone: 204-586-8474	Phone Call	Outbound	Confirming agenda for engagement	Mitch MacKay	Left message on machine.	Yes	
Manitoba Metis Federation	Follow up on agenda feedback	22-Nov-16	Stephen Howatt	Phone: 204-586-8474	Phone Message	Inbound	Confirming reciept of message	Mitch MacKay	Left message on machine.	Yes	
Manitoba Metis Federation	Notification of Public Information Sessions	23-Nov-16	Jasmine Langhan	Email: 'marci.riel@mmf.mb.ca' Email: 'tiffany.monkman@mmf.mb.ca'	Email	Outbound	Notification of Public Information Sessions	Mitch MacKay		No	
Manitoba Metis Federation	Confirmation on attendance	28-Nov-16	Jasmine Langhan	Phone: 204-586-8474	Phone Message	Outbound	Final confirmation of attendees	Mitch MacKay	Left message on machine.	No	
Black River First Nation	Follow up phone call re: Enagagement/ Relationship building	30-Nov-16	Patricia Mitchell	204-801-3822	Phone Call	Outbound	Follow up re: engagement	Christina Blouw	Patricia mentioned that they have been busy with another project but she will touch base with Chief and Council re: the proposed plan they have drafted for CNL engagement. She would like Chief and Council to sign off on it and then she will get back to us (either Mitch or Christina)	No	
Brokenhead Ojibway Nation	Follow up phone call re: Enagagement/ Relationship building	30-Nov-16	Gord Bluesky	Phone: 204-485-5310	Phone Call	Outbound	Follow up re: organization interest in participating in the WR-1 project	Christina Blouw	Left voicemail for Gord.	No	
Grand Council of Treaty 3	Engagement/ Relationship building	30-Nov-16	Sam	Phone: 807-548-4214 Email: reception@treaty3.ca	Phone Call	Outbound	Follow up re: organization interest in participating in the WR-1 project	Christina Blouw	Sam had stepped out of the office, alternate receptionist took a message and will get Sam to call me when she's back in	No	
Hollow Water First Nation	Initial phone call re: Engagement/ Relationship building	30-Nov-16	Henry Moneas - councillor	Phone: 204-363-7278 (band office) henrymoneas@hollowwater.com	Phone Call	Outbound	Initial phone call to gauge interest in the WR-1 project	Christina Blouw	Called and spoke with Henry Moneas. He indicated that he had not seen a Project Introductory letter. I indicated that we would send him a digital copy by email for his review. He thought that was a good plan, requested the letter also be emailed to the Chief. We agreed that it would be good for me to follow up with him one week after sending the email information.	Yes	Email Project Introductory letter to Henry Moneas and Chief Larry Baker. chieflarrybaker@hollowwater.com and henrymoneas@hollowwater.com
Iskatewizaagegan No.39 Independent First Nation	Follow up phone call re: Enagagement/ Relationship building	30-Nov-16	Reception	Phone: 807-733-2560	Phone Call	Outbound	Initial phone call to gauge interest in the WR-1 project	Christina Blouw	Delores was out of the office for the day. I indicated that I would call her back tomorrow.	Yes	Call back tomorrow.
Northwest Angle No.33	Initial phone call re: Engagement/ Relationship building	30-Nov-16	Nancy Blackhawk	Phone: 807-468-8852 email: lee9nancy@gmail.com	Phone Call	Outbound	Initial phone call to gauge interest in the WR-1 project	Christina Blouw	Spoke with Nancy. She was not able to find a copy of the letter and does not recall seeing the letter come in. It would be helpful if we could send her a copy of the letter via email. She will then print it out and forward it on to the Chief to review.	Yes	Send Nancy a copy of the Project Introductory letter. lee9nancy@gmail.com
Sagkeeng First Nation	Follow up phone call re: Enagagement/ Relationship building	30-Nov-16	Myles Courchene	Phone: (204) 367-2287	Phone Call	Outbound	Follow up re: engagement	Christina Blouw	Myles was with someone in his office. Admin assistant took a message and will get him to give me a shout back.	No	
Wabaseemoong Independent Nations	Follow up phone call re: Enagagement/ Relationship building	30-Nov-16	No contact person established yet	Phone: 807-927-2000	Phone Call	Outbound	Follow up re: engagement	Christina Blouw	Spoke with the maintenance person who answered the phone. He indicated that I should call back tomorrow.	Yes	Call back tomorrow.
Iskatewizaagegan No.39 Independent First Nation	Follow up phone call re: Enagagement/ Relationship building	1-Dec-16	Reception	Phone: 807-733-2560	Phone Call	Outbound	Initial phone call to gauge interest in the WR-1 project	Christina Blouw	No answer	No	
Sagkeeng First Nation	Follow up phone call re: Enagagement/ Relationship building	42705	Myles Courchene	Phone: (204) 367-2287 ceo@sagkeeng.ca	Phone Call	Inbound	Follow up re: engagement	Christina Blouw	Myles does not remember see in the CNL Intro letter in August. He requested we email the letter to him so he could review. I indicated that we would follow up with him next week re: community interest. He indicated that he would be out of the office next week but would have email access and could touch base that way.	Yes	Email Myles the Project Intro letter as sent to Sagkeeng in August. ceo@sagkeeng.ca
Wabaseemoong Independent Nations	Follow up phone call re: Enagagement/ Relationship building	42705	No contact person established yet	Phone: 807-927-2000	Phone Call	Outbound	Follow up re: engagement	Christina Blouw	Was transferred by reception to Valerie Fisher - Finance Officer. Left a voicemail for her to call me back.	no	
Hollow Water First Nation	Follow up re: Engagement/ Relationship building	42706	Henry Moneas - councillor	Phone: 204-363-7278 (band office) henry.moneas@hollowwater.ca	Phone Call	Outbound	Follow up call as emails are bouncing back - need to confirm email addresses	Christina Blouw	No answer. Will call back later.		
Hollow Water First Nation	Follow up re: Engagement/ Relationship building	42706	Henry Moneas - councillor	Phone: 204-363-7278 (band office) henry.moneas@hollowwater.ca	Phone Call	Outbound	Confirmed email addresses with Admin Staff	Christina Blouw	henry.moneas@hollowwater.ca chief.barker@hollowwater.ca	Yes	Re-send email to correct email addresses.

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Manitoba Metis Federation	CNL MMF Preliminary Meeting and Followup	7-Dec-16	Jasmine Langhan, Marci Riel	Email: 'marci.riel@mmf.mb.ca' Email: 'tiffany.monkman@mmf.mb.ca' Email: 'jasmine.langhan@mmf.mb.ca'	Email	Outbound	Followup after meeting attached meeting minutes presentation map VC feedback form and FTP link to larger files. Propose next meeting dates digital copies of the Comprehensive Study Report completed in 2003, CNL's 2015 Annual Safety Report, Environmental Monitoring Report, and Environmental Assessment Follow-up Program	Mitch MacKay		No	
Black River First Nation	Request to engage with Hollow Water, Black River, Brokenhead	8-Dec-16	Patricia Mitchell	Email: patricia2mitchell@gmail.com	Email	Inbound	Request to engage with Hollow Water, Black River, Brokenhead	Mitch MacKay	Requesting a date for next week along with Per Diem.	Yes	
Black River First Nation	Reply back to Patricia re: dates for engagement	9-Dec-16	Patricia Mitchell	Email: patricia2mitchell@gmail.com	Email	Outbound	Reply back to Patricia re: dates for engagement	Mitch MacKay	Suggested dates back along with format and location.	Yes	
Manitoba Metis Federation	Job Opportunity	12-Dec-16	Jasmine Langhan, Marci Riel	Email: 'marci.riel@mmf.mb.ca' Email: 'tiffany.monkman@mmf.mb.ca'	Email	Outbound	Summer Student Position for First Nation and Metis Affairs Coordinator	Mitch MacKay		No	
Black River First Nation	Confirmation of date	12-Dec-16	Patricia Mitchell	204-801-3822	Phone	Inbound	Confirmation of dates location and attendees	Mitch MacKay	Patricia says that three Nations will be attending, Chief and council, some technical advisors. Request for per diem and rental of hall. CNL asked for proposed budget and than to be invoiced. Patricia	Yes	
Black River First Nation	Job Opportunity	12-Dec-16	Patricia Mitchell	Email: patricia2mitchell@gmail.com	Email	Outbound	Summer Student Position for First Nation and Metis Affairs Coordinator	Mitch MacKay		No	
Grand Council of Treaty 3	Engagement/ Relationship building	14-Dec-16	Sam	Phone: 807-548-4214 Email: reception@treaty3.ca	Phone Call	Outbound	Follow up re: organization interest in participating in the WR-1 project	Christina Blouw	Sam indicated that it might be best if we just communicated directly with Roxanne Meawasige, Communications and Consultations Officer, Territorial Planning Unit tpu.consultation@treaty3.ca	yes	Email Roxanne Directly.
Iskatewizaagegan No.39 Independent First Nation	Follow up phone call re: Enagagement/ Relationship building	14-Dec-16	Reception	Phone: 807-733-2560	Phone Call	Outbound	Initial phone call to gauge interest in the WR-1 project	Christina Blouw	Spoke with Delores. We had a good conversation re: the WR-1 project. She will make a note and speak to the Chief tomorrow. She will then call me back.	No	
Northwest Angle No.33	Initial phone call re: Engagement/ Relationship building	14-Dec-16	Nancy Blackhawk	Phone: 807-468-8852 email: lee9nancy@gmail.com	Phone Call	Outbound	Follow up re: engagement	Christina Blouw	Nancy has made copies of the Project Intro letter and distributed to Chief and Council. She does not think they will be able to review prior to Christmas. We spoke about re-connecting in the new year to see if the community was interested in	Call back in January.	
Sagkeeng First Nation	Follow up phone call re: Enagagement/ Relationship building	14-Dec-16	Myles Courchene	Phone: (204) 367-2287 ceo@sagkeeng.ca	Phone Call	Outbound	Follow up re: engagement	Christina Blouw	Myles was on another call, Admin will get him to give me a call back.	No	
Sagkeeng First Nation	Follow up phone call re: Enagagement/ Relationship building	14-Dec-16	Myles Courchene	Phone: (204) 367-2287 ceo@sagkeeng.ca	Phone Call	Inbound	Follow up re: engagement	Christina Blouw	Spoke with Myles. He will talk to chief and Council tomorrow at their meeting and will get back to me either later tomorrow afternoon or on Monday. We spoke about the potential for CNL to go to Sagkeeng and present to Chief and Council. I also mentioned that Chief and Council were more than welcome to go to the WL site for a tour. Miles will get back to me.	No	
Shoal Lake No.40 First Nation	Follow up re: Engagement/ Relationship building	14-Dec-16	Samantha	Phone: 807-733-2315	Phone Call	Outbound	Follow-up email to gauge interest in the WR-1 project	Christina Blouw	Spoke with Samantha, she indicated that I should speak to Darryl Redsky, Lands and Resource Manager (elkclan@hotmail.ca). I will call him back tomorrow.	Yes	Call back tomorrow.
Wabaseemoong Independent Nations	Follow up phone call re: Enagagement/ Relationship building	14-Dec-16	No contact person established yet	Phone: 807-927-2000	Phone Call	Outbound	Follow up re: engagement	Christina Blouw	Left a voicemail for Harry (Chief Financial Officer) to call me back.	no	
Black River First Nation	Engagement/ Relationship building	15-Dec-16	Patricia Mitchell	204-801-3822	Meeting	Outbound	Project engagement with Black River, Brokenhead and Hollow Water First Nations at Swan Lake Office, Headingly, MB	Kristin Drewes	Project engagement meeting with Black River, Brokenhead and Hollow Water First Nations at Swan Lake Office, Headingly, MB		
Brokenhead Ojibway Nation	Engagement/ Relationship building	15-Dec-16	Gord Bluesky	Email: gordbluesky@gmail.com 204-485-5310	Meeting		Project engagement with Black River, Brokenhead and Hollow Water First Nations	Kristin Drewes	Project engagement meeting with Black River, Brokenhead and Hollow Water First Nations at Swan Lake Office, Headingly,	Yes	Provide meeting notes to participants

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Hollow Water First Nation	Engagement/ Relationship building	15-Dec-16	Patricia Mitchell	204-801-3822	Meeting	Outbound	Project engagement with Black River, Brokenhead and Hollow Water First Nations at Swan Lake Office, Headingly, MB	Kristin Drewes	Project engagement meeting with Black River, Brokenhead and Hollow Water First Nations at Swan Lake Office, Headingly, MB		
Sagkeeng First Nation	Follow up phone call re: Enagagement/ Relationship building	15-Dec-16	Myles Courchene	Phone: (204) 367-2287 ceo@sagkeeng.ca	Phone Call	Inbound	Follow up re: engagement	Christina Blouw	Spoke with Myles. Chief and Council are interested in a presentation and an open house for the community. Email Miles with potential dates for holding these events in the community in the new year.	Yes	Email Myles with potential dates for community events.
Sagkeeng First Nation	Follow up phone call re: Enagagement/ Relationship building	15-Dec-16	Myles Courchene	Phone: (204) 367-2287 ceo@sagkeeng.ca	Phone Call	Inbound	Follow up re: engagement	Christina Blouw	Spoke with Myles. He confirmed the January 25th date for the meeting with C&C along with the open house. He will book the gym at the SFN treatment centre and see if he can arrange to have chairs available. I will touch base with him in the new year.		
Shoal Lake No.40 First Nation	Follow up re: Engagement/ Relationship building	16-Dec-16	Samantha	Phone: 807-733-2315	Phone Call	Outbound	Follow-up email to gauge interest in the WR-1 project	Christina Blouw	Phone line was busy for each attempted call throughout the day	No	
Sagkeeng First Nation	Follow up phone call re: Enagagement/ Relationship building	19-Dec-16	Myles Courchene	Phone: (204) 367-2287 ceo@sagkeeng.ca	Email	Outbound	Follow up re: presentation and open house request	Christina Blouw	Emailed Myles with suggested dates for presentation to c&c and open house for Jan 2017. Also included the link for the CNL summer student position		
Sagkeeng First Nation	Follow up phone call re: Jan 25 C&C meeting and open house	3-Jan-17	Myles Courchene	Phone: (204) 367-2287 ceo@sagkeeng.ca	Phone Call	Outbound	Follow up re: C&C meeting and open house	Christina Blouw	Myles had stepped out of the office but Admin indicated they would give him the message I called.		
Sagkeeng First Nation	Follow up phone call re: Jan 25 C&C meeting and open house	3-Jan-17	Myles Courchene	Phone: (204) 367-2287 ceo@sagkeeng.ca	Phone Call	Inbound	Follow up re: C&C meeting and open house	Christina Blouw	Spoke with Myles. Offered to email him a notification poster for the community open house to be posted, put on the web site, radio announced and faxed to various organizations. Asked about inviting Powerview/Pine Falls residents to the community open house, he didn't see an issue with that; he will double check on this at the council meeting tomorrow		Email Myles summary of our discussion and send along notification poster for distribution.
Sagkeeng First Nation	Follow up phone call re: Jan 25 C&C meeting and open house	5-Jan-17	Myles Courchene	Phone: (204) 367-2287 ceo@sagkeeng.ca	Email	Outbound	Follow up re: C&C meeting and open house	Christina Blouw	Sent Myles the open house notification poster, links to the project webpage along with confirming logistical details for the open house Waiting for confirmation that Powerview/Pine Falls residents are	no	
Black River First Nation	Follow up on actions from meeting	10-Jan-17	Patricia Mitchell	Email: patricia2mitchell@gmail.com	Email	Outbound	Follow through on actions from previous meeting, attached draft meeting notes for approval and ad for Sagkeeng First Nation Open house	Mitch MacKay		Yes	
Black River First Nation	Follow up on actions from meeting	10-Jan-17	Patricia Mitchell	Email: patricia2mitchell@gmail.com	Email	Outbound	Introducing Whiteshell Laboratories Procurement	Mitch MacKay		No	
Black River First Nation	Follow up on actions from meeting	10-Jan-17	Patricia Mitchell	Email: patricia2mitchell@gmail.com	Email	Outbound	Introducing the Whiteshell Economic Regeneration Partnership	Mitch MacKay		No	
Shoal Lake No.40 First Nation	Follow up re: Engagement/ Relationship building	12-Jan-17	Samantha	Phone: 807-927-2000	Phone Call	Outbound	Follow-up email to gauge interest in the WR-1 project	Christina Blouw	Spoke with Samantha, she indicated that Darryl will be back in the office on Monday. I will email him and call back on Monday.	Yes	Email Darryl (elkclan@hotmail.ca) & call back on Monday.
Wabaseemoong Independent Nations	Follow up phone call re: Enagagement/ Relationship building	12-Jan-17	No contact person established yet	Phone: 807-927-2000 Fax: 807-927-2107	Phone Call	Outbound	Follow up re: engagement	Christina Blouw	Spoke to Anthony Henry, Band Manager. He does not remember seeing this letter come to the band office. He requested that I fax the letter to him, he will review and I will touch base with him in couple of days.	Fax Project intro letter to Anthony 807-927-2107	
Wabaseemoong Independent Nations	Follow up phone call re: Enagagement/ Relationship building	12-Jan-17	No contact person established yet	Phone: 807-927-2000 Fax: 807-927-2107	Fax	Outbound	Follow up re: engagement	Christina Blouw	Faxed Cover letter and associated WIN Project Intro LTR to both 807- 927-2107 and 807-927-2419	Fax Project intro letter to Anthony 807-927-2107	
Sagkeeng First Nation	Follow up phone call re: Jan 25 C&C meeting and open house	17-Jan-17	Lana Lavadier	Phone: (204) 367-2287 execassistant@sagkeeng.ca	Phone call	Outbound	Follow up re: C&C meeting and open house logistics	Christina Blouw	Left a voicemail for Lana requesting call back re: Jan 25th meeting logistics	no	

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Sagkeeng First Nation	Follow up phone call re: Jan 25 C&C meeting and open house	18-Jan-17	Lana Lavadier	Phone: (204) 367-2287 execassistant@sagkeeng.ca	Phone call	Outbound	Follow up re: C&C meeting and open house logistics	Christina Blouw	Lana has been sick the last two days. Christine, Admin, will email Lana re: confirming the Gym space booking and	no
Black River First Nation	Follow up on email	20-Jan-17	Patricia Mitchell	Email: patricia2mitchell@gmail.com	Email	Outbound	Introducing Whiteshell Laboratories Procurement	Gina Barnett	Gina Barnett is Manager of WLCP Procurement.	No
Black River First Nation	Followup on various emails	23-Jan-17	Patricia Mitchell	204-801-3822	Phone	Outbound		Mitch MacKay	Left a message outlinging some of the information provided in emails sent.	
Black River First Nation	Invite to 2 day enagement	24-Jan-17	Patricia Mitchell	Email:	Email	Inbound	2-day gathering	Mitch MacKay		Yes
Black River First Nation	Response to Invite to 2 day enagement	25-Jan-17	Patricia Mitchell	Email: patricia2mitchell@gmail.com	Email	Outbound	Confirm CNL attendance and compensation	Mitch MacKay		
Iskatewizaagegan No.39 Independent First Nation	Follow up phone call re: Enagagement/ Relationship building	2-Feb-17	Reception	Phone: 807-733-2560	Phone Call	Outbound	Initial phone call to gauge interest in the WR-1 project	Christina Blouw	Delores was out of the office until Monday. I indicated that I would call her back then.	No
Iskatewizaagegan No.39 Independent First Nation	Follow up phone call re: Enagagement/ Relationship building	2-Feb-17	Reception	Phone: 807-733-2560	Phone Call	Outbound	Initial phone call to gauge interest in the WR-1 project	Christina Blouw	Delores was out of the office until Monday. I indicated that I would call her back then.	No
Shoal Lake No.40 First Nation	Follow up phone call re: Enagagement/ Relationship building	2-Feb-17	Darryl Redsky	Phone: 807-927-2000	Phone Call	Outbound	Follow-up email to gauge interest in the WR-1 project	Christina Blouw	Spoke with reception. Darryl was busy on the phone. I left a message for Darryl to call me back.	
Black River First Nation	Response to Invite to 2 day enagement	6-Feb-17	Holly Morrisseau	Email: h.morrisseaubon261@gmail.com, patricia2mitchell@gmail.com	Email	Outbound	Followup on agenda and possible invite to Sagkeeng First Nation	Mitch MacKay		No
Grand Council of Treaty 3	Engagement/ Relationship building	8-Feb-17	Emily, Administration	807-548-4214	Phone Call	Outbound	Follow up re: organization interest in participating in the WR-1 project	Christina Blouw	Follow up on email sent by Mitch in December. Left message with Emily as Roxanne is travelling to Whitefish today.	No
Northwest Angle No.33	Engagement/ Relationship building	8-Feb-17	Darlene Sandy - Admin Assistant	Phone: 807-733-2200 whitesmoke_rose@hotmail.com	Phone Call	Outbound	Follow up re: engagement	Christina Blouw	Spoke with Darlene. The Kenora office has been closed and the duties/jobs transferred back to the community. Darlene mentioned that I could email her the information and she would pass it along to the appropriate people including the Chief & Council's admin assistant.	Request Mitch to send email to Darlene.
Grand Council of Treaty 3	Engagement/ Relationship building	9-Feb-17	Roxanne Meawasige	807-548-4214	Phone Call	Inbound	Follow up re: organization interest in participating in the WR-1 project	Christina Blouw	Roxanne left a voicemail for me to call her back	
Black River First Nation	Response to Invite to 2 day enagement	13-Feb-17	Patricia Mitchell	204-801-3822	Phone	Outbound	Followup on agenda and possible invite to AECL	Mitch MacKay	Left a message outlinging some of the information provided in emails sent.	No
Grand Council of Treaty 3	Engagement/ Relationship building	14-Feb-17	Roxanne Meawasige	807-548-4214	Phone Call	Outbound	Follow up re: organization interest in participating in the WR-1 project	Christina Blouw	Called Roxanne back, no answer at the GCT#3 office. Will try again later.	
Grand Council of Treaty 3	Engagement/ Relationship building	14-Feb-17	Roxanne Meawasige	807-548-4214	Phone Call	Outbound	Follow up re: organization interest in participating in the WR-1 project	Christina Blouw	Spoke with Roxanne, she would like more project information emailed to her. She is concerned about the nuclear waste management organization on the east side of their communities and would like to know more about the CNL project on the	Request Mitch to send more information to Roxanne.
Wabaseemoong Independent Nations	Follow up phone call re: Enagagement/ Relationship building	14-Feb-17	No contact person established yet	Phone: 807-927-2000 Fax: 807-927-2107	Phone Call	Outbound	Follow up re: engagement	Christina Blouw	Called to follow up with Anthony Henry re: faxed information. No answer, left a voicemail	
Black River First Nation	Response to Invite to 2 day enagement	15-Feb-17	Holly Morrisseau	Email: h.morrisseaubon261@gmail.com.	Email	Outbound	Followup on agenda for Feb 21 and logistics of Site tour Feb 22.	Leah Adams		yes
Black River First Nation	Response to Invite to 2 day enagement	16-Feb-17	Holly Morrisseau	Email: h.morrisseaubon261@gmail.com,	Email	Inbound	Followup on agenda for Feb 21 and logistics of Site tour Feb 22.	Leah Adams	Responding to my email for an agenda. Nothing available yet, she is waiting to hear from Patricia Mitchell	no
Black River First Nation	Response to Invite to 2 day enagement	16-Feb-17	Holly Morrisseau	Email: h.morrisseaubon261@gmail.com,	Email	Inbound	Response to my Request for logistics information for site tour.	Leah Adams	Holly responded and said she had to cancel the bus, but we offered to pay for it and to provide lunch on site during the	no
Iskatewizaagegan No.39 Independent First Nation	Follow up phone call re: Enagagement/ Relationship building	16-Feb-17	Reception	Phone: 807-733-2560	Phone Call	Outbound	Follow-up phone call to gauge interest in the WR-1 project	Christina Blouw	Delores was out of the office doing a house to house survey. I left a voicemail requesting a call back.	
Iskatewizaagegan No.39 Independent First Nation	Follow up phone call re: Enagagement/ Relationship building	16-Feb-17	Reception	Phone: 807-733-2560	Phone Call	Outbound	Follow-up phone call to gauge interest in the WR-1 project	Christina Blouw	Delores was out of the office doing a house to house survey. I left a voicemail requesting a call back.	
Shoal Lake No.40 First Nation	Follow up re: Engagement/ Relationship building	16-Feb-17	Darryl Redsky	Phone: 807-733-2315	Phone Call	Outbound	Follow-up email to gauge interest in the WR-1 project	Christina Blouw	Spoke with reception. Darryl was busy on the phone. I left a message for Darryl to call me back.	
Black River First Nation	Response to Invite to 2 day enagement	17-Feb-17	Holly Morrisseau	Email: h.morrisseaubon261@gmail.com.	Email	Outbound	Requested logistics information for site tour.	Leah Adams		no
Wabaseemoong Independent Nations	Follow up phone call re: Enagagement/ Relationship building	16-Mar-17	Anthony Henry, Band Manager	Phone: 807-927-2000 Fax: 807-927-2107	Phone Call	Outbound	Follow up re: engagement	Christina Blouw	Called to follow up with Anthony Henry re: faxed information.	
Wabaseemoong Independent Nations	Follow up phone call re: Enagagement/ Relationship building	17-Mar-17	General reception	Phone: 807-927-2000 Fax: 807-927-2107	Phone Call	Outbound	Follow up re: engagement	Christina Blouw	Called to see if there was anyone else that I could connect with, no answer at general reception	

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Manitoba Metis Federation	Follow up on letter	5-Apr-17	Jasmine Langhan, Marci Riel	Email:	Email	Outbound	Confirm reciept of CNL letter response	Mitch MacKay	No response after week	Yes
Manitoba Metis Federation	Follow up on letter	12-Apr-17	Jasmine Langhan	Phone	Phone	Outbound	Confirm reciept of CNL letter response	Mitch MacKay	Left a message to confirm recipet of letter.	Yes
Manitoba Metis Federation	Follow up on letter	12-Apr-17	Evan Laye	Phone	Phone	Inbound	Evan confirmed reciept of letter	Mitch MacKay	Even noted that the MMF were crafting another letter and would hope to have it along shortly. He expressed a desire to	
Sagkeeng First Nation	Follow up phone call re: Industry day	20-Apr-17	Miles Courchene	Phone: (204) 367-2287	Phone Call	Outbound	Following up to see if FN need help promoting or level of interest in industry day.	Mitch MacKay	Left message on machine.	Yes
Black River First Nation	Follow up phone call re: Industry day	20-Apr-17	Patricia Mitchell	Phone	Phone Call	Outbound	Following up to see if FN need help promoting or level of interest in industry day.	Mitch MacKay	Answering machine full	Yes
Wabaseemoong Independent Nations	Follow up phone call re: Enagagement/ Relationship building	28-Apr-17	Anthony Henry, Band Manager	Phone: 807-927-2000 Fax: 807-927-2107	Phone Call	Outbound	Follow up re: engagement	Christina Blouw	Spoke with Anthony Henry - CNL project was not top of mind. He vaguely remembered he and I speaking in January. I mentioned the May 17th meeting and asked if maybe there was someone else on Council that might know about this or be interested in discussing. Mentioned WIN had received participant funding to participate in this assessment. He mentioned that it might be good to follow up with Marvin Quewezance, the Traditional Land Use Coordinator. Anthony mentioned he would leave a note for Marvin but that he travelled a lot.	I agreed to call back and speak with Anthony re: getting in touch with Marvin. If not able to connect with Marvin through Anthony try emailing him, contact info from WIN TLUA webpage Vincent Quewezance – nvq@live.ca TLUA Coordinator Marvin McDonald – marleeque
Wabaseemoong Independent Nations	Follow up phone call re: Enagagement/ Relationship building	1-May-17	Anthony Henry, Band Manager	Phone: 807-927-2000 Fax: 807-927-2107	Phone Call	Outbound	Follow up re: engagement	Christina Blouw	Left voicemail for Anthony Henry.	
Wabaseemoong Independent Nations	Follow up phone call re: Enagagement/ Relationship building	1-May-17	Vincent Quewezance Marvin Macdonald WIN TLUA coordinators	Phone: 807-927-2000 Fax: 807-927-2107 'nvq@live.ca'; 'marleeque@outlook.com'	email	Outbound	Follow up re: engagement	Christina Blouw	Emailed both Vincent and Marvin re: Project description and opportunity to participate.	
Wabaseemoong Independent Nations	Follow up phone call re: Enagagement/ Relationship building	2-May-17	Marvin Lee McDonald	Phone: 807-927-2000 ext 251 Cell: 807-467-7437	Phone call	Inbound	Follow up re: engagement	Christina Blouw	Marvin left me a voicemail asking for me to give him a call back	
Wabaseemoong Independent Nations	Follow up phone call re: Enagagement/ Relationship building	2-May-17	Marvin Lee McDonald	Phone: 807-927-2000 ext 251 Cell: 807-467-7437	Phone call	Outbound	Follow up re: engagement	Christina Blouw	Spoke with Marvin he is very interested in the email I sent him yesterday, we discussed the Project and the May 17th meeting briefly. He was aware that the community had applied for participant funding and seems to remember Darren Harper, a community member who often helps pull together proposals for funding, mentioning this Project to him last fall. Marvin will connect with Darren and see if he is still the contact for this community initiative and get back to me. One way or another Marvin was very interested in attending the May 17th meeting here in Manitoba.	
Wabaseemoong Independent Nations	Follow up email after 2017 May 18 Meeting	19-May-17	Marvin Lee McDonald	marleeque@outlook.com	Email	Inbound	Marvin following up on a tour for Chief and Council	Mitch MacKay		Yes
Wabaseemoong Independent Nations	Responding to Marvin's email	23-May-17	Marvin Lee McDonald	marleeque@outlook.com	Email	Outbound	Suggesting dates for next tour	Mitch MacKay		Yes
Sagkeeng First Nation	Follow up email after 2017 May 18 Meeting	25-May-17	Miles Courchene	ceo@sagkeeng.ca	Email	Outbound	Getting Myles up to speed on 2017 May 18 meeting and suggesting possible dates for tour and industry day	Mitch MacKay		Yes

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Sagkeeng First Nation	Follow up to email from Myles	25-May-17	Miles Courchene	ceo@sagkeeng.ca	Email	Inbound	Myles has asked Lana Lavadier to schedule with council	Mitch MacKay		Yes
Manitoba Metis Federation	Follow up on engagement next steps	6-Jun-17	Jasmine Langhan	(204) 586-8474 ext. 234	Phone	Outbound	Begin to schedule next round of engagements	Mitch MacKay		Yes
Manitoba Metis Federation	Follow up on engagement next steps	12-Jun-17	Jasmine Langhan	(204) 586-8474 ext. 234	Phone	Outbound	Begin to schedule next round of engagements	Mitch MacKay		Yes
Wabaseemoong Independent	Coordinating site visit	14-Jun-17	Marvin Lee McDonald		Phone	Outbound	Discussion of logistics around site visit	Mitch MacKay		No
Sagkeeng First Nation	Coordinating site visit and industry day	14-Jun-17	Lana Lavadier		Phone	Outbound	Discussion of logistics around site visit and Industry day	Mitch MacKay		No
Manitoba Metis Federation	Follow up on engagement next steps	15-Jun-17	Stephen Howatt		Phone	Inbound	Confirmation that the MMF is busy scheduling a leadership meeting	Mitch MacKay	Confirmed CNL's commitment to help with	Yes
Grand Council of Treaty 3	Follow up on further information	20-Jun-17	Roxanne Meawasige	tpu.consultation@treaty3.ca	Email	Inbound	any and all aspect of meeting including Treaty 3 is requesting an update on WR-1	Mitch MacKay		Yes
Grand Council of Treaty 3	Providing an update on information pertaining to WR-1	22-Jun-17	Roxanne Meawasige	tpu.consultation@treaty3.ca	Email	Outbound	CNL provided an update and information available on the internet	Mitch MacKay		Yes
Black River First Nation	Notification of third round of public information sessions	5-Jul-17	Patricia Mitchell		Email	Outbound	Notification of third round of public information sessions	Mitch MacKay		No
Sagkeeng First Nation	Notification of third round of public information sessions	5-Jul-17	Miles Courchene		Email	Outbound	Notification of third round of public information sessions	Mitch MacKay		No
Brokenhead Ojibway Nation	Notification of third round of public information sessions	5-Jul-17	Holly Morrisseau		Email	Outbound	Notification of third round of public information sessions	Mitch MacKay		No
Manitoba Metis Federation	Notification of third round of public information sessions	5-Jul-17	Jasmine Langhan		Email	Outbound	Notification of third round of public information sessions	Mitch MacKay		No
Black River First Nation	Request for coordination of a visit to a entombed reactor in the United States	5-Jul-17	Patricia Mitchell		Email	Inbound	Request for coordination of a visit to a entombed reactor in the United States	Mitch MacKay		Yes
Black River First Nation	Replying to request	13-Jul-17	Patricia Mitchell		Email	Outbound	Acknowledging recipet of email and commitment to look into this.	Mitch MacKay		Yes
Sagkeeng First Nation	Follow up on site visit actions	31-Jul-17	Chief Henderson, Myles Courchene, Lana Lavadier		Email	Outbound	Providing digital copies of environmental protection presentation and SAR guide. Notifying of upcoming environmental workshop. Work on monitoring plan and need to schedule community open house.	Mitch MacKay		No
Black River First Nation	Replying to request	15-Aug-17	Patricia Mitchell		Email	Outbound	Replying to early request on possibility of touring a US site.	Mitch MacKay		
Sagkeeng First Nation	Environmental Protection	23-Aug-17	Myles Courchene CC'd Chief and Council	Myles Courchene' <ceo@sagkeeng.ca>	Email	Outbound	Invitation for members of community to participate in environmental protection workshop	Mitch MacKay		Yes
Black River First Nation	Environmental Protection	23-Aug-17	Patricia Mitchell		Email	Outbound	Invitation for members of community to participate in environmental protection workshop	Mitch MacKay		Yes
Brokenhead Ojibway Nation	Environmental Protection	23-Aug-17	Holly Morrisseau		Email	Outbound	Invitation for members of community to participate in environmental protection workshop	Mitch MacKay		Yes
Wabaseemoong Independent Nations	Environmental Protection	23-Aug-17	Marvin Lee McDonald		Email	Outbound	Invitation for members of community to participate in environmental protection workshop	Mitch MacKay		Yes
Manitoba Metis Federation	Environmental Protection	23-Aug-17	Jasmine Langhan		Email	Outbound	Invitation for members of community to participate in environmental protection workshop	Mitch MacKay		Yes
Sagkeeng First Nation	Environmental Protection	6-Sep-17	Myles Courchene		Phone	Outbound	Follow up on invitation for participation in environmental protection workshop	Mitch MacKay	Left message with admin.	Yes
Black River First Nation	Environmental Protection	6-Sep-17	Patricia Mitchell		Phone / text message	Outbound	Follow up on invitation for participation in environmental protection workshop	Mitch MacKay		Yes
Brokenhead Ojibway Nation	Environmental Protection	6-Sep-17	Holly Morrisseau		Phone / text message	Outbound	Follow up on invitation for participation in environmental protection workshop	Mitch MacKay		Yes
Wabaseemoong Independent Nations	Environmental Protection	6-Sep-17	Marvin Lee McDonald		Phone		Follow up on invitation for participation in environmental protection workshop	Mitch MacKay	Left message on phone	Yes
Manitoba Metis Federation	Environmental Protection	6-Sep-17	Jasmine Langhan		Phone		Follow up on invitation for participation in environmental protection workshop	Mitch MacKay	Left message on phone	Yes
Sagkeeng First Nation	EIS	8-Sep-17	Myles Courchene		Email	Inbound	Replying to August 23rd email. Saying he will forward to Chief and council.	Mitch MacKay		
Sagkeeng First Nation	EIS	9-Sep-17	Myles Courchene		Email	Outbound	Acknowleging email and asking if CNL can be of any assistance.	Mitch MacKay		
Brokenhead Ojibway Nation	EIS	18-Sep-17	Holly Morrisseau		Email/Text	Outbound	Following up on environmental protection workshop and up coming draft EIS release.	Mitch MacKay		

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Sagkeeng First Nation	EIS	18-Sep-17	Myles Courchene	Phone	Outbound	Following up on environmental protection workshop and up coming draft EIS release.	Mitch MacKay		
Sagkeeng First Nation	EIS	18-Sep-17	Myles Courchene	Email	Outbound	Followup from phone call on interest in Environmental protection workshop and begin to start planning for a community visit.			
Black River First Nation	EIS	18-Sep-17	Patricia Mitchell	Email	Outbound	Follow up on invitation for participation in environmental protection workshop and follow up on community visit.	Mitch MacKay		Yes
Black River First Nation	EIS	19-Sep-17	Patricia Mitchell	Phone	Outbound	Follow up on invitation for participation in environmental protection workshop and follow up on community visit.	Mitch MacKay	Message box was full	
Brokenhead Ojibway Nation	EIS	20-Sep-17	Bev Smith	Phone	Outbound	Follow up on invitation for participation in environmental protection workshop and follow up on community visit.	Mitch MacKay	Holly Morriseau has left for educational purposes. Bev requested an email follow up.	Yes
Brokenhead Ojibway Nation	EIS	20-Sep-17	Bev Smith	Email	Outbound	Follow up after phone conversation, request to forward information that was sent to Holly	Mitch MacKay		
Brokenhead Ojibway Nation	EIS	20-Sep-17	Bev Smith	Email	Outbound	Follow up after phone conversation to outline request related to EIS comment period.	Mitch MacKay		
Black River First Nation	EIS	29-Sep-17	Patricia Mitchell	Email	Inbound	Informed Patricia just returning from holidays and she will work on some dates for CNL to come to the community.	Mitch MacKay		
Black River First Nation	EIS	29-Sep-17	Patricia Mitchell	Email	Outbound	Acknowledging recipet of email and looking forward to visiting community	Mitch MacKay		
Sagkeeng First Nation	CNL CEO visit	29-Sep-17	Lana Lavadier	Phone call and email	Outbound	Trying to schedule a meeting between our CEO and the Chief.	Mitch MacKay		
Sagkeeng First Nation	CNL CEO visit	2-Oct-17	Chief Derrick Henderson	Text message	Outbound	Trying to schedule a meeting between our CEO and the Chief.	Mitch MacKay		
Black River First Nation	EIS	5-Oct-17	Patricia Mitchell	Email	Outbound	Notification of public comment period on the draft EIS.	Mitch MacKay		
Manitoba Metis Federation	EIS	5-Oct-17	Jasmine Langhan	Email	Outbound	Notification of public comment period on the draft EIS.	Mitch MacKay		
Sagkeeng First Nation	EIS	5-Oct-17	Myles Courchene	Email	Outbound	Notification of public comment period on the draft EIS.	Mitch MacKay		
Wabaseemoong Independent Nations	EIS	5-Oct-17	Marvin Lee McDonald	Email	Outbound	Notification of public comment period on the draft EIS.	Mitch MacKay		
Wabaseemoong Independent Nations	EIS	6-Oct-17	Marvin Lee McDonald	Email	Inbound	Wanting clarification on CNSC open house dates	Mitch MacKay		
Wabaseemoong Independent Nations	EIS	6-Oct-17	Marvin Lee McDonald	Email	Outbound	Providing CNSC open house dates and notifying that we have a community specific report to be sent out	Mitch MacKay		
Wabaseemoong Independent Nations	EIS	6-Oct-17	Marvin Lee McDonald	Phone	Outbound	Following up with Marvin to make sure I understood his request correctly. He said to just send him the report and he will get it up on the community website.	Mitch MacKay		
Black River First Nation	EIS	6-Oct-17	Patricia Mitchell	Email	Inbound	Acknowledging reciept of notification and commitment to find a date for CNL to visit community.	Mitch MacKay		
Northwest Angle No.33	EIS	10-Oct-17	Chief Darlene Comegan	letter	Outbound	sent EIS notification without attachments	Leah Adams		
Shoal Lake No.40 First Nation	EIS	10-Oct-17	Chief Irwin Redsky	letter	Outbound	sent EIS notification without attachments	Leah Adams		
Iskatewizaagegan No.39 Independent First Nation	EIS	10-Oct-17	Chief Gerald Garnet Lee Lewis	letter	Outbound	sent EIS notification without attachments	Leah Adams		
Grand Council of Treaty 3	EIS	10-Oct-17	Mervin Gryschuk	letter	Outbound	sent EIS notification without attachments	Leah Adams		
Chiefs of Ontario	EIS	10-Oct-17		letter	Outbound	sent EIS notification without attachments	Leah Adams		
Black River First Nation	EIS	24-Oct-17	Patricia Mitchell	Email	Outbound	Sending community specific report related to the draft EIS and a desire to visit community.	Mitch MacKay		Yes

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Sagkeeng First Nation	EIS	24-Oct-17	Myles Courchene	Email	Outbound	Sending community specific report related to the draft EIS and a desire to visit community.	Mitch MacKay	
Brokenhead Ojibway Nation	EIS	24-Oct-17	Bev Smith	Email	Outbound	Sending community specific report related to the draft EIS and a desire to visit community.	Mitch MacKay	
Manitoba Metis Federation	EIS	24-Oct-17	Marci Riel	email	Outbound	Follow up after teleconference on MMF Budget Discussion for WR-1	Mitch MacKay	
Sagkeeng First Nation	EIS	1-Nov-17	Chief Derrick Henderson	letter	Outbound	sent hard copies of Community specific report and draft EIS executive summary	Leah Adams	
Brokenhead Ojibway Nation	EIS	1-Nov-17	Chief Jim Bear	letter	Outbound	sent hard copies of Community specific report and draft EIS executive summary	Leah Adams	
Black River First Nation	EIS	1-Nov-17	Chief Sheldon Kent	letter	Outbound	sent hard copies of Community specific report and draft EIS executive summary	Leah Adams	
Hollow Water First Nation	EIS	1-Nov-17	Chief Larry Barker	letter	Outbound	sent hard copies of Community specific report and draft EIS executive summary	Leah Adams	
Wabaseemoong Independent Nations	EIS	1-Nov-17	Chief John Paishk	letter	Outbound	sent hard copies of Community specific report and draft EIS executive summary	Leah Adams	
Black River First Nation	EIS	3-Nov-17	Patricia Mitchell	Phone	Outbound	Confirming she received the community specific engagement report. Also trying to set up a site visit to another ISD in the US. Trying to find a date for CNL to visit the community.	Mitch MacKay	
Black River First Nation	EIS	15-Nov-17	Patricia Mitchell	email	Outbound	Arranging for meeting and discussing logistics	Mitch MacKay	
Black River First Nation	EIS	16-Nov-17	Patricia Mitchell	email	Outbound	Confirmation CNL can come to BRFN community on November 24th	Mitch MacKay	
Manitoba Metis Federation	EIS	17-Nov-17	Marci Riel	email	Outbound	Follow up after meeting and tour at WL on November 7. provided meeting notes and outlined actions resulting from the meeting.	Mitch MacKay	
Black River First Nation	EIS	18-Nov-17	Patricia Mitchell	Phone	Outbound	Confirming details on community visit directions ect...	Mitch MacKay	
Black River First Nation, Brokenhead Ojibway Nation, Hollow Water First Nation, Manitoba Metis Federation, Sagkeeng First Nation and	Site asset tour	20-Nov-17		Email	Outbound	Offer a site asset donation tour	Mitch MacKay	Many First Nation group had asked about how to procure items on the site during there tour. CNL developed a program to donate items.
Black River First Nation	EIS	20-Nov-17	Patricia Mitchell	Phone	Incoming	Calling to let me know that she may cancel the Friday event, but will let me know ASAP		
Sagkeeng First Nation	EIS	24-Nov-17	Myles Courchene	Phone	Outbound	Reaching out in response to letter from law firm to confirm how to proceed with community	Mitch MacKay	Left Message
Sagkeeng First Nation	EIS	24-Nov-17	Chief Derrick Henderson	Phone	Outbound	Reaching out in response to letter from law firm to confirm how to proceed with community	Mitch MacKay	Message box was full
Black River First Nation	EIS	27-Nov-17	Patricia Mitchell	Phone	Inbound	Patricia called to see if she could meet today about the draft EIS and procurement opportunities. We accomodated.	Mitch MacKay	
Sagkeeng First Nation	EIS	29-Nov-17	Corey Shefman, Kate Kempton	Teleconference	Outbound	First meeting with Sagkeeng First Nation lawyers after recieveing letter	Mitch MacKay	Follow up meeting and response to be scheduled
Sagkeeng First Nation	EIS	29-Nov-17	Corey Shefman, Trevor Grant	email	Outbound	forwarded copy of Sagkeeng Report as part of follow up to meeting regarding duty to consult	Mitch MacKay	As mentioned in our discussion earlier today, please see attached our engagement report update for Sagkeeng
Wabaseemoong Independent Nations	EIS	6-Dec-17	Marvin Lee McDonald	Phone	Inbound	Marvin was looking for help in finding a consultant to review the EIS	Mitch MacKay	CNCS took the action to find an independent consultant. Believed it was a conflict of intereset for CNL to suggest
Sagkeeng First Nation	EIS	11-Dec-17	Corey Shefman, Kate Kempton	Email	Outbound	Email response to teleconference including edits to a draft MOU	Mitch MacKay	
Sagkeeng First Nation	EIS	12-Dec-17	Corey Shefman, Kate Kempton	Email	Outbound	Email response clarifying CNL edits to draft MOU.	Mitch MacKay	

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Manitoba Metis Federation	EIS	14-Dec-17	Marci Riel	Email	Outbound	Email with attached letter outlining CNL's commitment to funding 2 MMF meeting for $30K	Mitch MacKay	
Sagkeeng First Nation	EIS	14-Dec-17	Corey Shefman, Kate Kempton	Teleconference	Outbound	Meeting in response to CNL's offer of 30 K plus cooperation agreement	Mitch MacKay	
Sagkeeng First Nation	EIS	19-Dec-17	Corey Shefman, Kate Kempton	Email	Outbound	A reiteration of CNL's commitment to 30 and cooperation agreement.	Mitch MacKay	
Black River First Nation	EIS	22-Jan-18	Patricia Mitchell	Phone	Outbound	Introduction / save the date for trip to Hallam entombed reactor. Also re-commitment of funds for community meeting.	Mitch MacKay	
Wabaseemoong Independent Nations	EIS	22-Jan-18	Marvin Lee McDonald	Phone	Outbound	Introduction / save the date for trip to Hallam entombed reactor. Also re-commitment of funds for community meeting.	Mitch MacKay	
Sagkeeng First Nation	EIS	25-Jan-18	Myles Courchene	Email	Outbound	Follow up email with details on Hallam trip and commitment form	Mitch MacKay	
Manitoba Metis Federation	EIS	25-Jan-18	Marci Riel	Email	Outbound	Follow up email with details on Hallam trip and commitment form	Mitch MacKay	
Wabaseemoong Independent Nations	EIS	25-Jan-18	Marvin Lee McDonald	Email	Outbound	Follow up email with details on Hallam trip and commitment form	Mitch MacKay	
Black River First Nation	EIS	25-Jan-18	Patricia Mitchell	Email	Outbound	Follow up email with details on Hallam trip and commitment form	Mitch MacKay	
Sagkeeng First Nation	EIS	3-Feb-18	Corey Shefman, OKT Law	Email	Inbound	Email requesting more than one attendee for Hallam Trip	Mitch MacKay	CNL committed to continue to update on availability of additional spots for the trip
Manitoba Metis Federation	EIS	14-Feb-18	Marci Riel	Email	Outbound	CNL commitment to fund a MMF Food consumption survey		
Sagkeeng First Nation	EIS	14-Feb-18	Myles Courchene	Email	Outbound	CNL commitment to fund a Sagkeeng Food consumption survey	Mitch MacKay	
Wabaseemoong Independent Nations	EIS	16-Feb-18	Marvin Lee McDonald	Email	Outbound	Offering an additional spot for a community member to join the Hallam trip	Mitch MacKay	
Manitoba Metis Federation	EIS	16-Feb-18	Stephen Howatt	Email	Outbound	Offering an additional spot for a community member to join the Hallam trip	Mitch MacKay	
Black River First Nation	EIS	16-Feb-18	Patricia Mitchell	Email	Outbound	Offering an additional spot for a community member to join the Hallam trip		
Sagkeeng First Nation	EIS	16-Feb-18	Myles Courchene	Email	Outbound	Offering an additional spot for a member of Sagkeeng to join the Hallam trip	Mitch MacKay	
Wabaseemoong Independent Nations		16-Feb-18	Marvin Lee McDonald	Phone	Inbound	Marvin called to confirm that a second person Georgina will be coming on the Hallam trip.	Mitch MacKay	
Grand Council of Treaty 3		26-Feb-18	Kristie Duncan	Phone	Outbound	Calling to follow up on correspondence and invite the council for a tour and engagement.	Mitch MacKay	
Black River First Nation	Hallam Trip	26-Feb-18	Patricia Mitchell	Phone	Outbound	Calling to follow up on information required to travel to Hallam. No answer message full.	Mitch MacKay	
Sagkeeng First Nation	EIS	26-Feb-18	Myles Courchene	Email	Outbound	Recommittment to conducting and funding a consumption survey	Mitch MacKay	
Black River First Nation	Hallam Trip	26-Feb-18	Patricia Mitchell	Phone	Inbound	Patricia calling back after seeing number on call display. She says that she will be traveling on her own but Councillor Oral will be traveling with us, he has ordered his passport.		
Sagkeeng First Nation	Hallam Trip	2-Mar-18	Marilyn Courchene	Email	Outbound	Accomodating Sagkeengs request to have a third member of there community join CNL for the Hallam trip	Mitch MacKay	
Sagkeeng First Nation	Hallam Trip	6-Mar-18	Lana Lavadier	Phone	Outbound	Calling to confirm who is coming for Hallam trip and get vital information for booking trip. Assured that chief will call me back.	Mitch MacKay	
Sagkeeng First Nation	Hallam Trip	6-Mar-18	Lana Lavadier	Phone	Outbound	Calling at request of Lana email. Received information on Hallam participants over the phone.	Mitch MacKay	

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Black River First Nation	Hallam Trip	8-Mar-18	Patricia Mitchell	Email	Outbound	Detailed information on Hallam trip including draft agenda and cost covering.	Mitch MacKay
Wabaseemoong Independent Nations	Hallam Trip	8-Mar-18	Marvin Lee McDonald	Email	Outbound	Detailed information on Hallam trip including draft agenda and cost covering.	Mitch MacKay
Manitoba Metis Federation	Hallam Trip	8-Mar-18	Stephen Howatt	Email	Outbound	Detailed information on Hallam trip including draft agenda and cost covering.	Mitch MacKay
Brokenhead Ojibway Nation	Hallam Trip	8-Mar-18	Gord Bluesky	Email	Outbound	Detailed information on Hallam trip including draft agenda and cost covering.	Mitch MacKay
Sagkeeng First Nation		8-Mar-18	Myles Courchene	Email	Outbound	Commitment letter to funding Aboriginal consumption survey	Mitch MacKay
Manitoba Metis Federation		20-Mar-18	Marci Riel	Email	Outbound	Update on draft responses to MMF comments on EIS	Mitch MacKay
Manitoba Metis Federation		20-Mar-18	Stephen Howatt	Email	Outbound	Update on Hallam trip and contribution agreement.	Mitch MacKay
Sagkeeng First Nation		21-Mar-18	Marilyn Courchene	Email	Outbound	Finalized agend afor Hallam trip commitment to covering travel expense.	Mitch MacKay
Brokenhead Ojibway Nation		23-Mar-18	Gord Bluesky	Email	Outbound	Final Hallam agenda and confirmation of hotel booking.	Mitch MacKay
Manitoba Metis Federation		23-Mar-18	Marci Riel	Email	Outbound	Draft responses to MMF comments on EIS shared.	Mitch MacKay
Black River First Nation		29-Mar-18	Patricia Mitchell	Email	Outbound	WR-1 Project update on WR-1 licensing delay	Mitch MacKay
Wabaseemoong Independent Nations		29-Mar-18	Marvin Lee McDonald	Email	Outbound	WR-1 Project update on WR-1 licensing delay	Mitch MacKay
Sagkeeng First Nation		29-Mar-18	Myles Courchene	Email	Outbound	WR-1 Project update on WR-1 licensing delay	Mitch MacKay
Manitoba Metis Federation		29-Mar-18	Marci Riel	Email	Outbound	WR-1 Project update on WR-1 licensing delay	Mitch MacKay
Manitoba Metis Federation		11-May-18	Stephen Howatt	Email	Outbound	GIS Mapping request fulfilled for MMF TK study	Mitch MacKay
Manitoba Metis Federation		17-May-18	Stephen Howatt	Email	Outbound	Additional files for GIS mapping	Mitch MacKay
Manitoba Metis Federation		23-May-18	Stephen Howatt	Email	Outbound	Clarifications on GIS mapping files and consumption survey	Mitch MacKay
Black River First Nation		30-May-18	Patricia Mitchell	Email	Outbound	Draft hallam trip report sent out for participant review and comment.	Mitch MacKay
Brokenhead Ojibway Nation		30-May-18	Gord Bluesky	Email	Outbound	Draft hallam trip report sent out for participant review and comment.	Mitch MacKay
Wabaseemoong Independent Nations		30-May-18	Marvin Lee McDonald	Email	Outbound	Draft hallam trip report sent out for participant review and comment.	Mitch MacKay
Sagkeeng First Nation		30-May-18	Tony Brown	Email	Outbound	Draft hallam trip report sent out for participant review and comment.	Mitch MacKay
Manitoba Metis Federation		30-May-18	Stephen Howatt	Email	Outbound	Draft hallam trip report sent out for participant review and comment.	Mitch MacKay
Black River First Nation		30-May-18	Oral Johnston	Email	Inbound	Comments back on draft trip report	Mitch MacKay
Manitoba Metis Federation		4-Jun-18	Stephen Howatt	Email	Outbound	Further GIS mapping files sent to MMF as requested	Mitch MacKay
Sagkeeng First Nation		8-Jun-18	Corey Shefman, Tony Brown	Email	Outbound	Follow up on any comments on the Hallam trip report and possible community engagement dates	Mitch MacKay
Black River First Nation		8-Jun-18	Patricia Mitchell	Email	Outbound	Follow up on any comments on the Hallam trip report and possible community engagement dates	Mitch MacKay
Wabaseemoong Independent Nations		8-Jun-18	Marvin Lee McDonald	Email	Outbound	Follow up on any comments on the Hallam trip report and possible community engagement dates	Mitch MacKay
Brokenhead Ojibway Nation		8-Jun-18	Tammy Moose	Email	Outbound	Follow up on any comments on the Hallam trip report and possible community engagement dates	Mitch MacKay
Sagkeeng First Nation		9-Jun-18	Chief Derrick Henderson	Email	Outbound	Follow up on request for copy of draft hallam trip report	Mitch MacKay
Wabaseemoong Independent Nations		11-Jun-18	Marvin Lee McDonald	Email	Inbound	Feedback on draft trip report provided community visit late July early August.	Mitch MacKay
Sagkeeng First Nation		11-Jun-18	Corey Shefman, OKT Law	Email	Inbound	Feedback on draft trip report provided.	Mitch MacKay

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Sagkeeng First Nation		11-Jun-18	Corey Shefman, OKT Law	Email	Outbound	Responding to feedback and clarifying requests for community meeting and environmental protection workshop	Mitch MacKay	
Sagkeeng First Nation		11-Jun-18	Corey Shefman, OKT Law	Email	Inbound	Providing information back on consumption survey interest, community meeting and environmental protection workshop.	Mitch MacKay	
Sagkeeng First Nation		12-Jun-18	Myles Courchene	Email	Inbound	Providing 17 consumption surveys back.	Mitch MacKay	
Brokenhead Ojibway Nation		12-Jun-18	Gord Bluesky	Email	Inbound	Providing information on who to contact now that Gordon and Buddy have left employment with the band office. No feedback on draft Hallam trip.	Mitch MacKay	
Sagkeeng First Nation		12-Jun-18	Myles Courchene	Email	Inbound	Request to do further consumption surveys with some small edits	Mitch MacKay	
Manitoba Metis Federation		12-Jun-18	Stephen Howatt	Email	Outbound	Asking for feedback on draft Hallam trip report	Mitch MacKay	
Sagkeeng First Nation		13-Jun-18	Myles Courchene	Email	Outbound	Providing edit request to consumption survey and outlining what additionally CNL will fund.	Mitch MacKay	
Sagkeeng First Nation	Survey	13-Jun-18	Myles Courchene Christine Courchene	Email	Outbound	Notification of additional funding for surveys and deadline of July 13	Mitch MacKay	
Sagkeeng First Nation		19-Jun-18	Corey Shefman, OKT Law	Email	Outbound	Clarifying environmental protection workshop, community visit timing and comments on draft Hallam trip report	Mitch MacKay	
Black River First Nation		19-Jun-18	Oral Johnston	Phone	Inbound	Oral informed CNL that Patricia Mitchell is no longer with the community and he is the lead contact now.	Mitch MacKay	
Black River First Nation		19-Jun-18	Oral Johnston	Email	Outbound	As requested by Oral email was sent confirming conversation and willingness to continue engagement with Oral as key contact.	Mitch MacKay	
Black River First Nation	follow on Hallem Report	19-Jun-18	Oral Johnston	Email	Outbound	resubmitted report - to Oral (Patricia's replacement)	Mitch MacKay	
Sagkeeng First Nation	Survey	19-Jun-18	Corey Shefman, Tony Brown	Email	Outbound	Update provided on the survey as well as discussion on a future EnvP Workshop	Mitch MacKay	
Manitoba Metis Federation	monthly check-in	22-Jun-18	Marci Riel	Email	Outbound	agenda for conference call	Mitch MacKay	
Sagkeeng First Nation	EIS	28-Jun-18	Corey Shefman, OKT Law	Email	Inbound	Request for additional funding for TK study	Mitch MacKay	
Sagkeeng First Nation	EIS	13-Jul-18	Corey Shefman, OKT Law	Email	outbound	Commitment to consider Sagkeeng request, ask about meeting to discuss request among other things.	Mitch MacKay	
Sagkeeng First Nation	EIS	9-Aug-18	Corey Shefman, OKT Law	Teleconference	Outbound	Meeting to discuss funding the TK CNL confirms support for this and provides comments/conditions	Mitch MacKay	
Sagkeeng First Nation		16-Aug-18	Chief Derrick Henderson	Email	Outbound	Invitation for Chief to attend a dinner with board of directors	Mitch MacKay	
Black River First Nation	EIS	24-Aug-18	Oral Johnston	Phone	Outbound	Returning Oral`s message. New project coordinator Kevin Bird. Want to have a community meeting on the TK study with Brokenhead, Hollow Water and Black River	Mitch MacKay	Yes
Manitoba Metis Federation		30-Aug-18	Marci Riel	Email	Outbound	Follow up email with actions from monthly meeting and attached copy of Hallam trip report.	Mitch MacKay	
Manitoba Metis Federation		30-Aug-18	Marci Riel	Email	Inbound	Acknowledging reciept of meeting actions and action to follow up shortly	Mitch MacKay	
Black River First Nation		6-Sep-18	Oral Johnston	Phone	Outbound	Follow up phone call left message on scheduling upcoming activities.	Mitch MacKay	
Black River First Nation		7-Sep-18	Oral Johnston	Phone	Inbound	Returning my call Oral confirmed a community meeting is being set up in Winnipeg September 26th. Also confirmed interest in attending WMS as co-presenter.	Mitch MacKay	
Black River First Nation		7-Sep-18	Oral Johnston	Email	Outbound	Confirmation of CNL attendance at September 26th meeting in Winnipeg.	Mitch MacKay	

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Black River First Nation		7-Sep-18	Oral Johnston	Email	Outbound	More information on co-presenting at the WMS	Mitch MacKay
Brokenhead Ojibway Nation		10-Sep-18	Bev Smith	Email	Outbound	Distributing copy of final Hallam trip.	Mitch MacKay
Wabaseemoong Independent Nations		10-Sep-18	Marvin Lee McDonald	Email		Distributing copy of final Hallam trip. Asking about when we could come to community next.	Mitch MacKay
Sagkeeng First Nation		10-Sep-18	Myles Courchene	Email		Distributing copy of final Hallam trip.	Mitch MacKay
Black River First Nation		15-Nov-18	Oral Johnston	Phone	Outbound	Updating Oral on upcoming meeting with SERDC.	
Black River First Nation		22-Nov-18	Oral Johnston	Phone	Outbound	Updating Oral on meeting with SERDC. And confirmation of possible community meeting December 3.	
Black River First Nation		23-Nov-18	Oral Johnston	Phone	Inbound	Confimation from Oral on a December 4th community meeting.	
Manitoba Metis Federation		29-Nov-18	Marci Riel	Email	Outbound	Formal letter extending MOU	
Black River First Nation		6-Dec-18	Oral Johnston	Email	Outbound	Follow up on actions out of the community meeting	
Black River First Nation		18-Dec-18	Oral Johnston	Email	Outbound	Follow up on contacting other communities	
Black River First Nation		7-Jan-19	Oral Johnston	Email	Outbound	Follow up on particpation and logistics for WMS 2019	
Brokenhead Ojibway Nation		24-Jan-19	Bev Smith	Phone	Outbound	Reaching out to the community to schedule continued engagements and updates.	
Wabaseemoong Independent Nations		24-Jan-19	Marvin Lee McDonald	Phone	Outbound	Reaching out to the community to schedule continued engagements and updates.	
Grand Council of Treaty 3		24-Jan-19	Kristie Duncan	Phone	Outbound	Reaching out to the community to schedule continued engagements and updates. Follow up on possible tour and environmental monitoring program.	
Brokenhead Ojibway Nation		24-Jan-19	Bev Smith	Email	Outbound	Reaching out to the community to schedule continued engagements and updates.	
Wabaseemoong Independent Nations		24-Jan-19	Marvin Lee McDonald	Email	Outbound	Followed up by email with Marvin as requested.	
Wabaseemoong Independent Nations		24-Jan-19	Waylon Scott	Email	Inbound	Marvin forwarded message to Waylon who asked for more information to bring up with Chief and council.	
Wabaseemoong Independent Nations		25-Jan-19	Waylon Scott	Email	Outbound	Replying to Waylon with additional information.	
Brokenhead Ojibway Nation		28-Jan-19	Bev Smith	Email	Inbound	Bev replied back with suggested dates to visit the community.	
Black River First Nation, Brokenhead Ojibway Nation, Hollow Water First Nation, Manitoba Metis Federation, Sagkeeng First Nation and	Site Re-licensing	19-Feb-19		Email	Outbound	Update on Site Re-licensing	
Manitoba Metis Federation	Environmental Monitoring	3-May-19	Jade Dewar	Email	Inbound/ Outbound	Email conversation regarding potential dates for MMF Observation of WL's Environmental Monitoring program	
Sagkeeng First Nation	Traditional Ceremony	7-May-19	Sabina Ijaz, Turtle Lodge	Email	Outbound	March 20 - May 7 (9 emails) continuing dialogue regarding setting up a date to meet to plan the Traditional Ceremony on the WL site	
Black River First Nation, Brokenhead Ojibway Nation, Hollow Water First Nation, Manitoba Metis Federation	Open House Invite	8-May-19		Email	Outbound	Invite to WL's June 8 Open House	
Manitoba Metis Federation	Environmental Monitoring	27-May-19	Jade Dewar	Email	Outbound	Confirmation of potential dates for Observation of EM	
Sagkeeng First Nation	EIS, outstanding items, invites to site	2-Jun-19	Corey Shefman, OKT Law	Email	Inbound/ Outbound	Email conversation (May 7, 31, June 2) regarding Sagkeeng's advance review of EIS. Follow up on community meeting and traditional ceremony. Invite to Open House with an invite to conduct a ceremony on site before the Open House or for National Indigenous Peoples Day	
Manitoba Metis Federation	Environmental Monitoring	5-Jun-19	Jade Dewar	Email	Inbound/ Outbound	Follow-up on potential dates for Observation of EM	
Brokenhead Ojibway Nation		7-Jun-19	Bev Smith	Email	Outbound	Provided copy of Winnipeg River Task Force report	

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Black River First Nation, Brokenhead Ojibway Nation, Hollow Water First Nation	Tour & TK Study	13-Jun-19	Adam Kroeker, HTFC Planning & Design	Email	Inbound/ Outbound	Request and provision of information including CNL presentation and visitors sign-in list				
Sagkeeng First Nation	Traditioal Indigenous Ceremony at CNL	13-Jun-19	Sabina Ijaz, Turtle Lodge	Email	Outbound	Setting up a meeting to discuss Turtle Lodge Ceremony on site		Follow up to March 18 Ceremony at Turtle Lodge	Yes	July 4th meeting set
Sagkeeng First Nation	Traditioal Indigenous Ceremony at CNL	26-Jun-19	Sabina Ijaz, Turtle Lodge	Email	Outbound	Setting up a meeting to discuss Turtle Lodge Ceremony on site		Visitors Forms for July 4 meeting to discuss Ceremony at Whiteshell	Yes	receipt of Visitor Forms
Sagkeeng First Nation	Traditioal Indigenous Ceremony at CNL	08-Jul-19	Sabina Ijaz, Turtle Lodge	Email	Outbound	Confirmation of August 19th date for Traditional Ceremony	Alanna Wilcox			
Manitoba Metis Federation	Facilitating Observation of CNL Environmental Monitoring program	08-Jul-19	Marci Riel	Email	Inbound	Proposal on amending Contribution Agreement to cover MMF expenses to participate in this activity	Alanna Wilcox		Yes	Revisions to the CA
Manitoba Metis Federation	Facilitating Observation of CNL Environmental Monitoring program	09-Jul-19	Marci Riel	Email	Inbound	Amending the Contribution Agreement (CA)	Alanna Wilcox		Yes	Revisions to the CA
Manitoba Metis Federation	Facilitating Observation of CNL Environmental Monitoring program	15-Jul-19	Marci Riel	Email	Outbound	Provided amended Contribution Agreement (CA)	Alanna Wilcox		Yes	Revisions to the CA
Manitoba Metis Federation	Facilitating Observation of CNL Environmental Monitoring program	16-Jul-19	Marci Riel	Email	Inbound	Confirmed agreement to amended Contribution Agreement (CA). Forwarded to President Chartrand	Alanna Wilcox		No	
Sagkeeng First Nation	Follow up	17-Jul-19	Sabina Ijaz, Turtle Lodge	Email	Outbound	Provision of documents requested during July 4 meeting including the Winnipeg River Task Force report, TK Study report, CNSC decision process	Alanna Wilcox			
Manitoba Metis Federation	Procurement Opportunities	18-Jul-19	Marci Riel	Email	Outbound	Setting up meeting between MMF and CNL Procurement	Alanna Wilcox		Yes	Meeting to discuss procurement opportunities
Sagkeeng First Nation	Community Meeting	25-Jul-19	Corey Shefman, OKT Law	Email	Inbound/ Outbound	Request to set up a Community meeting with CNL and CNSC	Alanna Wilcox			
Manitoba Metis Federation	Public Information Program	26-Jul-19	Marci Riel	Email	Outbound	Provided link to Public Information Program in connection with MMF request regarding notification to MMF for decommissioning activities which may impact MMF citizens	Alanna Wilcox		No	
SouthEast Regional Development Corporation	Procurement Opportunities	30-Jul-19	Chris Coggans, Golder	Email	Outbound	As a follow-up to the meeting with Golder, an offer to host an Industry Day, a meeting with SERDC or Shawano or provide information on the Asset Donation program.	Alanna Wilcox		No	
Manitoba Metis Federation	Procurement Opportunities	31-Jul-19	Marci Riel	Email	Outbound	Provided current list of Procurement opportunities as well as excerpt of language in procurement documents regarding Indigenous businesses	Alanna Wilcox		No	
Manitoba Metis Federation		06-Aug-19	Marci Riel	Email	Outbound	Provision of document outlining WR-1 major EA activities to close out Action #15	Alanna Wilcox		No	
Manitoba Metis Federation	Facilitating Observation of CNL Environmental Monitoring program	08-Aug-19	Marci Riel	Email	Inbound		Alanna Wilcox		Yes	Revisions to the CA
Sagkeeng First Nation	Check-in Meeting	13-Aug-19	Corey Shefman, OKT Law	Email	Outbound	Check-in with Sagkeeng prior to Turtle Lodge Ceremony, Community Meeting and License Hearing	Alanna Wilcox		Yes	set up meeting
Manitoba Metis Federation	Facilitating Observation of CNL Environmental Monitoring program	13-Aug-19	Marci Riel	Email	Inbound	Receipt of signed amended Contribution Agreement (CA) from President Chartrand	Alanna Wilcox		Yes	Obtain CNL signature and return to MMF
Manitoba Metis Federation	Notification of activities	13-Aug-19	Marci Riel	Email	Outbound	Provided draft letter outlining CNL's committement on notification of WR-1 decommissioning activities which may impact MMF citizens	Alanna Wilcox			
Sagkeeng First Nation		13-Aug-19	Sabina Ijaz, Turtle Lodge	Email	Outbound	Provision of document requested from July 4 meeting (CNSC decision process)	Alanna Wilcox		No	
Sagkeeng First Nation		13-Aug-19	Corey Shefman, OKT Law	Email	Outbound	Request to set up a check-in meeting prior to the Traditional Ceremony, community meeting and License hearing	Alanna Wilcox			
Manitoba Metis Federation	Facilitating Observation of CNL Environmental Monitoring program	15-Aug-19	Marci Riel	Email	Inbound	Provided final signed amended Contribution Agreement (CA) to MMF	Alanna Wilcox		No	
Manitoba Metis Federation	Procurement Opportunities	15-Aug-19	Marci Riel	Email	Outbound	Response to question from July 31 meeting regarding mandatory minimum employment requirements. Offer to meet to discuss MMF and N4 capabilities	Alanna Wilcox			
Manitoba Metis Federation	Post-closure Environmental Monitoring	15-Aug-19	Marci Riel	Email	Outbound	Confirmation to MMF that AECL has given the lead to CNL to discuss Environmental Monitoring post site dosure with Indigenous groups and asking how MMF would like to proceed	Alanna Wilcox			
Black River First Nation		10-Sep-19	Oral Johnston	Phone Call	Inbound/ Outbound	Reach out from Oral Johnson August 21 and response back upon my return from vacation. Just touching base	Alanna Wilcox			
Sagkeeng First Nation	Traditional Ceremony	11-Sep-19	Sabina Ijaz, Turtle Lodge	Email	Inbound/ Outbound	Numerous emails between July 8 and Sept 11 to discuss and confirm details for Traditional Ceremony	Alanna Wilcox			
Brokenhead Ojibway Nation	TK Study	11-Sep-19	Bev Smith	Email	Inbound	Received of catering invoice for lunch for community meeting for Traditional Knowledge study	Alanna Wilcox		Yes	Confirmed 12-Sep-19 that invoice has been paid

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Black River First Nation		19-Sep-19	Oral Johnston	Email	Inbound/ Outbound	Reach out from Oral Johnson August 21. Follow up to Sept 10 (approximately) phone call to confirm that we would be in touch once position has been filled.	Alanna Wilcox			
Sagkeeng First Nation		24-Sep-19	Chief Henderson, Corey Shefman, OKT Law	Email	Outbound	Follow up from Sagkeeng community meeting with the provision of WR-1 DDP as well as a request to set up a meeting to discuss several other items	John Gilbert		Yes	Set up meeting to continue discussions
Sagkeeng First Nation		30-Sep-19	Chief Derrick Henderson	Email	Outbound	Provided copy of Winnipeg River Task Force report as requested during Sept 18 community meeting	Alanna Wilcox			
Manitoba Metis Federation		07-Oct-19	Marci Riel	Email	Outbound	Providing a copy of email sent to CNSC acknowledging receipt of MMF Sept 30 Intervention	Alanna Wilcox		No	
Manitoba Metis Federation		07-Oct-19	Jade Dewar	Email	Inbound	Copy of Minister Park's report from the MMF AGA provided for our interest. Report mentions positive relationship between CNL and MMF	Alanna Wilcox		Yes	report provided to key executives within CNL
Sagkeeng First Nation	Engagement meeting with Sagkeeng First Nation	09-Oct-19	Corey Shefman, OKT Law	Email	Outbound	Oct 7 - 17, Arranging meeting with Sagkeeng Chief and Council regarding long-term relationship and items arising from the licence intervention. Meeting date subsequently changed	Alanna Wilcox		No	
Manitoba Metis Federation		16-Oct-19	Marci Riel	Email	Outbound	Follow up from monthly meetings as well as Licence Intervention with a request to set up a meeting to discuss items	John Gilbert		Yes	Set up meeting to continue discussions
Manitoba Metis Federation	Louis Riel celebration	17-Oct-19	Marci Riel	Email	Inbound	Invite to CNL to attend the gala dinner and play to celebrate the 175th anniversary of Louis Riel's birthday	Alanna Wilcox		Yes	Acceptance
Black River First Nation, Brokenhead Ojibway Nation, Hollow Water First Nation	TK Study	23-Oct-19	Elly Bonny, HTFC Planning & Design	email chain	Outbound/ Inbound	Follow up on release of Community TK Study	Alanna Wilcox		No	
Manitoba Metis Federation	Licence Intervention response	24-Oct-19	Marci Riel	Email	Outbound	Forwarded copy of CNL's response to MMF's Sept 30 Licence Intervention	Alanna Wilcox		No	
Sagkeeng First Nation	Engagement meeting with Sagkeeng First Nation	30-Oct-19	Corey Shefman, OKT Law, Lana Lavadier	Email	Outbound	Oct 28 - 30, Rescheduling meeting with Sagkeeng Chief and Council regarding long-term relationship and items arising from the licence intervention.	Alanna Wilcox		No	
Manitoba Metis Federation	Engagement meeting with MMF	31-Oct-19	Marci Riel	email chain	Outbound/ Inbound	Oct 24 - 31, Arranging meeting with MMF regarding long-term relationship and items arising from the licence intervention	Alanna Wilcox		No	
Sagkeeng First Nation	Engagement meeting with Sagkeeng First Nation	05-Nov-19	Corey Shefman, OKT Law	email chain	Outbound/ Inbound	Nov 1 - 5, Confirming agenda for engagement	Alanna Wilcox		No	
Manitoba Metis Federation	Engagement meeting with MMF	05-Nov-19	Marci Riel	email chain	Outbound/ Inbound	Nov 1 - 5, Confirming agenda for engagement	Alanna Wilcox		No	
Sagkeeng First Nation	WR-1 EIS	07-Nov-19	Corey Shefman, OKT Law	Email	Outbound	Confirmation of provision of EIS to review prior to submission	Alanna Wilcox		Yes	Provide EIS early January
Sagkeeng First Nation	ERM Launch	13-Nov-19	Sabina Ijaz, Turtle Lodge	Email	Outbound	Invitation to Elder Dave Courchene to speak at ERM Launch	Mitch MacKay		No	
Manitoba Metis Federation	Engagement meeting with MMF	14-Nov-19	Morrissa Boerchers	Email	Outbound	Provision of Procument documents (resend from July)	Alanna Wilcox		No	
Wabaseemoong Independent Nations	CNL Annual Reports	20-Nov-19	Marvin Lee McDonald	email chain	Outbound/ Inbound	Delivery of annual reports	Alanna Wilcox		No	
Black River First Nation, Brokenhead Ojibway Nation, Hollow Water First Nation	TK Study	20-Nov-19	Elly Bonny, HTFC Planning & Design	email chain	Outbound/ Inbound	Confirmation that TK Study has been posted on CNL's external website	Alanna Wilcox		No	
Black River First Nation, Brokenhead Ojibway Nation, Hollow Water First Nation	TK Study	21-Nov-19	Elly Bonny, HTFC Planning & Design	Email	Outbound	Confirmation that CNL provided the TK Study to AECL and brought to their attention the communities' desire to discuss future Land Use with them	Alanna Wilcox		No	
Wabaseemoong Independent Nations		12-Dec-19	Marvin Lee McDonald	Email	Outbound	Request to connect by telephone	Alanna Wilcox		Yes	
Sagkeeng First Nation	CNL Annual Reports	12-Dec-19	Chief Henderson, Lana Lavadier	email chain	Outbound/ Inbound	Follow up regarding undeliverable annual reports	Alanna Wilcox		Yes	
Sagkeeng First Nation	WR-1 EIS	13-Dec-19	Lana Lavadier, Chief Henderson	email chain	Outbound/ Inbound	Request for updated contact information for job postings	Alanna Wilcox		No	New contact information provided to WL HR Services
Sagkeeng First Nation	SMR	13-Dec-19	Chief Derrick Henderson	Email	Outbound	Provided StarCore contact information as requested during 2019 Dec 11 meeting	Alanna Wilcox		No	
Black River First Nation	Follow up from TK Study	16-Dec-19	Oral Johnston	Email	Outbound	Follow up from TK Study to discuss ceremony, next steps, regular meetings	Alanna Wilcox		Yes	
Sagkeeng First Nation	WR-1 EIS	17-Dec-19	Corey Shefman, OKT Law	Email	Inbound/ Outbound	Notes and actions from Dec 11th meeting	Alanna Wilcox		Yes	Completion of actions
Hollow Water First Nation	Follow up from TK Study	17-Dec-19	Furlon Barker	email chain	Outbound/ Inbound	Follow up from TK Study to discuss ceremony, next steps, regular meetings	Alanna Wilcox	Furlon not available Dec 18 as originally planned. Waiting for new date	Yes	
Brokenhead Ojibway Nation	Follow up from TK Study	17-Dec-19	Bev Smith	email chain	Outbound/ Inbound	Follow up from TK Study to discuss ceremony, next steps, regular meetings	Alanna Wilcox		Yes	
Manitoba Metis Federation	WR-1 EIS	17-Dec-19	Marci Riel	Email	Outbound	Notes and actions from Dec 3rd meeting	Alanna Wilcox		Yes	Completion of actions

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Sagkeeng First Nation	WL site licence	19-Dec-19	Chief Derrick Henderson	Email	Outbound	Notification of approval of 5 year decommissioning licence	Alanna Wilcox	No		
Manitoba Metis Federation	WL site licence	19-Dec-19	Marci Riel	Email	Outbound	Notification of approval of 5 year decommissioning licence	Alanna Wilcox	No		
Brokenhead Ojibway Nation	WL site licence	19-Dec-19	Bev Smith	Email	Outbound	Notification of approval of 5 year decommissioning licence	Alanna Wilcox	No		
Black River First Nation	WL site licence	19-Dec-19	Oral Johnston	Email	Outbound	Notification of approval of 5 year decommissioning licence	Alanna Wilcox	No		
Hollow Water First Nation	WL site licence	19-Dec-19	Furlon Barker	Email	Outbound	Notification of approval of 5 year decommissioning licence	Alanna Wilcox	No		
Wabaseemoong Independent Nations	WL site licence	19-Dec-19	Marvin Lee McDonald	Email	Outbound	Notification of approval of 5 year decommissioning licence	Alanna Wilcox	No		
Manitoba Metis Federation	WR-1 EIS	08-Jan-20	Marci Riel	Email	Outbound	Provided draft updated EIS for MMF's early review	Alanna Wilcox	Yes	Feedback due Feb 12	
Sagkeeng First Nation	WR-1 EIS	08-Jan-20	Chief Henderson, Corey Shefman, OKT Law	Email	Outbound	Provided draft updated EIS for SFN's early review	Alanna Wilcox	Yes	Feedback due Feb 12	
Sagkeeng First Nation	WR-1 EIS	09-Jan-20	Corey Shefman, OKT Law	email chain	Outbound/ Inbound	Provided draft Amendment MOU for provision of capacity funds ($25k) to review the updated EIS with a request to seek a Long-term Relationship Agreement	Alanna Wilcox	Yes	finalizing MOU	
Sagkeeng First Nation		13-Jan-20	Chief Derrick Henderson	Email	Outbound	Offer to have Mark Lesinski and team meet with Chief Henderson in Winnipeg as he was unable to make the Community Regeneration Partnership meeting. (Chief Henderson was unavailable)	Alanna Wilcox			
Manitoba Metis Federation	WR-1 EIS	14-Jan-20	Marci Riel	Email	Outbound	Provided updated Action List including actions from Dec 3 meeting for Marci's review	Alanna Wilcox			
Sagkeeng First Nation	WR-1 EIS	14-Jan-20	Alistair MacDonald, Firelight	email chain	Outbound/ Inbound	Offer to meet with Firelight to highlight changes made to the EIS	Alanna Wilcox			
Sagkeeng First Nation	WR-1 EIS	21-Jan-20	Corey Shefman, OKT Law	Email	Outbound	Provided final signed amended Contribution Agreement (CA) to SFN	Alanna Wilcox			
Sagkeeng First Nation	WR-1 EIS	21-Jan-20	Alistair MacDonald, Firelight	email chain	Outbound/ Inbound	Offer to meet with Firelight to highlight changes made to the EIS (Jan 14), meeting notice issued (Jan 21)	Alanna Wilcox			
Hollow Water First Nation	WR-1 EIS	22-Jan-20	Furlon Barker	Telephone then Email	Outbound	Reach out to follow up from TK Study to discuss ceremony, next steps, regular meetings	Alanna Wilcox			
Sagkeeng First Nation	Asset Donation	23-Jan-20	Chief Derrick Henderson	Email	Outbound	Request for asset donation of tables & chairs	Alanna Wilcox			
Brokenhead Ojibway Nation	WR-1 EIS	24-Jan-20	Bev Smith	Telephone then Email	Outbound/ Inbound	Reach out to follow up from TK Study to discuss ceremony, next steps, regular meetings. Advised by Bev that she was not available to connect at this time.	Alanna Wilcox			
Black River First Nation	WR-1 EIS	28-Jan-20	Oral Johnston	Telephone then email	Outbound/ Inbound	Discussed next steps from the community meeting including setting up an Indigenous Advisory Committee	Alanna Wilcox	Yes	next steps	
Sagkeeng First Nation	WR-1 EIS	28-Jan-20	Chief Henderson, Corey Shefman, OKT Law	Email	Outbound	Provided responses to comments received through CNSC from submission of the draft EIS (IR)	Alanna Wilcox			
Sagkeeng First Nation	WR-1 EIS	29-Jan-20	Chief Henderson, Corey Shefman, OKT Law	Email	Inbound/ Outbound	Response to questions on IR responses. Acknowledge of need to respond to Alternatives Assessment questions received June 2019	Alanna Wilcox			
SouthEast Regional Development Corporation	Procurement Opportunities	29-Jan-20	Anthony Cicconi, Golder	Email	Outbound	Provided Metis N4 Construction contact	Alanna Wilcox			
Manitoba Metis Federation		29-Jan-20	Marci Riel	Email	Outbound	Best wishes for Manitoba 150 – Métis Nation 2020 celebration in Ottawa	Brian Wilcox			
Sagkeeng First Nation		30-Jan-20	Sabina Ijaz, Turtle Lodge	email chain	Outbound/ Inbound	Advice on cultural awareness training for WL	Alanna Wilcox			
Manitoba Metis Federation	WR-1 EIS	31-Jan-20	Marci Riel	Email	Outbound	Provided response to Actions #13 and 18	Alanna Wilcox			
Sagkeeng First Nation		31-Jan-20	Chief Henderson, Corey Shefman, OKT Law	Email	Outbound	Response to action from Dec 11 meeting regarding asbestos left in trenches	Alanna Wilcox			
Sagkeeng First Nation	WR-1 EIS	03-Feb-20	Corey Shefman, OKT Law	Email	Outbound	Privided ETA for Alternatives Assessment responses	Alanna Wilcox			
Brokenhead Ojibway Nation	WR-1 EIS	05-Feb-20	Bev Smith	Email	Outbound	Provided EIS for early review by Brokenhead, Black River and Hollow Water	Alanna Wilcox			
Manitoba Metis Federation		06-Feb-20	Morrissa Boerchers	Email	Inbound/ Outbound	Communication regarding Environmental Monitoring activities MMF is interested in observing	Alanna Wilcox	Yes	Set up activities	
Sagkeeng First Nation	Asset Donation	07-Feb-20	Chief Derrick Henderson	Email	Outbound	Confirmation of delivery of tables and chairs	Alanna Wilcox			
Manitoba Metis Federation	WR-1 EIS	10-Feb-20	Morrissa Boerchers	Email	Outbound	Provided responses to comments received through CNSC from submission of the draft EIS (IR)	Alanna Wilcox			
Black River First Nation, Brokenhead Ojibway Nation, Hollow Water First Nation	WR-1 EIS	13-Feb-20	Bev Smith, Oral Johnston, Furlon Barker	Email	Outbound	Provided responses to comments received through CNSC from submission of the draft EIS (IR)	Alanna Wilcox			

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Sagkeeng First Nation	WR-1 EIS	14-Feb-20	Corey Shefman, OKT Law	Email	Outbound	Provided responses to questions on the Alternatives Assessment	Alanna Wilcox		
Manitoba Metis Federation	WR-1 EIS	18-Feb-20	Marci Riel	Email	Outbound	Provided response on Action #22 confirming no change in procurement procedure at this time. Interested in continuing to seek opportunities through MMF	Alanna Wilcox		
Sagkeeng First Nation	WR-1 EIS	18-Feb-20	Corey Shefman, OKT Law	Email	Outbound	Provided updated Action List including responses, updated dates to some of the actions. Inquired about status of the draft Terms of Reference for the IAC.	Alanna Wilcox		
Sagkeeng First Nation	WR-1 EIS	19-Feb-20	Corey Shefman, OKT Law	Email	Inbound/ Outbound	Response from SFN to early review of the EIS	Alanna Wilcox	Yes	Mtg with SFN to review
Manitoba Metis Federation	WR-1 EIS	21-Feb-20	Marci Riel	Telephone, then email	Outbound/ Inbound	Request to meet to discuss IAC	Alanna Wilcox		
Sagkeeng First Nation	WR-1 EIS	27-Feb-20	Corey Shefman, OKT Law	Email	Inbound/ Outbound	Confirmation of meeting to discuss SFN's review of EIS	Alanna Wilcox		
SouthEast Regional Development Corporation	Job Opportunities	04-Mar-20	Doug Mercer	Email	Outbound	Requested SERDC HR contact to send our postings to and provided copy of Ind Engagement Officer job description	Alanna Wilcox		
Sagkeeng First Nation	WR-1 EIS	05-Mar-20	Corey Shefman, OKT Law	Email	Inbound/ Outbound	Request from Corey Shefman for agenda from CNL for the March 6 meeting, then confirmation that there would only be time to discuss the EIS	Alanna Wilcox		
Sagkeeng First Nation	WR-1 EIS	05-Mar-20	Chief Derrick Henderson	Email	Outbound	Email from John Gilbert to Chief Henderson regarding March 6 meeting and CNL's desire to continue to work on relationship and items of importance identified during our March 6th meeting	Alanna Wilcox		
Brokenhead Ojibway Nation	WR-1 EIS	11-Mar-20	Alison Fraser, SVS	Email	Outbound	Confirmation that feedback on Brokenhead's early review of the EIS would be incorporated into the updated IER and as appropriate, into the EIS	Alanna Wilcox	Yes	Provide submitted EIS for their review
Sagkeeng First Nation	Asset Donation	16-Mar-20	Chief Derrick Henderson	Email	Outbound	Advised SFN that we are not able to have any visitors on site at this time due to COVID-19 and that we would follow up re: Quonset Hut	Alanna Wilcox		
Brokenhead Ojibway Nation	WR-1 EIS	16-Mar-20	Bev Smith Oral Johnston	Email	Inbound	Confirmation that BON was not able to participate in an Indigenous Advisory Committee at this time Call a mtg with 3 Communities and ask that they have an Elder there.	Alanna Wilcox		
Black River First Nation	WR-1 EIS	16-Mar-20		Telephone	Outbound	Next steps from Dec 5 TK roll-out meeting.	Alanna Wilcox	Yes	Discuss what they need to conduct a
Hollow Water First Nation	WR-1 EIS	16-Mar-20	Furlon Barker	Email	Outbound	Next steps from Dec 5 TK roll-out meeting.	Alanna Wilcox		
Sagkeeng First Nation		16-Mar-20	Sabina Ijaz, Turtle Lodge	Email	Inbound/ Outbound	Invitation to WAHBANUNG to be held March 19 and acceptance	Alanna Wilcox		
Sagkeeng First Nation	WL Quonset Huts	16-Mar-20	Chief Derrick Henderson	Email	Outbound	Quonset Huts and restrictions on visitors	Kristie Duncan		
Brokenhead Ojibway Nation	Indigenous Advisory Committee	16-Mar-20	Bev Smith	Email	Inbound/ Outbound	Bev indicated BON is focused on the EA and not interested in participating on the IAC	Kristie Duncan		
Black River First Nation	Ceremony on site	16-Mar-20	Oral Johnston	Call	Outbound	Planning for a ceremony on site	Kristie Duncan		
Hollow Water First Nation	TK Study	16-Mar-20	Furlon Barker	Call & e-mail	Outbound	Touch base on ceremony, TK study, IAC	Kristie Duncan		
Sagkeeng First Nation	WR-1 EIS	17-Mar-20	Corey Shefman, OKT Law	Email	Inbound/ Outbound	Email from Sagkeeng received with 3 components: (1) request for additional Alternative Means workshop $40k - $60k; (2)Sagkeeng's questions from the March 6th meeting for CNL's response as well as a request to document changes to the EIS; and (3)clarification on engagement for relationship vs consultation on technical issues. Confirmation of receipt of by CNL provided.	Alanna Wilcox	Yes	respond to email
Sagkeeng First Nation		19-Mar-20	Sabina Ijaz, Turtle Lodge	email chain	Outbound/ Inbound	Contact to advise that due to predicted snow and COVID, I was unable to attend WAHBANUNG. Sabina responded that they understood	Alanna Wilcox		
Sagkeeng First Nation (Turtle Lodge)	Canceling attendence to Wahbanung	19-Mar-20	Sabina & Dakota, Turtle Lodge	Email	Outbound	Canceling attendence to Wahanung	Kristie Duncan		
Sagkeeng First Nation (Turtle Lodge)	Canceling attendence to Wahbanung	19-Mar-20	Sabina & Dakota, Turtle Lodge	Email	Outbound	Canceling attendence to Wahanung	Kristie Duncan		
Sagkeeng First Nation	WR-1 EIS	25-Mar-20	Chief Derrick Henderson	Email	Outbound	Follow up from March 6 meeting where we asked Chief Henderson to reconsider his opinion on a FN Advisory Committee only (i.e. not including MMF)	Alanna Wilcox		
Sagkeeng First Nation	Indigenous Advisory Committee	25-Mar-20	Chief Derrick Henderson	Email	Outbound	Inquiring about Sagkeeng's participation in	Kristie Duncan		
Sagkeeng First Nation	Indigenous Advisory Committee	25-Mar-20	Chief Derrick Henderson	Email	Outbound	Requesting that Chief Henderson reconsider their position on the IAC, also requesting a time estimate on when CNL can expect a response.	Kristie Duncan		
Sagkeeng First Nation	Community Shut down	25-Mar-20	Corey Shefman, OKT Law	Email	Inbound	Corey informed CNL that Sagkeeng's office is closed	Kristie Duncan		
Brokenhead Ojibway Nation	WR-1 EIS	27-Mar-20	Alison Fraser, SVS	Email	Outbound	provided updated EIS for their review (rather than earlier draft version)	Alanna Wilcox		
Brokenhead Ojibway Nation	Sharing EIS	27-Mar-20	Alison Fraser, SVS	Email	Inbound	Receipt of EIS from Alison Fraser, SVS	Kristie Duncan		

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Brokenhead Ojibway Nation	Sharing EIS	27-Mar-20	Alison Fraser, SVS	Email	Inbound	Receipt of EIS from Alison Fraser, SVS	Kristie Duncan		
Sagkeeng First Nation	WR-1 EIS	30-Mar-20	Corey Shefman, OKT Law	Email	Outbound	follow up from March 25 email request to Chief Henderson regarding the Advisory Committee	Alanna Wilcox		
Sagkeeng First Nation		30-Mar-20	Sabina Ijaz, Turtle Lodge	email chain	Outbound/ Inbound	Question on whether Turtle Lodge is able to provide Indigenous Awareness Training	Alanna Wilcox		
Sagkeeng First Nation	Indigenous Advisory Committee	30-Mar-20	Corey Shefman, OKT Law	Email	Outbound	Requesting Sagkeeng reconsider their position on the IAC	Kristie Duncan		
Sagkeeng First Nation	Indigenous Advisory Committee	30-Mar-20	Corey Shefman, OKT Law	Email	Outbound	Requesting Sagkeeng reconsider their position on the IAC	Kristie Duncan		
Sagkeeng First Nation	WR-1 EIS	31-Mar-20	Corey Shefman, OKT Law	Email	Inbound	Provided conditional agreement to include MMF in the Advisory Committee, along with a draft Participation Agreement	Alanna Wilcox		
Brokenhead Ojibway Nation	Sharing EIS	31-Mar-20	Alison Fraser, SVS	Email	Outbound	Shared Updated EIS	Kristie Duncan		
Sagkeeng First Nation	Indigenous Advisory Committee	31-Mar-20	Corey Shefman, OKT Law	Email	Inbound	Sagkeeng stated they would include MMF but only under certain circumstances			
Brokenhead Ojibway Nation	Sharing EIS	31-Mar-20	Alison Fraser, SVS	Email	Outbound	Shared Updated EIS	Kristie Duncan		
Manitoba Metis Federation	WR-1 EIS	01-Apr-20	Morrissa Boerchers	Email	Inbound	Responses to WR-1 IR response table	Alanna Wilcox		
Manitoba Metis Federation	MMF's Review of CNL's Response Table	01-Apr-20	Morrissa Boerchers	Email	Inbound	MMF's Review of CNL's Responses Table	Kristie Duncan		
Manitoba Metis Federation	MMF's Review of CNL's Response Table	01-Apr-20	Morrissa Boerchers	Email	Inbound	MMF's Review of CNL's Responses Table	Kristie Duncan		
Sagkeeng First Nation	WR-1 EIS	03-Apr-20	Chief Derrick Henderson	Email	Outbound	Notification that the updated EIS was submitted to CNSC	Alanna Wilcox		
Wabaseemoong Independent Nations	WR-1 EIS	03-Apr-20	Marvin Lee McDonald	Email	Outbound	Notification that the updated EIS was submitted to CNSC	Alanna Wilcox		
Black River First Nation, Brokenhead Ojibway Nation,	WR-1 EIS	03-Apr-20	Oral Johnston, Bev Smith, Furlon Barker	Email	Outbound	Notification that the updated EIS was submitted to CNSC	Alanna Wilcox		
Manitoba Metis Federation	WR-1 EIS	03-Apr-20	Marci Riel	Email	Outbound	Notification that the updated EIS was submitted to CNSC	Alanna Wilcox		
Sagkeeng First Nation	WR-1 updated EIS submitted to CNSC for review	03-Apr-20	Chief Derrick Henderson	Email	Outbound	Updating that CNL has submitted the updated EIS for WR-1 in situ decommissioning	Kristie Duncan		
Sagkeeng First Nation	WR-1 updated EIS submitted to CNSC for review	03-Apr-20	Chief Derrick Henderson	Email	Outbound	Updating that CNL has submitted the updated EIS for WR-1 in situ decommissioning	Kristie Duncan		
Wabaseemoong Independent Nations	WR-1 updated EIS submitted to CNSC for review	03-Apr-20	Marvin Lee McDonald	Email	Outbound	Updating that CNL has submitted the updated EIS for WR-1 in situ decommissioning	Kristie Duncan		
Black River First Nation, Brokenhead Ojibway Nation, Hollow Water First Nation	WR-1 updated EIS submitted to CNSC for review	03-Apr-20	Oral Johnston, Bev Smith, Furlon Barker	Email	Outbound	Updating that CNL has submitted the updated EIS for WR-1 in situ decommissioning	Kristie Duncan		
Manitoba Metis Federation	WR-1 updated EIS submitted to CNSC for review	03-Apr-20	Marci Riel	Email	Outbound	Updating that CNL has submitted the updated EIS for WR-1 in situ decommissioning	Kristie Duncan		
Manitoba Metis Federation	Relationship building and procurement opportunities between MMF and Golder Associates	08-Apr-20	Anthony Cicconi, Golder	Email	Inbound/ Outbound	MMF and Golder to work together and discuss procurement opportunities.	Kristie Duncan		
Sagkeeng First Nation	WR-1 EIS	09-Apr-20	Chief Derrick Henderson	Email	Outbound	Response to Feb 18th email and table	Alanna Wilcox		
Manitoba Metis Federation	WR-1 EIS	09-Apr-20	Marci Riel	Email	Outbound	Follow up on request on how CNL can use MMF's TK study	Alanna Wilcox		
Sagkeeng First Nation	Responses to Sagkeeng's questions from February 18th letter	09-Apr-20	Chief Derrick Henderson	Email	Outbound	CNL responsed to Sagkeeng's questions presented in a letter on February 18th.	Kristie Duncan		
Manitoba Metis Federation	CNL's use of TK study	09-Apr-20	Marci Riel	Email	Outbound	Continuing their conversation on CNL's use of the TK Study and long-term relationship agreement	Kristie Duncan		
Sagkeeng First Nation	WR-1 EIS	10-Apr-20	Corey Shefman, OKT Law	Email	Inbound	Expressed disappointment in CNL's response in our April 9th email	Alanna Wilcox		
Sagkeeng First Nation	Sagkeeng's comments on CNL's responses to Sagkeeng's questions	10-Apr-20	Corey Shefman, OKT Law	Email	Inbound	Corey says they are disappointed with CNL's response, Corey states CNL agreed to provide a list of changes made to EIS in response of their TK study	Kristie Duncan		
Sagkeeng First Nation	Sagkeeng's advance review of CNL's ISD EIS	13-Apr-20	Corey Shefman, OKT Law	Email	Inbound/Outbound	Sagkeeng provided CNL with their advance review of CNL's EIS.	Kristie Duncan		
Sagkeeng First Nation	WR-1 EIS	15-Apr-20	Chief Derrick Henderson	Email	Outbound	Request for regular meetings	Alanna Wilcox		
Sagkeeng First Nation	Regular recurring meeting with Sagkeeng First Nation, CNSC, and AECL	15-Apr-20	Chief Derrick Henderson	Email	Outbound	CNL sent Sagkeeng an Action Items list and requested a regular recurring meeting with Sagkeeng, CNSC, and AECL	Kristie Duncan		
Sagkeeng First Nation	WR-1 EIS	19-Apr-20	Corey Shefman, OKT Law	Email	Outbound	Response to April 13 email from Corey Shefman indicating that CNL had no recollection of having comitted to supply a list of changes to the EIS as a result of Sagkeeng's questions and confirmation that we would provide responses to the IR table around the end of April.	Alanna Wilcox	Yes	IR response table
Sagkeeng First Nation	Sagkeeng's request for a list of changes to the EIS from Sagkeeng's comments	19-Apr-20	Corey Shefman, OKT Law	Email	Outbound	CNL stating they do not recall committing to sending Sagkeeng a list of changes to the EIS made based on Sagkeeng's comments	Kristie Duncan		

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Sagkeeng First Nation	Indigenous Advisory Committee	22-Apr-20	Corey Shefman, OKT Law	Email	Outbound	CNL requesting to touch base to discuss IAC PA and provided an update on responses	Kristie Duncan		
Sagkeeng First Nation	WR-1 EIS	23-Apr-20	Corey Shefman, OKT Law	Email	Outbound	Confirmation that we were working on the Participation Agreement for the IAC as well as responses to March 6 questions and that they were out for final internal reviews.	Alanna Wilcox	Yes	IAC PA responses to Mar 6 questions
Manitoba Metis Federation	Metis Cultural Awareness Training	23-Apr-20	Sharon Varga, Louis Riel Institute	Email	Outbound	CNL requesting cultural awareness training	Kristie Duncan		
Sagkeeng First Nation	Provided responses to Sagkeeng's questions from March 6 meeting, requested further meetings	04-May-20	Corey Shefman, OKT Law	Email	Outbound	CNL provided responses to Sagkeeng's questions, requested recurring meeting	Kristie Duncan		
Sagkeeng First Nation	Provided Sagkeeng with a revised participation agreement	04-May-20	Corey Shefman, OKT Law	Email	Outbound	CNL provided updated IAC-PA	Kristie Duncan		
Sagkeeng First Nation	CNL Action List	08-May-20	Corey Shefman, OKT Law	Email	Outbound	CNL provided an Action List that was created out of their December 11, 2019 meeting. Requested confirmation on Sagkeeng's decision on regular recurring meetings.	Kristie Duncan		
Sagkeeng First Nation	CNL Action List	08-May-20	Corey Shefman, OKT Law	Email	Inbound	Sagkeeng requested clarification on Action Items	Kristie Duncan		
Sagkeeng First Nation	Anticipated future vacancies at CNL	12-May-20	Sagkeeng HR Management	Email	Outbound	CNL provided a list of anticipated future vacancies at CNL	Kristie Duncan		
Sagkeeng First Nation	Sagkeeng's Response to anticipated future vacancies at CNL	12-May-20	Corey Shefman, OKT Law	Email	Inbound	Corey requested that CNL provide priority to qualified Sagkeeng members	Kristie Duncan		
Manitoba Metis Federation	FP Article	13-May-20	Marci Riel	Email	Outbound	CNL commented on articles by MMF Prsident Chartrand	Kristie Duncan		
Sagkeeng First Nation	CNL Action List	13-May-20	Chief Henderson, Corey Shefman, OKT Law	Email	Outbound	Provided updated CNL Action list	Kristie Duncan		
Sagkeeng First Nation (Turtle Lodge)	National Indigenous Peoples day	19-May-20	Sabina Ijaz, Turtle Lodge	Email	Outbound	CNL requesting suggestions and input on how they can celebrate National Indigenous Peoples Day	Kristie Duncan		
Sagkeeng First Nation (Turtle Lodge)	National Indigenous Peoples day	25-May-20	Sabina Ijaz, Turtle Lodge	Email	Inbound	Turtle Lodge provided suggestions on how CNL can celebrate National Indigenous Peoples Day	Kristie Duncan		
Sagkeeng First Nation (Turtle Lodge)	National Indigenous Peoples day	25-May-20	Sabina Ijaz, Turtle Lodge	Email	Outbound	Confirming time to video Dave for National Indigenous Day	Kristie Duncan		
Manitoba Metis Federation	Cultural Awareness Training	25-May-20	Sharon Varga, Louis Riel Institute	Email	Outbound	CNL following up on previous email regarding Metis Cultural Awareness Training	Kristie Duncan		
Manitoba Metis Federation	CNL presentation on Emergy Response capabilities and waste transport	26-May-20	Jade Dewar	Email	Outbound	CNL coordinating presentation for MMF on emergency response capabilities and waste transport	Kristie Duncan		
Manitoba Metis Federation	Cultural Awareness Training	26-May-20	Sharon Varga, Louis Riel Institute	Email	Inbound	Sharon stated she would respond next week	Kristie Duncan		
Manitoba Metis Federation	Introduction between Golder and MMF	26-May-20	Anthony Cicconi, Golder	Email	Inbound	Golder provided an update on their engagement with MMF. They had a conference call with MMF	Kristie Duncan		
Sagkeeng First Nation	RE: Response: Anticipated future vacancies at CNL	26-May-20	Chief Derrick Henderson	Email	Outbound	CNL provided a response to Sagkeeng's request for priority consideration for positions	Kristie Duncan		
Sagkeeng First Nation	Regular recurring meeting with Sagkeeng First Nation, CNSC, and AECL	26-May-20	Chief Derrick Henderson	Email	Outbound	CNL continues to request a recurring meeting with the community	Kristie Duncan		
Sagkeeng First Nation	Indigenous Advisory Committee	26-May-20	Chief Derrick Henderson	Email	Outbound	CNL provided draft IAC-PA	Kristie Duncan		
Sagkeeng First Nation	Indigenous Advisory Committee	26-May-20	Corey Shefman, OKT Law	Email	Inbound	Confirming receipt of draft IAC-PA	Kristie Duncan		
Sagkeeng First Nation	Indigenous Advisory Committee	26-May-20	Corey Shefman, OKT Law	Email	Outbound	Informing Sagkeeng CNL will send out IAC-PA to other communities	Kristie Duncan		
Sagkeeng First Nation	CNL's response: WR-1 Alternatives Assessment Completion proposal	26-May-20	Chief Derrick Henderson	Email	Outbound	Sagkeeng's WR-1 Atlernatives assessment	Kristie Duncan		
Sagkeeng First Nation	Regular recurring meetings	26-May-20	Chief Derrick Henderson	Email	Inbound	Sagkeeng will respond to e-mails but is unable to meet face to face. They are willing to meet via teleconference	Kristie Duncan		
Sagkeeng First Nation	CNL's response: WR-1 Alternatives Assessment Completion proposal	27-May-20	Corey Shefman, OKT Law	Email	Inbound	Responses to CNL questions on Sagkeeng's proposed Alternative Means Assessment	Kristie Duncan		
Manitoba Metis Federation	2018 Contribution Agreement	01-Jun-20	Morrissa Boerchers	Email	Outbound	CNL requested spending report for MMF contribution agreement	Kristie Duncan		
Sagkeeng First Nation	Regular recurring meetings	02-Jun-20	Chief Derrick Henderson	Email	Outbound	Stated Sagkeeng would not be able to meet face-to-face but could meet via teleconference	Kristie Duncan		
Sagkeeng First Nation	CNL's response: WR-1 Alternatives Assessment Completion proposal	05-Jun-20	Chief Henderson, Corey Shefman, OKT Law	Email	Outbound	CNL provided further comments and commitments regarding the Alternative Assessment	Kristie Duncan		
Sagkeeng First Nation	Indigenous Advisory Committee	05-Jun-20	Corey Henderson	Email	Inbound	Sagkeeng expresses concern over draf Indigenous Advisory Committee	Kristie Duncan		
Brokenhead Ojibway Nation	Updated EIS for early review	09-Jun-20	Alison Fraser, SVS	Email	Outbound	Followed up on SVS's review - they intended to provide a response the end of May	Kristie Duncan		
Sagkeeng First Nation	MOU Amending Agreement	10-Jun-20	Corey Shefman	Email	Outbound	CNL provided Sagkeeng with the Contribution Amending Agreement to fund Sagkeeng's remaining Alternative Means Assessment	Kristie Duncan		
Manitoba Metis Federation	Draft Long Term Relationship Agreement & Indigenous Advisory Committee Participation Agreement	11-Jun-20	Marci Riel	Email	Outbound	CNL provided MMF with a draft LTRA and IAC-PA	Kristie Duncan		

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Sagkeeng First Nation	Indigenous Advisory Committee	11-Jun-20	Chief Henderson, Corey Shefman, OKT Law	Email	Outbound	CNL responds to Sagkeengs refusal to join the IAC	Kristie Duncan
Sagkeeng First Nation	Indigenous Advisory Committee	11-Jun-20	Corey Shefman, OKT Law	Email	Inbound	Sagkeeng expresses concern over draf Indigenous Advisory Committee	Kristie Duncan
Sagkeeng First Nation	Alternatives 1 Pagers	12-Jun-20	Chief Henderson, Corey Shefman, OKT Law	Email	Outbound	CNL provided Sagkeeng with four plain language summary documents on the four alternative considered by CNL	Kristie Duncan
Manitoba Metis Federation	Trilateral Meeting Agenda	18-Jun-20	Morrissa Boerchers	Email	Outbound	CNL provided MMF with a draft agenda for their meeting with CNSC and MMF	Kristie Duncan
Brokenhead Ojibway Nation	EIS review and other updates	18-Jun-20	Bev Smith	Phone Call	Outbound	CNL requesting status update on SVS' review of EIS	Kristie Duncan
Brokenhead Ojibway Nation	EIS review and other updates	18-Jun-20	Bev Smith	Email	Outbound	CNL requesting status update on SVS' review of EIS	Kristie Duncan
Black River First Nation	Check-in	18-Jun-20	Oral Johnston	Phone Call	Outbound	CNL calling to provide project update	Kristie Duncan
Black River First Nation	Check-in	18-Jun-20	Oral Johnston	Email	Outbound	CNL e-mailing to provide project update and to touch base	Kristie Duncan
Sagkeeng First Nation	RE: CNL Response: Sagkeeng WR-1 Alternatives Assessment Completion proposal	18-Jun-20	Alistair MacDonald, Firelight	Email	Outbound	CNL requesting confirmation of receipt of one-pagers.	Kristie Duncan
Sagkeeng First Nation	RE: CNL Response: Sagkeeng WR-1 Alternatives Assessment Completion proposal	19-Jun-20	Alistair MacDonald, Firelight	Email	Inbound	Sagkeeng provided a brief update and committed to contacting CNL for an update meeting on this project	Kristie Duncan
Brokenhead Ojibway Nation	EIS review by SVS	22-Jun-20	Alison Fraser, SVS	Phone	Outbound	CNL followed up with Alison Fraser from SVS regarding comments on EIS	Kristie Duncan
Manitoba Metis Federation	MMF/CNL Meeting	22-Jun-20	Marci Riel	Phone	Outbound	Discussion.	Kristie Duncan
Manitoba Metis Federation	Proposed EM activities with MMF 200623	23-Jun-20	Jade Dewar	Email	Outbound	Regarding Jade's Site visit July 6, 2020	Kristie Duncan
Manitoba Metis Federation	MMF/CNL Meeting	23-Jun-20	Marci Riel	Email	Outbound	CNL proposed dates for a meeting	Kristie Duncan
Sagkeeng First Nation	Indigenous Advisory Committee	29-Jun-20	Corey Shefman	Email	Outbound	CNL provided potential meeting dates to Sagkeeng	Kristie Duncan
Brokenhead Ojibway Nation	Indigenous Advisory Committee	30-Jun-20	Bev Smith	Email	Outbound	CNL provided a draft IAC-PA for their review.	Kristie Duncan
Black River First Nation	Indigenous Advisory Committee	30-Jun-20	Oral Johnston	Email	Outbound	CNL provided a copy of the IAC-PA for review	Kristie Duncan
Hollow Water First Nation	Indigenous Advisory Committee	30-Jun-20	Furlon Barker	Phone	Outbound	CNL wanted to discuss IAC-PA. No answer.	Kristie Duncan
Hollow Water First Nation	Indigenous Advisory Committee	30-Jun-20	Furlon Barker	Email	Outbound	CNL provided a copy of the IAC-PA for review	Kristie Duncan
Sagkeeng First Nation	Indigenous Liaison for Sagkeeng	30-Jun-20	Corey Shefman	Phone	Inbound	Indigenous Liaison Position for Sagkeeng	Kristie Duncan
Sagkeeng First Nation	Indigenous Liaison for Sagkeeng	30-Jun-20	Corey Shefman	Email	Outbound	Indigenous Liaison Position for Sagkeeng	Kristie Duncan
Sagkeeng First Nation	CNL - Agreement	06-Jul-20	Corey Shefman	Email	Outbound	Signed Contribution Agreement for the Alternative Means work	Kristie Duncan
Brokenhead Ojibway Nation	BON EIS review by SVS	07-Jul-20	Alison Fraser, SVS	Phone	Outbound	Followed up with SVS on BON's EIS review by SVS	Kristie Duncan
Brokenhead Ojibway Nation	BON EIS review by SVS	07-Jul-20	Bev Smith	Email	Outbound	Followed up on BON's EIS review by SVS	Kristie Duncan
Manitoba Metis Federation	"Long Term" Relationship Agreement	07-Jul-20	Morrissa Boerchers	Email	Outbound	"Long Term" Relationship Agreement	Kristie Duncan
Manitoba Metis Federation	"Long Term" Relationship Agreement	07-Jul-20	Morrissa Boerchers	Email	Inbound	"Long Term" Relationship Agreement	Kristie Duncan
Black River First Nation	Posting external CNL vacancies	07-Jul-20	Oral Johnston	Email	Outbound	Posting external CNL vacancies	Kristie Duncan
Brokenhead Ojibway Nation	Posting external CNL vacancies	07-Jul-20	Bev Smith	Email	Outbound	Posting external CNL vacancies	Kristie Duncan
Hollow Water First Nation	Posting external CNL vacancies	07-Jul-20	Furlon Barker	Email	Outbound	Posting external CNL vacancies	Kristie Duncan
Wabaseemoong Independent Nations	Posting external CNL vacancies	07-Jul-20	Marvin Lee McDonald	Email	Outbound	Posting external CNL vacancies	Kristie Duncan
Manitoba Metis Federation	Monthly Check-in MMF, CNSC, CNL - June 22 meeting notes and action list	07-Jul-20	Morrissa Boerchers	Email	Outbound	Monthly Check-in MMF, CNSC, CNL - June 22 meeting notes and action list	Kristie Duncan
Sagkeeng First Nation (Turtle Lodge)	Dave Courchene - videos	07-Jul-20	Sabina Ijaz, Turtle Lodge	Email	Outbound	Dave Courchene - videos	Kristie Duncan
Sagkeeng First Nation (Turtle Lodge)	Dave Courchene - videos	07-Jul-20	Sabina Ijaz, Turtle Lodge	Email	Outbound	Provided Sabrina a password	Kristie Duncan
Sagkeeng First Nation	Update on Indigenous Liaison position for Sagkeeng	08-Jul-20	Corey Shefman	Email	Outbound	Update on Indigenous Liaison position for Sagkeeng	Kristie Duncan
Sagkeeng First Nation	Update on Indigenous Liaison position for Sagkeeng	08-Jul-20	Corey Shefman	Email	Inbound	Corey advised the community decision making mode	Kristie Duncan
Grand Council of Treaty 3	Site Tour	09-Jul-20	Brock Campbell	Email	Outbound	Organizing a site tour for Grand Council	Kristie Duncan
Grand Council of Treaty 3	Site Tour	14-Jul-20	Brock Campbell	Email	Outbound	Organizing a site tour for Grand Council	Kristie Duncan
Sagkeeng First Nation	Sagkeeng CNL Liaison job description	15-Jul-20	Corey Shefman	Email	Inbound	Chief and Council has decided to move ahead with the liaison position	Kristie Duncan
Sagkeeng First Nation	Sagkeeng CNL Liaison job description	15-Jul-20	Corey Shefman	Email	Outbound	CNL has an interest in reviewing the candidate for this position	Kristie Duncan
Sagkeeng First Nation	Sagkeeng CNL Liaison job description	16-Jul-20	Corey Shefman	Email	Inbound	Sagkeeng offers to set up a meeting to meet the candidate	Kristie Duncan
Sagkeeng First Nation	Sagkeeng CNL Liaison job description	16-Jul-20	Corey Shefman	Email	Outbound	Further discussion on setting up a meeting with Sagkeeng's Liaison	Kristie Duncan
Sagkeeng First Nation	Sagkeeng CNL Liaison job description	16-Jul-20	Corey Shefman	Email	Outbound	CNL provided comments on job description	Kristie Duncan
Sagkeeng First Nation	Sagkeeng CNL Liaison job description	16-Jul-20	Corey Shefman	Email	Inbound	Introducing Carl to CNL	Kristie Duncan
Sagkeeng First Nation	Sagkeeng CNL Liaison job description	16-Jul-20	Carl Fontaine, Corey Shefman	Email	Outbound	CNL responds to introduction letter	Kristie Duncan

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Sagkeeng First Nation	Indigenous Liaison for Sagkeeng and Relationship Agreement.	16-Jul-20	Corey Shefman	Phone	Outbound	Discussed process for engaging Carl Fontaine, Sagkeeng's Indigenous Liaison, Relationship Agreement, Environmental Monitoring, and regular recurring meetings.	Kristie Duncan
Sagkeeng First Nation	CNL Annual Reports	20-Jul-20	Chief Derrick Henderson	Email	Outbound	Requesting direction on who CNL should send their annual reports to.	Kristie Duncan
Black River First Nation	CNL Annual Reports	20-Jul-20	Oral Johnston	Email	Outbound	Requesting direction on who CNL should send their annual reports to.	Kristie Duncan
Hollow Water First Nation	CNL Annual Reports	20-Jul-20	Furlon Barker	Email	Outbound	Requesting direction on who CNL should send their annual reports to.	Kristie Duncan
Brokenhead Ojibway Nation	CNL Annual Reports	20-Jul-20	Bev Smith	Email	Outbound	Requesting direction on who CNL should send their annual reports to.	Kristie Duncan
Grand Council of Treaty 3	CNL Annual Reports	20-Jul-20	Brock Campbell	Email	Outbound	Requesting direction on who CNL should send their annual reports to.	Kristie Duncan
Wabaseemoong Independent Nations	CNL Annual Reports	20-Jul-20	Marvin Lee McDonald	Email	Outbound	Requesting direction on who CNL should send their annual reports to.	Kristie Duncan
Manitoba Metis Federation	CNL Annual Reports	20-Jul-20	Marci Riel	Email	Outbound	Requesting direction on who CNL should send their annual reports to.	Kristie Duncan
Grand Council of Treaty 3	Site Tour	21-Jul-20	Brock Campbell	In-person		Site Tour with Brock Campbell	Kristie Duncan
Grand Council of Treaty 3	Site Tour	22-Jul-20	Brock Campbell	Email	Outbound	CNL sent Brock pictures from the Site Tour	Kristie Duncan
Black River First Nation	IAC and Indigenous Liaison	22-Jul-20	Oral Johnston	Phone	Outbound	CNL spoke with Oral about the IAC and Liaison Position. Oral indicated BR and HW interest in joint position	Kristie Duncan
Hollow Water First Nation	IAC and Indigenous Liaison	22-Jul-20	Furlon Barker	Phone	Outbound	Left message regarding IAC and Indigenous Liaison Position	Kristie Duncan
Wabaseemoong Independent Nations	IAC and Indigenous Liaison	22-Jul-20	Marvin Lee McDonald	Phone	Outbound	Left message regarding IAC and Indigenous Liaison Position	Kristie Duncan
Wabaseemoong Independent Nations	IAC and Indigenous Liaison	22-Jul-20	Marvin Lee McDonald	Email	Outbound	CNL provided community with IAC-PA	Kristie Duncan
Sagkeeng First Nation	Introducing Carl to CNL	23-Jul-20	Carl Fontaine	Email	Outbound	CNL followed up on their e-mail reaching out to Carl Fontaine, Sagkeeng's new Liaison, requesting a meeting and site visit	Kristie Duncan
Sagkeeng First Nation	Draft LTRA and Contribution Agreement	23-Jul-20	Corey Shefman	Email	Outbound	CNL provided Sagkeeng Laywer with MOU Amending Agreement	Kristie Duncan
Sagkeeng First Nation	Potential Available Asset for Donation	23-Jul-20	Chief Derrick Henderson	Email	Outbound	CNL provided a list of office supplies for possible donations to the community.	Kristie Duncan
Black River First Nation	Potential Available Asset for Donation	23-Jul-20	Oral Johnston	Email	Outbound	CNL provided a list of office supplies for possible donations to the community.	Kristie Duncan
Hollow Water First Nation	Potential Available Asset for Donation	23-Jul-20	Furlon Barker	Email	Outbound	CNL provided a list of office supplies for possible donations to the community.	Kristie Duncan
Wabaseemoong Independent Nations	Potential Available Asset for Donation	23-Jul-20	Marvin Lee McDonald	Email	Outbound	CNL provided a list of office supplies for possible donations to the community.	Kristie Duncan
Brokenhead Ojibway Nation	Potential Available Asset for Donation	23-Jul-20	Bev Smith	Email	Outbound	CNL provided a list of office supplies for possible donations to the community.	Kristie Duncan
Sagkeeng First Nation	CNL Response: Sagkeeng WR-1 Alternatives Assessment Completion proposal	27-Jul-20	Alistair MacDonald, Firelight	Email	Inbound/Outbound	Alistair provided an update on the alternative means assessment	Kristie Duncan
Sagkeeng First Nation	Introducting CNL's new Indigenous Engagement Officer	29-Jul-20	Chief and Council	Email	Outbound	CNL introduced CNL's new Indigenous Engagement Officer.	Kristie Duncan
Brokenhead Ojibway Nation	Introducting CNL's new Indigenous Engagement Officer	29-Jul-20	Bev Smith	Email	Outbound	CNL introduced CNL's new Indigenous Engagement Officer.	Kristie Duncan
Manitoba Metis Federation	Introducting CNL's new Indigenous Engagement Officer	29-Jul-20	Marci Riel, Morrissa Boerchers, Jade Dwear	Email	Outbound	CNL introduced CNL's new Indigenous Engagement Officer.	Kristie Duncan
Black River First Nation	Introducting CNL's new Indigenous Engagement Officer	29-Jul-20	Oral Johnston	Email	Outbound	CNL introduced CNL's new Indigenous Engagement Officer.	Kristie Duncan
Hollow Water First Nation	Introducting CNL's new Indigenous Engagement Officer	29-Jul-20	Furlon Barker	Email	Outbound	CNL introduced CNL's new Indigenous Engagement Officer.	Kristie Duncan
Wabaseemoong Independent Nations	Introducting CNL's new Indigenous Engagement Officer	29-Jul-20	Marvin Lee McDonald	Email	Outbound	CNL introduced CNL's new Indigenous Engagement Officer.	Kristie Duncan
Grand Council of Treaty 3	Introducting CNL's new Indigenous Engagement Officer	29-Jul-20	Brock Campbell	Email	Outbound	CNL introduced CNL's new Indigenous Engagement Officer.	Kristie Duncan
Manitoba Metis Federation	Decommissioning Schedule	29-Jul-20	Marci Riel	Email	Outbound	Provided MMF with a copy of the decommissioning schedule.	Kristie Duncan
Sagkeeng First Nation	Introducing CNL's Indigenous Engagement Officer	29-Jul-20	Carl Fontaine	Email	Outbound	CNL introduced CNL's new Indigenous Engagement Officer.	Kristie Duncan
Grand Council of Treaty 3	Introducing CNL's Indigenous Engagement Officer	29-Jul-20	Brock Campbell	Email	Inbound	Setting up a meeting to discuss the project	Kristie Duncan
Grand Council of Treaty 3	Meeting with GCT#3 and new CNL	29-Jul-20	Brock Campbell	Email	Inbound	Set up a time and date for the introductory meeting	Kristie Duncan
Sagkeeng First Nation	Introducing Carl to CNL	04-Aug-20	Corey Shefman	Email	Outbound	Scheduling a site visit with Carl Fontaine	Kristie Duncan

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Sagkeeng First Nation	Introducing Carl to CNL	04-Aug-20	Corey Shefman	Email	Inbound/Outbound	Corey provided an update on Carl's contact	Kristie Duncan
Sagkeeng First Nation	Introducing Carl to CNL	04-Aug-20	Carl Fontaine	Email	Outbound	Sent Carl an introductory e-mail to organize a site visit	Kristie Duncan
Grand Council of Treaty 3	WR-1 EIS Executive Summary and Post-Closure Safety Assessment Webinar available on CNL website	05-Aug-20	Brock Campbell	Email	Outbound	Provided a link to WR-1 EIS Executive Summary and Post-Closure Safety Assessment Webinar that is available on CNL website	Kristie Duncan
Wabaseemoong Independent Nations	WR-1 EIS Executive Summary and Post-Closure Safety Assessment Webinar available on CNL website	05-Aug-20	Marvin Lee McDonald	Email	Outbound	Provided a link to WR-1 EIS Executive Summary and Post-Closure Safety Assessment Webinar that is available on CNL website	Kristie Duncan
Hollow Water First Nation	WR-1 EIS Executive Summary and Post-Closure Safety Assessment Webinar available on CNL website	05-Aug-20	Furlon Barker	Email	Outbound	Provided a link to WR-1 EIS Executive Summary and Post-Closure Safety Assessment Webinar that is available on CNL website	Kristie Duncan
Black River First Nation	WR-1 EIS Executive Summary and Post-Closure Safety Assessment Webinar available on CNL website	05-Aug-20	Oral Johnston	Email	Outbound	Provided a link to WR-1 EIS Executive Summary and Post-Closure Safety Assessment Webinar that is available on CNL website	Kristie Duncan
Manitoba Metis Federation	WR-1 EIS Executive Summary and Post-Closure Safety Assessment Webinar available on CNL website	05-Aug-20	Marci Riel, Morrissa Boerchers, Jade Dwear	Email	Outbound	Provided a link to WR-1 EIS Executive Summary and Post-Closure Safety Assessment Webinar that is available on CNL website	Kristie Duncan
Brokenhead Ojibway Nation	WR-1 EIS Executive Summary and Post-Closure Safety Assessment Webinar available on CNL website	05-Aug-20	Bev Smith	Email	Outbound	Provided a link to WR-1 EIS Executive Summary and Post-Closure Safety Assessment Webinar that is available on CNL website	Kristie Duncan
Sagkeeng First Nation	WR-1 EIS Executive Summary and Post-Closure Safety Assessment Webinar available on CNL website	05-Aug-20	Carl Fontaine and Chief and Council	Email	Outbound	Provided a link to WR-1 EIS Executive Summary and Post-Closure Safety Assessment Webinar that is available on CNL website	Kristie Duncan
Sagkeeng First Nation	Sent out a site visit checklist and visitor form	06-Aug-20	Carl Fontaine	Email	Outbound	In preparation for our meeting next week, CNL sent Carl Fontaine a visitor form	Kristie Duncan
Sagkeeng First Nation	Phone call to discuss upcoming visit	08-Aug-20	Carl Fontaine	Email	Outbound	Phone conversation with Carl to confirm site tour next week	Kristie Duncan
Manitoba Metis Federation	CNL Annual Reports	10-Aug-20	Marci Riel, Morrissa Boerchers, Jade Dwear	Email	Outbound	Followed up to discuss IAC-PA and invited to discuss over a phone call	Kristie Duncan
Black River First Nation, Hollow Water First Nation	Relationship Agreement	11-Aug-20	Elly Bonny, HTFC Planning & Design	Email	Outbound	Invitation to discuss relationship agreement	Kristie Duncan
Brokenhead Ojibway Nation	CNL Annual Reports	11-Aug-20	Bev Smith	Email	Outbound	CNL asked the best way to send CNL Annual Reports	Kristie Duncan
Hollow Water First Nation	CNL Annual Reports	11-Aug-20	Furlon Barker	Email	Outbound	CNL asked the best way to send CNL Annual Reports	Kristie Duncan
Wabaseemoong Independent Nations	CNL Annual Reports	11-Aug-20	Marvin Lee McDonald	Email	Outbound	CNL asked the best way to send CNL Annual Reports	Kristie Duncan
Sagkeeng First Nation	CNL Annual Reports	11-Aug-20	Carl Fontaine and Chief and Council	Email	Outbound	CNL asked the best way to send CNL Annual Reports	Kristie Duncan
Sagkeeng First Nation	CNL Annual Reports	11-Aug-20	Lana Lavadier	Email	Outbound	Sagkeeng sent preferred method for receiving the Annual Reports	Kristie Duncan
Sagkeeng First Nation	Site Tour	11-Aug-20	Carl Fontaine	Email	Outbound	Carl came to site for a site tour and introduction	Kristie Duncan
Sagkeeng First Nation	Invitation - CNL's Breakfast Briefing - WR-1 Disposal Facility Containment and Isolation Barriers - August 25, 2020	12-Aug-20	Carl Fontaine	Email	Outbound	CNL sent an invitation to their Breakfast series webinar	Kristie Duncan
Hollow Water First Nation	Invitation - CNL's Breakfast Briefing - WR-1 Disposal Facility Containment and Isolation Barriers - August 25, 2020	12-Aug-20	Furlon Barker	Email	Outbound	CNL sent an invitation to their Breakfast series webinar	Kristie Duncan
Brokenhead Ojibway Nation	Invitation - CNL's Breakfast Briefing - WR-1 Disposal Facility Containment and Isolation Barriers - August 25, 2020	12-Aug-20	Bev Smith	Email	Outbound	CNL sent an invitation to their Breakfast series webinar	Kristie Duncan
Black River First Nation	Invitation - CNL's Breakfast Briefing - WR-1 Disposal Facility Containment and Isolation Barriers - August 25, 2020	12-Aug-20	Oral Johnston	Email	Outbound	CNL sent an invitation to their Breakfast series webinar	Kristie Duncan
Sagkeeng First Nation	Follow-up email from site tour	12-Aug-20	Carl Fontaine	Email	Outbound	Provided additional information for Carl to review	Kristie Duncan
Grand Council of Treaty 3	Meeting with GCT#3 and new CNL	12-Aug-20	Brock Campbell	Email	Outbound	Discussed the WR-1 project and the NWMO position at GCT#3	Kristie Duncan
Brokenhead Ojibway Nation	Invitation - CNL's Breakfast Briefing - August 25, 2020 & CNL's Annual Reports	13-Aug-20	Bev Smith	Email	Outbound	Realized CNL had a outdated e-mail for Bev Smith and resent past e-mail to her including Invitation - CNL's Breakfast Briefing - August 25, 2020 & CNL's Annual Reports	Kristie Duncan
Manitoba Metis Federation	Phoned Morrissa to discuss IAC-PA	13-Aug-20	Morrissa Boerchers	Email	Outbound	Received an update on their review of the IAC-PA	Kristie Duncan
Brokenhead Ojibway Nation	Indigenous Advisory Committee	17-Aug-20	Bev Smith	Email	Outbound	Sent the IAC-OA for Bev to review	Kristie Duncan
Brokenhead Ojibway Nation	Indigenous Advisory Committee	17-Aug-20	Bev Smith	Email	Outbound	CNL provided additional context around the formation of the IAC	Kristie Duncan

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Sagkeeng First Nation	Training plan and seeking direction from chief and council	17-Aug-20	Carl Fontaine	Email	Outbound	CNL is drafting a training plan to support Carl in his role, Carl mentioned he needed more clarity on his role from his community's leadership	Kristie Duncan
Brokenhead Ojibway Nation	Review of the EIS	17-Aug-20	Bev Smith	Email	Outbound	CNL reached out to follow-up on Brokenhead Ojibway Nation's review of the EIS	Kristie Duncan
Brokenhead Ojibway Nation	Review of the EIS	18-Aug-20	Bev Smith	Phone call	Outbound	CNL reached out to follow-up on Brokenhead Ojibway Nation's review of the EIS	Kristie Duncan
Hollow Water First Nation	Called to discuss Annual Reports	18-Aug-20	Furlon Barker	Phone call (no response)	Outbound	CNL reached out to Hollow Water to discuss preference for sending out annual reports	Kristie Duncan
Black River First Nation	Invite to visit the community, suggested we organize a site visit with himself and his other council members	18-Aug-20	Oral Johnston	Phone call	Outbound	Oral suggested we organize a site visit with chief and council	Kristie Duncan
Brokenhead Ojibway Nation	EIS Review Follow-up	19-Aug-20	Bev Smith	Email & Phone call	Outbound	Followed up to discuss BON's review of the EIS	Kristie Duncan
Sagkeeng First Nation	Asset Donation	19-Aug-20	Lana Lavadier	Email	Outbound/Inbound	Email chain between Sagkeeng and CNL to discuss CNL's asset donations	Kristie Duncan
Wabaseemoong Independent Nations	CNL's responses to Wabaseemoong's comments on the 2017 draft Environmental Impact Statement	19-Aug-20	Chief and Council	Email	Outbound	CNL sent their responses to Wabaseemoong's comments on the EIS	Kristie Duncan
Sagkeeng First Nation	Follow-up	20-Aug-20	Carl Fontaine	Email	Outbound		Kristie Duncan
Brokenhead Ojibway Nation	IAC-PA	20-Aug-20	Bev Smith	Email	Outbound	Follow-up from phone conversation to confirm Brokenhead does not want to participate advisory committee	Kristie Duncan
Manitoba Metis Federation	Introductory Meeting	20-Aug-20	Morrissa Boerchers	Email	Inbound	MMF wants to set up a meeting to discuss draft agreement (IAC)	Kristie Duncan
Manitoba Metis Federation	Introductory Meeting	20-Aug-20	Morrissa Boerchers	Email	Outbound	Set up introductory meeting to discuss IAC and other initatives	Kristie Duncan
Manitoba Metis Federation	Introductory Meeting	20-Aug-20	Morrissa Boerchers	Email	Inbound	Set up for introductory call August 25, 2020	Kristie Duncan
Manitoba Metis Federation	Introductory Meeting	20-Aug-20	Morrissa Boerchers	Email	Outbound	Confirmed meeting time for August 25, 2020 at 3:30 PM	Kristie Duncan
Manitoba Metis Federation	Cultural Awareness Training	24-Aug-20	Shirley Russell, Louis Riel Institute	Email	Outbound	Connected with Shirley earlier today via phone to discuss Metis cultural awareness training and provided infomration about the project.	Kristie Duncan
Sagkeeng First Nation	Draft Training Plan	24-Aug-20	Carl Fontaine	Phone Call	Outbound	Left a message to discuss draft training plan	Kristie Duncan
Black River First Nation	IAC-PA	24-Aug-20	Elly Bonny, HTFC Planning & Design	Phone Call	Outbound	Left a message to discuss IAC-PA	Kristie Duncan
Sagkeeng First Nation	IAC-PA	25-Aug-20	Carl Fontaine	Phone Call	Outbound	Left a message to discuss future engagement with Sagkeeng First Nation	Kristie Duncan
Black River First Nation	IAC-PA	25-Aug-20	Elly Bonny, HTFC Planning & Design	Phone Call	Outbound	Scheduled a meeting a discuss her initial thoughts and feddback on the IAC-PA	Kristie Duncan
Sagkeeng First Nation	Travel and re-imbursement	25-Aug-20	Carl Fontaine	Email	Outbound	Upcoming training and site visits plus re-imburement for travel	Kristie Duncan
Sagkeeng First Nation	1/2 day cultural awareness training	25-Aug-20	Sabina Ijaz, Turtle Lodge	Email	Outbound	Discuss Anishinaabe cultural awareness training at Turtle Lodge	Kristie Duncan
Black River First Nation	Introductory Call	26-Aug-20	Elly Bonny, HTFC Planning & Design	Teleconference	Outbound	Met with Elly over the phone today, discussed BRFN and HWFN Core Engagement and IAC-PA	Kristie Duncan
Black River First Nation	Follow-up to introductory call	26-Aug-20	Elly Bonny, HTFC Planning & Design	Teleconference	Outbound	Followed-up with Elly to provide a draft copy of the Indigenous Liaison Training program.	Kristie Duncan
Sagkeeng First Nation	Training plan for Liaison	27-Aug-20	Chief Derrick Henderson	Email	Outbound	Seeking feedback on Carl's training program	Kristie Duncan
Wabaseemoong Independent Nations	CNL's responses to Wabaseemoong's comments	27-Aug-20	Marvin Lee McDonald	Email	Outbound	Follow-up to see if they received CNL's responses and if they would like to discuss them.	Kristie Duncan
Manitoba Metis Federation	MMF comments on LTA and IAC	27-Aug-20	Morrissa Boerchers	Email	Inbound	MMF provided comments on LTA and IAC	Kristie Duncan
Wabaseemoong Independent Nations	CNL's responses to Wabaseemoong's comments	27-Aug-20	Marvin Lee McDonald	Email	Inbound	Marvin provided an update and said Chief Scott and 2 council members were briefed and will get back to	Kristie Duncan
Wabaseemoong Independent Nations	CNL's responses to Wabaseemoong's comments	27-Aug-20	Marvin Lee McDonald	Email	Inbound	Asked if Wabasseemoong was interested in the Liaison position	Kristie Duncan
Sagkeeng First Nation	Contact in Sagkeeng	27-Aug-20	Carl Fontaine	Email	Inbound/Outbound	Carl asked who the our contact was in Sagkeeng, I said it was primarily him, Corey Shefman, and Chief Henderson	Kristie Duncan
Sagkeeng First Nation	Introduction and Training	27-Aug-20	Sagkeeng Chief and Council	Email	Outbound	Followed-up from Alanna's introductory e-mail to discuss engagement expectations, etc.	Kristie Duncan
Manitoba Metis Federation	MMF comments on LTA and IAC	31-Aug-20	Morrissa Boerchers	Email	Outbound	Requesting clarification on MMF comments on the IAC-PA	Kristie Duncan

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Sagkeeng First Nation	Contribution Agreement and Relationship Agreement	31-Aug-20	Corey Shefman	Email	Outbound	Followed up on status of contribution agreement and relationship agreement previously provided by Alanna	Kristie Duncan
Sagkeeng First Nation	Clarifying communications	31-Aug-20	Corey Shefman	Email	Outbound	Corey provided clarity on who should be cc'd on e-mails	Kristie Duncan
Sagkeeng First Nation	Update on training session	31-Aug-20	Carl Fontaine	Email	Outbound	Updated timing for training session	Kristie Duncan
Sagkeeng First Nation	CNL's Annual Compliance Monitoring Reports for 2019	31-Aug-20	Chief and Council	Email	Outbound	Provided a copy of CNL's Annual Compliance Monitoring Reports for 2019	Kristie Duncan
Hollow Water First Nation	CNL's Annual Compliance Monitoring Reports for 2019	01-Sep-20	Furlon Barker	Email	Outbound	Provided a copy of CNL's Annual Compliance Monitoring Reports for 2019	Kristie Duncan
Black River First Nation	2017 Whiteshell Labs Site Vist	01-Sep-20	Elly Bonny, HTFC Planning & Design	Email	Inbound/Outbound	Discuss possible future meeting to discuss IAC-PA	Kristie Duncan
Brokenhead Ojibway Nation	CNL's Annual Compliance Monitoring Reports for 2019	01-Sep-20	Bev Smith	Email	Inbound/Outbound	Bev provided feedback that the Annual Compliance Monitoring Reports for 2019 were too technical / CNL suggested a meeting with Brokenhead to discuss the	Kristie Duncan
Black River First Nation	2017 Whiteshell Labs site visit	02-Sep-20	Elly Bonny, HTFC Planning & Design	Email	Outbound	Confirmed timing of teleconference	Kristie Duncan
Sagkeeng First Nation	Mileage for Carl	02-Sep-20	Corey Shefman	Email	Outbound	CNL offered to pay Carl's mileage as it was not mentioned in the contribution agreement and wanted Sagkeeng's permission to do so.	Kristie Duncan
Sagkeeng First Nation	Mileage for Carl	02-Sep-20	Carl Fontaine	Email	Outbound	Confirmed permission from Sagkeeng to provide mileage directly to Sagkeeng	Kristie Duncan
Sagkeeng First Nation	Mileage for Carl	02-Sep-20	Corey Shefman	Email	Outbound	Confirmed permission from Sagkeeng to provide mileage directly to Sagkeeng	Kristie Duncan
Sagkeeng First Nation	Contribution Agreement	02-Sep-20	Corey Shefman	Email	Outbound	Continued to follow-up on the status of contribution agreement	Kristie Duncan
Sagkeeng First Nation	Contribution Agreement	02-Sep-20	Corey Shefman	Email	Inbound	Sagkeeng requested CNL to resend contribution agreement	Kristie Duncan
Sagkeeng First Nation	Contribution Agreement	02-Sep-20	Corey Shefman	Email	Outbound	CNL provided Sagkeeng with a contribution agreement	Kristie Duncan
Sagkeeng First Nation	PPE Donation	02-Sep-20	Lana Lavadier	Email	Inbound	CNL offered to provide a donation to Sagkeeng's school to help purchase PPEs for teachers and students / Lana forwarded CNL their education director's contact information	Kristie Duncan
Sagkeeng First Nation	PPE Donation	02-Sep-20	Crissy Courchene	Email	Outbound	CNL followed up with Crissy to discuss providing Sagkeeng with a donation to support PPEs for Sagkeeng's teachers and students	Kristie Duncan
Sagkeeng First Nation	1/2 day cultural awareness training	03-Sep-20	Sabina Ijaz, Turtle Lodge	Email	Inbound	Sabina will discuss with Turtle Lodge's group of elders	Kristie Duncan
Sagkeeng First Nation	Follow-up with Carl	03-Sep-20	Carl Fontaine	Email	Outbound	CNL requested a debrief and feedback on training session	Kristie Duncan
Sagkeeng First Nation	Signed amending agreement	03-Sep-20	Corey Shefman	Email	Inbound/Outbound	Corey provided a signed copy of amending agreement / CNL thanks Sagkeeng for the quick turnaround	Kristie Duncan
Sagkeeng First Nation	Mileage for Carl	07-Sep-20	Carl Fontaine	Email	Outbound	Requesting information to process Mileage checks	Kristie Duncan
Sagkeeng First Nation	Signed amending agreement	07-Sep-20	Corey Shefman	Email	Outbound	CNL provided Sagkeeng with a copy of the contribution agreement to fund Carl's position	Kristie Duncan
Sagkeeng First Nation	1/2 day cultural awareness training	07-Sep-20	Sabina Ijaz, Turtle Lodge	Email	Inbound/Outbound	Turtle Lodge requested dates for training / CNL suggested Sept 23 and 24	Kristie Duncan
Sagkeeng First Nation	RTW Site Orientation and Radiaiton Protection Training	08-Sep-20	Carl Fontaine	Email	Outbound	Training for RTW Site Orientation and Radiation Protection Training for Sagkeeng's Liaison	Kristie Duncan
Sagkeeng First Nation	Mileage rate	08-Sep-20	Carl Fontaine	Email	Inbound/Outbound	Carl requested to know CNL's mileage rate / CNL stated the mileage rate is $0.48/km	Kristie Duncan
Manitoba Metis Federation	MMF review of CNL's responses to MMF's comments on the EIS	08-Sep-20	Morrissa Boerchers	Email	Outbound	CNL provided an update on the IAC-PA and to see whether MMF knows when their review of CNL responses will be complete	Kristie Duncan
Sagkeeng First Nation	Discussion and feedback on initial training and review job description	08-Sep-20	Carl Fontaine	Email	Outbound/Inbound	CNL seeking feedback on the training provided to Carl and to discuss goals and future engagements with	Kristie Duncan
Manitoba Metis Federation	Update on IAC - PA	08-Sep-20	Morrissa Boerchers	Email	Outbound	CNL provided update on IAC-PA stated they have revised to IAC-PA based on feedback from MMF	Kristie Duncan
Sagkeeng First Nation	Invoicing for Sagkeeng's Liaison	08-Sep-20	Lana Lavadier	Email	Outbound	CNL requested an invoice as per CNL's agreement	Kristie Duncan
Sagkeeng First Nation	Invoicing for Sagkeeng's Liaison	08-Sep-20	Carl Fontaine, Corey Shefman	Email	Inbound/Inbound/Outbound	Sagkeeng Liaison stated he has not been compensated for his time working as liaison / Sagkeeng Lawyer stated the agreement was signed last week/ CNL states they are waiting on the invoice from Sagkeeng	Kristie Duncan
Manitoba Metis Federation	Update from MMF on review of CNL's responses	09-Sep-20	Morrissa Boerchers	Email	Inbound	MMF said they haven't heard back from the consultants yet about a timeline for their review	Kristie Duncan
Sagkeeng First Nation	Action Items	09-Sep-20	Corey Shefman	Email	Outbound	CNL requests a meeting to discuss action items	Kristie Duncan

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Sagkeeng First Nation	Invoicing for Sagkeeng's Liaison	09-Sep-20	Melanie...	Email	Outbound	CNL requests the invoice from Sagkeeng for Sagkeeng's Liaison	Kristie Duncan
Sagkeeng First Nation	Donation to Sagkeeng School	09-Sep-20	Lana Lavandier	Email	Outbound	CNL has not received a response from Sagkeeng regarding CNL's request to provide a donation to Sagkeeng's School for PPEs	Krisitie Duncan
Sagkeeng First Nation	Teleconference rescheduling	09-Sep-20	Carl Fontaine	Email	Outbound/Inbound/Outbound	CNL proposed postponing teleconference / Carl agreed	Kristie Duncan
Wabaseemoong Independent Nations	Site Tour and follow up	09-Sep-20	Marvin Lee McDonald	Email	Outbound	CNL invited Wabaseemoong for a site tour and asked whether Wabaseemoong would like to meet to discuss CNL's responses	Kristie Duncan
Sagkeeng First Nation	PPE Donations	10-Sep-20	Crissy Courchene	Email	Inbound	Sagkeeng confirmed receipt of CNL's email. Stated they'd reach out to discuss	Kristie Duncan
Sagkeeng First Nation	Turtle Lodge Event	10-Sep-20	Sabina Ijaz, Turtle Lodge	Email	Outbound	CNL asked if they can join the event remotely	Kristie Duncan
Sagkeeng First Nation	Sagkeeng - CNL Action Items and other topics	10-Sep-20	Corey Shefman	Email	Outbound	CNL proposed a teleconference 2:00 PM - 3:00 PM to discuss Action Items	Kristie Duncan
Manitoba Metis Federation	1/2 day cultural awareness training	10-Sep-20	Shirley Russell, Louis Riel Institute	Email	Outbound	CNL followed-up on their request to schedule a 1/2 day cultural awareness training	Kristie Duncan
Wabaseemoong Independent Nations	Site Tour and follow up	10-Sep-20	Marvin Lee McDonald	Email	Inbound	Marvin confirmed interest in site tour before the snow	Kristie Duncan
Wabaseemoong Independent Nations	Fall Environmental Monitoring Activities, Site Tour, Request to meet to discuss responses	10-Sep-20	Marvin Lee McDonald	Email	Inbound	CNL provided a list of their fall environmental monitoring activities and invited the community to observe	Kristie Duncan
Manitoba Metis Federation	Fall Environmental Monitoring Activities	10-Sep-20	Jade Dewar	Email	Outbound	CNL provided a list of their fall environmental monitoring activities and invited the community to observe	Kristie Duncan
Sagkeeng First Nation	Sagkeeng Liaison Invoicing	10-Sep-20	Cheryl Parkes	Email	Inbound	Sagkeeng provided invoices	Kristie Duncan
Brokenhead Ojibway Nation	Brokenhead Ojibway Nation WR-1 EIS Comments	11-Sep-20	Alison Gamble, SVS	Email	Inbound	SVS provides comments and recommendations in response to the revised Environmental Impact Statement for the in-situ Decommissioning of Whiteshell Reactor-1.	Kristie Duncan
Manitoba Metis Federation	Environmental Monitoring at CNL	11-Sep-20	Jade Dewar	Email	Inbound/Outbound	MMF expressed interest in participating in Mushroom collection / CNL provides a date for the scheduled mushroom collection	Kristie Duncan
Sagkeeng First Nation	Asset Donation	11-Sep-20	Lana Lavadier	Email	Outbound	CNL asked whether Chief and Council was still interested in Quonset Huts	Kristie Duncan
Sagkeeng First Nation	Weekly touch-base	14-Sep-20	Carl Fontaine	Phone Call	Outbound	Discussed initial outreach to community members; discussed how results of psycho-social analysis could guide community engagement	Kristie Duncan
Black River First Nation	Fall Environmental Monitoring	14-Sep-20	Oral Johnston	Email	Outbound	CNL provided a list of Fall environmental monitoring activities and invited the community to particate	Kristie Duncan
Sagkeeng First Nation	Fall Environmental Monitoring	14-Sep-20	Carl Fontaine, Corey Shefman	Email	Outbound	CNL provided a list of Fall environmental monitoring activities and invited the community to particate	Kristie Duncan
Hollow Water First Nation	Fall Environmental Monitoring	14-Sep-20	Furlon Barker	Email	Outbound	CNL provided a list of Fall environmental monitoring activities and invited the community to particate	Kristie Duncan
Brokenhead Ojibway Nation	Fall Environmental Monitoring	14-Sep-20	Bev Smith	Email	Outbound	CNL provided a list of Fall environmental monitoring activities and invited the community to particate	Kristie Duncan
Sagkeeng First Nation	PowerPoint Presentations from Training	14-Sep-20	Carl Fontaine	Email	Outbound	CNL provided the presentations used during Carl's Training	Kristie Duncan
Manitoba Metis Federation	Environmental Monitoring at CNL	14-Sep-20	Jade Dewar	Email	Outbound/Inbound	Confirming MMF's participation in Mushroom Collection/MMF confirms	Kristie Duncan
Sagkeeng First Nation	Orange Shirt Day	14-Sep-20	Carl Fontaine	Email	Outbound	CNL asked Carl if he could share a few words about residential schools and the importance of orange shirt day	Kristie Duncan
Hollow Water First Nation	CNL's responses to your community's comments on the 2017 draft of the EIS	15-Sep-20	Furlon Barker	Email	Outbound	CNL provides their responses to BRFN,BON, HWFN comments on 2017 draft EIS	Kristie Duncan
Black River First Nation	CNL's responses to your community's comments on the 2017 draft of the EIS	15-Sep-20	Oral Johnston	Email	Outbound	CNL provides their responses to BRFN,BON, HWFN comments on 2017 draft EIS	Kristie Duncan
Brokenhead Ojibway Nation	CNL's responses to your community's comments on the 2017 draft of the EIS	15-Sep-20	Bev Smith	Email	Outbound	CNL provides their responses to BRFN,BON, HWFN comments on 2017 draft EIS	Kristie Duncan
Sagkeeng First Nation	Invoicing for Sagkeeng's Liaison	15-Sep-20	Lana Lavadier	Email	Outbound	CNL provided an update on Invoicing	Kristie Duncan

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Manitoba Metis Federation	CNL's responses to MMF's comments on the 2017 and 2019 draft Environmental Impact Statements	16-Sep-20	Morrissa Boerchers	Email	Inbound/Outbound	MMF confirms receipt of CNL's responses and provides an update that their review will be completed early October / CNL suggested scheduling a meeting after their review to discuss	Kristie Duncan		
Manitoba Metis Federation	1/2 day cultural awareness training	16-Sep-20	Shirley Russell, Louis Riel Institute	Email	Outbound/Inbound/Outbound	Touching base to discuss timing/Shirley suggests dates/Date is confirmed	Kristie Duncan		
Manitoba Metis Federation	1/2 day cultural awareness training	16-Sep-20	Shirley Russell, Louis Riel Institute	Email	Inbound/Outbound	Shirley provided a cost breakdown and invoice	Kristie Duncan		
Sagkeeng First Nation	Asset Donation	16-Sep-20	Kyra Groulx	Email	Inbound/Outbound	Sagkeeng provided list of items they would like	Kristie Duncan		
Sagkeeng First Nation	Firelight Budget for IR Review	16-Sep-20	Corey Shefman	Email	Inbound	Sagkeeng provided firelights draft budget to review the Irs	Kristie Duncan		
Manitoba Metis Federation	Environmental Monitoring at CNL	17-Sep-20	Jade Dewar	Email	Outbound	CNL welcomes Jade to site to collect mushrooms with Environmental Monitoring group	Kristie Duncan		
Sagkeeng First Nation	Liaison Funding	18-Sep-20	Corey Shefman	Email	Inbound/Outbound	Sagkeeng request update on ETA for liaison funding / CNL provides update	Kristie Duncan		
Manitoba Metis Federation	Environmental Monitoring at CNL	18-Sep-20	Jade Dewar	Email	Inbound/Outbound	MMF said the mushroom picking went really well/CNL asked if MMF would like to participate in any more activities and asked whether they require a contribution agreement	Kristie Duncan		
Sagkeeng First Nation	Condolences	18-Sep-20	Henry Swampy	Email	Outbound	CNL sent their condolences to Henry and his family for the loss of his sister-in-law	Kristie Duncan		
Manitoba Metis Federation	Cultural Awareness Training	21-Sep-20	Shirley Russell, Louis Riel Institute	Email	Outbound	CNL asked about preferences for payment	Kristie Duncan		
Sagkeeng First Nation	Action Items	21-Sep-20	Corey Shefman	Email	Outbound	CNL provided a copy of the updated action items based on conversation with Corey	Kristie Duncan		
Sagkeeng First Nation	Invoicing for Sagkeeng's Liaison	21-Sep-20	Cheryl Parkes	Email	Outbound	CNL asked about preferences for invoices	Kristie Duncan		
Sagkeeng First Nation	Invoicing for Sagkeeng's Liaison	21-Sep-20	Corey Shefman	email chain	Inbounds/Outbounds	Sagkeeng clarified they would like to provide invoices based on what they receive from Carl/ Corey suggested CNL had a lengthy delay in processing invoices/Sagkeeng clarified there was no delay in payment to Carl	Kristie Duncan		
Sagkeeng First Nation	Work Planning Session/Environmental Protection	23-Sep-20	Carl Fontaine	Phone call and email	Outbound	CNL confirmed work planning session for September 30, 2020 and to discuss environmental protection program and participate in tree survey	Kristie Duncan		
Sagkeeng First Nation	CNL Response: Sagkeeng WR-1 Alternatives Assessment Completion proposal	24-Sep-20	Alistair MacDonald, Firelight	Email	Inbound	Alistair provided an update on Sagkeengs Alternatives Assessment: Sagkeeng Chief and Council met Thursday and worked through several exercises associated with Sagkeeng's assessment of preferred alternatives for the WR-1 Reactor Decommissioning	Kristie Duncan		
Wabaseemoong Independent Nations	Site tour	24-Sep-20	Marvin Lee McDonald	Phone call	Outbound	Called but no response. Left a message asking about dates for site tour	Kristie Duncan		
Manitoba Metis Federation	Cultural Awareness Training	27-Sep-20	Shirley Russell, Louis Riel Institute	Email	Outbound	CNL provided Louis Riel Institute with a signed invoice	Kristie Duncan		
Black River First Nation	Site Tour and in-person meeting	28-Sep-20	Oral Johnston	Email	Outbound	CNL invited Oral and his chief and council for a site tour	Kristie Duncan		
Black River First Nation, Hollow Water First Nation	IAC-PA and Job Description	28-Sep-20	Furlon Barker; Oral Johnston	Email	Outbound	CNL provided BRFN and HWFN with a copy of the newly revised IAC and job description	Kristie Duncan		
Manitoba Metis Federation	IAC-PA and Job Description	28-Sep-20	Marci Riel	Email	Outbound	CNL provided MMF with a copy of the newly revised IAC and job description	Kristie Duncan		
Manitoba Metis Federation	IAC-PA and Job Description	29-Sep-20	Morrissa Boerchers	Phone	Outbound	CNL called to discuss IAC Outline - No response	Kristie Duncan		
Manitoba Metis Federation	IAC-PA and Job Description	30-Sep-20	Morrissa Boerchers	Phone	Inbound	MMF Finished reivew of responses / suggested October 8 to discuss / MMF to confirm schedule	Kristie Duncan		
Sagkeeng First Nation (Turtle Lodge)	Cultural Awareness Training	30-Sep-20	Sabina Ijaz, Turtle Lodge	Email	Outbound	CNL to confirm Turtle lodge has the time to support delivery of cultural awareness training	Kristie Duncan		
Sagkeeng First Nation (Turtle Lodge)	Cultural Awareness Training	30-Sep-20	Sabina Ijaz, Turtle Lodge	Email	Inbound	Turtle Lodge confirms and states they'll send an estimate soon	Kristie Duncan		
Sagkeeng First Nation	Site Visit / Work Planning Session / Tree Survey	30-Sep-20	Carl Fontaine	In-person	Outbound	Carl came to site to develop outline for a workplan and participated in a tree survey/ He had to leave early and work planning was not completed	Kristie Duncan		
Sagkeeng First Nation	CNL responses to SFN comments on the draft EIS	09-Oct-20	Chief Derrick Henderson	email	outbound	Provision of Round 3 responses to Sagkeeng comments on the 2017 and 2019 draft EIS	Alanna Wilcox	Yes	Meeting to discuss
Manitoba Metis Federation	Cultural Awareness Training	13-Oct-20	Shirley Russell, Louis Riel Institute	email chain	Outbound/ Inbound	Slide deck for Metis Cultural Awareness Training	Alanna Wilcox		
Wabaseemoong Independent Nations	Comment Responses	15-Oct-20	Marvin Lee McDonald	telephone	Outbound	Follow up to request a meeting to review CNL's responses to WIN's comments on the 2017 draft EIS. Left 2 voice messages	Alanna Wilcox		
Sagkeeng First Nation	Community Engagement	15-Oct-20	Carl Fontaine	telephone	Outbound	Ideas for community engagement as well as feedback to CNL regarding hospitality Note: email indicates Sept 15 in error (s/b Oct 15)	Alanna Wilcox		

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Black River First Nation	Environmental Monitoring	16-Oct-20	Oral Johnston	telephone	Inbound	Confirming BR attendee for Fish Processing activity	Alanna Wilcox
Sagkeeng First Nation	Community Engagement	19-Oct-20	Carl Fontaine	telephone	Outbound	Further discussion on community engagement - youth, engagement team	Alanna Wilcox
Black River First Nation	Environmental Monitoring	20-Oct-20	Cameron McPherson	email	Outbound	Follow up in response to to staticy voice message to confirm attendance at the Fish Processing activity	Alanna Wilcox
Black River First Nation	Environmental Monitoring	20-Oct-20	Cameron McPherson	email	Outbound	Confirmed security clearance received for Russell Spence as well	
Black River First Nation	Environmental Monitoring	20-Oct-20	Cameron McPherson	email	Outbound	Request for addresses to send mileage cheques for Cameron as well as Russell Spence	Alanna Wilcox
Sagkeeng First Nation	Comment Responses	20-Oct-20	Corey Shefman, OKT Law	email	Outbound	sign Contribution Agreement to fund review of CNL's responses to Sagkeengs comments on the 2017 and 2019 draft EIS	Alanna Wilcox
Sagkeeng First Nation (Turtle Lodge)	Cultural Awareness Training	20-Oct-20	Sabina Ijaz, Turtle Lodge	email chain	Outbound/ Inbound	Invoice from Turtle Lodge for catering for lunch for the Cultural Awareness Training	Alanna Wilcox
Manitoba Metis Federation	Comment Responses	22-Oct-20	Jade Dewar, Marci Riel	email	Outbound	confirming agenda for meeting	Alanna Wilcox
Wabaseemoong Independent Nations	Comment Responses	22-Oct-20	Marvin Lee McDonald	email	Outbound	follow up on review of CNL's response to WIN comments on the 2017 draft EIS and request to meet to discuss. Follow up on request for site tour	Alanna Wilcox
Black River First Nation, Hollow Water First Nation	Comment Responses	22-Oct-20	Elly Bonny, HTFC Planning & Design	email	Outbound	follow up on review of CNL's response to BR/HW comments on the 2017 draft EIS and request to meet to discuss	Alanna Wilcox
Manitoba Metis Federation	Environmental Monitoring	26-Oct-20	Jade Dewar	email	Inbound/ Outbound	Provision of EM contact info	Alanna Wilcox
Black River First Nation, Hollow Water First Nation	Engagement Plan	27-Oct-20	Elly Bonny, HTFC Planning & Design	telephone	Inbound	Engagement Plan and budget, confirmed participation in IAC, revised job description for Liaison	Alanna Wilcox
Black River First Nation, Hollow Water First Nation	Engagement Plan	27-Oct-20	Elly Bonny, HTFC Planning & Design	email	Inbound	provision of Engagement Plan and budget	Alanna Wilcox
Sagkeeng First Nation	Comment Responses	28-Oct-20	Corey Shefman, Alistair MacDonald	email chain	Outbound/ Inbound	establishing date and format for meeting to review CNL's responses to SFN comments on the draft 2017 and 2019 EIS	Alanna Wilcox
Black River First Nation, Hollow Water First Nation, Manitoba Metis Federation, Sagkeeng First Nation	Environmental Monitoring	28-Oct-20	Oral Johnston, Furlon Barker, Jade Dewar, Carl Fontaine	email	Outbound	Provided notes and ppt from Oct 20 fish processing activity	Alanna Wilcox
Sagkeeng First Nation	Psycho-Social Impact Assessment	28-Oct-20	Corey Shefman, OKT Law	email	Inbound	Provided Psycho-Social study to CNL for review and to inform the EIS	Alanna Wilcox
Sagkeeng First Nation (Turtle Lodge)	Cultural Awareness Training	28-Oct-20	Sabina Ijaz, Turtle Lodge	email	Inbound/ Outbound	Logistics for Cultural Awareness Training, discussion re: COVID	Alanna Wilcox
Sagkeeng First Nation (Turtle Lodge)	Cultural Awareness Training	29-Oct-20	Sabina Ijaz, Turtle Lodge	email	Inbound/ Outbound	Postponed Cultural Awareness Training due to COVID	Alanna Wilcox
Wabaseemoong Independent Nations	Comment Responses	29-Oct-20	Marvin Lee McDonald and Band Office	email and telephone	Outbound	provided notice via email and voice message indicating that CNL required feedback within one week in order to work with WIN to resolve	Alanna Wilcox
Manitoba Metis Federation	Environmental Monitoring	29-Oct-20	Jade Dewar	email	Outbound	request for proposal for Environmental Monitoring including mileage and honorariums in order to develop a Contribution Agreement	Alanna Wilcox
Manitoba Metis Federation	Comment Responses	30-Oct-20	Jade Dewar, Marci Riel	email	Outbound	provided notes from Oct 26 meeting and outline of proposed workshops to address remaining comments	Alanna Wilcox
Black River First Nation, Hollow Water First Nation	Engagement Plan	30-Oct-20	Elly Bonny, HTFC Planning & Design	email	Inbound	Provided updated Engagement Plan draft to CNL for review	Alanna Wilcox
Black River First Nation, Hollow Water First Nation	Engagement Plan	02-Nov-20	Elly Bonny, HTFC Planning & Design	email chain	Outbound/ Inbound	Request to meet to discuss budget for proposed Engagement Plan and follow up to set meeting	Alanna Wilcox
Sagkeeng First Nation	Comment Responses	02-Nov-20	Corey Shefman, Alistair MacDonald	email chain	Outbound/ Inbound	scheduling meeting to review CNL responses to SFN comments on the 2017 and 2019 draft EIS	Alanna Wilcox
Sagkeeng First Nation	Alternative Means Assessment	02-Nov-20	Corey Shefman, OKT Law	email chain	Outbound/ Inbound	scheduling a joint meeting with SFN and CNSC to discuss AMA report	Alanna Wilcox
Sagkeeng First Nation	Community Engagement	03-Nov-20	Carl Fontaine	telephone	Inbound	To discuss recent emails as well as engagement during COVID	Alanna Wilcox
Black River First Nation, Hollow Water First Nation	Engagement Plan	03-Nov-20	Elly Bonny, HTFC Planning & Design	email chain	Outbound/ Inbound	Discussion re: setting up a meeting to review Engagement Plan further	Alanna Wilcox
Sagkeeng First Nation	Engagement Update	03-Nov-20	Corey Shefman, OKT Law	email	Outbound	Update on engagement activities for Chief and Council	Alanna Wilcox
Sagkeeng First Nation	Community Engagement	03-Nov-20	Carl Fontaine	email	Outbound	continued dialogue on possible COVID friendly engagement activities	Alanna Wilcox
Black River First Nation, Hollow Water First Nation	Comment Responses	04-Nov-20	Adam Kroeker, HTFC Planning & Design	email	Inbound/ Outbound	confirming deadlines for a meeting in order to ensure incorporation of feedback into the EIS	Alanna Wilcox
Manitoba Metis Federation	Comment Responses	04-Nov-20	Jade Dewar	email chain	Outbound/ Inbound	follow up on date for workshop, confirmation of agenda	Alanna Wilcox

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Sagkeeng First Nation	Community Engagement	04-Nov-20	Carl Fontaine	telephone	Outbound	Importance of establishing an engagement plan and commencing engagement with the community as well as Chief & Council and CNL leadership	Alanna Wilcox
Sagkeeng First Nation	Community Engagement	05-Nov-20	Carl Fontaine	email	Outbound	Summary of items from Nov 4 call	Alanna Wilcox
Manitoba Metis Federation	Comment Responses	05-Nov-20	Jade Dewar	telephone	Outbound	Voice message left for Jade to discuss possibly post-poning Watershed workshop	Alanna Wilcox
Sagkeeng First Nation	Psycho Social study	05-Nov-20	Corey Shefman, OKT Law	email chain	Outbound/ Inbound	continued follow up to set date for meeting to review Psycho Social Study	Alanna Wilcox
Manitoba Metis Federation	Comment Responses	05-Nov-20	Jade Dewar	email chain	Outbound/ Inbound	reach out to confirm agenda and date for workshop	Alanna Wilcox
Black River First Nation, Hollow Water First Nation	Comment Responses	11-Nov-20	Adam Kroeker, Elly Bonny, HTFC Planning & Design	email	Outbound	follow up to set up meeting to review CNL's response to comments on the 2017 draft EIS	Alanna Wilcox
Sagkeeng First Nation	Comment Responses	11-Nov-20	Alistair MacDonald, Firelight, Tony Brown	email	Outbound	Request to confirm availability to meet to review CNL's responses on comments on the 2017 and 2019 draft EIS	Alanna Wilcox
Sagkeeng First Nation	Alternative Means Assessment, Psycho Social Study	11-Nov-20	Corey Shefman, OKT Law	email	Outbound	request to confirm CNL's ability to attach SFN's AMA and Psycho-Social Study to CNL's WR-1 EIS	Alanna Wilcox
Sagkeeng First Nation	Psycho Social Study	11-Nov-20	Corey Shefman, OKT Law	email chain	Outbound/ Inbound	confirmation of agenda for meeting to review Psycho-Social Study	Alanna Wilcox
Sagkeeng First Nation	Alternative Means Assessment	12-Nov-20	Orit Rivietz, OKT Law	email	Outbound	Request to set up meeting to discuss AMA	Alanna Wilcox
Sagkeeng First Nation	Comment Responses	12-Nov-20	Alistair MacDonald, Firelight	email chain	Outbound/ Inbound	Continued discussion to confirm availability for 2nd meeting to review CNL's responses to comments on the 2017 and 2019 draft EIS	Alanna Wilcox
Black River First Nation, Hollow Water First Nation	Engagement Plan	12-Nov-20	Elly Bonny, HTFC Planning & Design	email	Outbound	Provided CNL's support of the Engagement Plan and budget. Sought answers to a few questions	Alanna Wilcox
Black River First Nation, Hollow Water First Nation	Comment Responses	13-Nov-20	Adam Kroeker, HTFC Planning & Design	email	Inbound/ Outbound	Provided updated version of BR/HW responses on CNL's comment response document. CNL proposed options for meeting dates to review.	Alanna Wilcox
Sagkeeng First Nation	Comment Responses	14-Nov-20	Corey Shefman, OKT Law	email	Inbound	Confirmation that SFN's response to CNL's comment response document was pending Chief Henderson's signature	Alanna Wilcox
Sagkeeng First Nation	Alternative Means Assessment	16-Nov-20	Orit Rivietz, OKT Law	email	Outbound	Follow up on request to set up meeting to discuss AMA	Alanna Wilcox
Sagkeeng First Nation	Comment Responses	16-Nov-20	Corey Shefman, OKT Law	email	Inbound	Provided SFN's responses to CNL's comment response document, along with a letter from Chief Henderson	Alanna Wilcox
Black River First Nation	Environmental Monitoring	16-Nov-20	Cameron McPherson	email	Inbound/ Outbound	follow up on mileage cheques for attending the Fish Processing activity	Alanna Wilcox
Sagkeeng First Nation	Comment Responses	17-Nov-20	Alistair MacDonald, Firelight	email chain	Outbound/ Inbound	Continued discussion to confirm dates of availability for 2nd meeting to review CNL's responses to comments on the 2017 and 2019 draft EIS	Alanna Wilcox
Sagkeeng First Nation	Community Engagement	18-Nov-20	Carl Fontaine	email chain	Outbound/ Inbound	Follow up from missed meeting to check in on Carl (Carl missed due to the need to go for a COVID test)	Alanna Wilcox
Manitoba Metis Federation	Comment Responses	18-Nov-20	Marci Riel	email	Outbound	Provided workshop agendas with a request for proposal from SVS for cost. Question to MMF re: Contribution Agreement for Environmenatl Monitoring activities	Alanna Wilcox
Sagkeeng First Nation	Comment Responses	19-Nov-20	Corey Shefman, OKT Law, Alistair McDonald, Firelight	email	Outbound	Follow up on Part 2 meeting notice - agenda to follow, requested confirmation if Tony Brown should be included	Alanna Wilcox
Manitoba Metis Federation	Engagement	19-Nov-20	Jade Dewar	email	Outbound	follow up on meeting agenda, MOU and IAC	Alanna Wilcox
Sagkeeng First Nation	AECL contacts	19-Nov-20	Corey Shefman, OKT Law	email	Outbound	confirmed email addresses for AECL contacts	Alanna Wilcox
Sagkeeng First Nation	Community Engagement	23-Nov-20	Carl Fontaine	telephone	Outbound	summary of weekly call	Alanna Wilcox
Sagkeeng First Nation	Community Engagement	23-Nov-20	Carl Fontaine	email	Outbound	confirmed Kristie reached out to Corey Shefman to indicate that Carl had not been able to reach him and requesting he call her back. Summarized in email topics of Nov 23 mtg	Alanna Wilcox
Sagkeeng First Nation	Community Engagement	23-Nov-20	Corey Shefman, Carl Fontaine	telephone	Outbound/ Inbound	follow up from Corey to Carl to connect	Alanna Wilcox
Black River First Nation, Hollow Water First Nation	Comment Responses	24-Nov-20	Adam Kroeker, HTFC Planning & Design	email	Outbound	suggested meeting date for reviewing CNL's responses to BR/HW and Brokenhead comments on the 2017 draft EIS	Alanna Wilcox
Manitoba Metis Federation	Comment Responses	25-Nov-20	Marci Riel, Jade Dewar	email	Outbound	provided agenda and focus Questions (83 & 142) for Nov 26 meeting	Alanna Wilcox
Sagkeeng First Nation	Community Engagement	25-Nov-20	Carl Fontaine	email	Outbound	provided notes from Nov 25 meeting discussing next steps in commujnity engagement	Alanna Wilcox
Sagkeeng First Nation	Comment Responses	25-Nov-20	Corey Shefman, Alistair MacDonald	email	Outbound	follow up on Nov 24 email confirming agenda for Nov 26 meeting	Alanna Wilcox

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Black River First Nation, Hollow Water First Nation, Manitoba Metis Federation, Sagkeeng First Nation	Economic Opportunities	25-Nov-20	Oral Johnston, Furlon Barker, Marci Riel, Carl Fontaine	email	Outbound	invitation to CNL's virtual Industry Day on Dec 9	Alanna Wilcox
Black River First Nation	Environmental Monitoring	26-Nov-20	Cameron McPherson	email	Inbound/ Outbound	Following up on outstanding mileage claims	Alanna Wilcox
Manitoba Metis Federation	Comment Responses	26-Nov-20	Jade Dewar	email	Inbound/ Outbound	follow up on Nov 26 meeting to indicate that it went well and thanks	Alanna Wilcox
Sagkeeng First Nation	Comment Responses	26-Nov-20	Carl Fontaine	email chain	Outbound/ Inbound	reach out as a reminder of meeting currently in progress with a request to join. Response from Carl with request for call in info. Late as a result of car trouble	Alanna Wilcox
Sagkeeng First Nation	Comment Responses	30-Nov-20	Corey Shefman, OKT Law	email	Outbound	provided agenda for Dec 1 meeting	Alanna Wilcox
Sagkeeng First Nation	Comment Responses	30-Nov-20	Alistair MacDonald, Firelight	email	Inbound/ Outbound	request for Dec 1 slide deck in advance of meeting	Alanna Wilcox
Manitoba Metis Federation	Comment Responses	30-Nov-20	Marci Riel, Jade Dewar	email	Outbound	provided notes from Nov 26 meeting along with proposed agendas for Workshops #2, 3, & 4	Alanna Wilcox
Manitoba Metis Federation		30-Nov-20	Marci Riel, Jade Dewar	email	Outbound	Kristie provided notice that she would be unavailable for a few days as she worked on EIS documentation	Alanna Wilcox
Sagkeeng First Nation	Asset Donation	03-Dec-20	Lana Lavadier	email	Outbound	Provided pictures of items that are available (as requested) for asset donation	Alanna Wilcox
Black River First Nation, Hollow Water First Nation	Community Engagement	03-Dec-20	Adam Kroeker, Elly Bonny, HTFC Planning & Design	email	Inbound/ Outbound	Setting up a meeting with CNSC for Dec 15 to review proposed budget for the BR/HW Engagement Plan. Confirmation of CNSC's support.	Alanna Wilcox
Manitoba Metis Federation	Comment Responses	07-Dec-20	Marci Riel	email	Inbound/ Outbound	confirmation of ETA on CNL's responses to MMF's comments on the draft EIS	Alanna Wilcox
Sagkeeng First Nation	Comment Responses	08-Dec-20	Alistair MacDonald, Corey Shefman, Tony Brown, Carl Fontaine	email	Outbound	Provided slide deck reflecting November 26 and December 1 meetings to review CNL's responses to Sagkeeng's comments on the draft 2017 and 2019 EIS submissions.	Alanna Wilcox
Sagkeeng First Nation	EIS	09-Dec-20	Corey Shefman	email	Outbound	Confirmation on when CNL intends to release IER for community review.	Alanna Wilcox
Sagkeeng First Nation	Community Engagement	10-Dec-20	Carl Fontaine	email chain	Outbound/ Inbound	Booking a time to meet to discuss progress on community engagement with Sagkeeng	Alanna Wilcox
Black River First Nation, Hollow Water First Nation	Comment Responses	14-Dec-20	Oral Johnston, Furlon Barker	email	Outbound	Provided slide deck for Dec 14 meeting to review Black River, Brokenhead and Hollow Water's comments on the draft 2017 EIS	Alanna Wilcox
Sagkeeng First Nation	Community Engagement	14-Dec-20	Carl Fontaine	email chain	Outbound/ Inbound	Follow up on missed meeting	Alanna Wilcox
Black River First Nation, Hollow Water First Nation	Comment Responses	15-Dec-20	Adam Kroeker, HTFC	email	Inbound/ Outbound	follow up on date(s) for meetings and discussion on CNL's response to community comments on the draft EIS	Alanna Wilcox
Black River First Nation	Community Engagement	15-Dec-20	Adam Kroeker, HTFC	email	Outbound	Offer to provide Chief Kent an update on the WR-1 project or the overall WL decommissioning project	Alanna Wilcox
Sagkeeng First Nation	Comment Responses	16-Dec-20	Alistair MacDonald, Corey Shefman, Tony Brown, Carl Fontaine	email	Outbound	Provided meeting notes from November 26 and December 1 meetings to review CNL's responses to Sagkeeng's comments on the draft 2017 and 2019 EIS submissions.	Alanna Wilcox
Sagkeeng First Nation	Community Engagement	17-Dec-20	Corey Shefman, Carl Fontaine	email	Outbound	Provided draft Project Update for their review prior to release to Chief Henderson	Alanna Wilcox
Manitoba Metis Federation	Comment Responses	17-Dec-20	Marci Riel	email	Outbound	Provided CNL's responses to MMF's comments on the draft 2017 and 2019 EIS	Alanna Wilcox
Sagkeeng First Nation	Community Engagement	18-Dec-20	Chief Henderson	email	Outbound	Provided Project Update to Chief Henderson on recent engagement activities with Sagkeeng	Alanna Wilcox
Sagkeeng First Nation	Community Engagement	21-Dec-20	Carl Fontaine	email	Outbound	Follow up on discussion items from November 23	Alanna Wilcox
Sagkeeng First Nation	Psycho-Social Assessment	22-Dec-20	Chief Henderson	email	Outbound	Provided CNL's formal response to Sagkeeng's Psycho-Social Study	Alanna Wilcox
Sagkeeng First Nation	Alternative Means Assessment	22-Dec-20	Chief Henderson	email	Outbound	Provided CNL's formal response to Sagkeeng's Alternative Means Assessment	Alanna Wilcox
Sagkeeng First Nation	EIS	22-Dec-20	Corey Shefman	email	Outbound	Provided CNL's EIS language on Sagkeeng's Psycho-Social Assessment and CNL's position on impact	Alanna Wilcox
Sagkeeng First Nation	Comment Responses	06-Jan-21	Alistair MacDonald	email	Outbound	Follow up on Contribution Agreement for Sagkeeng's review of CNL's responses to Sagkeeng's comments on the draft EIS	Alanna Wilcox
Black River First Nation	Comment Responses	06-Jan-21	Oral Johnston	email	Inbound/ Outbound	Provided contact information for the Algonquins of Pikwakanagan	Alanna Wilcox
Black River First Nation, Hollow Water First Nation	Community Engagement	11-Jan-21	Elly Bonny, HTFC Planning & Design	email	Outbound	Provided updated draft Community Liaison position job description	Alanna Wilcox

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Black River First Nation, Hollow Water First Nation, Manitoba Metis Federation and Sagkeeng First Nation	Economic Opportunities	11-Jan-21	Oral Johnston, Furlon Barker, Marci Riel, Carl Fontaine	email	Outbound	Invitation to CNL's Virtual Career Fair on January 18.	Alanna Wilcox
Black River First Nation, Brokenhead Ojibway Nation, Hollow Water First Nation	Comment Responses	11-Jan-21	Oral Johnston, Bev Smith, Furlon Barker	email	Outbound	Provided CNL's respones to the communities' comments on the draft 2017 EIS	Alanna Wilcox
Sagkeeng First Nation	Comment Responses	12-Jan-21	Corey Shefman	email	Outbound	Provided amended Contribution Agreement for additional funds to cover Sagkeeng's review of the Comment Responses	Alanna Wilcox
Black River First Nation, Hollow Water First Nation	Community Engagement	12-Jan-21	Elly Bonny, Adam Kroeker, HTFC	email	Inbound/ Outbound	Provided updated Community Liaison job description along with answers to questions	Alanna Wilcox
Manitoba Metis Federation	Community Engagement	13-Jan-21	Jade Dewar	email	Outbound	Follow up on tree planting, provided new cell #	Alanna Wilcox
Sagkeeng First Nation	Comment Responses	13-Jan-21	Chief Derrick Henderson	email	Outbound	Provided CNL's respones to the Sagkeeng's comments on the draft 2017 and 2019 EIS	
Sagkeeng First Nation	Community Engagement	13-Jan-21	Carl Fontaine	email	Inbound/ Outbound	Update from Carl on initiatves. Request from IEO to meet to discuss.	Alanna Wilcox
Sagkeeng First Nation	Comment Responses	14-Jan-21	Corey Shefman	email	Inbound/ Outbound	Receipt of signed amended Contribution Agreement and confirmation of receipt	Alanna Wilcox
Black River First Nation, Hollow Water First Nation	Community Engagement	14-Jan-21	Elly Bonny, Adam Kroeker, HTFC	email	Outbound	Provided final Community Liaison job description.	Alanna Wilcox
Manitoba Metis Federation	Comment Responses	14-Jan-21	Marci Riel, Jade Dewar	email chain	Outbound/ Inbound	Establishing dates, agenda and details for upcoming Workshops to address remaining concerns from MMF from draft EIS comments	Alanna Wilcox
Sagkeeng First Nation	EIS	15-Jan-21	Chief Derrick Henderson	email	Outbound	Provided advance copy of IER and CNL's EIS language on Sagkeeng's Psycho-Social Assessment	Alanna Wilcox
Sagkeeng First Nation	Community Engagement	18-Jan-21	Carl Fontaine	telephone	Outbound	Called but no response	Alanna Wilcox
Black River First Nation, Hollow Water First Nation	Community Engagement	19-Jan-21	Oral Johnston, Furlon Barker	email	Outbound	Provided Contribution Agreement to fund BR/HW 2 year engagement plan	Alanna Wilcox
Sagkeeng First Nation	Alternative Means Assessment	21-Jan-21	Corey Shefman	email	Inbound/ Outbound	Request for payment of Firelight invoices for Sagkeeng's Alternative Means Study and confirmation invoices have been sent for processing.	Alanna Wilcox
Sagkeeng First Nation	EIS	22-Jan-21	Corey Shefman	email chain	Outbound/ Inbound	Confirmation on Sagkeeng's review of IER and EIS language on Sagkeeng's Psycho-Social study and estimate ETA for completion. Confirmed those were the last documents Sagkeeng wanted to review.	Alanna Wilcox
Manitoba Metis Federation	EIS	25-Jan-21	Marci Riel	email	Outbound	Provided advance copy of IER and sought agreement to provide MMF's contact information to Mayor of Pinawa re: SMR project	Alanna Wilcox
Black River First Nation, Hollow Water First Nation	EIS	25-Jan-21	Oral Johnston, Furlon Barker	email	Outbound	Provided advance copy of IER and sought agreement to provide Black River's and Hollow Water's contact information to Mayor of Pinawa re: SMR project	Alanna Wilcox
Black River First Nation	Community Engagement	25-Jan-21	Oral Johnston	telephone	Outbound	discussion regarding reaching out directly to Chief Kent to connect and provide a project update	Alanna Wilcox
Black River First Nation, Hollow Water First Nation	Community Engagement	25-Jan-21	Oral Johnston, Furlon Barker	email	Outbound	Thank you for providing contact info for Mayor of Pinawa and provided 2 letters of support for the SMR project for their interest	Alanna Wilcox
Sagkeeng First Nation	Community Engagement	25-Jan-21	Carl Fontaine	email	Outbound	In response to request for Whiteshell fact sheets, advised that they were currently being updated and would be available by mid-February	Alanna Wilcox
Brokenhead Ojibway Nation	Comment Responses	25-Jan-21	Bev Smith	email	Outbound	Request for reference document from BON #44 comment	Alanna Wilcox
Manitoba Metis Federation	Comment Responses	26-Jan-21	Jade Dewar	email	Outbound	Follow up to request quote from Shared Value Solutions for workshops	Alanna Wilcox
Sagkeeng First Nation		27-Jan-21	Chief Derrick Henderson	email chain	Outbound/ Inbound	Confirmation from Chief Henderson that IEO could release his contact info to Mayor of Pinawa for SMR project	Alanna Wilcox
Sagkeeng First Nation	Psycho-Social Assessment	28-Jan-21	Corey Shefman	email	Inbound/ Outbound	Confirmation of receipt of request for additional work to provided response to CNSC and CNL on the Psycho-Social Assessment with commitment to respond.	Alanna Wilcox
Black River First Nation, Hollow Water First Nation, Manitoba Metis Federation, Sagkeeng First Nation	Economic Opportunities	29-Jan-21	Oral Johnston, Furlon Barker, Marci Riel, Carl Fontaine	email	Outbound	Notification of Summer Student job opportunity within WL Communications for 2021 May - August	Alanna Wilcox
Brokenhead First Nation, Hollow Water First Nation	Community Engagement	01-Feb-21	Elly Bonny, HTFC Planning & Design	email	Outbound	Confirmation of changes made to contribution agreement and notification that it will be returned to the communities for signing once CNL's internal review is complete	Alanna Wilcox

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Black River First Nation, Brokenhead Ojibway Nation, Hollow Water First Nation, Manitoba Metis Federation and Sagkeeng First Nation	Public Bulletin	02-Feb-21	Oral Johnston, Bev Smith, Furlon Barker, Chief Henderson, Marci Riel	email	Outbound	Notice on preliminary results indicating an increased level of caesium from the Whiteshell Laboratories site outfall	Alanna Wilcox
Sagkeeng First Nation	Public Bulletin	02-Feb-21	Corey Shefman	email	Inbound/ Outbound	Early response to questions on elevated caesium level bulletin with commitment to provide full answers early the following week	Alanna Wilcox
Sagkeeng First Nation	Psycho-Social Assessment	02-Feb-21	Chief Henderson, Corey Shefman, OKT Law	email	Inbound/ Outbound	Confirmation that CNL would fund additional work to provided response to CNSC and CNL on the Psycho-Social Assessment and requesting to meet with Chief and Council to discuss	Alanna Wilcox
Brokenhead Ojibway Nation		02-Feb-21	Alison Fraser, SVS	email	Inbound/ Outbound	Acknowlegement of article provided by SVS to CNL's Indigenous Engagement Officer	Alanna Wilcox
Manitoba Metis Federation	EIS	02-Feb-21	Marci Riel	email	Outbound	Follow up on how remaining workshops would be captured in the EIS and IER for the WR-1 EA	Alanna Wilcox
Black River First Nation, Hollow Water First Nation	EIS	03-Feb-21	Elly Bonny, HTFC Planning & Design	email	Outbound	Follow up to inquire if the communities would be reviewing the IER and providing feedback	Alanna Wilcox
Sagkeeng First Nation	Psycho-Social Study	08-Feb-21	Corey Shefman	email	Inbound/ Outbound	Proposed dates received from Sagkeeng to meet with Chief and Council to discuss next steps from Psycho-Social Assessment	Alanna Wilcox
Sagkeeng First Nation	Psycho-Social Study	08-Feb-21	Corey Shefman	email	Inbound/ Outbound	Response to CNL regarding funding to prepare responses to CNSC and CNL questions on the Psycho-Social Study and agreement to provide dates to meet with Chief and Council	Alanna Wilcox
Manitoba Metis Federation	Comment Responses	08-Feb-21	Jade Dewar	email	Outbound	Follow up to inquire about status of request for quote from Shared Value Solutions for their participation in the workshops	Alanna Wilcox
Wabaseemoong Independent Nations, Shoal Lake #40, Brokenhead Ojibway Nation, Grand Council Treaty #3, Iskatewizaagegan No. 39	EIS	08-Feb-21	Chief Scott, Chief Redsky, Bev Smith, Lucas King, Chief Lewis	email	Outbound	Notification to to Indigenous communities who declined to engage in the past, with an update on the status of the WR-1 EIS, and an offer to meet or provide a webinar.	Alanna Wilcox
Sagkeeng First Nation	Public Bulletin	12-Feb-21	Chief Henderson, Corey Shefman	email	Inbound/ Outbound	Provided responses to question on CNL's Feb. 2 public bulletin.	Alanna Wilcox
Manitoba Metis Federation	Follow-up meeting from WR-1 Montoring	15-Feb-21	MMF (2), CNL (1)	Teleconference		CNL and MMF met to discuss action items and next steps that came out of the workshop #3 on ground water monitoring	Kristie
Sagkeeng First Nation	FPIC	18-Feb-21	CNSC (4) AECL (7), CNL (5), and Sagkeeng Chief and Council (1), OKT (2)	Teleconference		AECL, CNSC, and Sagkeeng had a meeting to discuss the applications of FPIC on the WR-1 Project.	Kristie
Manitoba Metis Federation	Sustainability collaboration opportunities	18-Feb-21	MMF (2), CNL (2)	Teleconference		CNL and MMF met to discuss opportunities for collaboration (i.e. tree planting initatives, future monitoring intiatives)	Kristie
Manitoba Metis Federation	WR-1 EIS	11-Feb-21, 19-Feb-21	Marci Riel	Email	Outbound	Provided WLCP site wide project schedule in response to Action #23	Alanna Wilcox
Sagkeeng First Nation	EIS and PSIA Section Review	26-Feb-21	OKT	Email	Inbound	Sagkeeng provided their review of CNL's IER	Kristie
Sagkeeng First Nation	Alternative Means Assessment Review	26-Feb-21	OKT	Email	Inbound	Sagkeeng provided additional comments on CNL's revised alternative means assessment write up	Kristie
Sagkeeng First Nation	Alternative Means Assessment Review	26-Feb-21	OKT	Email	Outbound	CNL provided an updated version of the alternative means assessment write up based on Sagkeeng's review	Kristie
Sagkeeng First Nation	EIS and PSIA Section Review	27-Feb-21	OKT	Email	Inbound	Sagkeeng provided their review of CNL's psychosocial impact assessment	Kristie
Sagkeeng First Nation	WR-1 and Whiteshell Laboratories Fact Sheets	01-Mar-21	Sagkeeng's Liaison	E-mail	Outbound	CNL provided updated Factsheets on the project to Sagkeeng's Liaison.	Kristie
Sagkeeng First Nation, Manitoba Metis Federation, Black River First Nation, Hollow Water First Nation	CNL Public Bulletin Notice - Ceasium investigation.	01-Mar-21		E-mail	Outbound	CNL provided an update on the ceasium investgation to all involved communities.	Kristie
Manitoba Metis Federation	Alternative Means Assessment and VC Components	02-Mar-21	CNL (3) SVS (7) MMF (3) Golder (1)	Teleconference		CNL gave a presentation to the MMF on the Alternative Means Assessment conducted for the WR-1 EIS and CNL's methodology for selecting the Project's VCs	Kristie
Black River First Nation, Hollow Water First Nation	MOU Update	03-Mar-21	HTFC	Phone Call		Received a phone call from Elly - BR/HW Consultant. MOU has been approved, thumbs up for BR and HW to participate in the IAC.	Kristie

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Grand Council of Treaty 3	Project Update	04-Mar-21	Territorial Planning Unit (3) CNL (2)	Teleconference		CNL presented an overview of the project including end state, VC, alternative means, site history, WR-1 follow-up monitoring	Kristie
Sagkeeng First Nation	Engagement Proposal	04-Mar-21	Sagkeeng's Liaison	Email	Inbound	Sagkeeng provided CNL with an engagement proposal.	Kristie
Sagkeeng First Nation	Community Engagement	09-Mar-21		Teleconference		CNL met with Sagkeeng's Council to 1) go over Sagkeeng's proposal, 2) Best practices to engage Sagkeeng's members 3) Barriers that present Sagkeeng members from engageing on the project.	Kristie
Manitoba Metis Federation	IAC, liaison, Relationship Agreement	09-Mar-21	Marci Riel Jade Dewar Kristie Duncan Brian Wilcox	Teleconference		CNL met with MMF to discuss the Liaison position, Relationship Agreement, and MMF's involvement in the Indigenous Advisory Committee.	Kristie
Sagkeeng First Nation	Narrative's responses to questions on Psychosocial Impact Statement	10-Mar-21	OKT	Email	Inbound/Outbound	CNL received an e-mail from Sagkeeng's laywer with Narratives/Sagkeeng's responses. Sagkeeng's laywer also requested a meeting between leadership. CNL provided dates and times for the proposed meeting.	Kristie
Brokenhead Ojibway Nation	Community Engagement	11-Mar-21	Bev Smith	Email	Outbound	CNL reached out to Bev Smith and offered to engage with Brokenhead Ojibway Nation on the WR-1 Project	Kristie
Brokenhead Ojibway Nation	WR-1 EIS	13-Mar-21, 16-Mar-21	Alison Fraser, SVS	Email Chain	Outbound/ Inbound	Touching base re next activities including review of IR responses	Alanna Wilcox
Manitoba Metis Federation	WR-1 EIS	16-Mar-21, 18-Mar-21	Marci Riel	Email Chain	Outbound/ Inbound	Email introduction between MMF and Golder	Alanna Wilcox
Sagkeeng First Nation	Sagkeeng's requests from March 6 Meeting.	17-Mar-21- 18-Mar-21	Corey Shefman, OKT Law	Email Chain	Inbound/ Outbound	Sagkeeng's requests from the March 6 meeting, cost of alternative means assessment, clarification on	Kristie Duncan
Black River First Nation	Community Engagement	18-Mar-21	Oral Johnston	Phone Call	Outbound	CNL reached out to the Black River First Nation to build CNL's relationship. Update phone call focusing mainly on environmental monitoring and CNL's involvement in Vision Quest Conference and Lake Winnipeg Indigenous Collective.	Julia Radoiu
Black River First Nation, Hollow Water First Nation, Brokenhead Ojibway Nations	TK Study	17-Mar-21- 18-Mar-21	Oral Johnston, Furlon Baker, Kyle Remus, Elly Bonny, HTFC Planning & Design,	Kyle.Remus@QMenv.com	Email Chain	Inbound/ Outbound	BR, HW, BH requested a copy of the TK study to make available on their website in both official languages.	Julia Radoiu
Sagkeegn First Nation	PSIA	24-Mar-21-30-Mar-21	Corey Shefman, OKT Law		Email Chain	Inbound/ Outbound	Sagkeegn and Legal Representative OKT Law reached out to arrange a review of PSIA	Julia Radoiu
Black River First Nation	Community Engagement	25-Jan-21 04-Apr-21	Oral Johnston, Elly Bonny, HTFC Planning & Design		Email Chain	Outbound/ Inbound	Touching base on Contribution Agreement and reviewing comments.	Julia Radoiu
Manitoba Metis Federation	Community Engagement	12-Apr-21	Marci Riel, Jade Dewar		Email	Outbound	CNL sent out Feb-March Engagement MMF Update, offered to make engagement updates a regular occurance	Julia Radoiu
Black River First Nations	IAC, Relationship Agreement and Newsletter	12-Apr-21	Oral Johnston		Phone Call	Outbound/ Intbound	CNL called to discuss relationship agreement, IAC and Newsletter - lack of interest in the newsletter.	Julia Radoiu
Sagkeeng First Nation	WR-1 EIS	10-Apr-21 13-Apr-21	Corey Shefman, OKT Law		Email Chain	Outbound/ Inbound	Request for word version of comment tracking table so that CNL can respond, and subsequent provision of word document	Alanna Wilcox
Sagkeeng First Nation	Community Engagement	13-Apr-21	Carl Fontaine		Phone call	Outbound	CNL called Carl to remind him he was coming on WL site on Thursday, and went over adgenda for the visit.	Julia Radoiu
Sagkeegn First Nation	Project Update and Environmental Sampling	14-Apr-21			Email	Outbound	Touched base on the meeting April 6th, and CNL sent bi-monthly Feb-March Project and Engagement Update.	Julia Radoiu
Sagkeegn First Nation, Manitoba Metis Federation, Balck River First Nation, Hollow Water First Nations, White Dog First Nation, Brokenhead First Nation	WR-1 Webinar	19-Apr-21			Email	Outbound	CNL reached out to invite communities to the WR-1 Decomissioning Webinar and how CNL plans to protect the environment throughout the entire process.	Julia Radoiu
Black River First Nation, Hollow Water First Nation	Liason Officer and IAC Update	19-Apr-21	Elly Bonny, HTFC Planning & Design		Phone Call	Outbound/ Inbound	Updates on the Liason Officer, and disscused approach to the IAC. BR and HW discussed their involvement in the review of the document.	Julia Radoiu
Sagkeeng First Nation	Follow up from the Meeting	19-Apr-21	Carl Fontaine, Liaison Officer		Phone Call	Inbound/ Outbound	Discussed the follow-up actions from the meeting last Thursday.	Julia Radoiu
Manitoba Metis Federation	MOU Update	07-Apr-21-20-Apr-21	Marci Riel		Phone Call	Outbound/ Inbound	CNL phoned to disscuss MOU funding up the technical wrap up	Julia Radoiu

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Manitoba Metis Federation	Environmental Monitoring	20-Apr-21-	Jade Dewar		Email	Outbound	Confirming documents for MMf's monitoring proposal	Julia Radoiu		
Sagkeeng First Nation	Community Engagement	21-Apr-21	Carl Fontaine, Liaison Officer		Phone Call	Outbound	Indigenous Engagement Officer reached out to check in on the distribution of infrographics and the potential for radio engagement - no response	Julia Radoiu		
Sagkeeng First Nation	Community Engagement	26-Apr-21	Carl Fontaine, Liaison Officer		Email	Outbound	Relaying letter from Chief Henderson in order to open up a disscussion.	Julia Radoiu		
Sagkeeng First Nation	Proposal for Capacity Agreement	27-Apr-21-28-Apr-21	Corey Shefman, OKT Law, Alistair McDonald, Firelight		Email Chain	Outbound/ Inbound	After the review of Chief Henderson's letter, CNL proposed a relationship agreement in order to provide a frame work for addressing concerns and interests.	Julia Radoiu		
Black River First Nation, Hollow Water First Nation	Liason Officer Update	29-Apr-21- 02-May-21	Elly Bonny, HTFC Planning & Design		Email Chain	Outbound/ Inbound	CNL requested an update on Liaison position.	Julia Radoiu		
Manitoba Metis Federation	Technical Workshop Update	29-Apr-21- 02-May-21	Marci Riel, Jade Dewar		Email	Outbound	Disscusion of final details for the Techincal Wrap-up Workshop and MOU funding.	Julia Radoiu		
Manitoba Metis Federation	Wrap-Up Technical Workshop	05-May-21-10-May-21	Marci Riel, Jade Dewar		Email	Outbound	CNL sent Draft Agenda for revision for Final Technical Workshop Wrap up	Julia Radoiu		
	Technical Working Group	13-May-21	Corey Shefman, OKT Law and Sagkeegn		Email	Outbound	CNL reached out to confirm a date for a technical workshop, follow up emails suggested June 16th - now waiting on confirmation	Julia Radoiu		
	Liaison Officer	16-May-21	Kelsey Boubard, BR/HW Liaison Officer	kboubard430@gmail.com	Email Chain	Outbound/ Inbound	Reached out to liaison officer to give her a brief checklist of what is needed for her onsite visit.	Julia Radoiu		
Sagkeeng First Nation	Community Engagement	17-May-21	Lana Lavinder		Phone Call	Outbound	CNL reached out to Sagkeeng First Nation to provide any form of support.	Julia Radoiu		
Sagkeeng First Nation	Community Engagement	18-May-21	Carl Fontaine		Phone Call	Inbound	Carl Fontain reached out to check in providing an update. Kristie touched base on the current onboarding situation of the new liason/coordinator for BR/HW as well as inquiring about National Indigenous Peoples Day.	Julia Radoiu		
Manitoba Metis Federation	Environmental Monitoring	18-May-21	Marci Riel		Email	Outbound	CNL reached out to disscuss a potential monitoring opertunities citizen scientists may be interested in	Julia Radoiu		
Manitoba Metis Federation	Relationship Agreement	21-May-21	Marci Riel		Email Chain	Inbound/ Outbound	MMF reached out to CNL to reschedule meeting for the relationship agreement disscussion.	Julia Radoiu		
Black River and Hollow Water	Liaison Onboarding	25-May-21	Kelsey Boubard, BR/HW Liaison Officer		Email	Outbound	Check in with BR/HW liaison officer prior to site visit.	Julia Radoiu		
Black River and Hollow Water	EIS Materials	26-May-21	Elly Bonny and Adam Kroeker HTFC Planning, Oral Johnston, Furlon Barker		Email Chain	Outbound/ Inbound	MOU and EIS materials and setting up a budget meeting to check in on the MOU budget.	Julia Radoiu	Tentative place holder was set aside for a 6 month check-in	Yes	Follow up a week prior to make sure that everyone is aware of this meeting in october.
Black River and Hollow Water	Community Engagement	01-Jun-21	Kelsey Boubard, BR/HW Liaison Officer		Email Chain	Outbound/ Inbound	BR/HW liaision officer reached out to ask if the flags have been lowered in memory of the tragic findings at the Kamloops. Which was confirmed.	Julia Radoiu		
Manitoba Metis Federation	Enviornmental Monitoring	03-Jun-21	Bryanna Sherbo	bryanna.sherbo@mmf.mb.ca	Email Chain	Inbound/ Outbound	CNL reached out to ask the MMF's citizen scientist chosen for onsite monitoring to fill out the security forms required to come on site.	Julia Radoiu		
Manitoba Metis Federation	Enviornmental Monitoring	08-Jun-21	Jade Dewar		Email	Outbound	Relaying meeting notes and general schedule for confirmation on alignment.			
Manitoba Metis Federation	Enviornmental Monitoring	09-Jun-21	Bryanna Sherbo		Email Chain	Inbound/ Outbound	Confirmation of the environmental monitoring activities	Julia Radoiu		
Sagkeeng	Technical Working group	10-Jun-21	Corey Shefman, OKT Law		Email Reply	Outbound/ Inbound	Confirmation of draft agenda and proposed a plan.			
Sakeeng	WR-1 Walk Through	14-Jun-21	Dustin Courchene		Email chain	Inbound/ Outbound	Dustin Courchene touched base with CNL to inform them that he could not participate in the production of the WR-1 walk through video.	Julia Radoiu		
Sakeeng	Technical Working Group	16-Jun-21	Corey Shefman, OKT Law		email chain	Outbound/ Inbound	Disscusion on legal representation's prescence in the Technical Wotking Group Meeting.	Julia Radoiu		
Black River and Hollow Water	Liaison Onboarding	16-Jun-21	Kelsey Boubard, BR/HW Liaison Officer		Email Chain	Outbound/ Inbound	Check in with BR/HW liaison officer prior to site visit.	Julia Radoiu		
Manitoba Metis Federation	Environmental Monitoring	17-Jun-21	Bryanna Sherbo		Email Chain	Inbound/ Outbound	Bryanna touched base to proivde CNL with the MMF citizen scientists visitor forms.			
Black River and Hollow Water	Liaison Onboarding	21-Jun-21	Kelsey Boubard, BR/HW Liaison Officer		email chain	Outbound/ Inbound	Check in with BR/HW liaison officer prior to environmental protection presentation.	Julia Radoiu		
Manitoba Metis Federation	Environmental Monitoring	21-Jun-21	Bryanna Sherbo		email chain	Inbound/ outbound	Bryanna reached out to provide CNL with the final visitor form.	Julia Radoiu		
Black River and Hollow Water	Environmental Monitoring	21-Jun-21	Kelsey Boubard, BR/HW Liaison Officer		Email Chain	Outbound/ inbound	Check in with BR/HW liaison prior to the environemntal monitoring activities overview	Julia Radoiu		

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Manitoba Metis Federation	Environmental Monitoring	22-Jun-21	Bryanna Sherbo	email	outbound	Check in prior to onsite visitors with a final reminder of items required to come on site.	Julia Radoiu
Manitoba Metis Federation	Relationship Agreement	22-24-Jun-21	Marci Riel	Email chain	Outbound	Rescheduling of meeting to give time to MMF to review the revised relationship agreement draft.	Julia Radoiu
Sagkeeng	Technical Working Group and EIS Update	25-Jun-21	Corey Shefman, OKT Law	email chain	Inbound/ Outbound	OKT law reached out to CNL to receive and update on documents in the process of being revised, edited, drafted or updated. To which CNL responded by providing an overview of documents that have had an extensive number of changes.	Julia Radoiu
Sagkeeng	Community Gathering Budget	28-Jun-21	Carl Fontaine	Email FW	Inbound/ Outbound	Sagkeeng's liaison officer provided CNL with an idea of a budget for the community gathering budget.	Julia Radoiu
Manitoba Metis Federation	Environmental Monitoring	29-Jun-21	Bryanna Sherbo, Jade Dewar	Email	Outbound	CNL provided the final dates for the exit bat survey to MMF.	Julia Radoiu
Black River and Hollow Water	Environemntal Monitoring	30-Jun-21	Adam Kroeker, HTFC Planning & Design	Email Chain	Outbound/ Inbound	CNL reached our to BR/HW's liaison to schedule a meeting to cofirm the environmental monitoring participation for BR/HW.	Julia Radoiu
Black River and Hollow Water	Environemntal Monitoring Schedule	30-Jun-21	Kelsey Boubard, BR/HW Liaison Officer	Email	Outbound	CNL reached out to BR/HW's liaison officer to inform her of the time changes of the meeting.	Julia Radoiu
Sagkeeng	Check-in Meeting	30-Jun-21	Corey Shefman, OKT Law	email chain	Inbound/ Outbound	Sagkeeng's legal representative reached out to CNL to inform them he'd be running late to the check in. - CNL rescheduled to a different day	Julia Radoiu
Black River and Hollow Water	Check-in Meeting	05-Jul-21	Kelsey Boubard, BR/HW Liaison Officer	email chain	Outbound/ Inbound	CNL reached out to BR/HW's liaison Officer to schedule a check in meeting.	Julia Radoiu
Sagkeeng	Visitor Form	05-Jul-21	Carl Fontaine	Email	Outbound	CNL reached out to provide Sagkeeng's liaison officer with a WL visitor form for future use.	Julia Radoiu
Black River and Hollow Water	Check-in Meeting Scheduling	05-Jul	Kelsey Boubard, BR/HW Liaison Officer	Email Chain	Outbound/ Inbound	CNL reached out to schedule a check-in meeting with BR/HW liaison to which she confirmed she would be in attendece	Julia Radoiu
Manitoba Metis Federation	MOU Technical Details	07-Jul	Jade Dewar	Email	Outbound	CNL reached out to MMF to accquire their billing address.	Julia Radoiu
Sagkeeng	Visitor Form	08-Jul	Carl Fontaine	Email	Outbound	CNL provided Carl with a copy of the WL visitor forms	Julia Radoiu
Manitoba Metis Federation	Environmental Monitoring	12-Jul	Jade Dewar	Email Chain	Outbound/ Inbound	CNL reached out to ask Jade if he will be attending the exit bat survey. He confirmed by saying he won't be attending either days.	Julia Radoiu
Sakeeng	Interests and Concerns	13-Jul	Corey Shefman, OKT Law	Email	Outbound	CNL requested an update on the status of Summary of Interests and Concerns.	Julia Radoiu
Brokenhead Ojibway Nation	Check-in	13-Jul-21	Bev Smith	Phone Call	Outbound	Reached out to BON, no anwser.	Julia Radoiu
Sagkeeng, Black River and Hollow Water	Exit-Bat Survey	13-Jul	Carl Fontaine and Kelsey Boubard	Email	Outbound/ Inbound	CNL reached out to have one final check in prior the the exit bat survey.	Julia Radoiu
Turtle Lodge	Orange Shirt Day	19-Jul-21	Turtle Lodge/Sabina	Email Chain	Outbound/ Inbound	CNL reached out to disscus the possibility of ways to collaborate with Turtle Lodge on Orange Shirt day. Turtle Lodge responded by saying that a pre recorded video would be a resonable way to collaborate.	Julia Radoiu
Sagkeeng	Budget	19-Jul-21	Carl Fontaine	Email	Outbound	CNL provided Sagkeeng with a copy of the budget.	Julia Radoiu
Black River and Hollow Water	Lunch n' Learn	20-Jul-21	Kelsey Boubard, BR/HW Liaison Officer	Email	Outbound	CNL reached out to to BR/HW to check up on the status of the the Lunch and learn and decided to post pone the lunch n learn.	Julia Radoiu
Black River and Hollow Water, Sagkeeng and MMF	Environmental Moniotirng Update	21-Jul-21	Carl Fontaine, Kelsey Boubard, Jade Dewar, Bryanna Sherbo	Email	Outbound/ Inbound	CNL reached out to BR/HW, Sagkeeng, and MMF to let them know that berry sampling was cancelled.	Julia Radoiu
Sagkeeng	Funding	22-Jul-21	OKT Law	Email Chain	Inbound/ Outbound	CNL outlined some steps for Funding that may speed up the timeline.	Julia Radoiu
Sagkeeng	Technical Working Group	22-Jul-21	OKT Law, Firelight, Carl Fontaine	email	Outbound	CNL emailed Sagkeeng and representatives for follow up scheduling for the third techincal working group.	Julia Radoiu
Manitoba Metis Federation	Leadership Meeting	26-Jul-21	Marci Riel	email chain	Outbound/ Inbound	CNL requested an update regarding the leadership meeting between president Chartrand and CNL leadership	Julia Radoiu
Manitoba Metis Federation	Environmental Monitoring Data	26-Jul-21	Annie Martel annie.martel@mmf.mb.ca, Bryanna Sherbo	email chain	Outbound/ Inbound	CNL's environmental department reached out to MMF to give them an update on the data transfer for the bat survey.	Julia Radoiu
Black River and Hollow Water	Update - Lunch n' Learn	27-Jul-21	Kelsey Boubard, BR/HW Liaison Officer	Email Reply	Outbound/ Inbound	BR/HW's liaison officer provided an updated timeline for community engagement.	Julia Radoiu

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Hollow Water, MMF	Visitor Form for IAC	03-Aug-21	Furlon Barker, Marci Riel	Email	Outbound	CNL requested for a copy of the IAC participants who have not been on site's visitor form information.
Sagkeeng	Mileage Cheque	09-Aug	Carl Fontaine	Email	Outbound	Confirmation of mailing address for mileage cheques.
Wabaseemoong	Mileage Cheque	10-Aug	Marvin Lee	Email Chain	Outbound/ Inbound	Confirmation of mailing address for mileage cheques.
MMF	Oppertunities for Collaboration	19-Aug-21	Bryanna Sherbo, Tayler Fleming	Email	Outbound	CNL provided previous notes from the Novermber 26 Teleconference discussion of oppertunities for green collaboration
Sagkeeng, MMF, BR/HW	Environmental Monitoring Oppertunities	23-Aug-21	Bryanna Sherbo, Jade Dewar, Carl Fontaine, Kelsey Boubard	Email	Outbound/ Inbound	CNL provided MMF, Sagkeeng and BR/HW with upcoming monitoring activities for September.
BR/HW	Environmental Monitoring Oppertunities	26-Aug-21	Kelsey Boubard, BR/HW Liaison Officer	Phone VM	Outbound	CNL reached out to BR/HW liaison officer to receive a confirmation of their participation in the upcoming environmental monitoring activitiy in September.
Sagkeeng	Environmental Monitoring Oppertunities	26-Aug-21	Carl Fonatine	Phone Call	Outbound/ Inbound	Carl called CNL after being left a VM and confirmed that he is interested however, may be unable to attend as he wasn't feeling well.
BR/HW	Environmental Monitoring Oppertunities	02-Sep-21	Kelsey Boubard, BR/HW Liaison Officer	Email	Outbound	CNL reached out to BR/HW liaison officer to receive a confirmation of their participation in the upcoming environmental monitoring activitiy in September.
MMF	Environmental Monitoring Oppertunities	07-Sep-21	Bryanna Sherbo	Email Chain	Inbound	MMF provided CNL with a visitor form for a final participant from MMF.
MMF	Environmental Monitoring Oppertunities	08-Sep-21	Bryanna Sherbo	Email	Outbound	CNL provided some final information to MMF participants prior to their site visit.
Sagkeeng	TWG	13-Sep-21	OKT Law, Firelight, Carl Fontaine	Email Chain	Outbound/ Inbound	CNL provided Sagkeeng and consultation with a draft copy of the TWG agenda
Sagkeeng	TWG	14-Sep-21	OKT Law, Firelight, Carl Fontaine	Email Chain	Outbound/ Inbound	CNL provided Sagkeeng and consultation with a revised draft copy of the TWG agenda
Sagkeeng, MMF, BR/HW, Wabaseemoong, BON	IAC Updates	27-Sep-21		Email	Outbound	CNL reached out to IAC participants for a final check in and a reminder of covid protocols prior to the IAC meeting.
MMF	Targeted Alpha Therapy Project Discussion	01-Oct-21	Marci Riel	Email Chain	Outbound/ Inbound	CNL reached out to follow up on MMF president's interest in learning from about CNL's Isotope by offering some potential presentation dates.
MMF	Targeted Alpha Therapy Project Discussion	04-Oct-21	Marci Riel	Email Chain	Outbound/ Inbound	MMF responded to CNL's presentation dates and confirmed for Oct-20
Sagkeeng	Sagkeeng Nipi Update	07-Oct-21	Chief Henderson	Email	Inbound/ Outbound	CNL confirmed that they have received Sagkeeng's request for funding support and will be in touch shortly.
Sagkeeng	Sagkeeng Nipi Update	12-Oct-21	OKT Law	Email Chain	Inbound/ Outbound	OKT Law reached out to provide CNL with additional context surrounding the Nipi project
BR/HW	Six-Month Budget Review Agenda	12-Oct-21	HTFC Planning	Email	Outbound	CNL provided an overview of what the key focuses of the review meeting would be for their review.
BR/HW, HTFC Planning	Six-Month Budget Review Agenda	12-Oct-21	HTFC Planning	Email Chain	Outbound/ Inbound	HTFC confirmed the agenda and CNL leadership during the meeting. CNL replied and provided a copy of the budget proposal.
BR/HW, HTFC Planning	Contribution Agreement	13-Oct-21		Email	Outbound	CNL provided a copy of the draft agenda and Contribution Agreement budget proposal to BR/HW participants.
OKT Law	EIS Timeline	13-Oct-21		Email Chain	Outbound/ Inbound	CNL requested an updated timeline of EIS documnt review, specifically of the PSIA write up.
OKT Law	EIS Timeline	13-Oct-21		Email Chain	Inbound/ Outbound	OKT Law requested an estimated timeline for the verification of the updated budget from the legal department and the final signing of the Contribution Agreement.
OKT Law, Firelight, Carl Fontaine	Funding Request	18-Oct-21		Email Chain	Inbound/ Outbound	OKT Law provided final clarifications regarding the Sagkeeng Nipi program. CNL confirmed they have received this.
MMF	Target Alpha Therapy	19-Oct-21	Marci Riel	Email	Outbound	CNL provided participants of the TWG with a draft agenda for their review and a confirmation of the tentative meeting date.
				Email	Outbound	CNL

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Sagkeeng First Nation	Technical Working Group	19-Oct-21	Carl Fontaine, Corey Shefman, Alistair Macdonald	Nowge6@hotmail.com; alistair.macdonald@thefirelightgroup.com; cshefman@oktlaw.com	Email Chain	Outbound/Inbound	CNL emailed meeting agenda for the November 3, 2021 TWG meeting. November 2, 2021 - CNL recieved request to change meeting date and meeting changed to November 10, 2021 following emails from attendees. November 9, 2021 - CNL received email from Alistair regarding presentation logistics. CNL accomadated his request to present first and offered to reschedule the meeting if required.	Antonette Chau
Sagkeeng First Nation	Contribution Agreement	20-Oct-21	Corey Shefman	cshefman@oktlaw.com	Email	Outbound	Email with attachement of a copy of the agreement with AECL included as a signatory, for review prior to signature.	Rachel Chennette
Sagkeeng First Nation	Contribution Agreement	20-Oct-21	Chief Derrick Henderson	chief@sagkeeng.ca	Email	Outbound	Informing the Chief that CNL has put together an engagement newsletter for him and his council highlighting engagement between Sagkeeng First Nation, CNL, and AECL from April to September	Rachel Chennette
Sagkeeng First Nation	Contribution Agreement	20-Oct-21	Corey Shefman	cshefman@oktlaw.com	Email	Outbound	Revision to section 5(b) of agreement, asking if acceptable language	Rachel Chennette
Sagkeeng First Nation	Contribution Agreement	20-Oct-21	Corey Shefman	cshefman@oktlaw.com	Email	Outbound	Follow up email asking rationale of the deletion in section 5(b)	Rachel Chennette
Sagkeeng First Nation	Contribution Agreement	21-Oct-21	Corey Shefman	cshefman@oktlaw.com	Email	Outbound	Adjustment to section 5(b) of agreement, suggestion of expending the 90 days and for Sagkeen to hold the right to terminate the agreement.	Rachel Chennette
Sagkeeng First Nation	Contribution Agreement	21-Oct-21	Corey Shefman	cshefman@oktlaw.com	Email	Outbound	Follow up on agreement revision of section 5(b), revision does not work	Rachel Chennette
Sagkeeng First Nation	Contribution Agreement	25-Oct-21	Corey Shefman	cshefman@oktlaw.com	Email	Outbound	Follow up on proposed language of agreement, discussion on control over termination of the agreement	Rachel Chennette
Sagkeeng First Nation	Contribution Agreement	25-Oct-21	Corey Shefman	cshefman@oktlaw.com	Email	Outbound	Follow up on revised language of agreement	Rachel Chennette
Manitoba Métis Federation	Targeted Alpha Therapy	25-Oct-21	Marci Riel, Jade Dewar, Lorne Pelletier	marci.riel@mmf.mb.ca; jade.dewar@mmf.mb.ca; lorne.pelletier@mmf.mb.ca	Email Chain	Outbound/Inbound	CNL contacted MMF to schedule a meeting to discuss any follow-up questions and financial elements of the project. October 28, 2021 - Meeting date confirmed by MMF. November 2, 2021 - MMF informed that an NDA will need to be signed as part of the standard process for all potential investors; PDF copy attached for review and signature. November 16, 2021 - MMF emailed signed NDA; follow-up communication sent to MMF because the file could not be opened and an alernate file format was requested. New file received from MMF. November 17, 2021 - Follow-up meeting scheduled during the morning. CNL emailed the MMF the PPT slides for discussion during the meeting. November 18, 2021 - CNL sent the meeting attendees the action items following the meeting that was held on November 17, 2021.	Antonette Chau
Black River First Nation and Hollow Water First Nation	Contribution Agreement	25-Oct-21	Elly Bonny, Adam Kroeker, Furlon Barker, Oral Johnston, Kelsey Boubard	furlon.barker@hollowwater.ca; oraljohnston@black-river.ca; akroerker@hftc.ca; ebonny@hftc.ca; kboubard430@gmail.com	Email chain	Outbound/Inbound	CNL offered to reschedule the six-month budget review meeting. Response received with potential available dates. November 3, 2021 - CNL received email that the comminity is ready to schedule the meeting. CNL responded with a request to confirm date and time works for all attendees.	Antonette Chau
Sagkeeng First Nation	Contribution Agreement	26-Oct-21	Corey Shefman	cshefman@oktlaw.com	Email	Outbound	Follow up on getting agreement signed ASAP, and reverting back to language from original agreement	Rachel Chennette
Sagkeeng First Nation	Technical Working Group	27-Oct-21	Corey Shefman; Alistair Macdonald; Carl Fontaine	cshefman@oktlaw.com; Nowge6@hotmail.com; alistair.macdonald@thefirelightgroup.com	Email chain	Outbound/ Inbound	CNL sent the presentation for the TWG. CNL informed SFN's consultant that they have 45 minutes for a presentation on the Indigenous-led monitoring program. CNL requested a copy of the presentation in advance. SFN consultants sent the presentation October 28, 2021.	Rachel Chennette
Sagkeeng First Nation	Contribution Agreement	27-Oct-21	Corey Shefman	cshefman@oktlaw.com	Email	Outbound	Follow up email asking if there are any other concerns regarding the contribution agreement and whether Corey found the language under the termination clause acceptable	Rachel Chennette
Manitoba Métis Federation	Targeted Alpha Therapy	28-Oct-21	Marci Riel	marci.riel@mmf.mb.ca	Email chain	Outbound/ Inbound	CNL asked MMF to confirm dates for a follow-up investor's meeting and if they had received a presentation shared earlier. MMF confirmed two dates and asked CNL to send a meeting invitation. CNL sent an invitation for November 17, 2021.	Rachel Chennette

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Sagkeeng First Nation	Contribution Agreement	31-Oct-21	Corey Shefman	cshefman@oktlaw.com	Email Chain	Inbound/Outbound	CNL recieved feedback on the Sagkeeng/CNL/AECL Contribution Agreement. November 3, 2021 - CNL emailed Corey that AECL was given hios scheduler information because they needed some questions answered about the edits to the Contribution Agreement.	Antonette Chau
Sagkeeng First Nation	EIS	01-Nov-21	Carl Fontaine, Corey Shefman, Alistair Macdonald	Nowge6@hotmail.com; alistair.macdonald@thefirelightgroup.com; cshefman@oktlaw.com	Email Chain	Inbound/Outbound	CNL received comments back on Sections 6.7 and 11 of the draft EIS. November 2, 2021 - CNL confirmed receipt of the email and informed the community that Sections 6.8, 6.9 and 4.0 will be emailed in the coming weeks. CNL sent revised Section 2.0 draft based on the feedback received and offered to schedule a meeting to further discuss. November 9, 2021 - CNL requested a meeting on November 11, 2021 to further discuss the feedback received. Meeting scheduled on November 15, 2021.	Antonette Chau
Sagkeeng First Nation	Technical Working Group	02-Nov-21	Corey Shefman; Alistair Macdonald; Carl Fontaine	cshefman@oktlaw.com; Nowge6@hotmail.com; alistair.macdonald@thefirelightgroup.com	Email chain	Inbound / Outbound	SFN requested CNL reschedule the November 3, 2021 TWG. CNL moved the TWG to November 10, 2021.	Rachel Chennette
Manitoba Métis Federation	Targeted Alpha Therapy	02-Nov-21	Marci Riel	marci.riel@mmf.mb.ca	Email	Outbound	CNL ask MMF to sing a NDA prior to sharing financial information related to the investors meeting. CNL followed up on November 8, 2021.	Rachel Chennette
Sagkeeng First Nation	EIS	03-Nov-21	Corey Shefman; Alistair Macdonald	cshefman@oktlaw.com; alistair.macdonald@thefirelightgroup.com	Email	Outbound	CNL provided Sagkeeng with a copy of the revised Section 2.0 to show how CNL had incorporated Sagkeeng's feedback. Where integration was not possible, CNL provided a detailed explanation for why CNL was not able to incorporate Sagkeeng's comment.	Rachel Chennette
Sagkeeng First Nation	EIS	03-Nov-21	Corey Shefman; Alistair Macdonald; Carl Fontaine	cshefman@oktlaw.com; alistair.macdonald@thefirelightgroup.com; Nowge6@hotmail.com	Email	Outbound	CNL sent copies of the revised three column table both a track changes copy and a clean copy. CNL proposed discussing the changes at the TWG meeting.	Rachel Chennette
Sagkeeng First Nation	EIS	3-Nov-21	Corey Shefman; Alistair Macdonald	cshefman@oktlaw.com alistair.macdonald@thefirelightgroup.com	Email	Outbound	Kristie resent document with an updated title for clarification. *"Environmental Impact Statement for the In Situ Decommissioning of WR-1 at the Whiteshell Laboratories Site Section 2.0: Purpose of the Project and Alternatives to the Project Revision 3D2"*	Rachel Chennette
Wabaseemoong Independent Nations	EIS	04-Nov-21	Marvin Lee	marleeque@outlook.com	Email chain	Outbound / Inbound	CNL informed WIN that in two weeks CNL will be sharing the EIS Section 4.0 for review and comments. CNL requested WIN's review to make sure CNL adequately captured engagement on the WR-1 Project. CNL requested feedback within two weeks of receiving the section. WIN confined receipt.	Rachel Chennette
Hollow Water First Nation	EIS	04-Nov-21	Elly Bonny; Adam Kroeker	akroeker@htfc.ca;ebonny@htfc.ca	Email	Outbound	CNL informed HWFN that in two weeks CNL will be sharing the EIS Section 4.0 for review and comments. CNL requested HWFN's review to make sure CNL adequately captured engagement on the WR-1 Project. CNL requested feedback within two weeks of receiving the section. CNL requested a quote for the review and indicated with that a MOU can be developed.	Rachel Chennette
Manitoba Métis Federation	EIS	04-Nov-21	Marci Riel	marci.riel@mmf.mb.ca	Email	Outbound	CNL informed MMF that in two weeks CNL will be sharing the EIS Section 4.0 for review and comments. CNL requested MMF's review to make sure CNL adequately captured engagement on the WR-1 Project. CNL requested feedback within two weeks of receiving the section.	Rachel Chennette
Sagkeeng First Nation	EIS	04-Nov-21	Corey Shefman; Alistair Macdonald	cshefman@oktlaw.com; alistair.macdonald@thefirelightgroup.com	Email	Inbound	CNL received confirmation from Sagkeeng to proceed with incorporating Section 2.0 into CNL's submission package. CNL confirmed receipt and offered a meeting on Sections 11.0 and 6.7.	Rachel Chennette
Sagkeeng First Nation	Technical Working Group (TWG)	10-Nov-21			Teleconference		The focus of the technical working group meeting is on environmental monitoring. CNL delivered a presentation on the site's environmental protection program and Sagkeeng delivered a presentation on the Guardianship program.	Rachel Chennette

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Black River First Nation Hollow Water First Nation	Technical Working Group (TWG)	10-Nov-21			Teleconference		CNL, Black River First Nation and Hollow Water First Nation held a teleconference to go over their budget for the Relationship Agreement to and set next milestones and target dates.	Rachel Chennette
Manitoba Métis Federation	Community Engagement	11-Nov-21	Marci Riel, Jade Dewar, Taylor Fleming	marci.riel@mmf.mb.ca; jade.dewar@mmf.mb.ca; taylor.fleming@mmf.mb.ca	Email	Outbound	CNL sent invitation to attend webinar on November 16, 2021 - Overview of Environmental Protection at Whiteshell Laboratories	Antonette Chau
Black River First Nation and Hollow Water First Nation	Community Engagement	11-Nov-21	Elly Bonny, Adam Kroeker, Furlon Barker, Oral Johnston, Kelsey Boubard, Nelson Bird	furlon.barker@hollowwater.ca; oraljohnston@black-river.ca; akroerker@hftc.ca; ebonny@htfc.ca; kboubard430@gmail.com; nelsonrbird@outlook.com	Email	Outbound	CNL sent invitation to attend webinar on November 16, 2021 - Overview of Environmental Protection at Whiteshell Laboratories	Antonette Chau
Wabaseemoong Independent Nations	Community Engagement	11-Nov-21	Marvin Lee MacDonald	marleeque@outlook.com	Email	Outbound	CNL sent invitation to attend webinar on November 16, 2021 - Overview of Environmental Protection at Whiteshell Laboratories	Antonette Chau
Sagkeeng First Nation	Community Engagement	11-Nov-21	Carl Fontaine, Corey Shefman, Alistair Macdonald, Rachel Ford	Nowge6@hotmail.com; alistair.macdonald@thefirelightgroup.com; cshefman@oktlaw.com; rachel.ford@thefirelightgroup.com	Email	Outbound	CNL sent invitation to attend webinar on November 16, 2021 - Overview of Environmental Protection at Whiteshell Laboratories	Antonette Chau
Black River First Nation and Hollow Water First Nation; MMF; Sagkeeng First Nation	Indigenous Advisory Committee	12-Nov-21	Marci Riel, Jafe Dewar, Furlon Barker, Nelson Bird, Kelsey Boubard, Oral Johnston, Carl Fontaine, Marvin Lee MacDonald, Bev Smith; Jamie Dumont	marci.riel@mmf.mb.ca; jade.dewar@mmf.mb.ca; furlon.barker@hollowwater.ca; nelsonbird@outlook.com; kboubard430@gmail.com; oraljohnston@black-river.ca; nowge6@hotmail.com; marleeque@outlook.com; bsmith@brokenheadojibwaynation.com; jamie@blueprintinc.ca	Email Chain	Inbound/Outbound	IAC Record of meeting September 28, 2021 and final draft of Terms of Reference received from Jamie Dumont. December 2, 2021 - CNL emailed instructions to all First Nations to confirm whether the draft is ready to share with all the Nations' leadership once they have all reviewed the draft Terms of Reference. One minute survey included. Response received from Furlon Barker - no further comments and TOR is ok to be shared with Hollow Water's leadership for review; CNL acknowledged receipt of confirmation. December 7, 2021 - CNL emailed Carl Fontaine to follow-up on whether the TOR was reviewed and if it is ready to share with Sagkeeng's leadership.	Antonette Chau
Manitoba Métis Federation	Relationship Agreement	15-Nov-21	Marci Riel	marci.riel@mmf.mb.ca	Email chain	Outbound /Inbound	CNL and MMF corresponded to plan a meeting November 22, 2021 to discuss the relationship agreement.	Rachel Chennette
Black River First Nation and Hollow Water First Nation	Relationship Agreement	16-Nov-21	Elly Bonny, Adam Kroeker, Furlon Barker, Oral Johnston, Kelsey Bee	furlon.barker@hollowwater.ca; oraljohnston@black-river.ca; akroerker@hftc.ca; ebonny@htfc.ca	Email	Outbound	Set up a follow-up budget review meeting in Feburary 2022. Confirm whether date and time convenient for all to attend.	Antonette Chau
Sagkeeng First Nation	Technical Working Group	16-Nov-21	Carl Fontaine, Corey Shefman, Alistair Macdonald	Nowge6@hotmail.com; alistair.macdonald@thefirelightgroup.com; cshefman@oktlaw.com	Email	Outbound	Technical Working Group meeting notes from November 10, 2021 meeting sent to all attendees. Proposed agenda for the next three meetings included in the correspondence. CNL, River Front Strategies and AECL representatives included in email.	Antonette Chau
Sagkeeng First Nation	Technical Working Group	16-Nov-21	Carl Fontaine, Corey Shefman, Alistair Macdonald	Nowge6@hotmail.com; alistair.macdonald@thefirelightgroup.com; cshefman@oktlaw.com	Email	Inbound/Outbound	Request for address and contact informations for the primary representatives from CNL and AECL. November 18, 2021 - CNL responded with the requested information.	Antonette Chau
Sagkeeng First Nation	EIS	17-Nov-21	Carl Fontaine, Corey Shefman, Alistair Macdonald	Nowge6@hotmail.com; alistair.macdonald@thefirelightgroup.com; cshefman@oktlaw.com	Email	Outbound	CNL emailed Sagkeeng First Nation a copy of the meeting notes from the discussion about Sagkeeng's comments on Sections 6.7 and Section 11.0 of the EIS that was held on November 15, 2021.	Antonette Chau
Hollow Water First Nation	Relationship Agreement	17-Nov-21	Elly Bonny, Adam Kroeker	akroerker@hftc.ca; ebonny@htfc.ca	Email	Outbound	CNL requested an itemized invoice on how initial funding amount was spent and requested confirmation on whether an additional $30,000 was sufficient. Included in the email was language from the Relationship Agreement regarding CNL funding.	Antonette Chau
Sagkeeng First Nation	EIS	18-Nov-21	Carl Fontaine, Corey Shefman, Alistair Macdonald	Nowge6@hotmail.com; alistair.macdonald@thefirelightgroup.com; cshefman@oktlaw.com	Email	Outbound	Copy of Section 6.8 Land and Resourse Use from EIS submitted for review and comment. December 6, 2021 - CNL sent follow-up email on a target date for feedback to be received. Response received from Alistair that comments should be sent to CNL by December 8, 2021.	Antonette Chau

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Manitoba Métis Federation	Target Alpha Therapy	17-Nov-21		Teleconference		CNL hosted a teleconference with MMF to discuss CNL's alpha targeted therapy project which was a deliverable from the MMF, CNL, and AECL Leadership Meeting.	Rachel Chennette
Manitoba Métis Federation	Target Alpha Therapy	20-Nov-21 Marci Riel	marci.riel@mmf.mb.ca	Email	Outbound	CNL sent the presentation from the November 20, 2022 meeting.	Rachel Chennette
Manitoba Métis Federation	Relationship Agreement	22-Nov-21 Marci Riel, Jade Dewar	marci.riel@mmf.mb.ca; jade.dewar@mmf.mb.ca	Email	Outbound	Meeting notes and action items from November 22, 2021 meeting sent to attendees.	Antonette Chau
Sagkeeng First Nation	Relationship Agreement	22-Nov-21 Corey Shefman	cshefman@oktlaw.com	Email Chain	Inbound/Outbound	Signed agreement received and acknowledgement of receipt sent. CNL sent email to confirm that the agreement was submitted to AECL for signature. November 30, 2021 - CNL emailed a Copy of signed WR-1 Funding Agreement (stamped). CNL email sent requesting an invoice so that funding can be processed and released. CNL received request for information on whether funds will be provided directly to service providers or to Sagkeeng First Nation directly. CNL response stated funds will be sent to Sagkeeng First Nations directly and asked whether there would be any concerns. CNL response: "Without specific direction from Sagkeeng (Chief and Council) to release funds to their consultants or community members, we have to only give it to the Band. But if Chief Henderson provides CNL with written direction to do otherwise, we will follow his and his Council's direction. "	Antonette Chau
Manitoba Métis Federation	Relationship Agreement	22-Nov-21		Teleconference		CNL met with MMF to review the changes recommend by both parties legal council. CNL and the MMF discuss additional revisions that were still required around procurement.	Rachel Chennette
Hollow Water First Nation	Budget	25-Nov-21 Elly Bonny	ebonny@htfc.ca	Email	Outbound	CNL asked if HWFN would like to reschedule the six-month budget review meeting .	Rachel Chennette
Sagkeeng First Nation	EIS	26-Nov-21 Corey Shefman; Alistair Macdonald; Carl Fontaine	cshefman@oktlaw.com; alistair.macdonald@thefirelightgroup.com; Nowge6@hotmail.com	Email	Outbound	CNL sent a copy of EID Section 4.0 for review and feedback within two weeks. CNL also sent Section 4.0 Appendices via SFTP site. SFN's consultant told CNL they would review and comment by December 10, 2021.	Rachel Chennette
Manitoba Métis Federation	EIS	26-Nov-21 Marci Riel, Jade Dewar	marci.riel@mmf.mb.ca; jade.dewar@mmf.mb.ca	Email Chain	Outbound	Section 4.0 (Indigenous Engagement), Section 6.7 (Human and Ecological Health), Section 6.8 (Land and Resource Use) and Section 11.0 (Summary of Follow-up Monitoring) submitted for review and comment through CNL's SFTP site (login information included). MMF informed that Section 6.9 (Socio-economic) will be submitted once feedback from CNL's consultant is received. November 30, 2021 - Section 6.9 (Socio-economic) uploaded to the SFTP site and email sent for review and comment. Draft Contribution Agreement to support the technical review and comment was also emailed to the MMF for review. Scope of Work also requested from the MMF. CNL received email confirming MMF receipt of emails and forward to SVS. December 1, 2021 - CNL requested a target date from the SVS of when their review would be completed by. December 2, 2021 - Scope of Work received from the MMF; ammendments requested to the CA and edited document to be sent back for signature. Target date of review of EIS documents set for EOD on December 23, 2021. CNL responded with request for an earlier target date for reviews to be completed with offer to cover additional costs if needed. Assumptions provided to MMF that: • CNL will receive feedback by no later than Dec 23, 2021. • Once CNL receives the feedback we will review and follow-up if we have any questions.	Antonette Chau

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Sagkeeng First Nation	EIS	26-Nov-21	Carl Fontaine, Corey Shefman, Alistair Macdonald	Nowge6@hotmail.com; alistair.macdonald@thefirelightgroup.com; cshefman@oktlaw.com	Email Chain	Outbound	Section 4.0 (Indigenous Engagement) submitted for review and comment. Revised Section 4.0 Appendices uploaded to SFTP site for review and comment and email with login information sent. November 29, 2021 - Response from Sagkeeng received - comments will be submitted by December 10. CNL sent emailing confirming SFTP site was accessible. November 30, 2021 - CNL received confirmation that the SFTP was accessible and CNL sent email stating that Section 6.9 (Socio-economic) was also uploaded to the SFTP site for review and comment.	Antonette Chau
Black River First Nation and Hollow Water First Nation	EIS	26-Nov-21	Elly Bonny, Adam Kroeker, Furlon Barker, Oral Johnston, Kelsey Boubard	furlon.barker@hollowwater.ca; oraljohnston@black-river.ca; akroerker@hftc.ca; ebonny@htfc.ca; kboubard430@gmail.com	Email Chain/Telephone	Outbound	Section 4.0 (Indigenous Engagement) and Revised Section 4.0 Appendices uploaded to SFTP site for review and comment and email with login information sent. November 30, 2021 - CNL sent follow-up email requesting confirmation that the drafts for review were received and accessible. December 1, 2021 - CNL called Adam and then Elly from HTFC to confirm they had received Section 4.0 of the reviewed draft EIS and that they were able to access the file okay; voice mail left for each called requesting that they confirm they plan to review by the end of the week. CNL spoke with Adam from HTFC, consultant to BRFN and HWFN. He had received Section 4.0, was able to open the document and has reviewed Section 4.0 with the newly formed liaison committee and would be able to provide feedback by the end of the week. December 6, 2021 - CNL follow-up email sent to Adam Kroeker requesting comments on Section 4.0 (Indigenous Engagement). December 8, 2021 - CNL received comments on EIS Section 4.0 from Adam Kroeker. CNL responded to the comments received and sent the Figures for Section 4.0. December 13, 2021 - CNL emailed a copy of the workshop report that was sent to the participants after the October 20, 2021site visit and observation of fish processing. December 14, 2021 - CNL received a confirmation from Adam Kroeker that the files were received. December 20, 2021 - CNL emailed the link to Section 4.0 (Indigenous Engagement) and Revised Section 4.0 Appendices uploaded to SFTP site for review and comment and email with login information sent. November 30, 2021 - CNL sent follow-up email requesting confirmation that the drafts for review were received and accessible. Request for information on the intent of recepient to review was requested and offer to provide capacity funding if required for the review was extended. January 7, 2022 - CNL emailed Bev Smith that CNL will be proceeding with filing the revised draft EIS and extended an offer to contact CNL should the community wish to re-engage on the project. CNL also stated that CNL will continue to keep the community updated on the project and that there still remains many opportunities to participate in the environmental assessment process for WR-1.	Antonette Chau
Brokenhead Ojibway Nation	EIS	26-Nov-21	Bev Smith	bsmith@brokenheadojibwaynation.com; bsmithlrd@gmail.com	Email Chain	Outbound		Antonette Chau

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Wabaseemoong Independent Nations	EIS	26-Nov-21 Marvin Lee MacDonald	marleeque@outlook.com	Email Chain/Telephone	Outbound	Section 4.0 (Indigenous Engagement) and Revised Section 4.0 Appendices uploaded to SFTP site for review and comment and email with login information sent. November 30, 2021 - CNL sent follow-up email requesting confirmation that the drafts for review were received and accessible. Option to meet through teleconference to further discuss provided. December 1, 2021 - CNL called Marvin Lee MacDonald, Land and Resource Coordinator for WIN. Left a voicemail asking Marvin to confirm whether he had received section 4.0 of the revised draft EIS, whether he was able access the document, and whether he intended to review Section 4.0. CNL offered to set up a meeting to walk through the changes made to the section and specific subsections relating to Marvin's community. CNL requested Marvin confirm whether he intended to review section 4.0 by the end of the week if possible. December 2, 2021 - CNL requested confirmation on whether Section 4.0 will be reviewed and if any support is required. Confirmation of intent to review requested by December 6, 2021. January 7, 2022 - CNL emailed Marvin Lee MacDonald that CNL will be proceeding with filing the revised draft EIS and extended an offer to contact CNL should the community wish to re-engage on the project. CNL also stated that CNL will continue to keep the community updated on the project and that there still remains	Antonette Chau
Sagkeeng First Nation	Technical Working Group	27-Nov-21 Corey Shefman; Alistair Macdonald; Carl Fontaine	cshefman@oktlaw.com; Nowge6@hotmail.com; alistair.macdonald@thefirelightgroup.com	Email	Outbound	CNL sent the presentation from the TWG meeting on November 3, 2022. CNL asked for an advanced copy of the presentation for the meeting next week. CNL suggested meeting the first Wednesday of each month.	Rachel Chennette
Sagkeeng First Nation	EIS	30-Nov-21 Corey Shefman; Alistair Macdonald; Carl Fontaine	cshefman@oktlaw.com; alistair.macdonald@thefirelightgroup.com; Nowge6@hotmail.com	Email chain	Outbound/ Inbound	CNL sent a copy of EIS Section 6.9 via SFTP site for review and feedback within two weeks. SFN and CNL corresponded about accessing the files.	Rachel Chennette
Sagkeeng First Nation	Technical Working Group	30-Nov-21 Carl Fontaine, Corey Shefman, Alistair Macdonald	Nowge6@hotmail.com; alistair.macdonald@thefirelightgroup.com; cshefman@oktlaw.com	Email	Inbound/Outbound	Request to reschedule TWG meeting schedule on December 8, 2021 received. CNL response with available time and date sent. December 7, 2021 - CNL emailed draft agenda for meeting scheduled on Decemeber 15, 2021.	Antonette Chau
Black River First Nation and Hollow Water First Nation	Core engagement	01-Dec-21 Kelsey Boubard, BR/HW Liaison Officer	kbourbard430@gmail.com	Email Chain	Inbound/Outbound	Core engagement meeting was successful. December 2, 2021 - CNL response sent and option to meet to further discuss was provided. Request received for a meeting to be scheduled; CNL provided available date and time option. Meeting scheduled on December 7, 2021.	Antonette Chau
Manitoba Métis Federation	Relationship Agreement	02-Dec-21		Teleconference		CNL met with MMF to review the changes recommend by both parties legal council. CNL and the MMF discuss additional revisions that were still required around procurement.	Rachel Chennette
Manitoba Métis Federation	Relationship Agreement	07-Dec-21 Marci Riel; Jade Dewar	marci.riel@mmf.mb.ca; jade.dewar@mmf.mb.ca			CNL sent the meeting notes from the December 6, 2021 meeting and the revised Relationship Agreement based on our discussion in November.	Rachel Chennette
Brokenhead Ojibway Nation	EIS	08-Dec-21 Adam Kroeker	akroeker@htfc.ca	Email chain	Outbound/Inbound	CNL asked if BON would be providing comments on Section 4.0 of the EIS. HWFN sent comments December 8, 2021.	Rachel Chennette
Brokenhead Ojibway Nation	EIS	08-Dec-21 Adam Kroeker	akroeker@htfc.ca	Email chain	Outbound/Inbound	CNL sent responses to EIS comments and the Figures for Section 4.0.	Rachel Chennette
Sagkeeng First Nation	EIS	08-Dec-21 Alistair Macdonald	alistair.macdonald@thefirelightgroup.com	Email chain	Inbound / Outbound	SFN's consultant sent CNL comments on Section 6.8 of the draft EIS. CNL acknowledged receipt.	Rachel Chennette
Black River First Nation Hollow Water First Nation	CONTACT	09-Dec-21 Kelsey Boubard	kboubard430@gmail.com	Email	Outbound	CNL requested permission to use a photo from a tour of WR-1.	Rachel Chennette
Sagkeeng First Nation	EIS	09-Dec-21 Corey Shefman; Alistair Macdonald; Carl Fontaine	cshefman@oktlaw.com; alistair.macdonald@thefirelightgroup.com; Nowge6@hotmail.com	Email chain	Outbound	CNL confirmed that there are no appendices for EIS Section 6.9. CNL also confirmed that December 14, 2021 is an acceptable due date for the comments. CNL asked the SFN consultant to verify with Sagkeeng that Sagkeeng is comfortable with how CNL characterized the relationship.	Rachel Chennette

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Sagkeeng First Nation	Technical Working Group	09-Dec-21	Alistair Macdonald	alistair.macdonald@thefirelightgroup.com	Email	Outbound	CNL sent the proposed agenda for the December 15, 2021 technical working group meeting. CNL asked the SFN consultant if the proposal (monitoring) will be ready to share. SFN's consultant confirmed that if any updates were needed to the agenda they would be sent.	Rachel Chennette	
Sagkeeng First Nation		09-Dec-21	Chief Derick Henderson Carl Fontaine	chief@sagkeeng.ca Nowge6@hotmail.com	Email	Outbound	Offering condolences for the passing of Elder David Courchene	Jolene Olive	
Manitoba Métis Federation	Contact Newsletter	09-Dec-21	Jade Dewar Marci Riel	jade.dewar@mmf.mb.ca marci.riel@mmf.mb.ca	Email	Outbound	CNL asking permission to use photo from a site visit in Contact newsletter	Jolene Olive	
Sagkeeng First Nation	Technical Working Group (TWG)	09-Dec-21	Corey Shefman Carl Fontaine Alistair Macdonald	cshefman@oktlaw.com nowge6@hotmail.com alistair.macdonald@thefirelightgroup.com	Email	Outbound	CNL sending revised agenda for TWG meeting based on feedback from SFN	Jolene Olive	
Manitoba Métis Federation	Contact Newsletter	09-Dec-21	Jade Dewar Marci Riel	jade.dewar@mmf.mb.ca marci.riel@mmf.mb.ca	Email	Outbound/Inbound	CNL asking permission to use photo from a site visit in Contact newsletter. MMF replied that it was fine to use. CNL confirmed receipt.	Jolene Olive	
Manitoba Métis Federation	SVS proposal	09-Dec-21	Jade Dewar Marci Riel	jade.dewar@mmf.mb.ca marci.riel@mmf.mb.ca	Email	Outbound	CNL confirming that MMF will send signed proposal from SVS to the MOU.	Jolene Olive	
Manitoba Métis Federation	SVS proposal	13-Dec-21	Jade Dewar Marci Riel	jade.dewar@mmf.mb.ca marci.riel@mmf.mb.ca	Email	Outbound/Inbound	MMF confirmed they would review and comment on SVS on Dec 23, 2021. MMF indicated they have no issue with CNL attaching SOW and budget to proposal, but had not been asked to provide the document before. Suggested attaching applicable apges as a practice going forward. CNL replied they agreed and and indicated they would send a copy of the signed MOU shortly.	Jolene Olive	
Black River First Nation and Hollow Water First Nation	Community Liason Committee	13-Dec-21	Oral Johnston	oraljohnston@black-river.ca	Phone call	Inbound	Oral phoned to discuss the first community liaison committee meeting. Asked if CNL could forward any Nuclear conference for Kelsey to attend. CNL said they would forward information on upcoming events to the community. Asked about Quonset Huts. CNL stated they not reusable.	Jolene Olive	
Sagkeeng First Nation	Technical Working Group (TWG)	13-Dec-21	Carl Fontaine	nowge6@hotmail.com	Phone call	Outbound	Called to confirm it was still okay to go ahead with the Technical Working Group meeting in the wake of Elder Courchene's passing.	Jolene Olive	
Black River First Nation and Hollow Water First Nation	Environmental monitoring	13-Dec-21	Oral Johnston	oraljohnston@black-river.ca	Email	Outbound	CNL sent report that was sent to participants after a site visit an observation of fish processing.	Jolene Olive	
Black River First Nation and Hollow Water First Nation	EIS	13-Dec-21	Adam Kroeker Elly Bonny Oral Johnston Furlon Barker Kelsey Boubard	akroeker@htfc.ca ebonny@htfc.ca oraljohnston@black-river.ca furlon.barker@hollowwater.ca kboubard430@gmail.com	Email	Outbound	CNL advised that feedback from BRFN and HWFN on Section 4.0 was taken into account and copy was revsed. INcluded table from EIS to show how feedback was incorporated.	Jolene Olive	
Manitoba Métis Federation	EIS	14-Dec-21	Jade Dewar Marci Riel	jade.dewar@mmf.mb.ca marci.riel@mmf.mb.ca	Email	Outbound	CNL sent the signed MOU for MMF's records	Jolene Olive	
Sagkeeng First Nation	EIS	14-Dec-21	Corey Shefman Alistair Macdonald	cshefman@oktlaw.com alistair.macdonald@thefirelightgroup.com	Email	Outbound	CNL thanked recipients for their comments on sections 6.9, 6.7, 6.8, 11.0 and 4.0	Jolene Olive	
Sagkeeng First Nation	Technical Working Group (TWG)	14-Dec-21	Corey Shefman Carl Fontaine Alistair Macdonald	cshefman@oktlaw.com nowge6@hotmail.com alistair.macdonald@thefirelightgroup.com	Email	Outbound	CNL asked recipients if we could add Margot Thompson and Mitch MacKay to the technical working group meeting.	Jolene Olive	
Sagkeeng First Nation	Technical Working Group (TWG)	15-Dec-21	Corey Shefman Carl Fontaine Alistair Macdonald	cshefman@oktlaw.com nowge6@hotmail.com alistair.macdonald@thefirelightgroup.com	Email	Outbound	CNL provided recipients with call-in information for the upcoming meeting.	Jolene Olive	
Sagkeeng First Nation	Guardianship Programs	15-Dec-21			Teleconference		Sagkeeng presented on Guardianship programs and how CNL and Sagkeeng could incorporate similar elements into monitoring at Whiteshell Laboratories.	Rachel Chennette	
Sagkeeng First Nation	EIS	15-Dec-21	Alistair Macdonald	alistair.macdonald@thefirelightgroup.com	Email chain	Outbound	CNL and Alistair discussed a bullet in section 4.0 referencing a summary of commitments. They asked CNL to send the summary, CNL decided to remove the bullet and send the list of commitments as a next step after submission.	Jolene Olive	Have we sent this now?
Sagkeeng First Nation	CEMP report	16-Dec-21	Corey Shefman Alistair Macdonald	cshefman@oktlaw.com alistair.macdonald@thefirelightgroup.com	Email	Outbound	CNL sent Eastern Athabasca Regional Monitoring Program 2020/2021 Community Report as an example of a CEMP report	Jolene Olive	

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Sagkeeng First Nation	EIS	16-Dec-21	Alistair Macdonald	alistair.macdonald@thefirelightgroup.com	Email		Alistair emailed CNL to say comments on section 4.0 were coming, including a large appendix document. CNL confirmed receipt.	Jolene Olive
Sagkeeng First Nation	EIS	20-Dec-21	Corey Shefman Alistair Macdonald	cshefman@oktlaw.com alistair.macdonald@thefirelightgroup.com	Email	Outbound	CNL thanked recipients for their comments on section 4.0 of the EIS	Jolene Olive
Manitoba Métis Federation	EIS	20-Dec-21	Jade Dewar Marci Riel	jade.dewar@mmf.mb.ca marci.riel@mmf.mb.ca	Email	Outbound	CNL thanked recipients for their feedback on the EIS and asked to meet about the comments.	Jolene Olive
MMF	EIS	20-Dec-21	Jade Dewar Marci Riel	jade.dewar@mmf.mb.ca marci.riel@mmf.mb.ca	Email	Outbound	CNL asked MMF to meet in first week of January about feedback on the EIS.	Jolene Olive
Black River First Nation and Hollow Water First Nation	EIS	20-Dec-21	Adam Kroeker	akroeker@htfc.ca	Email	Outbound	CNl notifying Adam that the STFP site was running again.	Jolene Olive
Sagkeeng First Nation	Indigenous Advisory Committee	21-Dec-21	Carl Fontaine	nowge6@hotmail.com	Phone call	Outbound	CNL asked Carl if Terms of Reference document for the IAC was ready for Chief Henderson to review.	Jolene Olive
Sagkeeng First Nation	EIS	21-Dec-21	Corey Shefman Carl Fontaine Alistair Macdonald	cshefman@oktlaw.com nowge6@hotmail.com alistair.macdonald@thefirelightgroup.com	Email	Outbound	CNL thanked recipients for their comments on section 11.0 and attached a copy of the revised document with their changes incorporated.	Jolene Olive
Manitoba Métis Federation	EIS	22-Dec-21	Jade Dewar Marci Riel	jade.dewar@mmf.mb.ca marci.riel@mmf.mb.ca	Email	Outbound	CNL followed up with MMF about setting a meeting date in January.	Jolene Olive
Manitoba Métis Federation	Relationship Agreement	04-Jan-22	Jade Dewar Marci Riel	jade.dewar@mmf.mb.ca marci.riel@mmf.mb.ca	Email	Outbound/Inbound	MMF contacted CNL for review and comment of edits tracked by legal counsel to the MMF. Legal counsel requested that CNL make changes in tracked changes. CNL agreed.	Jolene Olive
Manitoba Métis Federation	EIS	04-Jan-22	Jade Dewar Marci Riel	jade.dewar@mmf.mb.ca marci.riel@mmf.mb.ca	Email	Outbound	CNL followed up with MMF about setting a meeting date in January.	Jolene Olive
Sagkeeng First Nation	EIS	05-Jan-22	Corey Shefman Alistair Macdonald	cshefman@oktlaw.com alistair.macdonald@thefirelightgroup.com	Email	Outbound/Inbound	CNL responded to Alistair's previous message about meeting to talk about sec 4.0 or the EIS	Jolene Olive
Manitoba Métis Federation	EIS	05-Jan-22	Jade Dewar Marci Riel	jade.dewar@mmf.mb.ca marci.riel@mmf.mb.ca	Email	Outbound	CNL emailed Marci and Jade about adjusting their meeting time.	Jolene Olive
Sagkeeng First Nation	Indigenous Advisory Committee	05-Jan-22	Carl Fontaine		Telephone	Outbound	CNL called Carl Fontaine - Liason Office for Sagkeeng First Nation; CNL left a message asking Carl whether he has reviewed the draft TOR. CNL followed up by emailing Carl the draft TOR again.	Antonette Chau
Sagkeeng	EIS	44566			Teleconference		CNL held a teleconference to go over Sagkeeng's comments on section 4.0 and to confirm once again at the list of interests and concerns was complete.	
Manitoba Métis Federation	EIS	44567			Teleconference		After reviewing MMF's feedback, CNL confirmed with MMF that they had adequate time to complete their review.	
Sagkeeng First Nation	EIS	06-Jan-22	Alistair Macdonald	alistair.macdonald@thefirelightgroup.com	Email	Outbound	CNL emailed the meeting notes from the January 5, 2022 meeting where Sagkeeng's comments on Section 4.0 (Indigenous Engagement) were clarified and discussed.	Antonette Chau
Brokenhead Ojibway Nation	Interests and Concerns table	09-Jan-22	Bev Smith		Phone call	Outbound	CNL left a message asking whether Bev would be reviewing the table of interests and concerns and the VCs.	Jolene Olive
Sagkeeng First Nation	EIS	31-Jan-22			Teleconference		CNL offered to provide capacity funding CNL sent Sagkeeng a revised copy of Section 4.0 (Indigenous Engagement) and Section 6.7 (Human Ecological Health). Both copies were provided in track changes with detailed responses to each of Sagkeeng's comments.	Rachel Chennette
Sagkeeng First Nation	Technical Working Group	31-Jan-22	Carl Fontaine, Corey Shefman, Alistair Macdonald	Nowge6@hotmail.com; alistair.macdonald@thefirelightgroup.com; cshefman@oktlaw.com	Email	Outbound	CNL emailed attendees the meeting notes and action items from the December 2021 meeting.	Antonette Chau
Sagkeeng First Nation	EIS	31-Jan-22	Corey Shefman, Alistair Macdonald	cshefman@oktlaw.com; alistair.macdonald@thefirelightgroup.com	Email	Outbound	CNL emailed the revised copies of Section 4.0 (Indigenous Engagement) and Section 6.7 (Human and Ecological Health) reflecting comments and feedback received from Sagkeeng (each document was sent in seperate emails). Clarification email sent stating that the Section 4.0 and the Section 6.7 documents that were sent to Sagkeeng are the versions that will be submitted to the CNSC with the updated draft EIS.	Antonette Chau
Black River First Nation and Hollow Water First Nation	Community Engagement	01-Feb-22	Oral Johnston, Furlon Barker, Kelsey Boubard	oraljohnston@black-river.ca; furlon.barker@hollowwater.ca; kboubard430@gmail.com	Email	Outbound	CNL emailed a request to schedule a teleconference on February 8, 2022 to discuss future engagements with the community and to provide a project update.	Antonette Chau

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Sagkeeng First Nation	Technical Working Group	02-Feb-22	Carl Fontaine, Corey Shefman, Alistair Macdonald, Allie Mayberry, Tania Salerno	Nowge6@hotmail.com; alistair.macdonald@thefirelightgroup.com; cshefman@oktlaw.com; allie.mayberry@thefirelightgroup.com; tania.salerno@thefirelightgroup.com	Email Chain	Outbound/Inbound	CNL emailed attendees the proposed agenda for the February 9, 2022 meeting, the IAC TOR final draft and the CNL IAC Record of meeting. Response received requesting confirmation of meeting date and addition of two Sagkeeng resources as attendees. February 3, 2022 - CNL emailed updated meeting agenda and confirmed additional attendees will be sent the calendar invite. CNL emailed all attendees (CNL and AECL included) the final meeting agenda, the draft CEMP and Healing and Resiliency work plans. February 7, 2022 - CNL emailed a request to change the date of the meeting. Meeting tentatively scheduled on February 22, 2022 once a few responses were received from the attendees. February 13, 2022 - CNL received a request to change the timing of the meeting. February 14, 2022 - CNL emailed confirmation that the meeting time was changed to accomodate the request.	Antonette Chau	
Sagkeeng First Nation	Community Advisory Committee	02-Feb-22	Carl Fontaine		Telephone	Inbound	Carl called CNL with an update and confirmed that members for the community advisory committee were selected and there is a band council resolution on this on the next community meeting; confirmed he would like to have the first meeting on February 15 and have a subsequent meeting with CNL staff two weeks after in March; requested that he would like additional information sheets to provide to the members of the committee.	Antonette Chau	
Black River First Nation and Hollow Water First Nation	Relationship Agreement	08-Feb-22	Elly Bonny, Adam Kroeker, Furlon Barker, Oral Johnston, Kelsey Boubard	furlon.barker@hollowwater.ca; oraljohnston@black-river.ca; akroerker@hftc.ca; ebonny@htfc.ca; kboubard430@gmail.com	Email Chain	Outbound/Inbound	CNL emailed a meeting request for February 8, 2022 to review the relationship agreement budget. Response received requesting to postpone the meeting. Meeting rescheduled to the following week.	Antonette Chau	
Manitoba Métis Federation	EIS	17-Feb-22	Marci Riel	marci.riel@Manitoba Métis Federation.mb.ca	Email	Outbound	Sent CNL's responses to the Red River Metis' feedback on the WR-1 EIS.	Rachel Chennette	
Manitoba Métis Federation	Relationship Agreement	17-Feb-22	Marci Riel, Jade Dewar	marci.riel@mmf.mb.ca; jade.dewar@mmf.mb.ca	Email	Outbound	CNL emailed the draft MMF relationship agreement to the MMF for review. CNL offered to meet to discuss proposed changes if required or to send the MMF a signed copy of the agreement if the edits are accepted.	Antonette Chau	
Manitoba Métis Federation	LTRA	21-Feb-22	Marci Riel	marci.riel@Manitoba Métis Federation.mb.ca	Email	Outbound	CNL sent a request for contact information	Rachel Chennette	
Sagkeeng First Nation	TWG Meeting	22-Feb-22	Alistair Macdonald Corey Shefman Carl	alistair.macdonald@thefirelightgroup.com cshefman@oktlaw.com nowge6@hotmail.com	Email chain	Inbound/Outbound	Coordinate SFN's availability to discuss the Healing and Resiliency Proposal	Rachel Chennette	CNL scheduled a meeting following responses from Sagkeeng FN
Black River First Nation	WL	22-Feb-22	Kelsey Bree; Adam Kroeker; Elly Bonny; Furlon Barker; Oral Johnston	oraljohnston@black-river.ca kboubard430@gmail.com akroeker@htfc.ca ebonny@htfc.ca furlon.barker@hollowwater.ca	Email	Outbound	CNL sent the framework for developing infographics with BRFN and HWFN	Rachel Chennette	Included a sample brochure and a social media post
Hollow Water First Nation	WL	22-Feb-22	Kelsey Bree; Adam Kroeker; Elly Bonny; Furlon Barker; Oral Johnston	oraljohnston@black-river.ca kboubard430@gmail.com akroeker@htfc.ca ebonny@htfc.ca furlon.barker@hollowwater.ca	Email chain	Inbound/Outbound	Share framework for developing infographics with BRFN and HWFN. HWFN responded guiding that the right approach would be to begin with the development of some of the smaller "bite-sized" pieces.	Rachel Chennette	Included a sample brochure and a social media post
Manitoba Métis Federation	WR-1	23-Feb-22	Lorelei Braun	lorelei.braun@Manitoba Métis Federation.mb.ca	Email	Outbound	Request for introductory meeting.	Rachel Chennette	
Sagkeeng First Nation	EIS	23-Feb-22	Alistair Macdonald; Corey Shefman; Carl	alistair.macdonald@thefirelightgroup.com cshefman@oktlaw.com nowge6@hotmail.com	Email	Outbound	CNL shared the revised Section 6.9 for detailed review and comments.	Rachel Chennette	CNL offer to meet to discuss the changes.
Sagkeeng First Nation	EIS	23-Feb-22	Alistair Macdonald		Email	Outbound	CNL sent in invitation for the TWM meeting, the topic was Sagkeeng's Proposal for the Healing and Resiliency Action	Rachel Chennette	
Manitoba Métis Federation	WL	23-Feb-22	Marci Riel	marci.riel@Manitoba Métis Federation.mb.ca	Email	Inbound	Manitoba Métis Federation shared the updated Manitoba Métis Federation AGA Sponsorship Package.	Rachel Chennette	CNL asked for an extension to submit the form.
Manitoba Métis Federation	WL	24-Feb-22	General inbox	aga@Manitoba Métis Federation.mb.ca	Email	Outbound	CNL submitted the AGA Sponsorship Package	Rachel Chennette	

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Black River First Nation Hollow Water First Nation	Contribution Agreement Invoicing	25-Feb-22	Elly Bonny, HTEC	ebonny@htfc.ca	Email chain	Inbound / Outbound	Compiling expenses for an invoice under the BRFN/HWFN/CNL contribution agreement.	Rachel Chennette	CNL acknowledged	
Manitoba Métis Federation	EIS	28-Feb-22	Lorelei Braun Jade Dewar		Email chain	Inbound / Outbound	Sharing infographics via STFP link. Manitoba Métis Federation and CNL corresponded about login credentials to access the information.	Rachel Chennette		
Sagkeeng First Nation	EIS	28-Feb-22	Alistair Macdonald; Corey Shefman; Carl Fontaine	alistair.macdonald@thefirelightgroup.com cshefman@oktlaw.com nowge6@hotmail.com	Email	Outbound	Sharing notes from the technical working group	Rachel Chennette		
Manitoba Métis Federation	Relationship Agreement	28-Feb-22	Marci Riel Jade Dewar		Email	Outbound	Request for Manitoba Métis Federation's review of the revised Relationship Agreement	Rachel Chennette		
Manitoba Métis Federation	Donation	28-Feb-22	Tayler Fleming	tayler.fleming@Manitoba Métis Federation.mb.ca	Email	Outbound	Request for details about handing out seedlings at the AGA.	Rachel Chennette		
Sagkeeng First Nation	EIS	02-Mar-22	Tania Salerno	tania.salerno@thefirelightgroup.com	Email	Inbound	Sagkeeng FN shared the Healing and Resiliency Action Plan SOW.	Rachel Chennette	CNL confirmed receipt	
Manitoba Métis Federation	EIS	02-Mar-22	Lorelei Braun Jade Dewar		Email	Outbound	Summary of takeaways from March2, 2022 meeting about communications.	Rachel Chennette		
Manitoba Métis Federation	WL	02-Mar-22	Lorelei Braun		Email chain	Inbound / Outbound	Manitoba Métis Federation sent contact information for the Manitoba Métis Federation communications contact. CNL and Manitoba Métis Federation corresponded on communications materials.	Rachel Chennette		
Sagkeeng First Nation	Healing and Resiliency Action Plan	44622			Teleconference		Sagkeeng provided an overview of the Healing and Resiliency Action Plan.	Rachel Chennette		
Manitoba Métis Federation	AGA	44622			Teleconference		CNL and MMF's communication director met to discuss co-developing an infographic in preparation for MMF's Annual General Assembly.	Rachel Chennette		
Sagkeeng First Nation	EIS	03-Mar-22	Alistair Macdonald; Carl Fontaine	alistair.macdonald@thefirelightgroup.com cshefman@oktlaw.com nowge6@hotmail.com	Email	Outbound	Shared CNL's and AECL initial recommended revisions to the CEMP proposal for Sagkeeng FN review.	Rachel Chennette		
Sagkeeng First Nation	EIS	07-Mar-22	Alistair Macdonald; Carl Fontaine	alistair.macdonald@thefirelightgroup.com cshefman@oktlaw.com nowge6@hotmail.com	Email chain	Inbound/Outbound	CNL and Sagkeeng FN's consultation shared information the March CLC and question that resulted from the consultation's meeting with the CLC.	Rachel Chennette		Yes Reponses to written questions
Brokenhead Ojibway Nation	Interest and Concerns Tables	07-Mar-22	Bev Smith	bsmith@brokenheadojibwaynation.com	Email	Outbound	Request for interest in reviewing the updated summary table of interests and concerns. CNL made changes to the tables based on CNSC feedback. CNL asked for a confirmation of interest within two weeks.	Rachel Chennette		
Wabaseemoong Independent Nations	Interest and Concerns Tables	07-Mar-22	Marvin Lee	marleegue@outlook.com	Email	Outbound	Request for interest in reviewing the updated summary table of interests and concerns. CNL made changes to the tables based on CNSC feedback. CNL asked for a confirmation of interest within two weeks.	Rachel Chennette		
Black River First Nation Hollow Water First Nation	Interest and Concerns Tables	07-Mar-22	Adam Kroeker; Elly Bonny; Oral Johnston; Furlon Barker; Kelsey Bee	akroeker@htfc.ca; ebonny@htfc.ca; oraljohnston@black-river.ca; furlon.barker@hollowwater.ca; kboubard430@gmail.com	Email	Outbound	Request for interest in reviewing the updated summary table of interests and concerns. CNL made changes to the tables based on CNSC feedback. CNL asked for a confirmation of interest within two weeks.	Rachel Chennette	Confirmed interest in reviewing the document.	
Manitoba Métis Federation	Interest and Concerns Tables	07-Mar-22	Marci Riel Jade Dewar	marci.riel@Manitoba Métis Federation.mb.ca; jade.dewar@Manitoba Métis Federation.mb.ca	Email	Outbound	Request for interest in reviewing the updated summary table of interests and concerns. CNL made changes to the tables based on CNSC feedback. CNL asked for a confirmation of interest within two weeks.	Rachel Chennette		
Sagkeeng First Nation	Interest and Concerns Tables	07-Mar-22	Alistair Macdonald; Corey Shefman; Carl Fontaine		Email	Outbound	Request for interest in reviewing the updated summary table of interests and concerns. CNL made changes to the tables based on CNSC feedback. CNL asked for a confirmation of interest within two weeks.	Rachel Chennette	Confirmed interest in reviewing the document.	

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Manitoba Métis Federation	Interest and Concerns Tables	07-Mar-22	Marci Riel; Jade Dewar	marci.riel@Manitoba Métis Federation.mb.ca; jade.dewar@Manitoba Métis Federation.mb.ca	Email chain	Inbound / Outbound	Manitoba Métis Federation confirmed they would like to review the updated summary table of interests and concerns. Manitoba Métis Federation requested that CNL share the update table for review and comment. The Manitoba Métis Federation ask CNL to clarify how CNL intends to address that Métis rights are equal but separate and distinct from Aboriginal and treaty rights as outlined in s.35. CNL's response indicated that CNL would be using the TKLUOS as well as the Harvester Consumption Report to guide how CNL ties interest and concerns Métis rights where appropriate. CNL asked is Manitoba Métis Federation could provide an overview.	Rachel Chennette	CNL coordinate a meeting to discuss the changes.
Sagkeeng First Nation		08-Mar-22	Alistair Macdonald; Corey Shefman; Allie Mayberry; Tanai Salerno		Email	Outbound	CNL shared the draft agenda for the March 9, 2022 TWG. CNL would suggested a focus on the CEMP proposal.	Rachel Chennette	
Manitoba Métis Federation	Interest and Concerns Table	08-Mar-22	Marci Riel		Email	Outbound	CNL and MMF corresponded to plan a call to discuss the updated I&C tables. CNL committed to support Manitoba Métis Federation's review of the repackaged interests and concerns table and offered a meeting after the AGA.	Rachel Chennette	
Sagkeeng First Nation	Guardianship Program	09-Mar-22			Teleconference		Further discussion on Sagkeeng's scope of work for a Guardianship program.	Rachel Chennette	
Sagkeeng First Nation	WR-1	10-Mar-22	Jason Day, Firelight		Feedback form	Inbound	Request for documents: *Whiteshell Laboratories Detailed Decommissioning Plan* and amendments to vol 1 and 6 of the plan in relation to the site license amendment (2019).	Rachel Chennette	
Sagkeeng First Nation	Statement of Work	10-Mar-22	Corey Shefman, OTK Law		Email chain	Inbound / Outbound	Follow-up from the Technical Working Group meetings, sharing the revised SOW and Addendum for Sagkeeng's proposed Community Environmental Monitoring Program. Sagkeeng brought up the funding discussion, advising that once CNL/AECL is prepared to commit to funding the SOW as a whole, then the project can proceed.	Rachel Chennette	CNL confirmed receipt
Manitoba Métis Federation	EIS	15-Mar-22	Lorelei Braun Jade Dewar		Email	Outbound	CNL provided a status update on the brochure draft.	Rachel Chennette	
Manitoba Métis Federation	AGA	15-Mar-22	Marci Riel		Phone call	Inbound	CNL and the MMF discussed the AMA. CNL noted that they would be in attendance. The Manitoba Métis Federation provided an update on the Relationship Agreement. Manitoba Métis Federation would like to meet to discuss the proposed review of Interest and concerns table.	Rachel Chennette	
Black River First Nation Hollow Water First Nation	WR-1	16-Mar-22	Kelsey Bree; Adam Kroeker; Elly Bonny; Furlon Barker; Oral Johnston		Email	Outbound	Invitation to attend the March 22, 2022 webinar.	Rachel Chennette	
Sagkeeng First Nation	WR-1	16-Mar-22	Carl Fontaine		Email	Outbound	Invitation to attend the March 22, 2022 webinar.	Rachel Chennette	
Wabaseemoong Independent Nations	WR-1	16-Mar-22	Marvin Lee		Email	Outbound	Invitation to attend the March 22, 2022 webinar.	Rachel Chennette	
Manitoba Métis Federation	WR-1	16-Mar-22	Marci Riel Jade Dewar		Email	Outbound	Invitation to attend the March 22, 2022 webinar.	Rachel Chennette	
Manitoba Métis Federation	EIS	16-Mar-22	Marci Riel		Email	Outbound	Resending CNL's responses to the Manitoba Métis Federation feedback on the EIS sections along with the corresponding sections. CNL committed to sending Section 6.8 next.	Rachel Chennette	
Manitoba Métis Federation	EIS	16-Mar-22			Phone call	Outbound	MMF confirmed they would review the interest and concerns table	Rachel Chennette	
Sagkeeng First Nation	Funding Agreement	17-Mar-22			Email	Outbound	CNL shared the funding agreement between AECL, CNL and Sagkeeng.	Rachel Chennette	
Sagkeeng First Nation	WL	18-Mar-22	Carl Fontaine, Sagkeeng Liaison Officer		Phone call	Inbound	SFN and CNL discussed the upcoming webinar, meeting the community liaison committee, a request for laptops and reviewed of the contribution agreement. CNL took action to approve the reallocation of funds for online engagement, details for a virtual meeting and send the webinar information.	Rachel Chennette	

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Manitoba Métis Federation	WL	18-Mar-22	Lorelei Brain, Jaydi Overwater, Marci Riel		Email	Outbound	CNL sent the preliminary draft of the brochure for Manitoba Métis Federation review and consideration. CNL also sent the update copy of the WR-1 factsheet. CNL followed-up on March 21, 2022.	Rachel Chennette
Manitoba Métis Federation	WL	21-Mar-22	Lorelei Brain, Jaydi Overwater, Marci Riel		Email chain	Outbound/ Inbound	CNL and the MMF corresponded to schedule a meeting about the communications products.	Rachel Chennette
Sagkeeng First Nation	Environmental Monitoring	21-Mar-22	Carl Fontaine		Email	Outbound	CNL and SFN discussed that Grand Council Treaty #3 has an Environmental Monitoring Service available to Sagkeeng First Nation for free.	Rachel Chennette
Manitoba Métis Federation	WL	22-Mar-22	Lorelei Brain, Jaydi Overwater, Marci Riel		Email chain	Inbound / Outbound	The MMF sent images for CNL to use in the development of communications materials. CNL acknowledged receipt.	Rachel Chennette
Manitoba Métis Federation	WL	22-Mar-22	Lorelei Brain, Jaydi Overwater, Marci Riel		Email	Outbound	CNL sent the MMF the revised draft brochure for review. CNL followed up March 23, 2022 prior to sending to the printers.	Rachel Chennette
Sagkeeng First Nation	Community Liaison Committee	22-Mar-22			Teleconference		Two CNL representatives met with Sagkeeng's community liaison committee to get to know each other and learn a bit more about the project.	Rachel Chennette
Sagkeeng First Nation	Community Liaison Committee	22-Mar-22	Carl Fontaine		Email	Outbound	CNL followed up after the SFN Sagkeeng Community Liaison Committee. CNL sent a copy of our 2020 Annual Compliance Monitoring Report as well as a copy of the answers to the committee member's initial questions and a copy of a summary of the Winnipeg River Task Force.	Rachel Chennette
Manitoba Métis Federation	Annual General Assembly	22-Mar-22	John Coutris	John.Coutris@medf.ca	Email	Inbound	The MMF shared information with CNL about CNL's sponsorship of the AGA and the tradeshow. CNL thanked the Manitoba Métis Federation and asked questions about the logistics of the tradeshow.	Rachel Chennette
Manitoba Métis Federation	Annual General Assembly	24-Mar-22			Conference		CNL participated in the MMF's Annual General Assembly. CNL had a booth at the event and engaged with Red River Métis citizens on the Whiteshell Laboratories Closure Project. March 24-27, 2022	Rachel Chennette
Manitoba Métis Federation	Interest and Concerns Table	28-Mar-22	Marci Riel; Jade Dewar		Email	Outbound	CNL shared the positive experience they had at the Manitoba Métis Federation AGA and asked to confirm the teleconference March 29, 2022.	Rachel Chennette
Manitoba Métis Federation	Interest and Concerns Table	29-Mar-22			Teleconference		CNL walked MMF and their consultants through the repackaged interest and concerns table and discussed their review and timeline. CNL and the MMF also discuss Red River Métis rights, claims, and interests.	Rachel Chennette
Sagkeeng First Nation	Working Group Meeting	29-Mar-22	Alistair Macdonald; Corey Shefam; Carl Fontaine		Email chain	Inbound / Outbound	SFN requested that CNL send the proposed agenda for the upcoming WGM. CNL send a draft agenda on March 230, 2022 and committed to send a finalized agenda a week prior to the meeting.	Rachel Chennette
Manitoba Métis Federation	Interest and Concerns Table	31-Mar-22	Marci Riel	marci.riel@mmf.mb.ca	Email	Outbound	CNL sent the MMF the repackaged interests and concerns table. This repackaging is based on feedback that the NPD project received from the CNSC on their EIS submission package. CNL requested that Manitoba Métis Federation review the changes and provide feedback in two to three weeks. CNL said that for next steps CNL would be preparing a contribution agreement. Once CNL receive SVS's scope of work CNL will send the signed contribution agreement back for signature.	Rachel Chennette
Manitoba Métis Federation	Interest and Concerns Table	06-Apr-22	Marci Riel	marci.riel@mmf.mb.ca	Email	Inbound	MMF sent CNL the attached SOW and budget from SVS for the work to review the I&C tables. MMF provided feedback and asked for updated sections of the EIS in the I&C tables. MMF informed CNL that they would not meet the deadline of April 29, 2022.	Rachel Chennette
Manitoba Métis Federation	Guardianship Program; Interest and Concerns Table	06-Apr-22			Teleconference		CNL and Sagkeeng discussed Sagkeeng's scope of work for the guardianship program and repackaging of Sagkeeng's interest and concerns table.	Rachel Chennette
Manitoba Métis Federation	Interest and Concerns Table	07-Apr-22	Marci Riel	marci.riel@mmf.mb.ca	Email	Outbound	CNL sent the MMF a signed contribution to support the MMF's review of the I&C tables. CNL request MMF sign and return the document. CNL proposed dates for a kick-off meeting. CNL followed up on the signed contribution April 11, 2022.	Rachel Chennette

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Sagkeeng First Nation	Interest and Concerns Table	11-Apr-22	Corey Shefman; Alistair Macdonald		Email	Outbound	CNL sent the SFN the repackaged interests and concerns table. This repackaging is based on feedback that the NPD project received from the CNSC on their EIS submission package. CNL requested that the SFN review the changes and provide feedback in two to three weeks. CNL offered a meeting to discuss the updates and another meeting once CNL incorporated edits from SFN to confirm the comments were adequately incorporated.	Rachel Chennette
Black River First Nation Hollow Water First Nation	Indigenous Engagement	12-Apr-22	Adam Kroeker	Adam Kroeker	Email chain	Inbound / Outbound	The communities consultant provided CNL an update on the Core Engagement Team and requested a tour of the site. CNL requested a meeting to discuss the opportunity.	Rachel Chennette
Sagkeeng First Nation	Interest and Concerns Table	12-Apr-22	Alistair Macdonald; Corey Shefam		Email chain	Inbound / Outbound	SFN consultant asked about when they would be receiving the list of commitments discussed at a meeting. CNL informed SFN that CNL would be prepared to share the draft list of commitments in the summer.	Rachel Chennette
Sagkeeng First Nation	Interest and Concerns Table	12-Apr-22	Corey Shefman; Alistair Macdonald		Email chain	Inbound / Outbound	SFN consultants requested that meetings not be missed for the NSDF hearing, and suggested an abbreviated meeting in June 2022. CNL agreed with the approach.	Rachel Chennette
Black River First Nation Hollow Water First Nation	Monthly meeting	13-Apr-22			Teleconference		CNL, BRFN, and HWFN discussed setting up a site tour with the core engagement team and CNL's environmental monitoring team.	Rachel Chennette
Black River First Nation Hollow Water First Nation	Monthly meeting	13-Apr-22	Elly Bonny; Adam Kroeker; Furlon Barker; Oral Johnston; Kelsey Bee	ebonny@htfc.ca; akroeker@htfc.ca; furlon.barker@hollowwater.ca; oraljohnston@black-river.ca; kboubard430@gmail.com	Email	Outbound	CNL shared meeting notes from the April 13, 2022 meeting.	Rachel Chennette
Sagkeeng First Nation	Interest and Concerns Table	13-Apr-22	Corey Shefman; Alistair Macdonald		Email	Outbound	CNL proposed the next TWG topic be an in-depth on the Sagkeeng-led environmental monitoring program. CNL also expressed that the focus for CNL is the CEMP and the EIS and that the April 21, 2022 meeting be moved to a facilitated in-person meeting. SFN agreed to in-person meetings.	Rachel Chennette
Wabaseemoong Independent Nations	Interest and Concerns Table	14-Apr-22	Marvin Lee	marleeque@outlook.com	Email	Outbound	CNL sent the WIN the repackaged interests and concerns table. This repackaging is based on feedback that the NPD project received from the CNSC on their EIS submission package. CNL requested that the WIN review the changes and provide feedback in two to three weeks. CNL offered a meeting to discuss the updates and another meeting once CNL incorporated edits from WIN to confirm the comments were adequately incorporated.	Rachel Chennette
Sagkeeng First Nation	Interest and Concerns Table	20-Apr-22	Corey Shefman; Alistair Macdonald		Email	Outbound	CNL proposed an agenda for the upcoming TWG.	Rachel Chennette
Grand Council Treaty #3	Environmental Monitoring	20-Apr-22	Chris Herc	environment.monitor@treaty3.ca	Email chain	Inbound / Outbound	GCT#3 offered monitoring support for other communities previously mention in a April 20, 2022 email. CNL passed along GCT#3 contact information to BRFN and HWFN.	Rachel Chennette
Black River First Nation Hollow Water First Nation	Environmental Monitoring	20-Apr-22	Adam Kroeker; Kelsey Bee	kboubard430@gmail.com; akroeker@htfc.ca	Email	Outbound	CNL sent responses to action items from the last meeting. CNL accepted the proposed tour date of May 26, 2022.	Rachel Chennette
Sagkeeng First Nation	Interest and Concerns Table	20-Apr-22	Corey Shefman; Alistair Macdonald		Email chain	Inbound / Outbound	The SFN consultant provided comments on CNL's proposed agenda for the CEMP workshop. CNL and the consultants corresponded about alternative dates for the workshop.	Rachel Chennette
Black River First Nation Hollow Water First Nation	Interest and Concerns Table	21-Apr-22	Elly Bonny; Adam Kroeker; Furlon Barker; Oral Johnston; Kelsey Bee	ebonny@htfc.ca; akroeker@htfc.ca; furlon.barker@hollowwater.ca; oraljohnston@black-river.ca; kboubard430@gmail.com	Email	Outbound	CNL sent the BRFN, HWFN and BON the repackaged interests and concerns table. This repackaging is based on feedback that the NPD project received from the CNSC on their EIS submission package. CNL requested that the communities review the changes and provide feedback in two to three weeks. CNL offered a meeting to discuss the updates and another meeting once CNL incorporated edits from Black River First Nation, Hollow Water First Nation, and Brokenhead Ojibway Nation's to confirm the comments were adequately incorporated.	Rachel Chennette

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Black River First Nation Hollow Water First Nation Brokenhead Ojibway Nation	Interest and Concerns Table	21-Apr-22	Bev Smith	bsmith@brokenheadojibwaynation.com	Email	Outbound	CNL sent the BRFN, HWFN and BON the repackaged interests and concerns table. This repackaging is based on feedback that the NPD project received from the CNSC on their EIS submission package. CNL requested that the communities review the changes and provide feedback in two to three weeks. CNL offered a meeting to discuss the updates and another meeting once CNL incorporated edits from BRFN, HWFN and BON's to confirm the comments were adequately incorporated.	Rachel Chennette
Sagkeeng First Nation	Technical Working Group	21-Apr-22	Corey Shefman; Alistair Macdonald; Carl Fontaine	cshefman@oktlaw.com; alistair.macdonald@thefirelightgroup.com; Nowge6@hotmail.com	Email	Outbound	CNL sent the draft agenda for the May 4, 2022 TWG.	Rachel Chennette
Sagkeeng First Nation	Interest and Concerns Tables	25-Apr-22			Teleconference		CNL held a teleconference with the MMF and their technical consultants to go over the MMF's repackaged interest and concerns table before their review.	Rachel Chennette
Sagkeeng First Nation	Technical Working Group	25-Apr-22	Corey Shefman; Alistair Macdonald; Carl Fontaine	cshefman@oktlaw.com; alistair.macdonald@thefirelightgroup.com; Nowge6@hotmail.com	Email	Outbound	CNL sent the meeting notes from the April 6, 2022 TWG.	Rachel Chennette
Sagkeeng First Nation	Interest and Concerns Table	25-Apr-22	Corey Shefman	cshefman@oktlaw.com	Email chain	Inbound / Outbound	SFN consultants sent CNL Sagkeeng's review of CNL's repackaged Interests and Concerns Table. CNL acknowledged receipt and asked for confirmation that SFN is comfortable with CNL's edits. SFN's consultant confirmed that SFN was okay with the concerns but the status section need work.	Rachel Chennette
Sagkeeng First Nation	Technical Working Group	26-Apr-22	Corey Shefman; Alistair Macdonald; Carl Fontaine	cshefman@oktlaw.com; alistair.macdonald@thefirelightgroup.com; Nowge6@hotmail.com	Email	Outbound	CNL postponed the TWG due to scheduling conflicts. The next TWG is scheduled for May 10, 2022.	Rachel Chennette
Sagkeeng First Nation	CEMP	26-Apr-22	Corey Shefman; Alistair Macdonald	cshefman@oktlaw.com; alistair.macdonald@thefirelightgroup.com	Email	Outbound	CNL expressed interest in co-developing the workshop process and suggested two dates for the CEMP workshop.	Rachel Chennette
Manitoba Métis Federation	Interest and Concerns Table	26-Apr-22	Meaghan Langille; Marci Riel; Jade Dewar; Carrie Breneman; Jason Stephenson; Leah Culver	leah.culver@sharedvaluesolutions.com; meaghan.langille@sharedvaluesolutions.com; jason.stephenson@sharedvaluesolutions.com; jade.dewar@mmf.mb.ca; carrie.breneman@sharedvaluesolutions.com	Email chain	Outbound/Inbound	CNL sent the MMF a proposed agenda for the May 5, 2022 meeting. CNL and MMF emailed to coordinate a meeting time.	Rachel Chennette
Manitoba Métis Federation	Relationship Agreement	26-Apr-22	Marci Riel		Email	Outbound	CNL informed the MMF that the agreement has been sent to CNL Procurement for review and that additional information may be required.	Rachel Chennette
Manitoba Métis Federation	Interest and Concerns Table	26-Apr-22	Marci Riel		Email chain	Inbound / Outbound	MMF sent CNL the signed CA for reference. MMF shared notes made by the SVS' and requested the CNL re-send the table with a column identifying where each of the initial Interest/Concern was first identified. CNL sent the requested table April 27, 2022.	Rachel Chennette
Wabaseemoong Independent Nations	Interest and Concerns Table	27-Apr-22	Marvin Lee	marleeque@outlook.com	Email	Outbound	CNL requested a meeting with WIN to walkthrough the changes CNL made to the I&Cs table.	Rachel Chennette
Wabaseemoong Independent Nations	Interest and Concerns Table	06-May-22			Teleconference		CNL walkthrough the revisions to the interests and concerns table and made changes based on WIN's feedback during the meeting.	
Sagkeeng First Nation	Interest and Concerns Table	10-May-22			Teleconference		CNL walked through Sagkeeng's revised interest and concerns table and discussed the upcoming in-person workshop (Guardianship Program)	
Wabaseemoong Independent Nations	Interest and Concerns Table	09-May-22	Marvin Lee	marleeque@outlook.com	Email	Outbound	CNL send the latest version of the I&C table and requested feedback.	Rachel Chennette
Black River First Nation Hollow Water First Nation	EIS	10-May-22			Teleconference		CNL met with BRFN and HWFN to discuss the status of the WR-1 submission, walkthrough their revised interest and concerns table, environmental assessment process, development of communication materials and other areas of interest.	Rachel Chennette
Black River First Nation Hollow Water First Nation	Interest and Concerns Tables	11-May-22	Adam Kroeker	akroeker@htfc.ca	Email	Outbound	CNL followed-up with documents discussed at meeting, offered a site tour and committed to sending the revised I&C table in track changes and a final copy.	Rachel Chennette

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Black River First Nation Hollow Water First Nation	Interest and Concerns Table	11-May-22 Adam Kroeker	akroeker@htfc.ca	Email chain	Outbound/Inbound	CNL sent the revised Interest and Concerns table in both track changes and a final copy. CNL asked about the correct translation of "AKI" and shared the next steps to submit. SFN accepted the edits and provided a recommendation about the term "aki".	Rachel Chennette
Sagkeeng First Nation	CEMP	13-May-22 Corey Shefman		Email chain	Inbound / Outbound	SFN asked to move the workshop. CNL looked at alternative dates.	Rachel Chennette
Manitoba Métis Federation	Interest and Concerns Table	18-May-22		Teleconference		CNL walked through the MMF's I&C table and the MMF's feedback on the I&C table. CNL focused on items where they would need to revise the MMF's proposed language and provided an explanation.	Rachel Chennette
Sagkeeng First Nation	CEMP	18-May-22 Corey Shefman; Alistair Macdonald		Email	Outbound	CNL sent a draft response to Sagkeeng's CEMP SOW for review and discussion. CNL suggested that the document be the basis for the the June 15-16, 2022 meeting. CNL followed-up on May 27, 2022.	Rachel Chennette
Manitoba Métis Federation	Indigenous Engagement	19-May-22 Marci Riel; Jade Dewar		Email	Outbound	CNL expressed concern for the MMF during the flooding. CNL/AECL offered any supported needed.	Rachel Chennette
Black River First Nation	Site tour	19-May-22 Kelsey Bree; Adam Kroeker;		Email	Outbound	CNL coordinated a pre-job for the upcoming site tour.	Rachel Chennette
Manitoba Métis Federation	Environmental Sampling	19-May-22 Jade Dewar		Email	Outbound	CNL sent the WL site's upcoming environmental monitoring and sampling schedule and asked for a meeting to discuss what activities Manitoba Métis Federation would like to participate in.	Rachel Chennette
Manitoba Métis Federation	Relationship Agreement	19-May-22 Marci Riel		Email	Outbound	CNL requested a meeting to discuss Manitoba Métis Federation's two additional clauses in the relationship agreement. CNL proposed dates for a meeting.	Rachel Chennette
Sagkeeng First Nation	Environmental Sampling	19-May-22 Carl Fontaine		Email	Outbound	CNL sent the WL site's upcoming environmental monitoring and sampling schedule and asked for a meeting to discuss what activities SFN would like to participate in.	Rachel Chennette
Manitoba Métis Federation	Interest and Concerns Tables	19-May-22 Marci Riel		Email	Outbound	CNL sent a revised I&C table and asked Manitoba Métis Federation to review and provide feedback.	Rachel Chennette
Sagkeeng First Nation	Site tour	19-May-22 Carl Fontaine		Phone call	Outbound	CNL phoned Carl to see when Carl, Liaison officer for Sagkeeng, wanted to organize a tour.	Rachel Chennette
Black River First Nation	Site Tour	19-May-22 Adam Kroeker; Kelsey Bee		Email chain	Outbound/Inbound	CNL sent a reminder for BRFN to complete the forms needed to visit the site. BRFN sent the completed forms to CNL June 2, 2022.	Rachel Chennette
Manitoba Métis Federation	Interest and Concerns Table	19-May-22 Marci Riel		Email	Outbound	CNL sent the latest version of the I&C table and asked the Manitoba Métis Federation to confirm that the summary table is reflective of their interests and concerns and the status of those interests. CNL requested confirmation by the end of the day.	Rachel Chennette
Sagkeeng First Nation	Guardianship Program	20-May-22		Teleconference		CNL and Sagkeeng discussed the logistics of the Guardianship Workshop.	Rachel Chennette
Manitoba Métis Federation	Relationship Agreement	25-May-22		Teleconference		CNL and the MMF discussed the relationship agreement and Indigenous economic participation.	Rachel Chennette
Black River First Nation Hollow Water First Nation	Tour	25-May-22		Teleconference		CNL, BRFN, and HWFN discussed the logistics for the upcoming site tour.	Rachel Chennette
Manitoba Métis Federation	Relationship Agreement	25-May-22 Marci Riel Jade Dewar		Email chain	Outbound/Inbound	CNL expressed interest in meeting to discuss two identified procurement clauses in the Relationship Agreement and other elements of the agreement. The MMF responded and requested an update on the status of the relationship agreement and revisions requested by the MMF. CNL and the MMF discussed capacity provided for involvement in site monitoring activities to bridge until the Agreement is signed.	Rachel Chennette
Manitoba Métis Federation	Relationship Agreement	25-May-22 Marci Riel; Jade Dewar		Email	Outbound	CNL sent the proposed agenda for the May 25, 2022 meeting.	Rachel Chennette
Manitoba Métis Federation	Interest and Concerns Tables	25-May-22 Marci Riel		Email chain	Outbound/Inbound	CNL asked if the MMF SVS's had reviewed the I&C table. CNL offered to support after the flooding. CNL followed-up on May 27, 2022. The MMFsent the table to CNL May 27, 2022.	Rachel Chennette
Sagkeeng First Nation	CEMP	26-May-22 Corey Shefman		Email chain	Outbound/Inbound	CNL send the contribution agreement to support SFN's involvement in the CEMP workshop for signature. SFN sent CNL a signed copy May 27, 2022	Rachel Chennette
Manitoba Métis Federation	Interest and Concerns Tables	30-May-22 Marci Riel		Email	Outbound	CNL sent the final I&C table as an FYI.	Rachel Chennette

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Black River First Nation	WL	30-May-22	Adam Kroeker		Email	Outbound	CNL send BRFN the location of the old underground research laboratories. CNL suggested add it to the planned site visit.	Rachel Chennette
Sagkeeng First Nation	Community activities	30-May-22	Orit Rivietz, OTK Law Legal Assistant		Email chain	Inbound/Outbound	Meeting request to discuss funding for SFN community activities. CNL proposed meeting after receiving feedback on the SOW. SFN clarified that the SOW doesn't have any impact on the invoicing and that they would like to meeting in advance of the feedback. CNL and SFN agreed to meeting June 10, 2022.	Rachel Chennette
Sagkeeng First Nation	Statement of Work	31-May-22	Alistair MacDonald; Corey Shefman; Carl Fontaine		Email	Outbound	CNL sent an email confirming next steps and sent action items from the May, 20, 2022 meeting.	Rachel Chennette
Black River First Nation Hollow Water First Nation	Invoicing	02-Jun-22	Elly Bonny		Email	Outbound	CNL confirmed that it had not received an invoice from BRFN or HWFN.	Rachel Chennette
Manitoba Métis Federation	Environmental Monitoring	06-Jun-22	Christian Goulet		Email	Outbound	CNL sent the Site Itinerary Plan for the mushroom collection visit.	Rachel Chennette
Sagkeeng First Nation	EIS	07-Jun-22	Alistair MacDonald; Corey Shefman		Email	Outbound	CNL sent the revised Section 6.8 'Land and Resource Use.'	Rachel Chennette
Black River First Nation	Site Tour	07-Jun-22	Adam Kroeker; Kelsey Bee		Email	Outbound	CNL sent a copy of the pre-tour presentation. CNL requested the presentation be shared with those attending the tour. CNL followed-up to confirm that the presentation had been shared.	Rachel Chennette
Sagkeeng First Nation	Technical Working Group	07-Jun-22	Alistair MacDonald; Corey Shefman		Email	Outbound	CNL proposed an agenda doe the Technical Working Group Meeting on June 9, 2022.	Rachel Chennette
Sagkeeng First Nation	CEMP	07-Jun-22	Alistair MacDonald; Corey Shefman; Carl Fontaine		Email	Outbound	CNL sent a draft agenda for the June 15-16, 2022 CEMP workshop.	Rachel Chennette
Black River First Nation Hollow Water First Nation	Site Tour	07-Jun-22	Oral Johnston; Furlon Barker; Kelsey Boubard		Email chain	Outbound/Inbound	CNL expressed concern about the lack of attendance at a tour pre-job meeting. CNL reminded participants about the PPE need. Kelsey Boubard replied and asked CNL to confirm if the meeting on June 8, 2022 was required. Both parties agreed to cancel the meeting.	Rachel Chennette
Manitoba Métis Federation	Environmental Monitoring	07-Jun-22	Christian Goulet		Email	Inbound	Manitoba Métis Federation emailed CNL about being delayed for the tour.	Rachel Chennette
Black River First Nation Hollow Water First Nation	Monthly Meeting	08-Jun-22	Elly Bonny; Adam Kroeker; Furlon Barker; Oral Johnston; Kelsey Bee		Email	Outbound	CNL sent an email to cancel the Jane 9, 2022 meeting.	Rachel Chennette
Manitoba Métis Federation	Environmental Monitoring	08-Jun-22	Christian Goulet		Email	Outbound	CNL informed the MMF that a staff member who was supporting the mushroom collection yesterday tested positive for Covid this morning.	Rachel Chennette
Sagkeeng First Nation	CEMP	08-Jun-22	Corey Shefman		Email chain	Inbound / Outbound	SFN sent CNL responses to CNL/AECL's counter-proposal to the changes in the SOW, a revised SFN SOW, a revised SFN SOW Addendum, and the SFN's edits to the agenda. CNL confirmed receipt and sent an update agenda.	Rachel Chennette
Sagkeeng First Nation	Interest and Concerns Table	09-Jun-22			Teleconference		CNL and Sagkeeng discussed the interest and concerns table as well as the agenda for the Guardianship Workshop.	Rachel Chennette
Black River First Nation Hollow Water First Nation	Site Tour	09-Jun-22			Tour		CNL hosted the BRFN and HWFN Community Liaison Committee for their first site tour.	
Black River First Nation Hollow Water First Nation	Site Tour	10-Jun-22	Kelsey Bee		Email	Outbound	CNL sent photos from the June 9, 2022 site tour and a copy of FAQ from questions in BRFN and HWFN's TK study. CNL requested feedback on the FAQ document.	Rachel Chennette
Black River First Nation Hollow Water First Nation	Public Disclosure	10-Jun-22	Kelsey Bee		Email	Outbound	CNL send a public disclosure to BRFN and HWFN.	Rachel Chennette
Manitoba Métis Federation	Public Disclosure	10-Jun-22	Christian Goulet		Email	Outbound	CNL send a public disclosure to the MMF.	Rachel Chennette
Wabaseemoong Independent Nations	Interest and Concerns Tables	13-Jun-22	Marvin Lee	marleeque@outlook.com	Email	Outbound	CNL requested WIN confirm that their review of how CNL had incorporated their revisions was complete and to confirm they had no objections to CNL proceeding with the submission of the draft EIS to the CNSC. CNL followed-up on June 20, 2022.	Rachel Chennette
Black River First Nation Hollow Water First Nation	Interest and Concerns Tables	13-Jun-22	Adam Kroeker		Email	Outbound	CNL requested the communities confirm that their review of how CNL had incorporated their revisions was complete and to confirm they had no objections to CNL proceeding with the submission of the draft EIS to the CNSC.	Rachel Chennette

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Sagkeeng First Nation	Interest and Concerns Tables	13-Jun-22	Alistair Macdonald; Corey Shefam		Email chain	Outbound/Inbound	CNL requested SFN confirm that their review of how CNL had incorporated their revisions was complete and to confirm they had no objections to CNL proceeding with the submission of the draft EIS to the CNSC. SFN stated that they committed to a single round of edits and that has been completed. They noted that any further commenting will be done during the FPIRT process. CNL acknowledged receipt of the email.	Rachel Chennette	
Wabaseemoong Independent Nations	Interest and Concerns Tables	13-Jun-22	Marvin Lee		Phone call	Outbound	CNL left a message for WIN's Lands and Resource Coordinator. CNL requested WIN confirm that their review of how CNL had incorporated their revisions was complete and to confirm they had no objections to CNL proceeding with the submission of the draft EIS to the CNSC.	Rachel Chennette	
Manitoba Métis Federation	Relationship Agreement	13-Jun-22	Marci Riel		Email chain	Inbound / Outbound	MMF requested an update on the status of the relationship agreement and the revisions requested by the MMF specific to items such as indigenous procurement, mandatory minimums and direct negotiation contracts. CNL responded and provided an update.	Rachel Chennette	
Manitoba Métis Federation	AGA	14-Jun-22	Joseph Bruneau	jbruneau54@hotmail.com	Email	Outbound	CNL requested information on a connection made at the AGA.	Rachel Chennette	
Manitoba Métis Federation	Interest and Concerns Table	14-Jun-22	Marci Riel		Email chain	Inbound / Outbound	The MMF confirmed CNL had incorporated their revisions was complete and to confirm they had no objections to CNL proceeding with the submission of the draft EIS to the CNSC. The MMF asked CNL to confirm in writing it's interest in discussions regarding to the table or list of environmental commitments. CNL confirmed interest in advancing those discussions.	Rachel Chennette	
Sagkeeng First Nation	Guardian Program	15-Jun-22			Meeting		CNL and Sagkeeng representatives met in-person in Winnipeg to negotiate a guardian program that would reduce fear and stimage at the site. June 15-16, 2022.	Rachel Chennette	
Sagkeeng First Nation	Interest and Concerns Table	16-Jun-22			Meeting		Sagkeeng confirmed during the workshop that the interests and concerns table reflects the communities interest and concerns as well as the status of those concerns.	Rachel Chennette	
Black River First Nation Hollow Water First Nation	Indigenous Engagement	22-Jun-22	Oral Johnston ; Adam Kroeker ; Kelsey Bee	oraljohnston@black-river.ca;akroeker@htfc.ca; kboubard430@gmail.com	Email	Outbound	CNL sent the Engagement Brief Template.	Rachel Chennette	
Sagkeeng First Nation	Tour	23-Jun-22	Carl Fontaine; Alistair MacDonald		Email	Outbound	CNL Suggested dated for the site tour, originally planned for June 30. CNL proposed July 11-14 or July 18 and 19, 2022 and asked that all participants complete a visitor form (attached in the email). CNL requested a pre-tour teleconference. CNL also confirmed that a 16 year old could join the tour.	Rachel Chennette	CNL followed-up June 29, 2022.
Sagkeeng First Nation	Site tour	23-Jun-22	Carl Fontaine		Email	Outbound	CNL sent an email to reschedule the June 30, 2022 tour and proposed alternative dates. CNL asked that all participants complete a visitor form and attend a prejob.	Rachel Chennette	
Sagkeeng First Nation	CEMP	23-Jun-22	Corey Shefman; Alistair Macdonald		Email chain	Inbound / Outbound	SFN requested draft notes from the workshop. CNL send the notes June 24, 2022.	Rachel Chennette	
Sagkeeng First Nation	Community Engagement	23-Jun-22	Carl Fontaine, Alistair Macdonald, Tania Salerno, Sara Fontaine	Nowge6@hotmail.com; alistair.macdonald@thefirelightgroup.com; tania.salerno@thefirelightgroup.com; sfontaine1809@outlook.com	Email Chain/Telephone	Outbound/Inbound	CNL coordinated a site tour for the CLC. June 29, 2022 - CNL sent follow-up email. July 6, 2022 - CNL sent follow-up email. July 11, 2022 - Telephone call received from Carl Fontaine; tour scheduled on July 19, 2022. July 14, 2022 - CNL emailed tour agenda and site entrance requirements. July 18, 2022 - Phone call #1: Carl phoned to confirm that he had dropped off the visitor forms for the tour. Phone call #2: CNL phoned Carl to confirm the final list of participants for the tour. Visitor form sent to CNL from Sara Fontaine; CNL confirmed receipt and re-iterated site entrance requirements.	Antonette Chau	
Sagkeeng First Nation	Invoicing	24-Jun-22	Kaitlin Sinclair	execassistant@sagkeeng.ca	Email	Outbound	CNL requested information about the funding mechanism as CNL has not received invoices from SFN. CNL request a meeting to discuss the topic.	Rachel Chennette	
Manitoba Métis Federation	Indigenous Engagement	28-Jun-22	Christian Goulet		Email	Outbound	CNL requested a date for a regular monthly check-in.	Rachel Chennette	

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Black River First Nation Hollow Water First Nation	EIS	29-Jun-22	Kelsey Bree; Adam Kroeker; Elly Bonny; Furlon Barker; Oral Johnston		Email	Outbound	Sharing the update that CNL has officially submitted the revised EIS to the CNSC.	Rachel Chennette	Acknowledged by HTFC		
Black River First Nation Hollow Water First Nation	Nuclear Conference	29-Jun-22	Kelsey Bree; Adam Kroeker; Elly Bonny; Furlon Barker; Oral Johnston		Email	Outbound	CNL invited BRFN and HWFN to attendee the Canadian Nuclear Association Conference in February 2023.	Rachel Chennette			
Sagkeeng First Nation	Job Postings	29-Jun-22	Kaitlyn Sinclai; Carl Fontaine		Email	Outbound	CNL requested confirmation about contacts for job postings.	Rachel Chennette			
Manitoba Métis Federation	Job Postings	29-Jun-22	Marci Riel		Email	Outbound	CNL requested confirmation about contacts for job postings.	Rachel Chennette			
Black River First Nation Hollow Water First Nation	Job Postings	29-Jun-22	Kelsey Bree; Adam Kroeker; Elly Bonny; Furlon Barker; Oral Johnston		Email	Outbound	CNL requested confirmation about contacts for job postings.	Rachel Chennette			
Wabaseemoong Independent Nations	Job Postings	29-Jun-22	Marvin Lee		Email	Outbound	CNL requested confirmation about contacts for job postings.	Rachel Chennette			
Grand Council Treaty #3	EIS	29-Jun-22			Phone call	Outbound	CNL informed the community that the draft EIS had been submitted. CNL inquired if there were any upcoming events CNL could present at. GCT#3 stated they recently had an event and would likely host a follow-up event that CNL could be a part of. CNL to speak with Hailey for more details. CNL confirmed Hailey was the appropriate contact for GCT#3 and tomorrow would be a good time to talk. CNL also inquired about best methods for reaching out to Shoal Lake 40, NWA 33 and 39. GCT#3 said that it could be challenging to get a hold of a community and to reach out to Hailey, their Policy Analyst.	Rachel Chennette			
Sagkeeng First Nation	EIS	29-Jun-22	Alistair Macdonald; Corey Shefam; Carl Fontaine		Email	Outbound	CNL informed the SFN that CNL has officially submitted the revised EIS to the CNSC.	Rachel Chennette			
Manitoba Métis Federation	EIS	29-Jun-22	Christian Goulet; Marci Riel; Jade Dewar		Email	Outbound	CNL informed the MMF that CNL has officially submitted the revised EIS to the CNSC.	Rachel Chennette			
Black River First Nation Hollow Water First Nation	EIS	29-Jun-22	Oral Johnston ; Adam Kroeker ; Kelsey Bee; Furlon Barker		Email	Outbound	CNL informed the communities that CNL has officially submitted the revised EIS to the CNSC.	Rachel Chennette			
Wabaseemoong Independent Nations	Job Postings	29-Jun-22	Marvin Lee	marleeque@outlook.com	Email chain	Outbound/ Inbound	CNL asked who the best community contact would be for job postings. WIN confirmed that the WIN-EWRRP-Coordinator is the correct contact. CNL requested a call.	Rachel Chennette			
Grand Council Treaty #3	Waste Transportation	30-Jun-22	Hailey Krolyk, Policy Analyst		Email	Outbound	CNL offered to come to the community to talk to people about nuclear waste transportation. CNL asked inquired if there are any Treaty #3 emergency response services along the highway that would be interested in having a presentation or training. CNL also asked about contacts for Soil Lake #40 and NWM	Rachel Chennette			
General Council Treaty # 3: - Shoal Lake #40; Iskatewizaagegan 39; Northwest Angle #33	Community Engagement - Waste Transportation	30-Jun-22	Hailey Krolyk, Michelle Shephard	hailey.krolyk@treaty3.ca; michelle.shephard@treaty3.ca	Email Chain	Outbound/Inbound	CNL emailed Treaty # 3 representatives following an interest shown in learning more about waste transportation at the last regulatory oversight review. Opportunities for engagement listed and previous engagement that did not receive responses were identified Updated contact information for the listed	Antonette Chau		Yes	Confirm whether a meeting has been scheduled
Black River First Nation Hollow Water First Nation	IEMP Sampling	05-Jul-22	Adam Kroeker; Kelsey Bee		Email	Outbound	CNL suggested scheduling a walking-about with some knowledge keepers before the IEMP Sampling with our Environmental team. CNL offered to schedule a meeting later that week to discuss upcoming monitoring activities.	Rachel Chennette			

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Manitoba Métis Federation	Relationship Agreement	06-Jul-22			Teleconference		CNL met with MMF to discuss the status of the relationship agreement, environmental monitoring activities on site, and future engagement activities.	Rachel Chennette
Sagkeeng First Nation	Guardianship Program	06-Jul-22	Corey Shefman	cshefman@oktlaw.com	Email chain	Inbound / Outbound	SFN requested a meeting with both parties' legal teams to discuss the drafting of the agreement. CNL began coordinating a meeting and asked for an update on the scope of work. SFN updated that the edits to the SOW were ongoing and suggested that CNL and AECL develop standard template terms for	Rachel Chennette
Manitoba Métis Federation	Technical Meeting	06-Jul-22	Christian Goulet; Marci Riel; Jade Dewar	christian.goulet@mmf.mb.ca; marci.riel@mmf.mb.ca; jade.dewar@mmf.mb.ca	Email	Outbound	CNL sent the proposed agenda for the July 6, 2022 meeting.	Rachel Chennette
Manitoba Métis Federation	Environmental Monitoring	06-Jul-22	Christian Goulet	christian.goulet@mmf.mb.ca	Email	Outbound	CNL sought the MMF's experience to assist in an eight week look ahead for monitoring on site and asked about known berry picking sites.	Rachel Chennette
Sagkeeng First Nation Wabaseemoong Independent Nations	Waste Transportation	6-Jul-22	Hailey Krolyk		Email	Outbound	Follow up email to confirm recepit of previous email regarding Waste Transportation Engagement Opportunity and Treaty #3 Engagement on the WR-1 Project	Rachel Chennette
Grand Council Treaty #3	Indigenous Engagement	11-Jul-22	Hailey Krolyk		Email chain	Outbound/Inbound	CNL sent the agenda for the July 21, 2022 meeting. CNL proposed planning upcoming events, providing an update on engagement done to date and GCT#3's interest in engagement and expectations. CNL and GCT#3 corresponded about rescheduling the meeting.	Rachel Chennette
Sagkeeng First Nation	Tour	11-Jul-22	Carl Fontaine	Nowge6@hotmail.com	Email	Outbound	CNL sent the draft agenda and visitor forms for the June 19, 2022 tour.	Rachel Chennette
Sagkeeng First Nation	Tour	11-Jul-22	Carl Fontaine		Email	Outbound	1) CNL called Carl to confirm dates for Sagkeeng's community liaison committee site tour.	Rachel Chennette
Sagkeeng First Nation	Contribution Agreement	11-Jul-22	Hema Bhargava	HBhargava@oktlaw.com	Email	Outbound	Follow up thank you for sending invoices. Asking for	Rachel Chennette
Sagkeeng First Nation	Guardians Programe	11-Jul-22	Corey Shefman	cshefman@oktlaw.com	Email	Inbound	email stipulating Promises from Sagkeeng	Rachel Chennette
Sagkeeng First Nation	Contribution Agreement	11-Jul-22	Corey Shefman, Orit Rivietz	cshefman@oktlaw.com;	Email	Outbound	CNL requested a quote for the September 2022-2023	Antonette Chau
Wabaseemoong Independent	Tour	12-Jul-22	Marvin Lee	marleeque@outlook.com	Email chain	Outbound/	Following a phone call, CNL expressed interest in	Rachel Chennette
Manitoba Métis Federation	Environmental Monitoring	12-Jul-22	Christian Goulet	christian.goulet@mmf.mb.ca	Email	Outbound	CNL sent the MMF the revised monitoring look ahead	Rachel Chennette
Manitoba Métis Federation	Environmental Monitoring	12-Jul-22	Christian Goulet, Energy and	christian.goulet@mmf.mb.ca	Email chain	Inbound	MMF asked about well testing the week of July 11,	Rachel Chennette
Manitoba Métis Federation	Environmental Monitoring	12-Jul-22	Christian Goulet, Energy and	christian.goulet@mmf.mb.ca	Email chain	Outbound	CNL confirmed well testing with MMF July 20, 2022.	Rachel Chennette
Black River First Nation and Hollow Water First Nation	Meeitng	12-Jul-22	Adam Kroker	akroeker@htfc.ca	Email	Outbound	Proposed agenda topics for upcoming meeting	Rachel Chennette N/A
Broken Head Ojibway Nation	Indigenous Engagement	12-Jul-22	Charleen	bonreception@brokenheadojibwaynation.com	Email	Outbound	1) Confirmed new chief from April election is Gordon Bluesky 2) Offered to set up a leadership meeting between	Rachel Chennette
Sagkeeng First Nation	Funding	12-Jul-22	Kaitlyn Sinclair Tanya Guimond	controller@sagkeeng.ca execassistant@sagkeeng.ca	Email	Outbound	Wanting to set up meeting with finance department to talk about invoicing for Sagkeeng's community liaison committee (CLC) and membership engagement. Signed a contribution agreement back in November 2021, but yet to receive any invoices	Rachel Chennette
Sagkeeng First Nation	Funding	12-Jul-22	Alistair Macdonal	alistair.macdonald@thefirelightgroup.com	Email	Outbound	SAFN Consultant. Would like to put together a contribution agreement for both Firelight and OKT for their continued involvement in the Technical Working Group	Rachel Chennette

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Black River First Nation and Hollow Water First Nation	Treaty days	13-Jul-22		Teleconference		CNL, BRFN, and HWFN discussed the upcoming Treaty days and how CNL could participate.	Rachel Chennette		
Grand Council Treaty #3	EIS	13-Jul-22	Lucas King	Email	Outbound	Sharing the update that CNL has officially submitted the revised EIS to the CNSC.	Rachel Chennette		
Shoal Lake #40	EIS	13-Jul-22	Chief Redsky kredsky11@hotmail.com	Email	Outbound	Sent a letter informing the community that CNL has officially submitted the revised EIS to the CNSC.	Rachel Chennette		
Iskatewizaagegan #39 Independent First Nation	EIS	13-Jul-22	Chief Lewis gerald2klewis@gmail.com	Email	Outbound	Sent a letter informing the community that CNL has officially submitted the revised EIS to the CNSC.	Rachel Chennette		
Brokenhead Ojibway Nation	EIS	13-Jul-22	Chief Bluesky bonreception@brokenheadojibwaynation.com	Email	Outbound	Sharing the update that CNL has officially submitted the revised EIS to the CNSC.	Rachel Chennette		
Wabaseemoong Independent Nations	EIS	13-Jul-22	Chief Scott waylonsc@yahoo.com	Email	Outbound	Sharing the update that CNL has officially submitted the revised EIS to the CNSC.	Rachel Chennette		
Northwest Angle #33 First Nation	EIS	13-Jul-22	Chief Comegan hief@nwa33.ca	Email	Outbound	Sent a letter informing the community that CNL has officially submitted the revised EIS to the CNSC.	Rachel Chennette		
Sagkeeng First Nation	Funding Agreement	13-Jul-22	Lana Lavadier assistantcao@sagkeeng.ca	Email chain	Outbound/Inbound	Coordination of a call to discuss Community Liaison activity. CNL shared the terms of reference document and a copy of the funding agreement.	Rachel Chennette		
Manitoba Métis Federation	Relationship Agreement	13-Jul-22	Marci Riel marci.riel@mmf.mb.ca	Email	Outbound	CNL sent the revised relationship agreement. CNL requested the MMF review Article 9. CNL offered a meeting to discuss the changes.	Rachel Chennette		
Hollow Water First Nation	Job Posting	13-Jul-22	Adam Kroeker akroeker@hfnc.ca	Email	Outbound	CNL sent HWFN a job posting for the Indigenous Relations Advisor Position for the Whiteshell Laboratories.	Rachel Chennette		
Manitoba Métis Federation	Environmental Monitoring	13-Jul-22	Christian Goulet, Energy and Infrastructure Coordinator christian.goulet@mmf.mb.ca	Email chain	Outbound	MMF confirmed well monitoring for July 20, 2022. MMF will be providing CNL berry picking dates in the near future. CNL reminded MMF about the PPE needed for the site visit.	Rachel Chennette		
Black River First Nation and Hollow Water First Nation	Community Engagement	13-Jul-22	Adam Kroeker, Furlon Barker, Oral Johnston, Kelsey Boubard furlon.barker@hollowwater.ca; oraljohnston@black-river.ca; akroeker@hfnc.ca; kboubard430@gmail.com	Email	Outbound	CNL emailed the attendees the meeting notes from the monthly CNL/BRFN/HWFN meeting on July 13, 2022.	Antonette Chau		
Black River First Nation Hollow Water First Nation	Monthly Meeting	14-Jul-22	Joanne Sieg; Furlon Barker; Oral Johnston	Email chain	Outbound/Inbound	CNL sent an invitation to the First Nations for the September 14, 2022. CNL proposed an agenda.	Rachel Chennette		
Manitoba Métis Federation	Engagement	14-Jul-22	Marci Riel, Jade Dewar, Christian Goulet jade.dewar@mmf.mb.ca; christian.goulet@mmf.mb.ca	Email	Outbound	CNL emailed the MMF about the new CNL main points of contact due to a change in staffing. Confirmation of tour for Christian Goulet on July 20, 2022 inlcuded in email.	Antonette Chau		
Sagkeeng First Nation	Community Liaison Committee	19-Jul-22		Tour		CNL hosted Sagkeeng's community liaison committee members on site for a tour of WR-1.	Rachel Chennette		
Sagkeeng First Nation	Meeting Materials	20-Jul-22	Carl The Elder nowge6@hotmail.com	Email	Outbound	CNL shared the presentation from the July 19, 2022 meeting.	Rachel Chennette		
Sagkeeng First Nation	Invoicing	25-Jul-22	Corey Shefman	Email chain	Inbound / Outbound	SFN asked CNL to confirm a cheque number related to a SFN invoice. CNL followed-up with SFN and confirmed that it had not been paid yet. CNL requested information on the payment.	Rachel Chennette		
Manitoba Métis Federation	Environmental Monitoring	28-Jul-22		In-person		CNL hosted MMF on site to participate in ground water sampling around the main campus.	Rachel Chennette		
Black River First Nation Hollow Water First Nation	Environmental Monitoring	28-Jul-22		In-person		BRFN and HWFN participated in berry picking near the underground research laboratory site.	Rachel Chennette		
Sagkeeng First Nation	Invoicing	02-Aug-22	Corey Shefman	Email chain	Inbound / Outbound	SFN wanted confirmation on a deposit sent to the community. CNL acknowledged.	Rachel Chennette		
Sagkeeng First Nation	Community Liaison Committee	02-Aug-22	Carl Fontaine	Email chain	Outbound/Inbound	CNL sent the Comprehensive Report and Appendices.	Rachel Chennette		
Manitoba Métis Federation	Relationship Agreement	08-Aug-22		Teleconference		CNL and MMF discussed that status of the relationship agreement, environmental monitoring activities and future engagements with the MMF.	Rachel Chennette		
Manitoba Métis Federation	Community Consult Meeting	10-Aug-22		In-person Meeting		CNL participated a MMF Community Consult Meeting in Lac du Bonnet. CNL shared information on their environmental monitoring program.	Rachel Chennette		
Sagkeeng First Nation	Opportunity for community engagement	16-Aug-22	Chief Henderson			CNL became aware of comments and remarks made by the Chief about Sagkeeng's work with CNL at the Fort Garry 150th anniversary - the need for leadership to come to the community. AECL and CNL leadership engaged.	Antonette Chau	Yes	WL leadership/communications to determine path forward to address
Manitoba Métis Federation	Environmental Monitoring	17-Aug-22		In-person		Metis Citizens participated in a bat survey at the Whiteshell Laboratories Site	Rachel Chennette		
Wabaseemoong Independent Nations	Tour	26-Aug-22		Phone call	Outbound	CNL and WIN discussed setting up a date for a tour. WIN suggested calling in a few weeks to confirm interest in attending a tour.			

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Grand Council Treaty #3	Indigenous Engagement	29-Aug-22	Hailey Krolyk	Email chain	Inbound / Outbound	GCT#3 followed-up to reschedule the July 21, 2022 meeting, also confirming the Wabaseemoong Independent Nations would be supporting the GCT#3. CNL proposed several meeting times and a draft agenda on September 19, 2022. Both parties agreed to a meeting September 28, 2022.	Rachel Chennette	
Manitoba Métis Federation	Monitoring Schedule	30-Aug-22	Marci Riel Jade Dewar Christian Goulet Phoenix Combe	Email chain	Outbound/Inbound	CNL sent the Manitoba Métis Federation a copy of proposed Monitoring program schedule until the end of the year and requested information on preferred monitoring activities that CNL can start coordinating. Manitoba Métis Federation introduced CNL to Phoenix Combe, Water Resources Specialist. The Manitoba Métis Federation sent CNL the list of monitoring events they wanted to participate in. Manitoba Métis Federation asked related questions. CNL confirmed receipt of dates. On September 16, 2022 the Manitoba Métis Federation followed-up about dates for the monitoring visits. CNL began coordinating site visits.	Rachel Chennette	
Sagkeeng First Nation	Technical Working Group	07-Sep-22		Teleconference		CNL and Sagkeeng discussed the Technical Working Group and the Gaurdianship Program Budget and scope of work.	Rachel Chennette	
Manitoba Métis Federation	Relationship Agreement	07-Sep-22		Teleconference		CNL and the MMF discussed the status of the relationship agreement, environmental monitoring and future engagement activties on WR-1.	Rachel Chennette	
Black River First Nation Hollow Water First Nation	Environmental Monitoring	08-Sep-22		In-person		BRFN and HWFN participated in muchroom collection from three locations around the Whiteshell Laboratories Site.	Rachel Chennette	
Sagkeeng First Nation	Guardianship Program	13-Sep-22	Alistair MacDonald; Corey Shefman; Carl Fontaine	Email chain	Outbound/Inbound	CNL sent SFN the Guardianship Program Agreement and Scope of Work. CNL clarified that . CNL has no interest in oversite and control, but simply a desire to support the Sagkeeng's program in a manner that enhances the Sagkeeng community's reduction of fear and stigma associated with the Whiteshell Site, and improves the overall relationship and understanding between the parties. SFN confirmed receipt and indicated they would review the documents and return to CNL. SFN asked if AECL/CNL will want to issue a joint 3-party press release.	Rachel Chennette	
Black River First Nation Hollow Water First Nation	Relationship Agreement	14-Sep-22		Teleconferecne		CNL, BRFN, and HWFN discussed extending the existing relationship agreement and coordinating future environmental monitoring activities.	Rachel Chennette	
Manitoba Métis Federation	2020 Compliance Report	16-Sep-22	Marci Riel Jade Dewar Christian Goulet	Email chain	Outbound/Inbound	CNL thanked the MMF for their responsive to CNL's 2020 Compliance Report. CNL sent the MMF CNL's specific responses to the comments and concerns outlined in their document. CNL requested a meeting to discuss the responses. CNL and the MMF corresponded to set up a September 28, 2022 meeting.	Rachel Chennette	
Manitoba Métis Federation	2020 Compliance Report	16-Sep-22	Marci Riel Jade Dewar Christian Goulet	Email	Outbound	CNL thanked the MMF for their responsive to CNL's 2020 Compliance Report. CNL sent theMMF CNL's specific responses to the comments and concerns outlined in their document. CNL requested a meeting to discuss the responses. CNL and the MMF corresponded to set up a September 28, 2022 meeting.	Rachel Chennette	
Manitoba Métis Federation	Monthly Meeting	19-Sep-22	Marci Riel Jade Dewar Christian Goulet	Email	Outbound	CNL sent the MMF the September 7, 2022 meeting note.	Rachel Chennette	
Manitoba Métis Federation	AMA	20-Sep-22	Generic Inbox	Email	Outbound	CNL's new Communications Officer introduced herself and submitted the completed sponsorship package for the upcoming AGA.	Rachel Chennette	
Sagkeeng First Nation	Event Invitation	20-Sep-22	Corey Shefman; Carl Fontaine; Alistair MacDonald; Derick Henderson; Linda Dorie; Kaitlyn	Email	Outbound	CNL invited the community the September 28, 2022 webinar	Rachel Chennette	
Black River First Nation Hollow Water First Nation	Event Invitation	20-Sep-22	Kelsey Bree; Adam Kroeker; Furlon Barker; Oral Johnston	Email	Outbound	CNL invited the community the September 28, 2022 webinar	Rachel Chennette	Acknowledged by Adam Kroeker

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Manitoba Métis Federation	Event Invitation	20-Sep-22	Jade Dewar; Marci Reil; Lorelei Braun		Email	Outbound	CNL invited the community the September 28, 2022 webinar	Rachel Chennette
Wabaseemoong Independent Nations	Event Invitation	20-Sep-22	Marvin Lee		Email	Outbound	CNL invited the community the September 28, 2022 webinar	Rachel Chennette
Black River First Nation Hollow Water First Nation	Waste Management Symposium	20-Sep-22	Kelsey Bree; Adam Kroeker; Furlon Barker; Oral Johnston		Email	Outbound	CNL shared information on Waste Management Symposium in Phoenix February 27 to March 2, 2023. CNL also shared the an opportunity for an individual to present Indigenous perspectives related to risk assessment of environmental remediation challenges.	Rachel Chennette
Manitoba Métis Federation	AGA	20-Sep-22	John Coutris		Email chain	Inbound / Outbound	MMF requested a high resolution copy of the CNL logo. CNL provide copies for use.	Rachel Chennette
Manitoba Métis Federation	Invoice	20-Sep-22	Kara Basaldua	kara.basaldua@Manitoba Métis Federation.mb.ca	Email chain	Inbound / Outbound	MMF sent CNL the invoice for your Red River Métis October 14-16, 2022 AGA sponsorship & tradeshow exhibitor fee. CNL acknowledged receipt.	Rachel Chennette
Manitoba Métis Federation	Monitoring Schedule	21-Sep-22	Christain Goulet	Christian Goulet <christian.goulet@Manitoba Métis Federation.mb.ca>	Email chain	Outbound/Inbound	CNL rescheduled the monitoring activities planned for September 22, 2022 citing no confirmation of the activities. The MMF sent a revised list of activities September 22, 2022.MMF also asked questions that CNL forwarded to the appropriate teams for dispositioning.	Rachel Chennette
Grand Council Treaty #3	Indigenous Engagement	23-Sep-22	Hailey Krolyk		Email	Outbound	CNL shared presentation materials in advance on the meeting that day.	Rachel Chennette
Grand Council Treaty #3	WR-1	23-Sep-22			Teleconference		CNL provided an overview of the Whiteshell Laboratories site and a status update for the WR-1 Project, highlighting engagement with Treaty #3 members. CNL and GCT#3 discuss future engagements.	Rachel Chennette
Wabaseemoong Independent Nations	Tour	23-Sep-22	Marvin Lee	marleeque@outlook.com	Email	Outbound	CNL reaffirmed the interest in having the WIN community members visit the site. CNL also asked if there are any specific monitoring activities WIN would like to be involved in.	Rachel Chennette
Grand Council Treaty #3	WL	23-Sep-22	Hailey Krolyk	hailey.krolyk@treaty3.ca	Email	Outbound	CNL sent a copy of the presentation from the September 23, 2022 meeting.	Rachel Chennette
Manitoba Métis Federation	AGA	26-Sep-22	John Coutris	John.Coutris@medf.ca	Email chain	Outbound/ Inbound	CNL asked what time the tradeshow closes each day of the tradeshow. MMF shared that the tradeshow ends each day at 4:30 p.m.	Rachel Chennette
Sagkeeng First Nation	Budget	27-Sep-22	Corey Shefman	cshefman@oktlaw.com	Phone call	Outbound	CNL called the SFN consultant to discuss payments for the TWG, CEMP Workshops and the Indigenous Liaison Position. The consultant was in agreement that CNL go ahead with the payments.	Rachel Chennette
Sagkeeng First Nation	Training	01-Nov-21			Meeting/Training		CNL hosted a debreif on the trauma-informed engagement training. Somia from Narratives Inc, provided an overview the trauma informed engagement training, walked through some of the material that was discussed and how CNL and Sagkeeng could use these teachings to develop a trauma informed action plan.	Rachel Chennette
Grand Council Treaty #3	Webinar	28-Sep-22	Sara Fontaine		Email chain	Outbound/ Inbound	CNL followed up from a question asked during the September 28, 2022 webinar and send GCT #3 member a link to the CNL YouTube page.	Rachel Chennette
Sagkeeng First Nation	Webinar	28-Sep-22	Carl Fontaine	Sara.Fontaine@treaty3.ca	Phone call	Outbound	CNL telephoned to share that the September 28, 2022 webinars would be posted online. CNL will send the link via email.	Rachel Chennette
Grand Council Treaty #3	WL	28-Sep-22	Hailey Krolyk	hailey.krolyk@treaty3.ca	Email	Outbound	CNL sent GCT#3 notes from the September 23, 2022 meeting.	Rachel Chennette

Appendix B Full Tables of Indigenous Comments on the EIS and CNL's Responses

This table was included in the IER for the sole purpose of providing additional information about the concerns brought forward by the First Nations and the Red River Métis on the WR-1 Project. The last column displays the last round of comments as of October 2021. CNL will be engaging each Nation to develop final comments and will submit this information with the final EIS.

B.1 Sagkeeng First Nation

No.	Source	Comment Summary (All original submissions can be found on the Canadian Environmental Assessment Registry, Reference #80124)	Response provided by CNL – provided to Sagkeeng January 2020, updated May 2020	Sagkeeng Comment February 2020	CNL's Response and Proposed Next Steps Oct, 2020	Sagkeeng Responses Nov, 2020	CNL's Latest Comments Jan 2021
		EIS					
		Introduction					
9.	Sagkeeng First Nation (SFN) (Jan 15, 2018)	It is SFN's understanding that: • The Government of Canada has entered into a commercial partnership with Canadian National Energy Alliance (CNEA) to manage but not accept the environmental liabilities associated with the Whiteshell Laboratories (WL) site. CNEA is a partnership of multi-national, for-profit corporations. • The contractual relationship between Canada and CNEA is focused on the management of environmental liabilities for a defined period of time and does not extend to the long-term / perpetual care of the site. • CNL and CNEA are both acting as agents of Canada and, in this regard, the application for the proposed project has been submitted on behalf of the Government of Canada, with the Government's full support. • Canada's contractual relationship with CNEA in no way absolves the Crown of its responsibilities for the WL site and its fiduciary duties to SFN. • Canada is and will continue to be responsible in perpetuity for any environmental liabilities at the WL site, regardless of any contractual relationships it may have entered into with CNEA or other parties. SFN recommends that CNL confirm/refute the accuracy of their understandings and describe the following in detail: • The nature of the contractual relationship between Canada and CNEA; • The financial terms between Canada and CNEA, with emphasis on any incentives/penalties related to the schedule and budget of the proposed undertaking; • The respective responsibilities of Canada, CNL, CNEA and other parties for the environmental liabilities at the WL site, both now and in the future; and, • The respective responsibilities of Canada, CNL, CNEA and other parties to fulfill the fiduciary obligations of Canada to SFN as they pertain to the proposed undertaking.	The contractual relationship between Canada and CNEA is currently embodied in a three-tiered model involving Atomic Energy of Canada Limited (AECL), Canadian Nuclear Laboratories (CNL), and Canadian Nuclear Energy Alliance (CNEA). AECL is a federal Crown corporation, responsible for managing Canada's radioactive waste and decommissioning liabilities and enabling nuclear science and technology. Following a restructuring process, AECL now operates under a Government-owned, Contractor-operated model. Under this model, while AECL retains ownership of the sites, facilities, assets and liabilities, it delivers its mandate through a long-term contract with the private sector for the management and operation of its sites. CNL confirms that the Federal Government will indefinitely remain responsible for all environmental liabilities at the Whiteshell site, regardless of the contractual mechanisms it uses to manage those liabilities. CNL operates under a Government-owned, Contractor-operated (GoCo) model, whereby the site, facilities and assets remain the property of AECL. The GoCo model is set up so that CNL remains the operator of all AECL sites regardless of whether a new contractor is selected. CNL is meant to be an 'enduring entity'. While the ownership of CNL may change (CNEA is the current owner of CNL), CNL will remain the operator and licensee for all AECL sites. CNEA is a consortium of private companies that has been contracted by AECL under the GoCo to leverage AECL assets to perform work safely and efficiently on AECL's waste and decommissioning responsibilities, provide nuclear science and technology services to support Canada's federal responsibilities and priorities, and offer and provide services to third parties on commercial terms, in each case while containing and reducing costs and risks over time. 1. & 2. AECL is a federal Crown corporation and receives funding from the Government to deliver on its mandate – namely to enable nuclear science and technology and protect the environment by managing the Government of	SFN requested clarification on four topics, the responses of which are summarized as follows: 1. *The nature of the contractual relationship between Canada and CNEA* – CNL's response focuses primarily on this topic. SFN considers the response to be adequate. 2. *The financial terms between Canada and CNEA, with emphasis on any incentives/penalties related to the schedule and budget of the proposed undertaking* – CNL has not provided the requested information. SFN requires this information to better understand the Proponent's motivations for proposing a project that will have significantly greater impacts on SFN than the currently approved project. 3. *The respective responsibilities of Canada, CNL, CNEA and other parties for the environmental liabilities at the WL site, both now and in the future* – CNL has not provided the requested information. SFN requires this information to confirm that the Federal Government will indefinitely remain responsible for all environmental liabilities at the Whiteshell site, regardless of the contractual mechanisms it uses to manage those liabilities. 4. *The respective responsibilities of Canada, CNL, CNEA and other parties to fulfill the fiduciary obligations of Canada to SFN as they pertain to the proposed undertaking* – CNL has not provided the requested information. SFN requires the information to confirm that, as a Federal agency, AECL's obligations to protect the "honour of the Crown" and SFN interests is not diminished by the contractual arrangements between AECL, CNEA and CNL. With respect to the last two points, it is SFN's understanding that CNL is acting as an "agent of the Crown" that acts exclusively under the direction of AECL. In this respect, while CNL is the proponent of the proposed undertaking, AECL retains all responsibilities	2. Financial terms – as indicated in our May 2020 response, CNL is unable to release the financial terms of the CNEA contract as this is commercially sensitive. 3. Environmental Liabilities – As indicated in our May 2020 response, all environmental liabilities of the Whiteshell site are those of AECL, a federal Crown corporation (therefore, by extension, these liabilities are those of the Government of Canada). They are and will remain those of AECL into the future, regardless of any governance or contractual mechanism used to operate the site. As the operator of the site and licensee, CNL is responsible for the safe ongoing operations and decommissioning at the site, as per the terms of its licence issued by the Canadian Nuclear Safety Commission. 4. Fiduciary Obligations – With respect to the WR-1 project, the Crown has assessed that it has a duty to consult consistent with section 35 of the Constitution Act. The Canadian Nuclear Safety Commission, as the regulator, is the lead department responsible for discharging the Crown's duty to consult obligations. It is important to distinguish that for the WR-1 Environmental Assessment, the Canadian Nuclear Safety Commission holds the duty to consult.	While response 3 is adequate, responses 2 and 4 are a repetition. Furthermore, the 'duty to consult' is only a component of the broader "honour of the Crown".	**2. CNL cannot comply with this specific request and therefore considers this comment closed. CNL provides a rationale below.** Rationale: As stated in our October response, CNL is unable to release the financial terms of the Canadian National Energy Alliance (CNEA) contract, as this is commercially sensitive. **4. CNL has provided further clarity of our position regarding the duty to consult and the honour of the crown. CNL requests that Sagkeeng accept this comment as fully addressed with the additional information provided below**. The duty to consult and the honour of the Crown is the responsibility of the Canadian Nuclear Safety Commission, as the regulator. Reconciliation with Indigenous peoples is a top priority of the Government of Canada. As part of the WR-1 Environmental Assessment, the Canadian Nuclear Safety Commission, as the regulator and Responsible Authority for the decisions under CEAA 2012 and the NSCA, is the lead Federal Agency responsible for discharging the Crown's duty to consult obligations for this Project." As an agent of the Crown, Atomic Energy of Canada Limited (AECL) is also committed to engaging with Indigenous peoples, in an open and cooperative way, with a view to achieving a mutual understanding of interests and identifying opportunities for mutual benefit. The commercial arrangements between AECL, CNL and CNEA do not change the Crown's obligations under s. 35 of the

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			Canada's radioactive waste responsibilities. As AECL's mandate is delivered through a GoCo model, AECL has contractual arrangements in place with CNEA and CNL to manage its sites. With respect to the Whiteshell site, the site is managed under a specific target-cost agreement. CNEA earns fee based on its cost performance against a target cost over the entire project. Also, the contract includes provisions for fee reductions where there are safety, security or environmental incidents. Overall, the contract is set up to incentivize effective performance without compromise to health and safety. AECL provides oversight with a view to obtaining value for Canada under the contract. Moreover, CNL has obligations as a licensee to maintain safe operations, and the Canadian Nuclear Safety Commission (CNSC), as the independent federal regulator, oversees safety of CNL's operations and protection of the environment. Details around how much fee CNEA is getting cannot be disclosed as it is commercially confidential. 3. AECL is responsible for the Government of Canada's radioactive waste and decommissioning liabilities. This includes responsibility for the decommissioning of the Whiteshell Laboratories. As AECL is a federal Crown corporation, these liabilities are liabilities of the Government of Canada. From a governance perspective, AECL delivers its mandate through a GoCo model, which means that AECL contracts the work to do the decommissioning and waste management to CNL. Practically speaking, this means that AECL provides funding to CNL to undertake the necessary activities to deliver on its radioactive waste and decommissioning responsibilities. Furthermore, the GoCo model has been set up for CNL to be an enduring entity, meaning that AECL could award a new contract for the management and operation of CNL to a different consortium, and CNL would nonetheless remain responsible for the management and operation of AECL's sites. While the ownership of CNL may change, CNL will remain the operator and licensee. That said, the liabilities remain those of AECL, and by extension, the Government of Canada.	related to the environmental liabilities at the site, including any fiduciary responsibilities that relate to SFN.			Constitution Act. As a part of CNL's role in managing and operating AECL's sites on its behalf, CNL is engaging with Indigenous communities on an ongoing basis to inform them of the project and to address concerns where possible.

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			This will remain true irrespective of what contractor may be in place.				
23.	SFN (Jan 15, 2018)	SFN indicates that the list of relevant codes, standards and guidelines provided in Section 1.6.2 of the draft EIS has omitted reference to the Draft Technical Guidance produced by the Canadian Environmental Assessment Agency (CEAA) for assessing "Current Use of Lands and Resources for Traditional Purposes" (CULRTP). SFN also identifies the gap that the draft EIS does not include the assessment of CULRTP as a stand-alone valued component (VC). SFN also notes that virtually all Indigenous groups in Canada have rejected the language in the Canadian Environmental Assessment Act, 2012 (CEAA 2012), that the focus of assessment of effects under Section 5(1)(c) should be limited to "current use" of lands and resources for traditional purposes. Aboriginal and treaty rights and the resources and activities they are tied to, are not limited by current use, but should be assessed with reference to past, present and desired future use. Tying the assessment to merely current use is not in the interests of reconciliation, especially given that alienation effects (cutting Indigenous peoples off from current access to lands and resources) have been enforced by prior Crown decisions. SFN recommends that CNL provide an explanation for the omission of this technical guidance and a supplementary submission providing an assessment of CULRTP for SFN, including provision of information on desired future use of lands and resources by Sagkeeng.	Canadian Nuclear Laboratories does not consider the supplementary submission recommended by Sagkeeng First Nation warranted. A stand-alone valued component (VC) assessing potential Project effects on traditional land and resource use is already included in the Environmental Impact Statement (EIS). The potential Project effects on the desired future use of the WL site are assessed in sections 6.8 and 6.9. Based on the definition provided in the Canadian Environmental Assessment Agency's (2015) draft "Technical Guidance for Assessing the Current Use of Lands and Resources for Traditional Purposes under the Canadian Environment Assessment Act, 2012", the topics that would be assessed under a Current Use of Lands and Resources for Traditional Purposes are assessed under the stand-alone valued component (VC), Traditional Land and Resource Use by Aboriginal Persons. The sections where baseline and effects assessment information can be found are: • Description of the Environment: Section 6.8.4.2.5 Traditional Land and Resource Use • Pathways Analysis for Traditional Land and Resource Use by Aboriginal People: Section 6.8.5.2 CNL acknowledges Sagkeeng First Nation's assertion that "virtually all Indigenous groups in Canada have rejected the language in the Canadian Environmental Assessment Act, 2012 (CEAA 2012). The focus of assessment of effects under Section 5(1) (c) should be limited to 'current use' of lands and resources for traditional purposes," the Project was assessed in the framework of the Canadian Environmental Assessment Act, 2012, which focused on effects to current use. To help determine the scope of the environmental assessment, CNL engaged with First Nation and Métis communities, the public, and regulators. Through engagement with Indigenous communities, CNL learned that future use of the current WL Site upon decommissioning of the site is important to multiple potentially affected parties and communities. To reflect the importance of this issue, consideration of future uses of the WL site, including interest by Indigenous groups, is included in the EIS. Potential project effects that consider future uses of the WL site are considered under: • Land Tenure VC in Section 6.8 ; and • Community Well-being VC in Section 6.9.	Sagkeeng requested additional information in the EIS specific to impacts on Sagkeeng land and resource use, and provision of information on desired future use by Sagkeeng of the Project-affected area. CNL has not provided the requested information. No information on desired future use was gathered by CNL, and section 6.8 pools all Indigenous groups together. For the record, Sagkeeng finds the level of effort and rigour that was placed in the assessment of effects on Sagkeeng Indigenous land and resource use to be inadequate. Among the issues with it were: 1. No verification of VCs with Sagkeeng or integration of Sagkeeng TLUOS VCs into the assessment; 2. Very limited integration of the results of Sagkeeng's TLUOS into the assessment (approximately two pages of baseline is the only meaningful reference); 3. Lack of proper consideration of Indigenous land use impact pathways associated with perceived risk, fear and stigma associated with long-term nuclear waste disposal on our territory. CNL's "acknowledgement" of our concerns about lack of consideration of desired future use means nothing, given CNL's unwillingness to gather information from Sagkeeng on this topic to inform the assessment. Given that a future with ISD has fundamentally different likely potential for our members to ever use this area again for our traditional practices, understanding Sagkeeng's desired future uses of the site is critical to understanding the magnitude of effect to our land uses. What makes this even more disconcerting to us is that relevant information on this topic is readily available. The planned and desired future use of the Study Area is detailed throughout Section 4 of the Sagkeeng TLUOS report, in all VC categories (Water Resources; Medicines, Berries, and Other Food Plants; Hunting and Trapping; and Anicinabe Pimatiziwin). In addition, our members are willing to engage on this topic and provide critical insights. We again request that CNL engage us on this important issue.	CNL wishes to thank Sagkeeng for their feedback, comments and engagement on the project. Through these interaction CNL has learned a tremendous amount regarding the importance of connectedness to the land, spirituality and the importance of ceremony, the historic importance of the area to Sagkeeng, and the importance of water and the long-term stewardship interests of SFN to name a few. Thank you for this engagement as it has helped improve the quality of CNL's EIS. CNL is proposing numerous changes within the EIS which reflect CNL growth and learning, and consideration of Sagkeeng values. Overall, CNL maintains its view that the current VC of "Traditional Land and Resource Use by Indigenous People" is a broadly encompassing VC for traditional use that can adequately describe and assess potential effects on traditional land and resource use. Under that VC traditional use by SFN is described according to the five VCs employed in the Sagkeeng Land Use and Occupancy Study (p. 6-428). There is an inference in the question that because each of the VCs used in the traditional land use and occupancy study are not each stand-alone VCs in the EIS that somehow the values information is then not assessed. This is incorrect. The assessment of Project Interactions and Mitigation in section 6.8.5 considers all the values under the broader VC category of Traditional Land and Resource Use by Indigenous People. The description of historic and present-day traditional use is described in section 6.8 but each Indigenous community's use is clearly delineated into sub-sections in section 6.8.4.2.5.1. The requirement for CNL for the WR-1 *In situ* Decommissioning Project is to assess the effects of the project on current land use. As SFN is aware, Sagkeeng land and resource use does not currently occur on the WL property. There is no requirement for CNL to assess the effects of the project on a land use that is not currently existing. However, independent of the WR-1 decommissioning project, CNL wishes to engage with SFN on future land use and end state of the Whiteshell site and is planning for formal engagements. In the meantime, CNL will to continue to move forward with the WR-1 *In situ* Decommissioning Project in order to actually	In reference to the numerous changes CNL has proposed for their EIS, Sagkeeng has not seen any of these proposed revisions. We recommend that CNL provide those proposed revisions, in track changes from the original EIS, to Sagkeeng, and let Sagkeeng review and comment on the substance of those revisions. We have no way of knowing otherwise; review and comments on this table is of limited value without seeing the actual proposed changes. We recommend collaborative review of actual relevant proposed revisions to the EIS, prior to it being refiled with the CNSC. **Sagkeeng appreciates CNL's admission that the Whiteshell Laboratories has completely alienated Sagkeeng members from practicing their Treaty and aboriginal rights and TLRU in the area within the Whiteshell Laboratories footprint.** Nowhere in the version of the EIS that we have seen, which is now several years in the past, have the implications of that alienation or proper characterization of impacts on TLRU or Sagkeeng rights in the pre-Project circumstance been conducted. This means, of course, that the vulnerability of these Valued Components to additional change (and, importantly, continuation of a pre-existing adverse effect on Sagkeeng through future actions under different alternative scenarios) has not been established. Overall, the statement here is disconcerting as it reminds us of similar arguments made about other government-imposed decisions for land use and policy made in the past, not having to deal with	**CNL considers this comment closed.** While CNL has made efforts to address Sagkeeng's original concern regarding current land use as a baseline under CEAA 2012, for the additional concerns outlined in Sagkeeng's most recent comments, CNL is not able to address concerns in this comment related to psycho-social impacts, in-situ decommissioning, CEAA 2012, and the alternative means assessment. Sagkeeng's original comment was regarding current land use and how tying the assessment to merely current use is not in the interests of reconciliation; especially given that alienation effects (cutting Indigenous peoples off from current access to lands and resources) have been enforced by prior Crown decisions. CNL provided additional information twice on how it has incorporated traditional land use into the Environmental Impact Statement (EIS). Sagkeeng has rejected CNL's efforts to address Sagkeeng's comments. CNL is not considering psycho-social impacts of the project as a primary pathway. CNL will continue with its proposed EIS for In situ decommissioning of the WR-1 Reactor. CNL's EIS and Environmental Assessment process is in alignment with CEAA 2012. CNL will provide a copy of the EIS at the same time we submit to the regulator. Historical land use is out of scope of the WR-1 EIS. CNL feels Sagkeeng's following statement, "Sagkeeng appreciates CNL's admission that the Whiteshell Laboratories has completely alienated Sagkeeng members from practicing their Treaty and aboriginal rights and TLRU in the area within the Whiteshell Laboratories footprint," takes liberties on CNL's previous response were we stated, "Sagkeeng land and resource use

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					pursue other possible alternative uses for the site. CNL has stated clearly that perceptions that may alter behaviour do not represent an environmental effect as considered under CEAA (2012). Communities have been living with the existing reality since 1965, from an active reactor to shut down and in the process of being decommissioned. These decommissioning activities are proposing to make the people and the environment safer, to create future access to the site and to involve the Sagkeeng in a long-term meaningful way. By decommissioning the site, these activities could be contributing to improved safety of humans and the environment compared to the baseline conditions. Under CEAA (2012) there would be no pathway for concerns about risk, fear and perceptions in terms of representing actual environmental effects. However, CNL treats this concern very seriously and through funding support, the provision of further educational materials, and ongoing engagement, such as communications through the CNL funded Indigenous Liaison, is making efforts to help address this issue with Sagkeeng, other Indigenous communities and the general public. The EIS Project Interactions sections do address the topic of perceptions, fear and stigma and proposes mitigation and monitoring measures to address them. We have copied these statements from the current EIS so that SFN can review them directly. In section 6.8.5 which is the Project Interaction and Mitigation section and one goes to 6.8.2.2 under Secondary Pathways the issue of fear and stigma is discussed. SFN is encouraged to read the Conclusion section. Specifically, please go to page 6-447 of the December 20th, 2019 version that was provided to SFN. There is one bullet on that page and the following text is provided below. The text relevant to the point raised by Sagkeeng is highlighted in bold and states: "The Project may change the perceived suitability of the LSA for outdoor recreation and tourism and traditional land and resources." "The WL site was established in the 1960s with WR-1 becoming operational in 1965. Since that time, there have been nuclear research and more recently, decommissioning activities at the site. The area around the WL site in the LSA is currently used for agricultural activities, wildlife harvesting activities, fishing and private	the legacy of how those changes impacted and continue to impact us. We would recommend CNL not make statements in the future that are contrary to the principles of reconciliation that its client and the land owner (both, the Canadian Government through AECL) has committed to. In reference to CNL wishing to engage with Sagkeeng on future land use and end state, we encourage CNL to review and come prepared to discuss the recommendations made in our 2019 submission to the CNSC during the Whiteshell Laboratories re-licensing process. Formal commitments to concrete actions, rather than a "plan for a plan", are desired; Sagkeeng has already identified some of the critical elements of how the parties should be collaborating at the site level. CNL's statement suggesting that in situ decommissioning opens up new possibilities to future land use, is contrary to Sagkeeng's findings. Sagkeeng's alternatives assessment and the psycho-social impact assessment by Narratives both indicate that a future with In Situ Decommissioning actually reduces the viability of use of the site in the future for activities that Sagkeeng would like to see retrenched at the site - eventual reintegration of the site into the cultural landscape of Sagkeeng Anicinabe. The continued in perpetuity fencing of the site, the knowledge that radioactive reactor materials were left in the ground, those things which are not required for full removal options, reduce the flexibility of Sagkeeng future land uses; they do not increase them. Sagkeeng asks CNL to reconsider this statement in light of Sagkeeng's studies.	does not currently occur on the WL property. There is no requirement for CNL to assess the effects of the project on a land use that is not currently existing." CNL will endeavour to make possible the ability for community members to come on site and practice ceremony. CNL respects Sagkeeng's view and agrees to disagree on the topic of situ-decommissioning and opening up new possibilities to future land use. Once the site is fully decommissioned, it will be available for other uses for the first time since the early 1960s. Sagkeeng is a member of the Whiteshell Community Regeneration Partnership that looks into economic development opportunities in the region, including potential future uses at the Whiteshell Laboratories site. **Proposed steps to address concerns:** At a minimum CNL will document Sagkeeng's concerns on the psycho-social and clearly state Sagkeeng's preferred method of decommissioning is full removal of the WR-1 reactor. This will be documented in the Indigenous Engagement Report and EIS. In a meeting on December 1, 2020, CNL proposed to work with Turtle Lodge to support Sagkeeng members connection to the land at the Whiteshell Laboratories site: 1) Increase CNL's understanding of Anishinabe history and Worldview 2) Support ceremonies at the Whiteshell site 3) CNL was also interested in discussing the possibility of creating a space on-site for Sagkeeng to conduct ceremony In addition, CNL requested Chief and Council's support to pursue a community engagement initiative by Sagkeeng's liaison officer. CNL also suggested creating an Indigenous Stewardship Monitoring Initiative and CNL is open to

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					residences. This has not altered land and resources use in proximity to the WL site with activities, as such deer hunting, agricultural activities, fishing and other uses of the Winnipeg River are still popular. The presence of the encased WR-1 is not expected to cause changes in these existing activities, although a small number of users may perceive areas in proximity to the site as less optimal than if the reactor had been removed in its entirety. The Project will be engineered to demonstrate long-term safety through a combination of site characteristics and engineered design features and to isolate and contain contamination inside the reactor vault and limit releases of hazardous substances, including radiological substances. According to the ERA, thresholds for airborne and waterborne contaminants will not be exceeded as a result of the Project (EcoMetrix 2019). Therefore, there is no need to change land use in land released by AECL for unrestricted use or on the land in the LSA around the WL site; however, the presence of an encapsulated reactor and associated perceptions may make engaging in activities in the LSA less desirable for some users. To mitigate perceptions related to the suitability for use of the WL site and the lands around it, CNL will support robust communication of environmental monitoring results to confirm the safety of the WL site and help address concerns about future uses. CNL also seeks to work with Sagkeeng on how they would like to be involved in environmental monitoring and has held preliminary discussions on this topic. Sharing of monitoring results will be extended to Indigenous peoples, however the exact mechanism of these efforts will be jointly defined with these Indigenous Communities. In addition to personal outreach, Canadian Nuclear Laboratories will continue to use a public website and other media mechanisms to share information and receive feedback from Indigenous peoples and the immediate local communities through the duration of the Project. Future communication mechanisms to keep local communities and Indigenous peoples informed will be determined as necessary, and in consultation with them. Overall, with mitigation in place, Project effects on land and resource use are expected to be negligible. These pathways are therefore characterized as secondary." CNL has also addressed this concern about perceptions in section 6.8.7, the Conclusions	As regards CNL's statement that perceptions that alter behaviour are not an environmental effect to be considered under CEAA (2012) do not follow precedent. Perceived risk is a perfectly legitimate form of impact, recognized by Canada (including Health Canada) for at least the last couple of decades. CNL's statement suggests that the proponent has the right and capacity to define what is considered a viable impact pathway under CEAA 2012. This is incorrect. CNL has provided no evidence that either the legislation explicitly prohibits consideration of perceived risk and its impacts on human behaviour as a viable impact pathway during environmental assessments under CEAA 2012. CNL making this statement also suggests a lack of knowledge about how Indigenous peoples make decisions about current and future traditional land and resource use. It also suggests that CNL considers the continuation of an existing adverse effect pathway - alienation of Sagkeeng members from using the area within and around the WR-1 Reactor for traditional purposes due to perceived risk, fear and stigma - into the future in the Project case, not a legitimate topic for this EA to engage in. This is disrespectful to Sagkeeng, which will be forced to continue to the bear the brunt of this existing (and very real) adverse effect into the future in the Project case, and to the process of environmental assessment, which is designed to protect the environment AND people, especially "most vulnerable receptors", which in the human environment clearly includes Indigenous peoples with	exploring Indigenous employment and economic participation opportunities. CNL is also continuing to set up an Indigenous Advisory Committee.

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					section where it is stated: "In addition, to mitigate perceptions related to the suitability for use of the WL site and the lands around it, CNL will support robust communication of environmental monitoring results to confirm the safety of the WL site and help address concerns about future uses. CNL will continue to engage with local communities, municipalities and Indigenous peoples" (p. 6-449). In section 6.9.6.1.2 under Application Case Results CNL has stated: "The permanent presence of the encapsulated WR-1 will change the perceived suitability of the WL site for the future uses due to the perceived risk associated with the long-lived radiological hazards of the reactor vessel. This is a major concern for communities in the LSA. …. CNL will support robust communication of environmental monitoring results to confirm the safety of the WL site and help address concerns and mitigate perceptions about the site's suitability for future uses" (p. 6-502 to 6-503). In Section 12.7 CNL has stated: "CNL will implement the Environmental Assessment Follow-up Program for WR-1 to verify the accuracy of predicted environmental effects and determine the effectiveness of mitigation that has or is to be implemented. In addition, to mitigate perceptions related to the suitability for use of the WL site and the lands around it, CNL will support robust communication of environmental monitoring results to confirm the safety of the WL site and help address concerns about future uses. In addition, CNL has supported the conducting of Traditional Knowledge and Land Use studies. The carrying out of such studies has assisted in better understanding modern and traditional land and resource use near the WL site. CNL is aware that some of the Indigenous communities have continuing concerns about the potential effects of the Project and more broadly the WL site and the potential effect on traditional land and resource use and more specifically on the wildlife, fish and plants upon which such use is based. As such, CNL is committed to involving such organizations in monitoring and to communicating with them over the long-term to address on-going concerns. Overall, CNL will continue to engage with local communities, municipalities and Indigenous peoples." (p. 12-13) CNL has also undertaken specific engagement activities to better address this point. The	connections to the impacted area. Again, CNL has chosen to ignore inputs from Sagkeeng (at many times during this EA and including the results of the Sagkeeng Alternatives Assessment and the Psycho-social Impact Assessment) that ISD reduces rather than increases the likelihood that this site can be reintegated into Sagkeeng cultural, spiritual, and traditional uses. The factors influencing this are laid out in those two documents. Sagkeeng has called for "long-term, meaningful involvement" in site planning, monitoring and management, but has not seen CNL actually adopt any of our recommendations for how to make this happen as yet (for example our recommendations in 2019's re-licencing process). And any meaningful involvement needs to start at the decommissioning planning stage. CNL has maintained since the outset of this process that only it makes decisions about which decommissioning strategy to adopt; Sagkeeng does not see shutting us out from this process of consideration of alternative to be a good start, a strong foundation, for a "long-term meaningful" relationship. CNL is also requested to identify which of our recommended measures from the 2019 re-licencing process it has adopted in concert with our Nation; we have no record of any concrete actions to date. CNL states that there "would be no pathway for concerns about risk, fear and perceptions in terms of representing actual environmental effects" under CEAA (2012); however, if the site is decommissioned in the wrong way, it can lead to alienation in perpetuity by our members, which is an impact	

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					Hallam trip to Nebraska with invited Indigenous participants (including SFN) was particularly organized to help address this topic. This point is mentioned on page 4—6 of the EIS. CNL has highlighted all of the above text in order for SFN to understand that it does consider the topic of fear and stigma to be a real concern and CNL wants to address it. CNL is willing to undertake processes specific to Indigenous communities and SFN to address this concern. CNL is committed to continue to engage on this topic with SFN, to understand better their concerns and address them to the extent possible. That process would be aided by SFN sharing the results of the study they are undertaking on this topic and being funded by the CNSC. CNL made its best efforts to incorporate all the necessary information on existing land use from SFN and apologizes if some specific information was not described in the EIS. Certainly, there is recognition of existing traditional uses continuing to be important in the future. The requirement for CNL for the WR-1 In-situ Disposal Project is to assess the effects of the project on current land use. As SFN is aware, Sagkeeng land and resource use does not occur on the WL property. There is no requirement for CNL to assess the effects of the project on a land use that is not currently existing. CNL is interested in engaging with Sagkeeng on broader issues related to future land use, which we see as an important component of meaningful Sagkeeng involvement in the long-term stewardship of the land. AECL, as the site owner, is also interested in participating in these discussions.	pathway that CNL refuses to meaningfully consider despite Sagkeeng bringing evidence forward that this is a likely outcome of ISD (as against full removal options such as that contemplated in the existing CSR and site licence). Sagkeeng would argue that the transition from a temporary land use with a nuclear reactor built on site, to a permanent radioactive waste depository, is in fact a change to the environment in the future at the WR-1 facility, from what is currently legally allowed under the existing decommissioning licence. The absence of full removal of these radioactive wastes quite definitively is an environmental effect causing agent as against the base case of full removal. It creates a situation where an uncertain technology, imposed in a site not planned for nuclear waste management, would leave a risk causing agent in the ground when it could in fact be removed. It is this change, the continuation of existing risks into the much longer future than ever before contemplated in this site, that is an environmental effect in the eyes of any reasonable person. CNL continues to use terms like "small number" of people would be affected by an encased WR-1, without any evidence to support them. How has CNL made this assertion? has it polled the people of Sagkeeng about their preference for ISD versus full removal? Sagkeeng membership is not a small number. It is entirely possible, and indeed, probable that in fact more than a small number of people may see adverse effects on their ability and willingness to use the area as a result of a shift by Canada and its contractor from full removal of the hazardous materials to burying it in the ground in perpetuity. If CNL cannot justify its assertion with any hard data,	

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						derived from actually talking to people, this assertion should be removed from the EIS as it is not supported by evidence. In relation to statements made about "major concern for communities in the LSA", CNL recognizes the permanent presence of radioactive waste in an encapsulated ISD facility as a "concern" but not an "impact". Can CNL clarify the difference in terms of outcomes for people actually experiencing the "concern" or "impact"? Is there any difference? Sagkeeng sees this as an accurate statement of public concern. However, we are disappointed that this legitimate public concern is not also recognized as a viable impact pathway by CNL and we see no meaningful justification for why this "concern" is not an "impact". CNL makes statements regarding environmental monitoring and communicating results. CNL is asked to actually quantify and qualify how and when it plans to engage Sagkeeng in any and all initiatives associated with monitoring, planning, management activities, risk communication, and offsets for impacts on Sagkeeng values and uses. These vague statements cannot be confirmed or refuted as currently framed and therefore provide no confidence to Sagkeeng or decision-makers. In relation to comments made on risk communication, Sagkeeng fails to see how communication alone – given that under ISD this site will become and remain for all time a 'radioactive waste disposal facility' - is mitigation for alienation and loss of use, and fear and stigma. It is also not clear what level of commitment the proponent has to developing a Risk Communication Strategy/Program that is	

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						relevant to reduction of fear and stigma as expressed by Indigenous peoples, particularly in light of the need for trauma-informed processes, as discussed in the Psychosocial Impact Assessment. Can CNL provide a meaningful response to the recommendations made in the Sagkeeng Psychosocial Impact Assessment re: required mental health mitigation, trauma-informed decision making, and monitoring? Despite CNLs offer to mitigate impacts with robust communication of environmental monitoring results, Sagkeeng's position remains that the best way to reduce the legitimate "concern" and "impact" of fear, stigma and alienation associated with the radioactive waste, is to remove it. After all, in the mitigation hierarchy, it is preferable to remove or avoid the impact altogether rather than reduce it or monitor it (monitoring is really the "mitigation" being proposed here, and that is very low on the mitigation hierarchy). Sagkeeng provided their psycho-social impact assessment and alternative assessment to CNL in late October 2020. What does CNL propose as next steps for integration of the results of the psycho-social impact assessment and the alternatives assessment into the EIS? CNL states that they, and AECL, are interested in engaging on broader issues of future land use with Sagkeeng. AECL and CNL are requested to identify what steps have been taken to activate these relationship level discussions and what commitments have been made to date.	
		Purpose of the Project					

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29.	SFN (Jan 15, 2018)	SFN expresses the position that there is insufficient justification for adopting a revised approach in the draft EIS and provides the following comments: • The original decommissioning proposal for WR-1, as described in the 2001 Comprehensive Study Report (CSR), was based on the disposal of virtually all radioactive wastes at off-site radioactive waste facilities. • Despite this important commitment, AECL subsequently instructed CNL to accelerate the project timeframe such that the site is decommissioned by 2024 (as indicated in Section 1.1, pages 1-7 to 1-9 of the draft EIS). This arbitrary timeline effectively precludes the use of off-site disposal facilities due to the fact that they won't become operational for multiple decades. As a consequence, on-site disposal options such as ISD became the pre-determined decommissioning solution. Significantly, the revised approach is anticipated to cost a fraction of the plan that Canada originally committed to implement. • In Section 2.3 of the draft EIS, CNL states that a fundamental objective of the revised proposal is to ensure that it does not nullify obligations previously committed to in the CSR. However, it is the view of SFN that switching from off-site to on-site disposal constitutes a significant and fundamental difference between the original and revised proposals. Based on those differences, SFN asserts that the revised proposal is inconsistent with and nullifies AECL's prior CSR commitments. • The original (i.e., CSR) and revised alternative selection processes resulted in completely different outcomes: an original proposal with off-site disposal and a revised proposal disposing on-site, in situ. CNL's draft EIS for the revised proposal does not present an adequate rationale for this fundamental change. However, based on the criteria that were used for the alternatives assessment, it appears that cost and expediency were given increased emphasis by the latter evaluation. There has been no consultation process to confirm that these values, chosen by the Canadian Government and its agents in AECL and CNL, have been confirmed in a socialization process with affected First Nations and other Manitobans. • Importantly, Canada's original proposal indicated that low-level waste (LLW) present in trenches and radiologically contaminated sediment in the Winnipeg River would be actively monitored for an extended period prior to determining the acceptability of those materials for in situ disposal. In contrast, the revised proposal involves disposing of relatively large quantities of hazardous radioactive waste from WR-1 in situ, without an extended period of monitoring to confirm its acceptability first. • In summary, failure to justify the diametrically opposed conclusions of the CSR and draft EIS undermines the credibility of the selection process. The flip-flop also undermines public and SFN confidence.	Atomic Energy of Canada Limited (AECL) conducted its first environmental assessment for completing the decommissioning of the Whiteshell site, in 1999, which is described in the Comprehensive Study Report (CSR). The CSR called for the complete removal of the WR-1, facilities, associated systems and components. Waste would be removed, classified, segregated and placed in interim storage on site. The below-grade concrete structure would largely remain in place. The CSR recognized that 1) there was no national permanent disposal solution for nuclear waste and 2) technological advancements would allow for specific techniques and processes not necessarily envisaged at the time. The CSR was also developed at a time when Canada had little experience in significant nuclear decommissioning work. Obligations of the CSR remain; the only exclusion if approved is the proposed in situ decommissioning of WR-1. The mechanism for measuring potential impacts is the environmental assessment process which includes engagement with Indigenous communities and the public. The assessment of alternatives is given in Section 2 of the Environmental Impact Statement (EIS). It has been revised for clarity, and incorporates feedback from SFN, other engaged Indigenous groups and the Public. WR-1 has been in safe storage with surveillance since it was shut down in 1985 and is routinely monitored. Once decommissioned, WR-1 will remain under institutional control for at least 300 years.	SFN recommended that CNL present a detailed description justifying all differences between the original (i.e., CSR) and the revised proposal. It was requested that the description clearly demonstrate how the revised proposal does not nullify any of AECL's obligations from the original proposal. CNL has not provided the requested information. CNL's response to SFN's request indicates that the obligations of the CSR remain in place, with the only exception being in situ decommissioning of WR-1. SFN strongly asserts that this exclusion is significant and that it represents a major change from the approach proposed by AECL in the CSR; changing from off-site disposal to ISD is a fundamental change to the remedial strategy for the site that requires comprehensive justification. Based on the evidence provided by CNL (including the alternatives assessment), SFN concludes there is no technical justification for CNL to nullify its former commitment. This is contrary to CNL's fundamental objective of honouring the CSR obligations. In the absence of any technical justification, SFN assumes that that the proposed change is motivated primarily by potential cost reductions. While Canada may save some money, the consequences associated with this major change in position will be disproportionately borne by SFN.	The CSR describes the high level plan for decommissioning of the Whiteshell Laboratories Site and documents an assessment of potential environmental impacts resulting from the proposed decommissioning. It is an assessment document and not a statement of obligation. The CSR was approved in 2002 and includes acknowledgement that: *"It is expected that an optimization exercise will be conducted for each facility and the results will form the basis for the individual detailed decommissioning plans. Because of the technical developments that will be achieved over the lifetime of the project, it is not possible to speculate on what new processes or techniques will be available to those implementing the decommissioning plans."* *"The availability of off-site national disposal facilities is essential to completing the decommissioning of the Whiteshell Laboratories' site."* CNL acknowledges that the proposed ISD is a significant change in decommissioning strategy for WR-1 brought about through experience and knowledge gained in the 20 years since the CSR was written. Because the proposed variation to in situ disposal of WR-1 from full dismantling and off-site storage/disposal of waste, this work must undergo a separate environmental assessment under the Canadian Environmental Assessment Act (2012). Because it is a significant deviation, the impacts of the proposed plan must be examined and assessed against current human health and environmental protection standards, including any improvements that that been incorporated into those standards since 2002. This also includes meaningful Indigenous consultation and engagement. Engagement by CNL has been extensive for ISD compared to that done for the CSR. CNL's primary commitment is the protection of human health and the environment. As this project is being funded through AECL and the Government of Canada (and therefore taxpayers' dollars), cost is indeed a factor, but it is not the only factor, nor is it the prominent factor. The decision to pursue ISD is primarily based on the need to re-evaluate the original plan based on new knowledge and expertise, as well as changing context and developments. This includes international best practices that show that long wait times for decommissioning may not be optimal as facilities degrade over time,	CNL states that they are pursuing ISD in light of new knowledge and expertise. However, the most knowledgeable and expert organization in the world, the IAEA, has reiterated in 2019-20 that CNSC should reject ISD as a decommissioning strategy for nuclear reactors. Sagkeeng contends that there have been no material advancements in the knowledge gained related to ISD over the last 20 years. In fact, it is our understanding that in 2020, IAEA recommended that "CNSC should consider revising its current and planned requirements in the area of decommissioning to align with the IAEA guidance that entombment is not considered an acceptable strategy for planned decommissioning of existing nuclear power plants (NPPs) and future nuclear facilities." and that CNSC responded that "The CNSC will update its regulatory document, REGDOC-2.11.2, Decommissioning, to explicitly reflect the CNSC's recognition that in situ decommissioning should not be considered an acceptable strategy for planned decommissioning of existing nuclear power plants and future nuclear facilities other than uranium mines. It is expected that Commission approval of the regulatory document will be sought in summer 2020." This suggests that ISD is NOT the preferred option based on our current knowledge of decommissioning, from the highest level of nuclear experts, and seemingly endorsed by the CNSC as of 2020. It is not clear to Sagkeeng why "legacy" sites would be excluded from this requirement.	**Agree to disagree based on irreconcilable differing positions. CNL considers this comment closed.** CNL is continuing with its plan to submit the Environmental Impact Statement (EIS) on In situ decommissioning to the regulator and does not agree with Sagkeeng's opinion on in-situ disposal. With regards to the International Atomic Energy Association (IAEA) recommendation Sagkeeng refers to, The Canadian Nuclear Safety Commission responded to the IAEA's recommendation by stating: "…In those cases, and in line with IAEA Safety Requirements, entombment could be considered an option when supported by a safety case. While the current text of draft REGDOC-2.11.2, Decommissioning, restricts the use of in situ decommissioning to uranium mines and mills, exceptional circumstances and legacy sites, the CNSC will include further text to explicitly reflect that in situ decommissioning should not be considered an acceptable strategy for planned decommissioning of existing NPPs [nuclear power plants] and future nuclear facilities other than uranium mines. CNL is providing a safety case and the Whiteshell Laboratories site is considered a legacy, which is an exceptional circumstance for considering in situ decommissioning. Sagkeeng's original comment requested CNL provide justification for CNL's propose in situ decommissioning. Below we provide additional rationale for why we feel in-situ is a safe and viable option for WR-1 decommissioning. There are many sound technical reasons why WR-1 is a suitable candidate for In Situ Disposal (ISD). • Small size of the facility. • The facility is already below grade and can contain the waste in a robust shielded underground structure.

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		SFN recommends that CNL present a detailed description justifying all differences between the original (i.e., CSR) and the revised proposal. The description should clearly demonstrate how the revised proposal does not nullify any of AECL's obligations from the original proposal.			and knowledge about facilities gets lost (as individuals familiar with facilities retire). Over time, environmental liabilities such as the WR-1 which are not tackled and the radioactivity not stabilized can lead to increased risks (to the environment and workers) and costs. As was noted, the CSR was predicated on the assumption that a waste disposal facility would be available for all the waste at WL, including the WR-1 reactor core. That assumption has not been realized. In order to reduce its environmental liabilities, AECL has asked CNL to review plans and propose projects that would protect the environment and reduce risks. As part of this, improvements in decommissioning expertise which has been gained in the 20 years since the original CSR was prepared were considered. The alternative means analysis conducted by CNL has demonstrated that there is not a better alternative now to achieve the decommissioning objective of reduced risk and liability removal. ISD is safe and effective.	There is no material evidence of recent improvements in ISD decommissioning expertise. CNL needs to back up their assertion with actual evidence that ISD technology has improved and that it has become a recognized "preferred" alternative including when the perspectives of the impacted peoples are integrated. We note for example that CNL came to the conclusion in Section 2 of the initial draft EIS, long since refuted by Sagkeeng in the results of both the Sagkeeng Alternatives Assessment and in the psycho-social impact assessment, that ISD was in fact "socially acceptable". The evidence provided by Sagkeeng clearly demonstrates that nothing could be further from the truth. Has CNL revised this clearly erroneous claim in its revised draft EIS? We don't know, because we have not been provided this material to date. We request that CNL provide Sagkeeng with the actual material it plans to put in its Alternative Means Assessment (Section 2 of the EIS in previous iterations), rather than simply provide this highly repetitious comment and response material. We are happy to provide feedback on the actual materials. We also request that CNL integrate the findings of the two above-noted studies into its revised Alternative Means Assessment. Sagkeeng questions whether CNL's engagement meaningful if they disregard virtually all input received? Sagkeeng has expressed strong and consistent opposition to this change of plans from full removal to "cement in place" and been rebuffed at every turn by CNL. SFN has shown that the alternative means analysis was	• The thick, reinforced concrete structure of the facility has been tested and verified to be in good shape (condition assessment discussed in Section 3.4.9.1.1 of the EIS). • When tested, the grout containing locally sourced materials (e.g., sand, fly ash, cement) met all performance expectations. • Over 30 years of storage with surveillance has reduced the inventory of short lived isotopes. • Low permeability of the surrounding clay. • 99.9% of the radioactive material is trapped in the reactor vessel steels and zircalloy pipes and tanks, deep within the facility and underground, which will corrode very slowly, ensuring effective containment of the waste while natural radiation decay occurs. The ISD design consists of many overlapping safety barriers, including: • The waste form (slow corroding resists releases). • The Vault (thick heavy concrete designed to be water tight). • The grouted below grade structure (prevents collapse/ subsidence, slows groundwater, and creates favourable chemical conditions to further slow corrosion). • Foundation walls (up to 4 feet thick and verified to be structurally sound, slows groundwater). • Cap and Cover (divert snow and rain, and resist human intrusion). The methodology for placement of the grout will be to pour it in "lifts" or small batches so grout can be properly placed where it needs to go. Strict quality control testing and inspection will be done on raw materials and the mixed grout to

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						fundamentally flawed, with results skewed towards CNL's pre-determined preference. AECL was responsible for ensuring that a waste disposal facility was available. They have failed to make any meaningful progress on that front, and now somehow therefore SFN is expected to accept the impacts of ISD? This is not reasonable or fair, and beneath the honour of the Crown. And, Canada (through AECL) still has not engaged Sagkeeng in any meaningful engagement on the legacy of harms caused by the facility during its lifetime and into decommissioning. Why has AECL not initiated any consultation on what Sagkeeng has lost? Overall, CNL shows no evidence that it has considered what Sagkeeng has had to say over the past two and a half years on this topic. We again ask that CNL show evidence that it is integrating the results of the two recently released studies by Sagkeeng into a reconsideration of alternative means, and activate a multi-party, multiple accounts evaluation of alternative means to decommission the WR-1 facility.	ensure the highest quality final product. The requirements the grout must meet are given in the EIS Section 3.4.6.2 Table 3.4.6-1 Target Physical Properties of Grout. The target requirements are easily achieved by most cement based mixes, and the mix CNL has selected for WR-1 is no exception. A detailed laboratory test program was performed to verify that the grout mix does meet or exceed all the target properties. The Whiteshell Reactor Disposal Facility (WRDF) will employ best available grout technology and quality assurance to extend it well beyond 300 years. This period of time was chosen for analytical purposes to evaluate worst-case potential dose to receptors, but the safety assessment was performed for a much longer duration, recognizing that the hazard exceeds thousands of years. CNL has created user friendly communications documents, including posters, documents and the WR-1 web page on the WR-1 Decommissioning Homepage to help communicate the proposed ISD project. CNL heard the concerns of the communities and incorporated changes to the EIS to enhance the description of the design, methodology and integrity of grout encapsulation. In addition, the Comprehensive Study Report states: "The long-term management of nuclear wastes is contingent upon finding a nationally acceptable solution consistent with federal policy on waste management. At present, no options or sites have been defined or approved that will provide such a solution. The availability of off-site national disposal facilities is essential to completing the decommissioning of the Whiteshell Laboratories' site. Provision of national waste disposal facilities is not within the Whiteshell Laboratories Decommissioning Project scope. Until a national facility

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							is available, the wastes arising from the decommissioning project will remain in other secure interim waste management facilities licensed by the CNSC." One of the key considerations for waiting for a national facility was to avoid double handling of materials and the exposures and risks associated with that. As of this time, there is still no indication of a national repository, or even a private repository for ILW with an expected opening date. The CSR is also clear that: "…it is recognized that various strategies, approaches and technologies will be available to achieve the end-state. It is expected that an optimization exercise will be conducted for each facility and the results will form the basis for the individual detailed decommissioning plans. Because of the technical developments that will be achieved over the lifetime of the project, it is not possible to speculate on what new processes or techniques will be available to those implementing the decommissioning plans. When the detailed decommissioning plans are developed in the future, the regulator will be able to verify that the optimization process took place and that the applicable standards will be met." Further, CSA N294 – Decommissioning of facilities containing nuclear substances states: "7.7 Changes to the decommissioning strategy Changes to the decommissioning strategy might be warranted as a result of such considerations as (a) post-operational contamination survey results; (b) assessments of hazards or environmental impacts; and (c) new technological developments or regulatory requirements." Given the original Decommissioning strategy is heavily reliant on the

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							assumption that a waste disposal facility is available and no national facility is currently even planned for ILW International best practice is to reduce deferment periods, not extend them. The review of the approach to decommissioning WR-1 is warranted. The base assumptions of the CSR, including the acceptable deferment periods, and the availability of a ILW disposal facility are no longer valid. By reassessing the approach, CNL now believes in situ disposal is the most practical of all 4 safe alternatives to provide a long term final end state for the wastes in WR-1 that does not rely on future generations to perform any additional actions to further handle or manage these wastes. Further, while in-situ disposal is not a 'new' technology (it is proposed for portions of the WL site within the CSR), since 2002, almost 20 additional years of verification monitoring has been performed on existing in-situ disposal facilities. In some cases, almost 60 years of monitoring have demonstrated these facilities are performing the functions they were designed to perform. As with any technology, it becomes more reliable, and thus more attractive for use as, more data is gathered confirming it is performing as expected. CNL takes offense to Sagkeeng's assertion that CNL has ignored Sagkeeng input. We have provided numerous examples of where the EIS has been modified and changed as a result of Indigenous input. CNL has committed to meaningful ongoing engagement, and involvement in long-term monitoring of the site. CNL has not provided details to this point as the intent is to mutually develop the details of those initiatives. With respect to historical harms (which are out of scope of the EA), AECL can engage with Sagkeeng and

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							help facilitate discussions with other government organizations. As Sagkeeng is probably aware, issues related to past harm, historical issues and legacy are led by Crown-Indigenous and Northern Affairs Canada.
30.	SFN (Jan 15, 2018)	SFN explains that the WR-1 was designed as a nuclear research reactor, not an in situ radioactive waste disposal facility. SNF indicates that retrofitting it to dispose of radioactive wastes in place more than 50 years after it was constructed without any planning for that potential end state is inappropriate. Fundamentally, such a "retrofit" approach will inevitably be less effective in containing the waste than a purpose-built repository. SFN recommends that CNL present a detailed analysis and comparison of potential radiation exposure pathways from: a) the retrofit ISD concept; and b) a purpose-built, off-site disposal facility, as envisaged in the original CSR proposal.	The objective of our submission to the CNSC, as determined through a safety assessment, is to demonstrate that the ISD approach is an acceptable and safe method for disposing of the intermediate and low level waste expected from WR-1. A detailed analysis and comparison of potential radiation exposure pathways from: a) the retrofit ISD concept; and b) a purpose-built, off-site disposal facility, as envisaged in the original CSR proposal is not a necessary supporting analysis for the purpose of demonstrating ISD as safe to people and the environment. The project alternatives were analyzed for multiple criteria, the selected option was analyzed for human and environmental effects, and it is shown to be safe and protective.	SFN recommended that CNL present a detailed analysis and comparison of potential radiation exposure pathways from: a) the retrofit ISD concept; and b) a purpose-built, off-site disposal facility, as envisaged in the original CSR proposal. CNL has not provided the requested information. CNL's alternatives assessment includes a *qualitative* comparison of the potential impacts associated with each of the alternatives. Those qualitative comparisons have not been supported by *quantitative* estimates that prove CNL's preferred ISD concept is superior to other alternatives. When making decisions with potentially significant and long-lasting implications to the environment, SFN and other stakeholders, simply stating that a given alternative will perform well rel5ative to other alternatives is insufficient. Quantitative justification for such positions must be provided.	It is not possible to perform a detailed quantitative comparison of the 'retrofit ISD concept' to a 'purpose-built', off-site disposal facility, as the information required to perform that comparison does not exist for the 'purpose built' concept. Information such as location, geotechnical properties, hydrogeological conditions, and availability of construction materials would be necessary to perform the requested comparison. Since the 'purpose built' concept is purely hypothetical, the comparison is done using a similar level of detail, and looks qualitatively at key aspects of both concepts. The process for alternatives assessment is not to fully develop and explore multiple proposals all at the same time to arrive at a 'best' solution. The process is to identify feasible options, and to apply criteria, from the perspective of the proponent (CNL), to identify the 'Preferred' alternative. The Preferred alternative is then developed in greater detail and assessed for its impacts on human health and the environment. It is neither required, nor practical to perform detailed quantitative comparative analyses beyond what is currently provided in Section 2.0 of the EIS.	CNL's final statement about a detailed quantitative comparative analysis being neither practical nor required is a repetition of previous responses. A quantitative assessment COULD be performed if certain assumptions were made regarding the off-site disposal location. Relying exclusively on a qualitative assessment, with CNL making the qualitative determinations using criteria that don't contemplate the preferences of interested parties is inconsistent with best practice, lacks transparency and is not defensible. This is not in keeping with best or acceptable practice, from the perspective of Indigenous peoples. See for example, the First Nations Major Project Coalition's Major Project Assessment Standard, endorsed by 65 Canadian Indigenous groups. In that Standard, the following criteria related to alternative means assessment are identified: 2.2 Involvement of affected First Nations in all initial activities, including planning, design, alternatives and siting/routing assessments, and scope of assessment decisions, as early as possible and before initial project submissions are made to the Crown. [Sagkeeng was not involved by CNL in consideration of alternative means from the outset of planning]. 2.5 First Nations are engaged in a meaningful assessment of the alternative means to undertake a project (e.g., routing, siting, chosen technology), and alternatives to the project, prior to the filing of an application for the preferred alternative [This did not occur for WR-1]. This	**CNL is unable to comply with Sagkeeng's request.** CNL is unable to comply with Sagkeeng's request that CNL provide a detailed analysis and comparison of potential radiation exposure pathways from: a) the retrofit In Situ Disposal (ISD) concept; and b) a purpose-built, off-site disposal facility, as envisaged in the original Comprehensive Study Report proposal. As explained, CNL cannot perform a comparison between retrofit ISD and a purpose-build facility because this facility does not exist. The project alternatives were analyzed for multiple criteria, the selected option was analyzed for human and environmental effects, and it is shown to be safe and protective. CNL would like to point out the average effective yearly dose rate from natural radiation (background) in Winnipeg is **4.1 mSv/a** (Canadian Nuclear Safety Commission Fact sheet – Natural background radiation). The estimated peak Total Dose rate to humans for the Whiteshell Reactor Disposal Facility is **0.0005 mSv/a** (Environmental Impact Statement (EIS) Table 6.7.1-15: Summary of Total Dose during the Post-closure Phase Human Health Valued Components). Hence the change in average dose rate to humans in our normal evolution scenario would be from **4.1000 to 4.1005 mSv/a or 0.0012%.** This is likely less than the yearly variation in the average background radiation as measured in Winnipeg. The project is also being considered under CEAA 2012 and not the Impact Assessment Act. CNL will continue to submit the EIS under CEAA 2012. CNL supported and funded the Alternative Means Assessment

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						may include but would not be limited to: 2.5 (a) Identification of both Proponent criteria and First Nations criteria with which to assess alternatives. These criteria must go beyond technical and economic feasibility (e.g., potential for rights and title infringement), be weighted in a transparent fashion, and assessed for each alternative. [Sagkeeng called for this and was rebuffed by CNL since January 2018. Sagkeeng's recently released Alternative Means Assessment shows how incorporating First Nations criteria makes for a fundamentally different set of findings in relation to preferred alternative means]. 2.5 (b) Collection and review of adequate information to compare the benefits and risks of each alternative, including detailed information on comparative costs of each alternative. [CNL has provided adequate information on comparative financial costs, but used only a qualitative assessment of benefits and risks of the proposed alternative means, which has contributed to an overemphasis on worker and transport risks in the alternative means assessment, even though CNL has indicated that all four technically and economically feasible alternatives can be undertaken safely for workers and the environment]. 2.5 (c) In any case where two or more potential project components and/or routes are being promoted as viable alternatives by the Proponent, those components/routes will be subject to fulsome effects characterization across all applicable Valued Components– carried through to the effects assessment phase for comparative analysis. [CNL has only focused its EIS on the ISD alternative, meaning that actual comparison to a future with the currently permitted	conducted by Sagkeeng that reflects the values and issues of that community specifically. While CNL will not conduct a re-assessment of Alternatives based on the Sagkeeng, results we are evaluating the documents collectively. We recognize the perspective of Sagkeeng and have acknowledged their position quite clearly within the EIS. CNL disagrees with Sagkeeng and given the uniqueness of these circumstances, believes the ISD option is "preferred". At the end of the day, the decision will rest with the regulator, and we hope to be able to work productively with Sagkeeng regardless of that regulatory outcome.

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						decommissioning plan, which involves full removal, does not occur. This reduces the ability for parties and decision-makers to understand the comparative benefits and risks of a future with ISD and a future without ISD.] 2.5 (d) Joint assessment of alternatives between the Proponent and affected First Nations. [CNL continues to refuse to conduct any such exercise with Sagkeeng, despite this being recognized best practice for controversial projects related to the ultimate management of hazardous wastes (e.g., the Canada Deline Uranium Team, the Giant Mine Remediation Project).] 2.5 (e) If a Proponent brings forward an Application without having conducted the requisite alternatives assessment, the First Nations may require the above-noted steps to occur prior to moving forward with the full assessment of the preferred alternative. Sagkeeng does not expect that only guidance from Indigenous groups will be considered however, when looking at alternative means to decommission the facility. We would point CNL (again) to the IAEA's recommendations, and CNSC's commitments to revise its guidance, to indicate that ISD is generally not an acceptable alternative means for decommissioning a nuclear reactor. CNSC (2020). 2019 Integrated Regulatory Review Service Mission. Staff Presentation to the Commission. CMD 20-M9, June 17, 2020. In addition, we note that this is a federally funded project, on a federally owned property, and would suggest that Canada must require that this Project be assessed using the current law of the land, IAA 2019. Anything less is a disservice to Canadians. Projects are not graduated to newer environmental assessment/impact assessment	

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						regimes when they are proposed by private sector companies, in large part because the change in assessment requirements could be commercially punitive to proponents. That is not the case here; Canada and Canadians are paying for the entire decommissioning Project, and Canadians want to see the best possible assessment of alternative means. There is nothing punitive to any commercial entity about using guidance developed under the new federal Impact Assessment Act for alternative means assessment. And that guidance currently states the following: -"consideration [of alternative means] provides an important opportunity for meaningful engagement with Indigenous peoples, the public and other participants". [THIS WAS NOT THE CASE WITH WR-1, where the Proponent continues to insist that the alternative means assessment is its alone to conduct with input on criteria, risk, benefits, weighting or perspectives of any other party, including Sagkeeng] -"the alternative means assessments should be informed by, but not limited to, the following: Any assessment of the effects of the designated project that is conducted by or on behalf of an Indigenous governing body and that is provided with respect to the designated project [Sagkeeng has provided both an independent alternative means assessment and an independent assessment of the psycho-social impacts of alternative means and these have yet to be integrated by the Proponent, or even committed to be	

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						integrated by the Proponent, into its alternative means assessment] Indigenous knowledge [not integrated into the Proponent's alternative means assessment] -"The approach and level of effort applied to addressing "alternative means" can be established on a project-by-project basis taking into account five key considerations: • The description of the project components and activities • The anticipated positive and adverse effects associated with the potential alternative means, taking into account the potential for mitigation; • The current status or vulnerability of VCs that may be impacted by the alternative means; • The potential for alternative means to increase the positive effects of the project; and • The preferences and views expressed by Indigenous groups and the public. [The Proponent's alternative means assessment has ignored the preferences and views of Sagkeeng, has ignored the long-term benefits to Sagkeeng use, rights, culture, well-being and mental health of full removal options (all positive effects of full removal), has not considered the vulnerability of Sagkeeng members (via fear, stigma, land alienation and perception of the health of country foods) in the pre-project circumstance in	

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						its alternative means assessment, nor weighted these factors high enough in its weighting scheme for alternative means assessment], and overestimated the importance of worker and transport safety risks in its assessment [which can be readily mitigated through existing industry practices and regulation], artificially skewing the preferability of ISD upwards. The guidance goes on to state that the proponent should "facilitate an open and participatory process" for its alternative means assessment, with the benefits of "facilitating transparency and fostering greater support for projects and decisions" and that "various perspectives obtained through early meaningful engagement of Indigenous peoples, the public and other participants can inform the development and assessment of alternatives". [This was clearly not the case for WR-1 by CNL] The guidance states as well that "the extent to which alternatives are to be analyzed and compared is also case specific. Some instances where more detailed analyses may be warranted include when the difference among alternatives and their associated effects are unclear or when there is substantial interest or concerns	

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						from participants". [both of these factors are in play with WR-1, yet the Proponent insists that only they should be involved in the alternative means assessment and that only qualitative comparisons between alternative means are required] [all of the above is from IAAC's "Policy Context: "Need for", "Purpose of", "Alternatives to" and "Alternative means" – provide web citation dated Jan 23, 2020.] IAAC's guidance allows the assessment agency to direct proponents to include other parameters, such as community preference and impacts on Indigenous rights, into the assessment of alternatives. We would request that CNL do this voluntarily, or if this is not the case, that AECL require and CNSC require that the proponent do so. In addition, alternative means should be compared using the expectations of IAA 2019, which is to consider how the positive and adverse environmental, health, social and economic effects on VCs, which under IAA 2019 are not solely tied to "changes to the environment" in the way they were under CEAA 2012, are impacted by each of the technically and economically feasible alternative means. And we fully agree with the Impact Assessment Agency of Canada's guidance that "Proponents may also be required to consider the view or information provided by Indigenous peoples, the public, and other participants in establishing parameters to compare the alternative means" and that the proponent may be required to apply a Gender Based Analysis Plus to the analysis to describe the effects on diverse or vulnerable groups, which in this case includes	

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						Sagkeeng land users and community members. [all of the above is from IAAC's "Guidance: "Need for", "Purpose of", "Alternatives to" and "Alternative means", dated January 23, 2020.] Sagkeeng expects for a federally funded, federally owned proposed Project, that each of the above-noted current guidance elements be applied to the alternative means assessment for the WR-1 Reactor environmental assessment. There are no commercial interests at stake; what is at stake is Canada's Constitutional responsibility to Indigenous peoples and their rights, Canada's commitment to reconciliation, and Canada's commitment to uphold the United Nations Declaration on the Rights of Indigenous Peoples, Article 29(2) of which states: "States shall take effective measures to ensure that no storage or disposal of hazardous materials shall take place in the lands or territories of indigenous peoples without their free, prior and informed consent". Sagkeeng does not consent to turning the Whiteshell Laboratories, in particular the WR-1 Reactor facility, into a permanent radioactive waste disposal facility. ISD will cause this to happen. Do AECL and CNL agree that this action, without Sagkeeng approval, would be contrary to Canada's commitment to fully implement UNDRIP?	
33.	SFN (Jan 15, 2018)	SFN expresses the following concerns with the proposed project relative to the "As Low as Reasonably Achievable" (ALARA) principle: • The ALARA principle is an internationally accepted requirement for the management of potential risks from ionizing radiation. CNL indicates it is committed to ALARA as it pertains to both people and the environment. Specifically, the principle is identified as a "strategic requirement" of the project (Section 3.4.2 of the draft EIS). In this regard, CNL asserts that conformance with the	The assessment of alternatives is given in section 2 of the EIS. The section was revised for clarity, and based on feedback from SFN, other engaged Indigenous groups and the public. It is important to understand that the ALARA principle must also consider socio-economic factors as well. The assessment will clarify the differences in the approaches, and the relative risks not only to each other, but to what is considered 'acceptable' risk. The purpose being to show that while ISD may in	SFN recommended that prior to selecting a preferred alternative, CNL should conduct a detailed quantitative assessment demonstrating the performance of each alternative relative to the ALARA principle. <u>CNL has not provided the requested information</u>. In their response CNL states: *"while ISD may in some ways have a higher risk than complete removal, there are several ways that ISD is less risky than overall removal, and that the risks of both are small compared to the limits established by the CNSC based on an extensive*	The ALARA principle is one of a series of factors that were considered in determining that an in situ disposal model was a preferred option from that of complete dismantling and off-site waste disposal. Numerous factors were involved in determining that the in-situ method of disposal for WR-1 was preferred approach. CNL is committed to continuing to work with SFN to address ongoing issues and concerns regarding the WR-1. In addition, CNL is committed to	The requested quantitative assessment of ALARA has not been provided. CNL re-iterates their commitment to working with Sagkeeng. But not apparently if it involves contemplating changes to the preferred alternative and/or the selection	**CNL does not agree with Sagkeeng's recommendation as explained in previous responses. CNL considers this comment closed.** Sagkeeng requested that prior to selecting a preferred alternative, CNL should conduct a detailed quantitative assessment demonstrating the performance of

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		ALARA principle was a fundamental requirement of the alternatives assessment. The evidence presented in the draft EIS suggests otherwise. • The original proposal which involved off-site disposal of radioactive wastes is clearly consistent with ALARA; by removing the wastes from the site and depositing them in a robust, purpose-built radioactive waste disposal facility, the residual risks at the WL the site would be reduced to the greatest degree possible, without incurring undue risks at another location. The original proposal and associated commitment to dispose of wastes off-site were made taking into consideration all relevant risks, including occupational exposures and the potential for transportation accidents. • In contrast, the revised proposal involves leaving the waste on-site. Under this approach, some effort would be taken to isolate the wastes in situ, but the residual risks would still be greater than those associated with the original proposal. To illustrate, the proposed ISD groundwater will not meet drinking water standards / guidelines during the period of institutional control and for thousands of years into the future. Specifically, Section 2.5.4.2 of the draft EIS concludes the ISD alternative "represents the highest risk to the environment at the WL site during the post closure phase because the majority of radioactive materials will be present on site, unlike the other alternatives where the radioactive materials are either completely or partially removed." • Based on its inferior residual risk profile relative to the original proposal, the revised proposal cannot be classified as ALARA; the original proposal keeps risks lower and, based on its prior acceptance, is also "reasonably achievable". SFN expresses the position that the decommissioning of the WR-1 must comply with the ALARA principle and, as a result, the revised proposal is not acceptable. Notably, the revised proposal also fails to meet CNL's own criterion that the ALARA principle will be a "strategic requirement" of the project. SFN recommends that prior to selecting a preferred alternative, CNL should conduct a detailed quantitative assessment demonstrating the performance of each alternative relative to the ALARA principle.	some ways have a higher risk than complete removal, there are several ways that ISD is less risky than overall removal, and that the risks of both are small compared to the limits established by the CNSC based on an extensive body of evidence.	*body of evidence*.". CNL has not, however, presented a quantitative assessment to support this critically important conclusion. Simply stating that an alternative is ALARA without quantifying the magnitude of any differences is of limited value. Contrary to CNL's conclusion, SFN initial conclusion is that disposal of hazardous radioactive materials in a near surface retrofitted facility is intrinsically inferior to other alternatives in most respects. Specifically, the ISD concept will clearly result in greater risks to the environment and SFN. Based on the limited evidence that is currently available, CNL and SFN have reached diametrically opposed conclusions. The burden of proof for reconciling this situation rests with the proponent, not SFN. Towards this end, SFN maintains that any qualitative conclusions reached by CNL regarding the risks of different alternatives must be accompanied by quantitative assessments. Failure to do so will undermine the decision-making process.	exploring a long-term relationship with SFN as we acknowledge your long-term interests in this project.	process, which is what Sagkeeng's priority is. Sagkeeng has shown willingness to work collaboratively both on WR-1 and at the site level with Whiteshell Laboratories, but has not seen any changes to date in CNL's actual willingness to give Sagkeeng a larger role in site planning, management and monitoring, and has seen no sign of movement by CNL to understand and more importantly to accept, Sagkeeng's concerns about ISD as against other viable alternative means to decommission the facility. There have not been any promises lived up to, nor a willingness to respect Sagkeeng's right to FPIC in relation to the alternative means for decommissioning. Is CNL committed to respecting a Sagkeeng decision on whether it will consent to ISD for WR-1? Is AECL committed to respecting a Sagkeeng decision on whether it will consent to ISD for WR-1? A definitive answer needs to be provided.	each alternative relative to the As Low As Reasonably Achievable (ALARA) principle. CNL responded stating that the ALARA principle is one of a series of factors that were considered in determining that an In Situ Disposal (ISD) model was a preferred option from that of complete dismantling and off-site waste disposal. CNL will not be revisiting the Alternative means assessment. CNL is willing to engage with Sagkeeng's members to inform them about the low risk associated with the proposed ISD of the WR-1 Reactor and discuss their concerns and gather feedback on the project. In response to Sagkeeng's request, CNL will be providing a letter to Sagkeeng on CNL's interpretation of FPIC with respect to the project.
35.	SFN (Jan 15, 2018)	SFN expresses the concern that the proposed ISD approach lacks alignment with international practices and provides the following comments: • CNL asserts that the ISD approach has been implemented successfully or is planned to be used at a variety of sites in the U.S. (e.g., Savannah River Site). These projects are very recent and there is insufficient monitoring data to validate their long-term performance. Further, it is critical to note that the vast majority of sites where radioactive wastes	Canada is a member state of the International Atomic Energy Agency (IAEA). The IAEA provides guidance for decisions concerning safety, but is not a regulatory agency. The Canadian nuclear industry follows regulations enforced through the *Nuclear Safety Control Act*, administered by the Canadian Nuclear Safety Commission (CNSC).	SFN indicated that ISD is inconsistent with international best practices. While the approach has been used in some situations, it has not been the preferred method and regulatory / advisory agencies have indicated that it is generally not considered to be an appropriate approach for the management of radioactive wastes. For example, the IAEA has concluded that ISD "*is not considered a decommissioning strategy, and is not an option in the case of planned permanent shutdown. It*	As indicated in our May 2020 response, there are several IAEA documents that specifically describe ISD as an acceptable decommissioning approach: • Decommissioning Strategies for Facilities Using Radioactive Material, ISR-50. • Predisposal Management of Radioactive Waste, IAEA General	The IAEA documents referenced in CNL's May 2020 response generally consider ISD as an acceptable decommissioning approach only when other alternatives are not advisable (e.g., after an accident when occupational risks are significantly elevated). That case does not apply to Whiteshell.	**Agree to disagree. CNL considers this comment closed due to irreconcilable differences.** Sagkeeng expressed concern with the proposed In Situ Disposal (ISD). CNL provided additional information and rationale for their decision. Sagkeeng maintains its opposition to this

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		have been decommissioned have used conventional off-site disposal approaches. • In the vast majority of circumstances, ISD (also referred to as entombment) has not been the preferred method and regulatory / advisory agencies have indicated that it is generally not considered to be an appropriate approach for the management of radioactive wastes. • Section 2.4.2 of the draft EIS states that CNL has relied heavily on guidance of international radioactivity authorities, including the IAEA. However, based on the following guidance from the IAEA [1], SFN questions the extent to which CNL has followed international best practices: "Entombment, in which all or part of the facility is encased in a structurally long-lived material is not considered a decommissioning strategy, and is not an option in the case of planned permanent shutdown. It may be considered a solution only under exceptional circumstances (e.g., following an accident)". • Further, the U.S. Nuclear Regulatory Commission (NRC) [2] states: "The NRC staff position is that entombment should be used as a last resort for the decommissioning of power reactor facilities, with the expectation that this method would be selected only under unique decommissioning circumstances", and that "Entombment should be used only if this option provides more benefit than harm to public health and safety and the environment and does not create a legacy situation to be managed by future generations." SFN expresses the position that the remedial strategy for WR-1 should be based only on techniques that are consistent with internationally recognized best practices for the management of radioactive wastes. SFN notes that such techniques must have a proven track record of effectively containing radioactive wastes for extended timeframes. ISD currently fails to meet this requirement and it therefore cannot be supported. References: [1] IAEA. 2014. Decommissioning of Facilities: General Safety Requirements. IAEA Safety Standards, General Safety Requirements Part 6, No. GSR Part 6 [2] US Nuclear Regulatory Commission, Regulatory Improvements for Power Reactors Transitioning to Decommissioning, Regulatory Basis Document, NRC-2015-0070, 3150-AJ59, 2017 November.	Current IAEA guidance for decommissioning of nuclear power facilities states that in-situ decommissioning (ISD) or entombment should only occur in exceptional circumstances (GSR part 6, STI/PUB/1652, ISBN 78–92–0–102614–9). The IAEA has also supported ISD for research and prototype reactors. The following documents describe the use of ISD as an acceptable decommissioning approach for reactors like WR-1: • Decommissioning Strategies for Facilities Using Radioactive Material, ISR-50. • Predisposal Management of Radioactive Waste, IAEA General Safety Requirements Part 5, IAEA, Vienna, 2009. • Disposal of Radioactive Waste, IAEA Specific Safety Requirements Series No. SSR-5, IAEA, Vienna, 2011. • Remediation of Areas Contaminated by Past Activities and Accidents, International Atomic Energy Agency, Remediation of Areas Contaminated by Past Activities and Accidents, IAEA Safety Requirements Series No. Ws-R-3, IAEA, Vienna, 2003 They describe ISD as acceptable for facilities that: • Are below grade, such as WR-1. • Do not have significant quantities of long lived isotopes. WR-1 has a low inventory of these radionuclides (only 10% of the inventory for a Class I Nuclear Facility). Consequently, WR-1 is a suitable candidate for ISD. • Are located in specific locations (suitable geology and hydrogeology). • Can be isolated from the environment using engineered barriers such as grout. • Can be easily monitored during an institutional control period to verify the performance of the waste facility. CNL believes that WR-1 is a suitable facility to propose ISD, based on our detailed site and facility characterization studies, our commitment to have a 300-year institutional control period, and our understanding of the technology available to decommission small research reactors. All the above documents are readily available on the IAEA website: https://www-pub.iaea.org/books/iaeabooks/series/73/Safety-Reports-Series There are many sound technical reasons why WR-1 is a suitable candidate for in-situ decommissioning.	*may be considered a solution only under exceptional circumstances (e.g., following an accident)*". In their response, CNL indicates that while Canada is a member of IAEA, it is not compelled to follow guidance issued by the agency. While SFN acknowledges this as legally accurate, we draw attention to CNL's intention to implement a concept that is contrary to guidance issued by an international body that focuses on minimizing impacts from radioactive materials. This warrants serious public concern and associated serious consideration by CNSC. It is SFN's understanding that the CNSC has yet to establish a policy position regarding the use of ISD. Such a policy would typically be developed following a systematic evaluation of the technology, taking into consideration all relevant evidence. This would ideally occur independent of any specific regulatory applications that might unduly influence the policy development process. In the absence of a pre-established policy on the use of ISD, the current application from CNL is effectively forcing the CNSC to establish a de-facto policy through precedent. In this respect, authorizing ISD at the Whiteshell site has the potential to establish a precedent for the closure of other facilities. SFN considers this precedent to have significant and far-reaching adverse implications. On this basis, SFN strongly recommends that the proposed undertaking not be authorized to proceed until CNSC has had an opportunity to develop an independent policy position regarding the use of ISD in Canada. SFN would welcome any opportunities to contribute to the development of such a policy.	Safety Requirements Part 5, IAEA, Vienna, 2009. • Disposal of Radioactive Waste, IAEA Specific Safety Requirements Series No. SSR-5, IAEA, Vienna, 2011. • Remediation of Areas Contaminated by Past Activities and Accidents, International Atomic Energy Agency, Remediation of Areas Contaminated by Past Activities and Accidents, IAEA Safety Requirements Series No. Ws-R-3, IAEA, Vienna, 2003 It should also be noted that the IAEA document quoted (GSR part 6, STI/PUB/1652, ISBN 978–92–0–102614–9), as well as all of the other IAEA safety standards include as a preamble this text which is relevant: "…many of the IAEA safety standards, in particular those addressing aspects of safety in planning or design, are intended to apply primarily to new facilities and activities. The requirements established in the IAEA safety standards might not be fully met at some existing facilities that were built to earlier standards. The way in which IAEA safety standards are to be applied to such facilities is a decision for individual States." Furthermore, the CNSC is currently updating its regulatory document REGDOC 2.11.2 Decommissioning regarding the potential to use in situ decommissioning. (http://nuclearsafety.gc.ca/eng/acts-and-regulations/consultation/comment/regdoc2-11-2.cfm). Section 4 of the REGDOC 2.11.2, Decommissioning Strategy, specifies: "The licensee shall select a decommissioning strategy that will form the basis for the planning for decommissioning and facilitate achieving the desired end state of the decommissioning project…" The following decommissioning strategies should be considered individually or in combination: a. immediate (prompt) decommissioning – to decontaminate and dismantle without any planned delays	Given this context, why are they being referred to as evidence that ISD is acceptable in this circumstance? This seems misleading at best. Please identify in what circumstances these IAEA documents consider ISD as a preferable decommissioning approach. As CNL points out, IAEA documents and safety standards, including GSR part 6, STI/PUB/1652, ISBN 978–92–0–102614–9, include the preamble quoted, however, as indicated above, it is only under unique circumstances where ISD would warrant consideration. in addition, the IAEA as recently as in its 2019 Integrated Regulatory Review Mission to Canada, found that "CNSC should consider revising its current and planned requirements in the area of decommissioning to align with the IAEA guidance that entombment is not considered an acceptable strategy for planned decommissioning of existing nuclear power plants and future nuclear facilities". And CNSC has said it will update its regulatory document, REGDOC-2.11.2, accordingly. So the argument that "existing facilities" like WR-1 do not apply when talking about ISD as an unacceptable strategy, does not hold water. Nor does Sagkeeng accept that "legacy" facilities should be decommissioned to a second-class standard. The quote shared from REGDOC-2.11.1, Waste Management, Volume III: Safety Case for Long-Term Radioactive Waste Management, Version 2 suggests that ISD would be acceptable to CNSC, except the sentence at the end of the paragraph (highlighted in yellow at left) is critically important. Clearly removal is "practicable", as noted by CNL in its alternative means assessment, therefore the proposed ISD approach would not be	decommissioning method. Therefore, while CNL is continuing with their submission of the Environmental Impact Statement (EIS) for ISD for WR-1, CNL will document Sagkeeng's concern. Based on the irreconcilable differences, CNL recommends closing this comment. Sagkeeng referred to Canadian Nuclear Safety Commission's responses to International Atomic Energy Association (IAEA) Suggestion S6 which also states the following: "…In those cases, and in line with IAEA Safety Requirements, **entombment could be considered an option when supported by a safety case.** While the current text of draft REGDOC-2.11.2, *Decommissioning*, restricts the use of *in situ* decommissioning to uranium mines and mills, exceptional circumstances and **legacy sites**…"

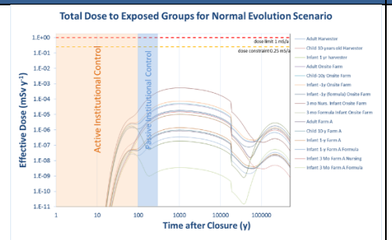
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			• Small size of the facility, compared with current power reactors. • The facility is below grade which can contain the elements in a robust shielded underground structure. • Over 30 years of storage with surveillance has reduced the inventory of short lived isotopes • Low permeability of the surrounding clay. • Majority of contamination is in the reactor vault deep within the facility and underground. • 99.9% of the radioactive material is activated within the reactor vessel steels and zircalloy which will corrode very slowly in the expected alkaline environment. The alkalinity leads to insoluble oxides to form on the surface of the metal protecting it from further corrosion.		b. deferred decommissioning – to place the facility in a period of storage with surveillance followed by decontamination and dismantlement, or to conduct activities directed at placing certain buildings or facilities in a safe, secure interim end state, followed by a period of storage with surveillance, and ultimately decontamination and dismantlement c. *in situ* decommissioning – to place the facility, or portions of the facility, in a safe and secure condition, in which some or all of the radioactive contaminants are disposed of in place, which may result in the creation of a waste disposal site In such a case where the end state for *in situ* decommissioning results in a waste disposal site, the licensee shall satisfy all regulatory requirements for a radioactive waste disposal facility and demonstrate safety via a safety case and post-closure safety assessment of a disposal facility. Further information on safety case and safety assessment can be found in draft REGDOC-2.11.1, Waste Management, Volume III: Safety Case for Long-Term Radioactive Waste Management, Version 2. "…*In situ* decommissioning may be considered a viable solution under exceptional circumstances (e.g., following a severe accident) or for legacy sites for which decommissioning was not planned as part of the design (e.g. in situations where the fuel has been removed and the use of in-situ will be protective of workers, public and the environment), and which will remain under institutional control for the foreseeable future. In order to align with international best practice, *in situ* decommissioning should not be considered a reasonable decommissioning option for situations where removal is practicable." Note: In Canada, legacy sites specifically refer to research and demonstration facilities or facilities dating back to the birth of nuclear technologies in Canada for which decommissioning was not planned as part of the design. Finally, it should also be noted that in September 2018, the CNSC requested an Integrated Regulatory Review Service (IRRS) mission – an international peer review mission from the IAEA.	acceptable, nor would it be consistent with international best practices". How does CNL reconcile this guidance to its current preference for ISD? CNSC's own guidance says ISD is not preferrable or even "considered a reasonable decommissioning option" in the exact circumstance encountered at WR-1, where there is a practicable removal option. We note as well that the CNSC's commitment was to revise its REGDOC 2.11.2 after the IAEA 2019 findings, as follows: "The CNSC will update its regulatory document, REGDOC-2.11.2, Decommissioning, to explicitly reflect the CNSC's recognition that in situ decommissioning should not be considered an acceptable strategy for planned decommissioning of existing nuclear power plants...". When are CNL, AECL and CNSC going to live up to the recommendations of IAEA and, even more importantly, CNSC's own requirements? The CNSC regulatory framework contemplates scenarios where dismantling may not be practical. Sagkeeng wonders why CNL considers dismantling not "practical" for the Whiteshell site. AECL and CNL have already determined that it is practical....it just isn't their preference, for reasons that have been called into strong question by Sagkeeng. CNL's suggestion under the 'Canada's response' section appears to be that it is complying with the intent of the IAEA guidance, even though ISD clearly is in contravention of both the spirit and plain language interpretation of that guidance. In addition, full removal options are in fact "practical" and doable, as established in the existing alternative means assessment conducted *by CNL*. The Canada	

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					The IRRS mission to Canada was held September 3 to 13, 2019. This was considered a full-scope mission and reviewed Canada's framework for safety, along with the CNSC's core regulatory processes for all aspects of Canadian nuclear regulation, against IAEA Safety Requirements, which act as the international benchmark for safety. In its Report of the IRRS Mission to Canada, the review team highlighted 6 good practices, and provided 16 suggestions and 4 recommendations. Below is an excerpt from the IRRS review and Canada's response: <u>IRRS Text:</u> S6. CNSC should consider revising its current and planned requirements in the area of decommissioning to align with the IAEA guidance that entombment is not considered an acceptable strategy for planned decommissioning of existing nuclear power plants (NPPs) and future nuclear facilities. <u>Canada's response:</u> Accepted. The CNSC's regulatory framework is performance-based rather than prescriptive; however, the CNSC seeks alignment with international best practices. There may be legacy situations where immediate or deferred dismantling, or a combination thereof, is not a practical decommissioning strategy when all relevant factors are considered. In those cases, and in line with IAEA Safety Requirements, entombment could be considered an option when supported by a safety case. While the current text of draft REGDOC-2.11.2, Decommissioning, restricts the use of in situ decommissioning to uranium mines and mills, exceptional circumstances and legacy sites, the CNSC will include further text to explicitly reflect that in situ decommissioning should not be considered an acceptable strategy for planned decommissioning of existing NPPs and future nuclear facilities other than uranium mines. It is expected that Commission approval of REGDOC-2.11.2 will be sought in summer 2020. Currently, in situ decommissioning is not the selected decommissioning strategy for any existing	response indicates that entombment will only be considered when immediate or deferred dismantling are not practical. Therefore, in cases like this where these other alternatives are practical, the clear expectation from Canada is that ISD should not be considered an **acceptable, let alone preferrable**, option. Therefore, ISD should not be proposed and if it is proposed, it should be rejected on these grounds. There is no emergency requiring ISD, nor is there practical constraint to dismantling. For the record, Sagkeeng considers the WR-1 reactor a nuclear power plant with the same type of risks associated with nuclear reactors producing commercial power, regardless of its status as a research reactor. If ISD is a bad choice for a commercial reactor, it is a bad choice for a research reactor.	

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					Canadian NPPs. Canada considers itself to be in line with the IAEA safety standards relating to NPPs." http://nuclearsafety.gc.ca/eng/resources/international-cooperation/irrs/canada-response-irrs-2019-summary.cfm http://www.nuclearsafety.gc.ca/eng/resources/international-cooperation/irrs/canada-response-irrs-2019.cfm		
		Alternative Means of Carrying out the Project					
		Alternatives Means of Carrying out the Project - General					
40.	SFN (Jan 15, 2018)	SFN explains that despite being referred to as "in situ decommissioning" the proposed undertaking involves constructing a permanent hazardous waste disposal facility for radioactive waste. Based on modern best practices, the decision to construct such a facility at a given location would be preceded by a rigorous, transparent and highly consultative siting process. The overall goal of such a process would be to select a preferred site which: a) has superior physical / technical attributes; and b) has a "willing host" for the facility. SFN indicates that the extensive efforts of Canada's Nuclear Waste Management Office (NWMO) to find a willing host for nuclear fuel wastes is a recent example of this practice. Ontario Power Generation (OPG) has also implemented a rigorous siting/design process over more than a decade for a radioactive waste deep geologic repository (DGR) that is both technically effective and publicly acceptable. Even non-hazardous waste disposal facilities are subjected to robust siting exercises. SFN notes that with regard to the proposed ISD project, a siting study has not been performed to confirm that the WL site is technically superior and publicly acceptable. As a result, SFN indicates that virtually no evidence has been presented to support the conclusion that the site is the most appropriate location for such a facility. Instead, the site was selected primarily because that's where the wastes are currently located. SFN argues that such an approach is inconsistent with best practices and is not defensible. SFN states that they did not consent to have the WR-1 radioactive research laboratory constructed on its traditional lands in the first place nor does it agree to have the radioactive wastes from that laboratory permanently disposed of and leaking contaminants onto its lands when other viable alternatives exist. On this basis, SFN is not a willing host for the proposed ISD project.	CNL have adapted the Project terminology to use "in situ disposal" to more accurately reflect the project objective. CNL revised the Environmental Impact Statement (EIS) submission to include a more detailed summary of the geologic conditions at the WL site. The EIS, Decommissioning Safety Assessment Report (DSAR), Environmental Risk Assessment (ERA), Hydrogeological Study Report and Groundwater and Solute Transport Modelling Report provide the necessary evidence of the suitability of the WL site for the Whiteshell Reactor Disposal Facility (WRDF). The WRDF provides the required protection for humans, and the environment. The proposed WR-1 in situ decommissioning can only proceed if it receives regulatory approvals. An Environmental Assessment is being conducted under the Canadian Environmental Assessment Act and led by the Canadian Nuclear Safety Commission. The Environmental Assessment will evaluate project activities and the mitigation strategy for any possible environmental effects throughout the life of the project.	As noted previously by SFN, best practices for the siting of waste management facilities (particularly hazardous wastes) should be informed by rigorous, transparent and highly consultative siting process. Such facilities should also be constructed only on lands where there is a "willing host". SFN is not aware of any modern hazardous waste management facilities being constructed in Canada without adhering to these fundamental principles. Despite these standard requirements, CNL proposes to implement ISD in this case: a) without confirming that the Whiteshell site is superior to other alternatives; and b) without confirming that SFN is a willing host for the facility. SFN has expressed significant concerns with CNL's failure to comply with these fundamental requirements. CNL has not provided any information that alleviates these concerns. SFN reiterates it does not support the construction of a hazardous waste management facility on its traditional lands. In particular, we reject CNL's conclusion that retrofitting WR-1 to serve as a permanent repository for long-lived radioactive wastes is superior to a purpose-built facility. To support this position, SFN draws attention to Canada's obligations under the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) which states: "*States shall take effective measures to ensure that no storage or disposal of hazardous materials shall take place in the lands or territories of indigenous peoples without their free, prior and informed consent*" – Article 29 SFN also notes that Canada has committed to implementing this and other UNDRIP obligations in the federal Impact Assessment Act (IAA, 2019). Based on the information presented to date, it is SFN's view that CNL's proposed ISD concept is in clear violation of these obligations. We therefore request that Canada (i.e., AECL, not CNL) present evidence indicating how these critically important obligations have been met.	The Environmental Assessment is under CEAA 2012, and is a process designed to gather input from the public and Indigenous communities. As previously noted, the process also includes an assessment of alternatives (section 2 of the EIS). The section was revised for clarity, and based on feedback from SFN, other engaged Indigenous groups and the public The project alternatives were analyzed for multiple criteria, the selected option was analyzed for human and environmental effects, and it is shown to be safe and protective of humans and the environment. In the absence of a waste disposal facility, AECL and CNL are taking reasonable steps to reduce environmental liabilities and risks with the objective to further protect the environment. Our Indigenous engagement efforts are focused on building meaningful relationships with open, transparent communications, and ongoing involvement in the project. CNL acknowledges SFN's concerns and preferences for full dismantlement and will continue to work with SFN to address these issues to the extent possible.	CNL states that their alternatives assessment has been informed by feedback from SFN. To the contrary, most if not all of SFN's feedback has been ignored by the Proponent. All four alternatives can be completed safely and economically. What all four alternatives cannot say is that each will have the same degree of long-term adverse effects on Aboriginal and treaty rights, psycho-social fear and stigma effects on well-being, and traditional land and resource use. Full removal options show a strong possibility of long term reductions in adverse effects on these values, while ISD would literally "cement in place" these impacts, effectively on a permanent basis. It is not acceptable for Canada to argue, on grounds that are now rejected by the existing law of the land (IAA 2019), that differences in positive and negative effects outcomes, effects on Indigenous health, social and economic conditions that come with the project, even if not initiated by a change to the environment as narrowly defined in the past, and impacts on rights, should be ignored in this EA. ISD should not be considered the only option since AECL failed to develop a waste facility.	**CNL recommends closing this comment due to irreconcilable positions on the project.** CNL has made efforts to address Sagkeeng's concerns by providing additional information. However, despite CNL's efforts to provide substantive information, Sagkeeng's outstanding concerns remain with regards to the project being considered on CEAA 2012 and the proposed in-situ decommissioning option. CNL will document Sagkeeng's concerns in the Indigenous Engagement Report (IER) and Environmental Impact Statement (EIS). CNL has provided additional information on why the project is being considered under CEAA 2012. On August 28, 2019, the Impact Assessment Act (IAA) came into force, repealing the CEAA 2012. The IAA contains transitional provisions for environmental assessments of designated projects commenced under CEAA 2012 and for which the Canadian Nuclear Safety Commission (CNSC) is the Responsible Authority. The CNSC has informed CNL that the Environmental Assessment for the WR-1 Project will continue under CEAA 2012. CNSC notes that as per the transition provision described in subsection 182 of the IAA: "Any environmental assessment of a designated project by the Canadian Nuclear Safety Commission or the National Energy Board commenced

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						Again, Sagkeeng seeks a status report on how a meaningful relationship has been developed with our Nation. What planning, mitigation and monitoring measures - concrete ones rather than vague statements - that we have made in relation to WR-1 or the Whiteshell facility overall, have been integrated into commitments for this EA? Please provide a list for our review and comment. And, overall, we must ask again - are CNL and AECL committed not to proceed with ISD unless and until it is given Sagkeeng's Free, Prior and Informed Consent? This would be a meaningful relationship that lives up to Canada's commitments to Indigenous peoples under UNDRIP. CNL will need to tell us what 'address these issues to the extent possible' means.	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." As outlined in subsection 182, given that the WR-1 Project was commenced under CEAA 2012 and a decision statement has not yet been issued, it therefore will continue to be completed under its current process. Having said that, CNL has supported Sagkeeng's Traditional Land Use and Occupancy Study and have incorporated findings into the EIS as appropriate. CNL has supported Sagkeeng's Indigenous Liaison for two years, and we have committed to developing an Indigenous Stewardship Monitoring initiative in collaboration with Sagkeeng. As such, CNL respectfully disagrees with Sagkeeng's perspective that they have taken a narrow reading of environmental assessment requirements.
43.	SFN (Jan 15, 2018)	SFN indicates that CNL fails to meet the requirements of CNSC's Generic EIS Guidelines (Section 4.2) with regards to providing an assessment of all potential environmental effects of the proposed ISD approach and of each alternative mean of carrying out the project. SFN explains that the four different alternatives should all have been subject to an environmental effects assessment; however, they were not. Instead, SFN indicates that the draft EIS provides only a subjective, qualitative evaluation of each of the proposed alternatives. For example, no dose estimates to workers, public, or non-human biota are provided for each of the alternatives. As a result, SFN indicates that it is impossible to determine the relative environmental impacts and benefits of each alternative. This undermines the credibility of the assessment process and selected alternative (i.e., ISD). SFN recommends that CNL conduct a revised alternatives assessment that quantitatively evaluates the relative impacts of all alternatives.	The assessment of alternatives is consistent with the CNSC Generic Guidelines for the Preparation of an EIS (CNSC 2016) and the CEAAs Operational Policy Statement: Addressing the "purpose of" and "Alternative Means" under CEAA, 2012 (2015). As per the CEAAs Operational Policy Statement: Addressing the "purpose of" and "Alternative Means" under CEAA, 2012 (2015), the intent is to relate the alternative means under consideration with their potential effects on key value components (VCs). The purpose is to develop a sufficient understanding of potential environmental effects of the alternative means under consideration to inform the selection of a preferred alternative, and, subsequently, to serve in scoping the environmental effects assessment. A full assessment of environmental effects is not necessary at this stage (Canadian Environmental Assessment Agency 2015). That being said, CNL heard SFN's feedback and organized and funded an Alternatives Assessment workshop, to provide them with the opportunity to learn about the project alternatives and to enable Sagkeeng First Nation to share their alternatives assessment incorporating their community values. SFN terminated the workshop about half way through the second day, stating that their	SFN recommended that CNL conduct a revised alternatives assessment that quantitatively evaluates the relative impacts of all alternatives. <u>CNL has not provided the requested information</u>. SFN acknowledges that CNL organized a process to seek input from SFN on an assessment of alternatives. As part of that process, SFN's technical advisors critiqued the CNL assessment methodology and proposed specific improvements to make the decision-making process more transparent, traceable and defensible. CNL's revised alternatives assessment (as presented in Chapter 2 of the December, 2019 EIS) rejected all of the recommendations from SFN's technical advisors. In addition, CNL has not provided any explanations regarding why those recommendations were rejected. During a teleconference on February 4th, 2020, CNL indicated they assumed that SFN was no longer interested in addressing the alternatives assessment concerns identified by its technical advisors. However, CNL indicated they had not confirmed the accuracy of this assumption with SFN. This assumption was definitively false; at no time has SFN indicated to CNL that our concerns regarding the alternatives assessment (as identified by our advisors) have been resolved, or that the alternatives assessment process was completed. In fact, Sagkeeng provided 48 questions on Section 2 of	CNL followed Guidelines under CEAA 2012 to conduct the Alternatives Assessment. Following consideration of feedback received, while CNL did not significantly alter its Alternatives Assessment, CNL did revise the EIS to provide additional detail supporting the selection of ISD as its preferred alternative. Following the termination of the Alternatives Assessment workshop in February of 2019, CNL appreciated the opportunity to participate in the Ceremony at Turtle Lodge and to host a Ceremony at the Whiteshell site. Following these Ceremonies, when SFN submitted the agenda items to CNL for discussion at our December 2019 meeting, CNL understood those items, which did not include the Alternatives Assessment work, were SFN's priorities. Having clarified their position in February of 2020, and reminding CNL of the outstanding questions from June 2019, CNL apologized for the oversight and proceeded to prepare the response to SFN. CNL appreciates SFN's interest in completing the Alternative Means Assessment. In order to ensure SFN's views are fully explored CNL offered to fund the remaining alternative means	CNL "did not significantly alter its Alternatives Assessment" despite the fact that SFN made many recommendations consistent with best practice in such assessments. Why? If ISD is preferable to CNL, why would CNL not be confident that other parties would have similar opinions? This is a federal project, in Sagkeeng traditional territory, and Canadians (and particularly Section 35 rights holders) should be a part of the process of deciding what alternative means is preferable. To allow (with all due respect) a third party contractor in CNL to decide what alternative is preferable, is not in Canada or Canadians' interests. By saying that CNL is confident in the findings of its alternatives assessment (which it is suggested above in this response has changed little if	**CNL recommends closing this comment due to irreconcilable differences.** In Sagkeeng's original comment, they recommended CNL conduct a revised alternatives assessment that quantitatively evaluates the relative impacts of all alternatives and stated CNL fails to meet the requirements of Canadian Nuclear Safety Commission's (CNSC) Generic Environmental Impact Statement (EIS) Guideline. CNL reflected on this request and decided the alternative means assessment documented in the EIS is sufficient and is in accordance with CNSC's Generic EIS Guidelines and consistent with CEAA2012 requirements and best practice in Canada. CNL funded Sagkeeng's alternative means assessment which is documented in the EIS and Indigenous Engagement Report. CNL will document in a letter to Sagkeeng

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			community needed to take a couple of steps back in the process. It was agreed at that time, that a ceremony discussing the Project would occur at the Turtle Lodge International Centre for Indigenous Education and Wellness. As a result of feedback received from Indigenous peoples and the public, CNL revised the alternative analysis section providing additional detail to support the selection of the preferred alternative.	the draft EIS in June 2019 to CNL, with the obvious intent of resuming the alternatives assessment process. CNL did not respond to these question until February 13, 2020, and only after Sagkeeng reminded CNL of their existence. The absence of completion of this alternatives assessment process remains a critical gap in the EIS that must be addressed. In addition, Sagkeeng submits that this is not a standard alternatives assessment for a brand new proposed Project. CNL is asking Canada to deviate from an already approved "full removal" plan from the 2002 CSR. As a result, the onus is on CNL to definitively show that ISD is the preferred alternative over the existing approved plan, and this requires a more detailed (including quantitative inputs and additional criteria relevant to other parties like Sagkeeng) examination of the pros and cons of each alternative.	assessment work and looks forward to receiving the results early 2020 October, discussing them with SFN and where appropriate including them in the final EIS. CNL is confident in the results of the Alternatives Assessment and that ISD will be protective of humans and the environment.	any in substance in revisions to Section 2 of the EIS), CNL is directly ignoring a multitude of concerns raised on the public record by Sagkeeng for this environmental assessment. CNL is effectively saying by exuding this confidence, that Sagkeeng's inputs are irrelevant to the consideration of alternatives. This is a disconcerting position for CNL to take and suggests to Sagkeeng that our legitimate concerns are being ignored rather than "integrated". At our forthcoming meetings, Sagkeeng requests that CNL identify how it will incorporate the results of both the Sagkeeng Alternatives Assessment and the psycho-social impact assessment into the alternatives assessment in the EIS. In addition, we have no way of knowing what, if any, changes have been made to section 2 of the EIS. Sagkeeng requests that the Proponent provide is proposed revised Section 2 to Sagkeeng for review prior to filing the EIS.	the details of integration of Sagkeeng's independent alternative means report in the revised draft EIS. Sagkeeng will have an opportunity to review the EIS when it is resubmitted to the CNSC.
50.	SFN (Jan 15, 2018)	SFN expresses the concern that the alternatives assessment places excessive emphasis on occupational risks and requests that CNL address the following issues in a multi-party reconsideration of alternatives: • The assessment methodology places excessive emphasis on the potential need for mitigation of occupational risks, even though precedent indicates all alternatives can be implemented safely. • To illustrate, the majority of "C" circuit was safely removed and placed in on-site interim storage during the first phase of WR-1 decommissioning. The successful decommissioning of "C" circuit serves as evidence that the remaining WR-1 systems can be safely dismantled and removed for disposal elsewhere. Further, hundreds of other sites with radiological and conventional hazards comparable to the WR-1 facility have been decommissioned safely. • The conclusion that the occupational risks of decommissioning can be effectively mitigated is supported by multiple statements in the draft EIS (e.g., Section 12.9, page 12-14). • CNL's prior decision to implement off-site disposal indicates that the occupational risks associated with that	CNL revised the alternatives assessment to provide additional clarity and detail on the selection of the preferred alternative. While all alternatives can be implemented safely, CNL has reviewed the previous decisions for decommissioning strategies and taken a different approach that better aligns with the current level of knowledge and realization of changes in past assumptions. CNL's decision making process, follows the ALARA principle, which must also consider socio-economic factors (ALARA is often mistakenly thought to mean 'as low as possible'). CNL has selected ISD as the preferred option, based on both short and long-term health, safety and socio-economic risks. CNL has performed a post-closure safety assessment and determined that ISD can be protective of people and the environment over the long term. The following plot demonstrates anticipated doses to the public over time and show that in all cases the dose to the public never exceeds any regulatory limits and is in fact well below them.	SFN expressed multiple concerns with the alternatives assessment methodology used by CNL. The following is a synopsis of those concerns and the actions taken by CNL: 1. *For greater transparency and comparison, the qualitative assessment should be converted to a quantitative evaluation*. Rejected by CNL. 2. *There is excessive emphasis on occupational risks at the expense of other considerations and weighting should be revisited.* Rejected by CNL. 3. *The assessment was inappropriately based on the potential need for mitigation of risks, not the residual effects after mitigation.* Rejected by CNL. 4. *The assessment placed excessive emphasis on transportation risks which have been shown to be negligible.* Rejected by CNL. 5. *The assessment was skewed due to the use of a comparative evaluation of alternative performance (e.g., most favourable, favourable and least favourable) instead of absolute performance (e.g., good, almost as good)*. Rejected by CNL.	CNL acknowledges SFN's desire for a different process for evaluation of the alternatives and to support this, CNL has funded the completion of Sagkeeng's Alternatives Assessment work. CNL looks forward to receiving the results, discussing them with SFN and where appropriate including in the EIS or IER. CNL respects SFN's differing opinion on the approach for assessing the alternatives. CNL is following CEAA 2012, as per the regulatory requirements, and determined that ISD is protective of humans and the environment.	Above, CNL indicates it would where appropriate include materials from the Sagkeeng Alternatives Assessment in the final EIS. This is the more appropriate location for Sagkeeng's alternatives assessment findings, not the Indigenous Engagement Report. The approach proposed by Sagkeeng would be fully compliant with both CEAA 2012 AND the new Act; whereas the CNL model would not meet the new act because it neglects to actively engage interested parties in the evaluation process, does not consider positive and adverse effects, does not require meaningful integration of Indigenous knowledge, and only considers impacts on Indigenous peoples that are caused by a "change to the environment". Again,	**CNL recommends closing this comment pending verification of written sections in the EIS.** CNL has formally acknowledged and identified sections in the Environmental Impact Statement (EIS) that will be adjusted to reflect Sagkeeng's perspectives and values as it pertains to their Alternative Means Assessment. CNL will be summarizing and referencing the Sagkeeng Alternative Means Assessment in the EIS and Indigenous Engagement Report (IER) to ensure the perspective of Sagkeeng is clearly articulated and the regulator understands Sagkeeng's dissenting view. Specifically, CNL will: • include a summary of Sagkeeng's Alternative Means

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		approach were deemed manageable and acceptable. Nonetheless, CNL repeatedly asserts that the partial reduction of those risks was a critically important factor in the selection of ISD as the preferred alternative. These assertions are not accompanied by an analysis that quantifies the residual occupational risks (i.e., after mitigation) associated with each alternative. Without such analysis, there is insufficient evidence to support CNL's conclusion that the residual occupational risks of ISD are materially lower than other alternatives. • SFN notes that long-lived radioactivity represents a permanent hazard to the environment, as compared to the finite duration of occupational exposures. Within this context, CNL's unilateral decision to place a heavy emphasis on minimizing occupational risks resulted in less emphasis being placed on other critically important topics such as the long-term protection of the environment and public well-being. SFN questions the appropriateness of giving priority to the elimination of temporary, manageable and fully regulated/controlled risks to informed workers at the expense of long-term, uncontrolled exposures to the environment and public.		6. *The assessment placed insufficient emphasis on long-lived risks/impacts that may occur after the closure phase*. Rejected by CNL. 7. *The assessment criteria included a preference for alternatives that did not require interim waste storage. There is no basis for this criterion, provided other objectives can be met*. Rejected by CNL. 8. *The assessment did not consider the potential impacts and risks associated with "reversibility", if required.* Rejected by CNL. 9. *The assessment did not consider the relative technical uncertainty associated with the various alternatives.* Rejected by CNL. 10. *The assessment evaluated only the conventional socio-economic impacts (e.g., jobs and contracting) without considering the long-term and significant psycho-social impact of hazardous waste disposal.* Rejected by CNL. In summary, CNL has not incorporated any of the recommended alternatives assessment methodology changes proposed by SFN's advisors. We also note that the design and implementation of the methodology was performed unilaterally by CNL without any involvement from SFN or other interested parties. This is wholly inconsistent with modern best practices in environmental decision-making for federal sites where contamination is present. For example, in the case of the former Giant Mine under the management of the Federal Government, the local Dene and Metis peoples were direct, active and equal participants in the assessment and selection of preferred remedial approaches. The same applies to numerous other federally managed sites. Sagkeeng sees no reason why a different standard should apply in this case; it is certainly beneath the Crown's commitments to reconciliation, the upholding of Treaty, and UNDRIP. As an additional note, in Section 4 of the revised draft EIS, the assertion is made by CNL that Sagkeeng "appeared to recommend Rolling Stewardship" (Table 4.3.2-2; pg. 4-24). For the record, Sagkeeng does not yet have a preferred alternative because the alternatives assessment process has not been defensibly completed. Sagkeeng has provided more information in the attachments on criteria that we would like to see integrated into the alternatives assessment.		Sagkeeng respectfully submits that this federally funded project on federally owned lands should be held to the existing standards of IAA 2019, and that provisions for allowing projects proposed prior to changes in environmental assessment legislation to have their assessments conducted through the prior legislation, should not apply when it is a federal government project. Why would Canada not hold itself to the highest and current standards of impact assessment, rather than to a Proponent's restrictive reading of an outdated Act?	Assessment and reference the full report in the IER; • include a subsection under Section 4 of the EIS dedicated to providing an overview of Sagkeeng's assessment, its findings, and recommendations; and • include a paragraph under Section 2 of the EIS that describes the engagement with Sagkeeng to conduct its own Alternative Means Assessment and key findings that resulted.
51.	SFN (Jan 15, 2018)	SFN expresses the concern that the alternatives assessment places excessive emphasis on transportation risks and requests that CNL address the following issues in a multi-party reconsideration of alternatives: • The draft EIS concluded that that the radiological risks associated with off-site transportation of WR-1 wastes would not be significant. Specifically, Section 2.5.1 states:	Section 2 of the EIS was revised to provide additional clarity and detail on the selection of the preferred alternative. There is future uncertainty as to whether a final disposal option for WR-1 wastes would be available at an off-site location in the future. The risks of transportation are small, but are not zero. They were included as part of a larger	Sagkeeng stands behind its outstanding concern, shared by Mr. Tony Brown with CNL in February 2019, that the CNL assessments places excessive emphasis on transportation risks which have been shown to be negligible. This valid concern appears to have been rejected by CNL, as no action has been taken to reduce the emphasis on transportation risks, which CNL states	CNL thanks Sagkeeng for their feedback and agrees that the transportation of waste is a safe activity, and while there are risks related to road travel, those risks are small. CNL has adapted the Alternative Means section of the Environmental Impact Statement to reflect this by focusing on key risks and uncertainties and also reducing the	Response appreciated. This change has not affected the assessment, at least in the version that we have seen. Sagkeeng requests to see any updates to the alternatives assessment by CNL, to	**CNL considers this comment closed.** CNL will provide a copy of the revised Environmental Impact Statement when it submitted to the Canadian Nuclear Safety Commission and agrees to document Sagkeeng's

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		"…the risk of public exposure during transport is extremely low." • Nonetheless, the draft EIS also states: "….the transportation of waste may result in increased degradation of the existing transportation infrastructure." CNL deemed the degradation of roads to be sufficiently important that the alternatives assessment included a criterion preferring approaches that would involve less transportation. • CNL has not provided any evidence to support the specious argument that the relatively small quantities of waste generated during the decommissioning of WR-1 would have a material adverse impact on the regional road network. • In the absence of radiological risks and evidence that waste transportation would cause material impacts to the existing transportation infrastructure, it is inappropriate that the alternatives assessment penalized alternatives that involve off-site disposal. Doing so skewed the selection process towards the ISD alternative.	discussion around relocation of these wastes, possibly without having a final disposal pathway in place. Such a situation would be unfavourable, as it puts the workers and public at additional risk (albeit small), at significant costs, for potentially no net benefit (waste is still not disposed).	at multiple places in the EIS are vanishingly small for the transportation of radioactive materials.	emphasis on transportation risks within the assessment.	understand the implications, if any, to CNL's alternatives assessment. And for the record, it is still Sagkeeng's position that reconsideration of the preferability of alternative means should be conducted in a multi-party forum including a seat at the table for Sagkeeng.	position in the Indigenous Engagement Report.
52.	SFN (Jan 15, 2018)	SFN expresses the concern that the alternatives assessment places excessive emphasis on potential mitigation requirements and requests that CNL address the following issues in a multi-party reconsideration of alternatives: • The potential need for mitigation was used as a criterion in the alternatives assessment. Specifically, the draft EIS states that the alternatives assessment was based on the following: "Alternatives that minimize the need for mitigation the most were considered most favourable, while alternatives that minimize the need for mitigation the least were considered least favourable" (Section 2.5.1, page 2-10). • Using the potential need for mitigation as an assessment criterion provided limited useful information. It also skewed the assessment towards approaches such as ISD that are fundamentally minimalist (i.e., alternatives that involve the least effort/intervention and cost). This was done at the expense of alternatives that are otherwise superior. • To illustrate, the draft EIS concluded that occupational exposures and transportation risks associated with all of the alternatives can be effectively controlled and mitigated to acceptable levels. Nonetheless, any alternatives requiring such mitigation were classified as "least favourable". • Basing the assessment on the potential need for mitigation is inappropriate; penalizing an otherwise superior alternative simply because it requires mitigation to reduce potential impacts to acceptable levels is inconsistent with standard environmental impact assessment practice. Instead, the assessment should be based on the nature of any residual risks after any mitigation has been implemented.	Section 2 of the EIS was revised to provide additional clarity and detail on the selection of the preferred alternative. CNL agrees that all alternatives can be implemented safely, so the difference in safety levels is difficult to compare. However, work that requires multiple levels of mitigation, to achieve the same safety factor, also has multiple potential failure points where there is a risk to workers or the public. Work that requires fewer levels of mitigation has fewer potential failure points where there is a risk to workers or the public. Therefore alternatives requiring fewer levels of mitigation, are inherently safer.	See outstanding Sagkeeng concern #3 in Comment #50 above. CNL has done nothing to quantify the level of risk between the different alternatives, associated with mitigation application. Therefore, the more salient comment here is that "all alternatives can be implemented safely", which means that differences in the public safety, environmental, and psycho-social implications of leaving the materials in the ground in a non-purpose built, near-surface location, versus other alternatives, need to more heavily weighted criteria. CNL has refused to do this to date.	CNL respects Sagkeeng's consideration of psycho-social impacts and the weight this has may have on the community members. Modelling has predicted that ISD is protective of humans and the environment. There are no impacts to traditional rights. While all alternatives can be done safely, total dismantlement presents workers in a situation where there are very real risks such as working in confined spaces, working at heights and exposure to greater radiation.	CNL is asked to identify how it has concluded that ISD would have no impacts on Aboriginal and treaty rights. What expert practitioner of rights impact assessment was utilized in this process? Can CNL identify who has made this conclusion on their behalf and what qualifications for the conduct of rights impact assessment that individual or individuals have? Has CNL conducted a rights impact assessment? That would require following IAAC's guidance for how to conduct a rights impact assessment, which also requires that the Indigenous groups themselves are central to the understanding of rights and how they might be impacted by the proposed Project. Has CNL done this with Sagkeeng? Rights impact assessment is not a statement that can just be inferred from biophysical effects characterization by a Proponent, it must involve the Indigenous peoples themselves, and must consider the variety of factors that have in the past, are now, and likely in the future will impact on the practice and	**CNL stands by its alternative means assessment and considers this comment closed.** Sagkeeng's original comment expressed concern that the alternatives assessment placed excessive emphasis on potential mitigation requirements. In response, CNL revised Section 2 of the Environmental Impact Statement to provide additional clarity on the selection of the preferred alternative. The basis of CNL's position is that no Indigenous and treaty rights are currently being practiced on the Whiteshell site, and that the perceived concerns are not impacts to Indigenous rights. The Canadian Nuclear Safety Commission is conducting a rights impact assessment for the WR-1 In situ environmental assessment.

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						practicability of rights in the Project affected area. Those factors include but go far "beyond the biophysical" and include factors associated with real and perceived risk, fear, stigma, concerns about contamination, feelings of safety on the land, and beyond. CNL is requested to withdraw its statement here unless it can show that lying behind it is a full and proper rights impact assessment. Sagkeeng is not asking CNL to "respect" Sagkeeng's submissions; Sagkeeng is asking that the CNL EIS "reflect" those submissions. They are not academic musings by Sagkeeng; they are real and meaningful potential impact pathways, long-term, from the ISD alternative means that makes them less preferable from a Sagkeeng perspective and will have real impact outcomes as understood under IAA 2019 and by the federal government in 2020. CNL is asked to integrate the results of both the Sagkeeng Alternatives Assessment and the Psycho-social Impact Assessment into its EIS, in meaningful consultation with Sagkeeng, and preferably through a proper multi-party reassessment of alternative means.	
53.	SFN (Jan 15, 2018)	SFN expresses the concern that the alternatives assessment places inappropriate emphasis on impact duration and requests that CNL address the following issues in a multi-party reconsideration of alternatives: • Impact duration is typically used as a key determinant when evaluating impact significance. All other factors being equal, an impact that lasts longer is typically classified as being more significant. • Potential impacts from the proposed undertaking range from short duration impacts during the active remediation phase to long-lived impacts that will persist for thousands of years after the project has been implemented. The alternatives assessment presented in the draft EIS did not consider the duration of potential impacts. As a result, the assessment failed to acknowledge impacts that are of	Section 2 of the EIS was revised to provide additional clarity and detail on the selection of the preferred alternative. The discussion of effects of each alternative was divided into 3 phases: Closure Phase, Institutional Control Phase, and Post-Institutional Control.	Sagkeeng's outstanding issue #6 in Comment #50 above indicates that our concern that the alternatives assessment placed insufficient emphasis on long-lived risks/impacts that may occur after the closure phase, has not been addressed by CNL. Sagkeeng has provide more information to CNL on our priority criteria and guiding questions, which indicate that Sagkeeng prefers against alternatives that push the burden of risk into the future in our territory. The issue therefore remains outstanding.	CNL understands Sagkeeng's concern for perceived long-lived risks; however, conservative long-term modelling shows that In situ decommissioning is protective of humans and the environment. The design In situ decommissioning of WR-1 implements many protective barriers that ensure effective containment and isolation of the WR-1. In the unlikely event that environmental monitoring results indicate a concern, CNL has identified mitigation measures in the EIS to address the issue. CNL reiterates here for emphasis, that no impacts are predicted to the biophysical environment.	This is a repetition of previous statements.	**CNL considers this comment closed.** CNL will document Sagkeeng's position and will include reference to Sagkeeng's Alternatives assessment in Section 2 and Section 4 of the Environmental Impact Statement.

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		lower magnitude but longer durations. Again, this approach skewed the assessment towards alternatives such as ISD.					
54.	SFN (Jan 15, 2018)	SFN indicates that they were not consulted on the design of the alternatives assessment methodology (e.g., criteria, weighting, etc.), nor were they allowed to participate in the assessment itself. As a result, SFN expresses the position that the draft EIS is premature and provides the following comments: • A variety of techniques are available to ensure that a diverse range of criteria and values are effectively integrated into complex decision-making processes. For example, Multiple Accounts Analysis (MAA) techniques are used extensively within the private sector to inform defensible mine closure decisions. The technique has also been used by Indigenous and Northern Affairs Canada and other federal departments operating under the Federal Contaminated Sites Action Plan. • When implemented through a collaborative process with interested parties, MAA can serve as an effective tool to gain consensus on the preferred approach. Unfortunately, the process used to select the ISD alternative falls far short of the expectations of MAA or similar approaches. • Within the draft EIS, CNL presented a high-level, conceptual assessment of alternatives to the project. The qualitative assessment was used to select the preferred ISD approach but insufficient information was presented to justify the selection. While each of the assessed alternatives were noted to have qualitative advantages relative to the other alternatives, it is impossible to discern the rationale for the final decision to select ISD as the preferred alternative. In the absence of a systematic, traceable and more rigorous assessment of alternatives, the decision to proceed with the ISD alternative cannot be justified.	The assessment of alternatives is consistent with the CNSC Generic Guidelines for the Preparation of an EIS (CNSC 2016) and the CEAAs Operational Policy Statement: Addressing the "purpose of" and "Alternative Means" under CEAA, 2012 (2015). As per the CEAAs Operational Policy Statement: Addressing the "purpose of" and "Alternative Means" under CEAA, 2012 (2015), the intent is to relate the alternative means under consideration with their potential effects on key VCs. The purpose is to develop a sufficient understanding of potential environmental effects of the alternative means under consideration to inform the selection of a preferred alternative, and, subsequently, to serve in scoping the environmental effects assessment. A full assessment of environmental effects is not necessary at this stage (Canadian Environmental Assessment Agency 2015). The alternatives assessment was revised to provide additional detail to support the selection of the preferred alternative. CNL agreed to perform an Alternatives Means workshop with SFN that incorporated some aspects of a Multiple Account? Analysis. CNL presented SFN with details to support the Alternatives Means prior to the Workshop and then worked through the details with SFN at the workshop. CNL provided funding for SFN to conduct a community workshop to develop their own project alternatives means analysis. CNL invested 3 days to go through this with SFN. SFN terminated approximately 50% the way through and requested CNL participate in a ceremony instead. CNL continues to engage with SFN, and encourages continuous feedback on all aspects of the EIS.	Sagkeeng's concern that this is a not a typical alternatives assessment of a new proposed project are raised in relation to Comment #43 above. Sagkeeng's letter which accompanied this comment table highlights the fact that Sagkeeng never indicated that moving to ceremony was somehow an "end" to the alternatives assessment process. On the contrary, it was required as a step to ground the relationship more effectively. Sagkeeng has not "moved on" from alternatives assessment in the interim, and in fact asked for more information on the alternatives assessment in June 2019, which was not forthcoming until February 2020. The alternatives assessment was never terminated by Sagkeeng, and CNL has never reengaged us on it; it remains outstanding.	Following the termination of the Alternatives Assessment workshop in February of 2019, CNL appreciated the opportunity to participate in the Ceremony at Turtle Lodge and to host a Ceremony at the Whiteshell site in order to "ground the relationship more effectively". These ceremonial events provide opportunity for Sagkeeng to reconnect to the site. This is one of a number of opportunities that help mitigate perceptive effects, typically fear and stigma. CNL stopped follow-ups with Sagkeeng on the Alternative means workshop resulting from no communication by Sagkeeng on the topic and a misunderstanding that agenda items submitted from Sagkeeng for the December 2019 meeting, which followed completion of the Ceremonies, were SFN's priorities. Alternative means were not on that meeting agenda and the topic was not raise by Sagkeeng during the half day meeting except for one question about how climate change was incorporated in the EIS and alternatives assessed. Having clarified their position in February of 2020, and reminding CNL of the outstanding questions from June 2019, CNL apologized for the oversight and proceeded to prepare the response to SFN. CNL appreciates SFN's interest in completing the Alternative Means Assessment. In order to ensure SFN's views are fully explored, CNL has provided capacity funding to Sagkeeng to conduct the remaining assessment work and looks forward to receiving the results and including them as an important record in the environmental assessment process.	This response is a repetition of prior positions, and also a repeat of earlier statements in this table.	**CNL recommends closing this comment pending verification of EIS additions related to Sagkeeng's alternative means assessment.** CNL believes we have fully answered the questions, although understands Sagkeeng's concerns regarding the alternative means assessment remains. Sagkeeng's Alternative Means Assessment has been reflected upon and has resulted in augmentations to the Alternatives means assessment. This has not however altered CNL's decision on In Situ Disposal being the preferred means on decommissioning. CNL will make reference to Sagkeeng's Alternative Means Assessment in Section 2 and Section 4 of the Environmental Impact Statement.
		Alternatives Means of Carrying out the Project - Evaluation Approach					
55.	SFN (Jan 15, 2018)	SFN indicates that Sagkeeng were not involved in the identification of the criteria that were used to conduct the assessment and CNL's failure to incorporate the value systems of the First Nation into the criteria that were used to select the preferred alternative constitutes a fatal flaw of the process. SFN indicates that an additional fatal flaw of the alternatives assessment is the use of criteria that are equally weighted, without giving recognition to their relative importance. SFN explains this is a gross over-simplification that skewed the selection process towards alternatives that perform well in areas that are arguably less important. SFN illustrates these points with the following example:	The assessment of alternatives is consistent with the CNSC Generic Guidelines for the Preparation of an EIS (CNSC 2016) and the CEAAs Operational Policy Statement: Addressing the "purpose of" and "Alternative Means" under CEAA, 2012 (2015). As per the CEAAs Operational Policy Statement: Addressing the "purpose of" and "Alternative Means" under CEAA, 2012 (2015), the intent is to relate the alternative means under consideration with their potential effects on key VCs. The purpose is to develop a sufficient understanding of potential environmental effects of the alternative means under consideration to inform the selection of a preferred alternative, and, subsequently, to serve in	Sagkeeng appreciates CNL's commitment to revise Section 2 of the EIS to include any relevant additions to the alternatives assessment. Sagkeeng has provided additional new materials along with this submission of comments, in support of our outstanding recommendation that CNL incorporate Sagkeeng criteria and weighting into its alternatives assessment. We have identified 12 criteria we believe need to be integrated into the alternatives assessment. We look forward to CNL engaging us on how to accomplish this.	CNL has completed its alternatives assessment per the guidance of CEAA 2012 and looks forward to receiving Sagkeeng's independent completed Alternatives Assessment work. Upon receipt CNL will review and coordinate a discussion with SFN to discuss the results and incorporate into the EIS and IER or append as deemed appropriate and to meet the timelines of the Environmental Assessment process. The Sagkeeng Alternative Means report will be an important record in the environmental assessment process.	We look forward to these discussions.	**CNL considers this comment closed.** CNL is in the process of updating the Environmental Impact Statement (EIS) based on Sagkeeng's alternative assessment and will provide Sagkeeng with a copy of the EIS once it has been completed.

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		the ISD approach performed poorly relative to all other alternatives on the "protection of human and ecological health" which is clearly the primary driver for implementing the proposed project. Despite this, ISD was selected as the preferred alternative, reportedly because the approach has advantages in other areas (e.g., lower occupational risks and costs). Without being given appropriate opportunities to contribute to key aspects of the alternatives assessment (e.g., selection of criteria and weighting), SFN express the position that they cannot provide Free, Prior and Informed Consent (as required under the United Nations Declaration of the Rights of Indigenous Peoples) to the conclusions reached by that assessment, including the selection of ISD as the preferred alternative. SFN recommends that CNL's alternatives assessment be revised to incorporate criteria and weightings that are selected in collaboration with SFN and other interested/affected/priority rights holding parties.	scoping the environmental effects assessment. A full assessment of environmental effects is not necessary at this stage (Canadian Environmental Assessment Agency 2015). The alternatives assessment was revised to provide additional detail to support the selection of the preferred alternative. CNL presented the valued components and the alternatives at two meetings with SFN; one at the Whiteshell site with Elders, some Councillors and youth and once in a community meeting at SFN. Results were also shared in the community newsletter that was distributed to SFN. Furthermore, early in 2019, as a result of feedback from SFN, CNL organized and funded an Alternatives Assessment workshop, to provide SFN with the opportunity to learn about the project alternatives and to enable Sagkeeng First Nation to share their alternatives assessment incorporating their community values. SFN terminated the workshop approximately half way through the second day, stating that their community needed to take a couple of steps back in the process. It was agreed at that time, that a ceremony discussing the Project would occur at the Turtle Lodge International Centre for Indigenous Education and Wellness. CNL continues to solicit feedback from all interested parties, and specifically from Indigenous communities. CNL will revise Section 2 of the EIS as appropriate to include any relevant additions to the alternatives assessment that are provided, as appropriate.				
		Alternatives Means of Carrying out the Project - Alternative #3 (ISD Approach)					
69.	SFN (Jan 15, 2018)	SFN expresses their concerns with respect to the manner and rationale by which CNL chose the ISD approach. SFN notes that there are numerous flaws with the approach used to select the preferred ISD alternative. Among the most significant gaps: • Sagkeeng was not given an opportunity to participate in the process; • The assessment methodology was skewed towards the selection of the ISD alternative. For example, excessive emphasis was placed on the avoidance of occupational and transportation risks that can be effectively mitigated, while at the same time giving insufficient attention to long-term impacts to people and the environment; and, • CNL did not adhere to Section 4.2 of CNSC's Generic EIS Guidelines, which requires a full and proper assessment of effects of all alternative means to undertake the project. Only an inadequate, primarily qualitative, assessment was undertaken of the other three alternatives considered.	The assessment of alternatives is consistent with the CNSC Generic Guidelines for the Preparation of an EIS (CNSC 2016) and the CEAAs Operational Policy Statement: Addressing the "purpose of" and "Alternative Means" under CEAA, 2012 (2015). As per the CEAAs Operational Policy Statement: Addressing the "purpose of" and "Alternative Means" under CEAA, 2012 (2015), the intent is to relate the alternative means under consideration with their potential effects on key VCs. The purpose is to develop a sufficient understanding of potential environmental effects of the alternative means under consideration to inform the selection of a preferred alternative, and, subsequently, to serve in scoping the environmental effects assessment. A full assessment of environmental effects is not necessary at this stage (Canadian Environmental Assessment Agency 2015). The alternatives assessment was revised to provide additional detail to support the selection of the preferred alternative.	We note here that CNL refers to several opportunities given to Sagkeeng to engage with CNL in relation to alternatives. However, CNL fails to recognize that none of the recommendations made about scoring, weighting or criteria, or formal reconsideration of alternatives in a multi-party setting, or assessment of psycho-social impacts or implications of different alternatives on Treaty rights, issues at the very centre of Sagkeeng's continuously stated concerns since January 2018, have led to any meaningful changes in the alternatives assessment process. No material changes were made to the alternatives assessment based on Sagkeeng input. In other words, CNL has heard what Sagkeeng had to say, and then effectively ignored our findings. This is not actual "listening" and not meaningful engagement. We have again reiterated in these comments, our letter, and attachments provided, what meaningful engagement would look like, and encourage CNL to start listening to us and acting on our concerns.	CNL has heard, understands, and respects Sagkeeng's thoughts and opinions on this topic. Following CEAA 2012 guidelines, CNL has determined that ISD is protective of humans and the environment and it was assessed that it would not have any negative impact on existing traditional land use and rights related to biophysical effects. CNL developed an evaluation process that takes into consideration a variety of factors including best practices in the decommissioning industry. CNL must consider each of these factors and therefore cannot singularly adopt Sagkeeng's requests to change scoring, weighting, and criteria on alternatives assessment. That said, the inclusion of Sagkeeng's perspectives on alternatives is important to CNL. This is why CNL fully funded Sagkeeng to complete their own assessment process and why CNL commits to incorporating the resulting document into the	CNL's statement in the second paragraph is a full repetition of previous statements. To date to our knowledge, CNL has not adopted any of SFN's recommendations with respect to the alternative means assessment, including such things as scoring, weighting, and criteria. Please provide evidence of any requested revisions by Sagkeeng that have been adopted in relation to the alternative means assessment. Regarding CNL's statement about their evaluation process, Sagkeeng must again reiterate that impact assessment on the human environment must go "beyond the biophysical",	**CNL considers this comment closed.** CNL has funded Sagkeeng's Alternative Means Assessment. CNL has reviewed the assessment and have made revisions to Section 2 of the Environmental Impact Statement (EIS). CNL will provide a copy of the EIS once it is complete. CNL disagrees with Sagkeeng's assertions that perceptions result in a physical impact to the environment. We leave that determination in the hands of the regulator. CNL will document Sagkeeng's concerns and position in the Indigenous Engagement Report and Section 4 of the EIS.

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			CNL has met with the Sagkeeng First Nation multiple times in relation to the Project, including discussions with the CNSC, meetings with Chief and Council, community events (e.g., open house, industry day), a site tour and a benchmarking trip to a reactor that underwent ISD in 1969. CNL developed a community specific report that was shared with SFN. From a high level perspective the report summarizes both potential adverse impacts of the project on potential or established Aboriginal or treaty rights. CNL developed a community report out of the benchmarking trip to the in situ reactor in Hallam, Nebraska. This report was shared with all participating communities. Based on feedback from SFN, CNL organized and funded an Alternatives Assessment Workshop which was terminated part-way through at SFN's request. CNL subsequently funded and participated in a traditional ceremony at Turtle Lodge, and later hosted and funded a traditional Ceremony at CNL's Whiteshell site. Through these activities, CNL has continued to learn from and share with SFN.	Our letter also addresses some misunderstandings in what CNL indicated it had "learned" from Sagkeeng, including a suggestion by CNL staff that Sagkeeng had somehow "moved on" from alternatives assessment by December 2019 – we have not; and a suggestion that Sagkeeng would not reengage with the affected lands in the future under any alternative. On the latter issue, Sagkeeng's position is that a future with radioactive materials buried under the ground in our territory is much more likely to see long-term to permanent alienation from not just the WR-1 location, but the entire Whiteshell area, than a future that sees all these materials removed and the land given time and opportunity to heal..	record. CNL looks forward to reading the final report and discussing the results with Sagkeeng. Sakgeeng notes CNL misunderstanding of the Sagkeeng priorities and CNL regrets this misunderstanding.	especially in the context of an industrial sector as controversial and publicly concerning as the nuclear sector. Indigenous peoples make decisions on where they will and will not go and will and will not harvest on the basis of a complex mixture of observations, indigenous knowledge, and perceptions of risk. No rights impact assessment or assessment of effects on traditional land and resource use, in 2020 (or even in 2017) can ignore these factors; they are integral to any meaningful assessment of effects on these values/valued components. Sagkeeng looks forward to discussing the results of the Sagkeeng Alternatives Assessment and the Sagkeeng Psycho-social Impact Assessment with CNL. We will expect for those meetings that CNL will identify what the implications of the findings will be for the EIS and preferred alternatives. Sagkeeng is encouraged, in light of this new understanding about CNL's misunderstanding, and the findings of the two studies, to discuss the implications of this long-term reconnection vs. alienation under different alternative means to decommission WR-1, and how this needs to be considered in the alternative means assessment.	
73.	SFN (Jan 15, 2018)	SFN indicates that there is a lack of alignment with the hazard duration and the design life of the proposed ISD and provides the following comments: • The 300-year design life of the proposed ISD approach is not aligned with the duration of the hazard, which exceeds many thousands of years. CNL acknowledges that, over the long-term, grouting with cementatious materials will be relatively ineffective in preventing groundwater flow through the WR-1 structure (Section.6.3.2 of the draft EIS). • Specifically, the draft EIS suggests that, with time,	The Whiteshell Reactor Disposal Facility (WRDF) will employ best available grout technology and quality assurance to extend it well beyond 300 years. This period of time was chosen for analytical purposes to evaluate worst-case potential dose to receptors, but the safety assessment was performed for a much longer duration, recognizing that the hazard exceeds thousands of years. The WRDF would not likely withstand the impacts of glaciation. Glaciation is expected to occur within this	CNL has confirmed SFN's understanding that the use of ISD will ultimately result in the dispersal of radioactivity on SFN's traditional lands. SFN has repeatedly and consistently expressed the position that this is fundamentally unacceptable and recommended that CNL reconsider viable alternatives to address this issue. CNL has not performed the reconsideration requested by SFN. SFN reiterates that the acceptance of the ISD proposal would effectively nullify Canada's and AECL's prior CSR	CNL acknowledges Sagkeeng's position that they are opposed to ISD and the resulting anticipated release of minimal amounts of radioactivity over thousands of years. CNL is confident that any release of radioactivity will be well below that of background levels of radiation and will be protective of humans and the environment. As stated earlier, the CSR describes the plan for decommissioning of the Whiteshell Laboratories	Our understanding is that from a technical perspective, ISD has not somehow become a preferred means for decommissioning since 2002, an understanding that aligns with IAEA's recent guidance to Canada (CNSC specifically) that ISD is not a preferred or even acceptable alternative, except in extraordinary circumstances	**CNL recommends closing this comment.** CNL has provided additional information to make our position clear. CNL proposed that in-situ decommissioning of the WR-1 is in line with Canadian Nuclear Safety

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		virtually all of the radionuclides from the WR-1 structure will be dispersed in the receiving environment. This "solution to pollution by dilution" approach is reported to reduce potential risks to acceptable levels. SFN cannot accept an approach that involves hazardous materials being dispersed on its lands, regardless of when it happens. • The proposed ISD approach could not withstand the impacts of glaciation; under such a circumstance it is likely that the entire inventory of radioactivity would be widely dispersed. CNL's position that this would result in radiological doses below risk thresholds is credible but may not prove accurate. The timeline for such an event is many thousand years in the future. The grout will have fully failed prior to this point and prolonged release of residual radioactivity will have already started. The current proposal will ultimately result in the dispersal of radioactivity on SFN's traditional lands. **SFN expresses the position that this is fundamentally unacceptable**, as Sagkeeng has identified in the past and in the minimal amount of consultation record for this proposed project. SFN recommends that CNL reconsider viable alternatives to address this issue.	area in accordance with the natural glaciation cycle established. This glaciation is expected to occur approximately 100,000 years from present time, but this return may be delayed by global climate changes measured and projected. Once glaciation occurs, the area will be covered with a thick sheet of ice for tens of thousands of years, based on glaciation studies and data for this region. Conservatively, it has been assumed that human inhabitants would return to the area as soon as 140,000 years from present, once again to ensure a conservative estimate of dose consequences. At the time of this projected re-habitation, glaciation would have dispersed the remaining radioactive materials, but the amount remaining after being dispersed is a tiny fraction of the radioactivity currently at the facility. This is not due solely to "dilution" of the materials by the glaciation event, but by radioactive decay of the materials which are assumed to escape the ISD structure. In fact, the amount of residual radioactivity is so tiny, that it is far less than the Unconditional Clearance Level defined by CNSC for each of the specific radioactive materials remaining. Few long half-lived activation products would at that time be of an activity level similar to naturally occurring radioactive nuclide levels already naturally present in the region, e.g., Kasmere Lake surficial uranium deposit area, which would compare to the ISD area after 140,000 years.	commitments. We also note that, as indicated by the IAEA and other radiation authorities, that in situ disposal should only be used under exceptional circumstances. Last, the construction of a hazardous waste facility on the Whiteshell site without the free, prior and informed consent of SFN is clearly a contravention of international commitments made by the Government of Canada (e.g., UNDRIP).	Site, as it was approved in 2002 and included acknowledgement that: *"It is expected that an optimization exercise will be conducted for each facility and the results will form the basis for the individual detailed decommissioning plans. Because of the technical developments that will be achieved over the lifetime of the project, it is not possible to speculate on what new processes or techniques will be available to those implementing the decommissioning plans."* *"The availability of off-site national disposal facilities is essential to completing the decommissioning of the Whiteshell Laboratories' site."* CNL acknowledges that the proposed ISD is a significant departure in decommissioning strategy for WR-1. It is because of this fact that the proposed ISD must undergo a separate environmental assessment under the Canadian Environmental Assessment Act (2012). Because it is a significant deviation, the impacts of the proposed plan must be examined and assessed against current human health and environmental protection standards, including any improvements that have been incorporated into those standards since 2002. CNL has determined that the WR-1 reactor is a good candidate for In Situ Disposal meeting the criteria laid out by the IAEA. CNL's primary commitment is the protection of human health and the environment. The proposed ISD enhances this commitment as CNL must now meet modern expectations for environmental protection. Cost is a consideration in every public project, but it is one of many factors that were considered in the re-evaluation. The CSR was predicated on the assumption that a waste disposal facility would be available for all the waste at WL, including the WR-1 reactor core. Currently there is no waste disposal facility in Canada and this has forced a reassessment of the reliance put on future assumed developments. CNL, as a responsible steward of the environment, regularly re-assesses its strategy and project plan as new information arises, or significant changes in expectations occur. CNL must also take on the responsibility of ensuring that the problem of waste is not merely transferred from one territory to another. As part of its assessment, CNL considers improvements in decommissioning expertise which has been gained in the 20 years since the	that do not apply at the WR-1 reactor location. CNL will have to clarify their statement that ISD enhances their commitment to protect human health and the environment; IAEA guidance appears to refute it. response, 3rd paragraph: Switching to ISD is not an "optimization" - it's a completely different project. Sagkeeng appreciates the issue of not having another jurisdiction take responsibility for actions and messes conducted and created by another. We would ask AECL and CNL, in the spirit of this principle, why AECL and CNL have never engaged Sagkeeng in discussion of what harms have been caused to our people by Canada's choice, without consultation with us, to build a nuclear reactor on our traditional territory. We take responsibility for impacts we cause to mother earth and to our neighbours; what about Canada? Has Canada ever thought to apologize? Ever sought to establish the temporal, spatial and issue extent of harms on Sagkeeng from the Whiteshell Laboratories? Ever offered to engage in discussions around reconciliation measures including compensation for these losses? Sagkeeng also appreciates the issue of not creating a new mess somewhere that is not already dealing with these issues. Our understanding is that if material is moved, it would be a relatively minor addition to the existing storage of radioactive wastes at the Chalk River Laboratories in Ontario. Questions: 1. If the WR-1 waste was fully transferred to a facility like Chalk River Laboratories, what proportion of total ILW	Commission guidelines. The Environmental Impact Statement (EIS) concludes that in-situ disposal is safe and protective of the environment. CNL acknowledges Sagkeeng's position that the in-situ disposal option is fundamentally unacceptable and will document Sagkeeng's position in the Indigenous Engagement Report and the EIS. Historical land use is out of scope of the Environmental assessment process for the WR-1 reactor. <u>Responses to Sagkeeng's Questions</u> 1. If the WR-1 waste was fully transferred to a facility like Chalk River Laboratories, what proportion of total Intermediate Level Waste (ILW) and Low Level Waste (LLW) at Chalk River Laboratories would be from Whiteshell Laboratories? *If WR-1 waste was fully transferred to a facility like Chalk River Laboratories, the proportion of ILW and LLW waste from WL received at CRL would be ~ 5%.* 2. How much High Level Waste (HLW), ILW and LLW has been removed from Whiteshell Laboratories and sent to other hazardous waste facilities already? What facilities was it sent to? *To date, WL has dispositioned 5,356 m3 of low-level waste and 63.5m3 of intermediate-level waste, all of which was safely transported to Chalk River Laboratories. At this time no HLW has been shipped.* 3. Where did the nuclear fuel from WR-1 go to? Was it moved safely? Was that nuclear fuel the most radioactive materials that were on the Whiteshell Laboratories site?

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					original CSR was prepared. Best practices also include advancing decommissioning, advancing hazard reduction and minimizing handling and repackaging of waste. Having said all that, CNL looks forward to discussing the results of Sagkeeng's alternatives assessment, and working with Sagkeeng to understand and consider the results.	and LLW waste at Chalk River Laboratories would be from Whiteshell Laboratories? 2. How much HLW, ILW and LLW waste has been removed from Whiteshell Laboratories and send to other hazardous waste facilities already? What facilities was it sent to? 3. Where did the nuclear fuel from WR-1 go to? Was it moved safely? Was that nuclear fuel the most radioactive materials that were on the Whiteshell Laboratories site? If the vast bulk of radioactive waste from the facility has been or will be moved to Chalk River Laboratories anyway, why is CNL arguing that it has concerns about transporting radioactive wastes from one territory to another? It would appear that CNL only has concerns about transporting the smaller portion of waste from the WR-1 reactor; why is this concern emerging only now, and only on this portion of the waste? And why would CNL propose to create not one but two permanent radioactive waste disposal facilities by not moving the WR-1 waste to an existing waste storage facility like Chalk River Laboratories?	*Fuel from WR-1 is currently located in the Concrete Canister Storage Facility at the WL Waste Management Area. It was moved there safely and has been stored there safely for decades. The materials are planned to be consolidated at the Chalk River site and disposed of through a national spent fuel disposal program. Spent nuclear fuel is the most radioactive material at WL, but the materials are already in the appropriate configuration to be made ready for transportation.* 4. If the vast bulk of radioactive waste from the facility has been or will be moved to Chalk River Laboratories anyway, why is CNL arguing that it has concerns about transporting radioactive wastes from one territory to another? *CNL does not have concerns about the safety of shipping wastes from one territory to another. CNL and the nuclear industry as a whole have a demonstrated track record for safely executing shipment of radioactive materials. The discussion of transportation related to WR-1 comes as a practical question, in that every shipment carries with it minor risks. In most cases, the most prominent risk is from a traffic accident, not from a radiological spill. The reactor core materials from WR-1 have no permanent disposal location at CRL or other site in Canada. Transporting them adds incremental efforts and risks with no change in the disposal status for those liabilities. There is no value to transporting them, as the materials are no closer to disposal by doing so. The more significant challenge with WR-1 is recovering the waste from the facility. While doing so is technically feasible, cutting, handling and package the core components dramatically increases dose exposure and industrial risk to workers.*

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							5. It would appear that CNL only has concerns about transporting the smaller portion of waste from the WR-1 reactor; why is this concern emerging only now, and only on this portion of the waste? *As above, CNL does not have concerns about being able to safely ship wastes from WL to CRL. The waste can be safely transported with very low risk. In most cases, the most prominent risk is from a traffic accident, not from a radiological spill. The materials from WR-1 have no permanent disposal location at CRL. Transporting them adds incremental efforts and risks with no change in the disposal status for those liabilities. There is no value to transporting them, as the materials are no closer to disposal by doing so.* 6. And why would CNL propose to create not one but two permanent radioactive waste disposal facilities by not moving the WR-1 waste to an existing waste storage facility like Chalk River Laboratories? *There is no current proposal to create a centralized ILW disposal facility, suitable for the WR-1 core components. The location or quantity of facilities that are created, now or in the future is not clear, and that uncertainty is part of the decision to dispose of WR-1 now in a safe, compliant manner, and not defer that liability to another generation.*
74.	SFN (Jan 15, 2018)	Fundamental amongst Sagkeeng's concerns with CNL's ISD proposal is that the plan doesn't solve the problem of radioactivity but rather passes the burden to future generations. SFN provides the following comments: • In an attempt to address current liabilities in an expeditious and inexpensive way, CNL plans to pass the burden of the radioactive wastes to future generations of the SFN and the broader public. • SFN cultural laws and norms and stewardship values on the landscape are in vehement opposition to the "future loading" of impacts onto the generations to follow. SFN has survived in this landscape by taking a precautionary, forward looking approach to managing change; the CNL proposal is contrary to SFN values.	In the case of both radioactive waste which slowly become less radioactive over time, or industrial wastes which do not decay, the wastes are managed in a way that is protective of the environment over the long term. The proposed Whiteshell Reactor Disposal Facility (WRDF) is designed to be passively safe, that is, no further human intervention is required to prevent an unacceptable impact to people or the environment. The Environmental Impact Statement (EIS) summarizes the expected impacts to future site residents and land users, under the assumption that the facility degrades over time, and that no mitigating actions are taken. The results show the	Sagkeeng requested that Sagkeeng integrate our cultural laws and norms into a reassessment of the alternatives. <u>CNL has not done this.</u> CNL has not indicated anywhere in the EIS what it has learned about Sagkeeng cultural laws and norms, spiritual relationship to this land, and responsibilities to future generations. Nor has the alternatives assessment in Section 2 of the revised draft EIS adopted any criteria that relate to these values. Sagkeeng has provided additional information with this submission of Sagkeeng values/preference criteria that should be used in the assessment of alternatives. Ones that are relevant to this issue include: 1. Protecting and promoting Sagkeeng culture/spirituality	CNL has deeply appreciated its interactions and engagement with SFN. This has included: • July 2017 Whiteshell site tour to 16 SFN members including 9 youth • July 2017 Industry Day • July 2018 Engagement meeting on Sagkeeng First Nation comments on the WR-1 draft EIS • Sagkeeng First Nation food intake survey on harvested foods • Alternatives Analysis Workshop specifically for Sagkeeng • Traditional ceremony and discussion on Project alternatives at the Turtle Lodge	There is no evidence that CNL has made any material changes to its project to address the concerns expressed by SFN. In that context, these expressions of CNL's appreciation for what they have "learned from the community" don't mean much. If, indeed, CNL wants to recognize the things it has flagged here, it will incorporate them into the EIS where appropriate, especially and firstly into the alternatives assessment. Assessment of effects on people - the ones that	**CNL recommends closing this comment, pending Sagkeeng's review of EIS additions related to their alternative means assessment.** CNL has funded Sagkeeng's Alternative Means Assessment and has made reference to it in Section 2 and Section 4 of the Environmental Impact Statement. As stated in our December 1 meeting, CNL proposes the following to help address Sagkeeng's concerns:

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		• Based on the availability of other more permanent and effective approaches (including the previously approved proposal), the SFN cannot accept the ISD concept. SFN states: "The fact that the duration of the risk far outlasts the planned design life of ISD is absolutely unacceptable. It is anathema to Sagkeeng that the risk and impact of these decisions will be forced onto future generations. Sagkeeng lived and exercised its traditional practices in the area around the Whiteshell Lab long before the lab was there, and will continue to do so long after CNL is gone. It is Sagkeeng that bears the risk. Moreover, unlike other nuclear waste disposal solutions in Canada, no rigorous siting exercise was conducted to determine the best, and least impacting, site for the facility. The Whiteshell Lab was never built for long-term storage of nuclear waste, and rights-holders including Sagkeeng were never consulted about the possibility of long-term storage of radioactive materials." SFN expresses the position that this is fundamentally unacceptable because it violates cultural laws and norms. SFN recommends that CNL reconsider viable alternatives to address this issue.	facility is still protective of the environment so the burden of further managing those wastes is not transferred.	2. Reduced mental stress/fear/stigma Overall, Sagkeeng prefers for alternatives that have the least potential to pass on risks – brought into our territory from outside – to future generations.	International Centre for Indigenous Education and Wellness • Traditional Indigenous Ceremony on Whiteshell site. Ceremony included a ceremonial fire, drum group, pipe and water ceremonies and tobacco offering. • September 2019 Community Meeting • December 2019 Relationship Building Meeting to specifically address requests by Sagkeeng First Nation CNL understands that Sagkeeng's people have a strong connection to the land and that cultural laws and norms are important to the Sagkeeng community. CNL has made efforts to give further consideration and integrate into the EIS what it has learned from Sagkeeng. Unfortunately, the EIS is a technical document that doesn't always lend itself to passing on the appreciation CNL staff have felt about what it has learned from the community. CNL recognizes that: protecting and promoting Sagkeeng culture/ spirituality; and, reducing mental stress, fear and stigma are important to Sagkeeng. CNL does wish to continue with dialogue with Sagkeeng so see what else CNL can do on these two issues to help address the situation for Sagkeeng's membership. While CNL recognizes that Sagkeeng's opinion and CNL's proposed approach do not seem fully reconcilable at this point, CNL does want to take further actions to help address Sagkeeng's concerns, especially around reducing fear and concern about the project through education, ceremony, and other site participation that may enable reconnection with the lands and reduce stigma resulting from perception of conditions and risk. CNL has explained to Sagkeeng that we are willing to pursue a relationship agreement with Sagkeeng that can assist in dealing with many of the diverse concerns and interests expressed by Sagkeeng.	are actually felt - not just the ones that scientists "model" - is a hard but necessary part of impact assessment in 2020. Regardless of what alternative means is eventually used at WR-1, the protection and promotion of Sagkeeng rights and culture/spirituality, and the reduction of mental stress, fear and stigma, will be important. This needs to occur in relation to the management of WR-1 decommissioning and the Whiteshell Laboratories facility as a whole. CNL and AECL are both requested to identify what it is committed to doing to reduce adverse effects on, and promote benefits, in relation to these two topics. We strongly encourage CNL and AECL to review Sagkeeng's recommendations from 2019's licence renewal process and identify the degree to which those recommendations will be adopted by CNL and AECL with Sagkeeng moving forward, as a first step. Sagkeeng members must be involved in future planning, monitoring, setting up of and implementation of adaptive management, and risk communication in relation to the facility and its surroundings, into the future. In addition, compensatory measures for past, present and future adverse effects on our members from the Whiteshell Laboratories must be subject to a Nation-to-Nation table with Canada.	1) Document Sagkeeng's concerns in the Indigenous Engagement Report; 2) Work through Turtle Lodge to support local healing processes; 3) Seek Chief and Council support to pursue community engagement activities initiated by Sagkeeng's Indigenous Liaison and supported by CNL; 4) Explore the opportunity to create an on-site area for Sagkeeng to conduct ceremony; and 5) Creation of an Indigenous Stewardship Monitoring Initiative.
75.	SFN (Jan 15, 2018)	SFN expresses the view that the ISD proposal's requirements for perpetual institutional control are unacceptable and provides the following comments: • The proposed license amendment for shallow in situ disposal of WR-1 is likely to require an indefinite period of institutional care to monitor and maintain the infrastructure necessary to prevent potential impacts. Active institutional controls will continue after the stated 300-year institutional control period and will be maintained in perpetuity. These perpetual institutional controls would include, in general, physical barriers/fencing, signage, and other actions to prevent	CNL plans to maintain institutional controls in perpetuity, or as long as it is reasonable to do so. CNL does not currently plan to cease institutional control at 300 years after closure. The 300 year institutional control period was selected as a duration for which there is reasonable confidence that institutional control could be maintained. CNL agrees that institutional controls alone are not sufficient to provide long term safety. The Whiteshell Reactor Disposal Facility (WRDF) is designed to be passively safe over the natural evolution of the site and be protective of the	Sagkeeng's position remains that the alternatives assessment has not put enough emphasis on the following criteria: 1. Reduced long-term risks in Sagkeeng territory 2. Reduced management requirements for future generations 3. Flexibility to adapt to contingencies We have provided further detail on these and other Sagkeeng criteria in our attachments to this submission. We look forward to discussing these with CNL and	CNL understands that completion of Sagkeeng's Alternatives Assessment is important and as such has funded this work and looks forward to discussing the report. Following that discussion, information will be incorporated into the EIS and/or IER or appended as appropriate. CNL's position remains that the proposed ISD approach does reduce long-term risk in Sagkeeng territory compared to the current baseline conditions. The proposed approach requires minimal future management other than to	Sagkeeng's position remains that the reduction of risk caused by ISD needs to be compared not to today's baseline, but to the currently licensed full removal scenario. In that comparison, ISD actually increases long-term risk versus full removal, by leaving the radioactive materials in place where it may leak out over hundreds of years into the	**CNL recommends closing this comment. Agree to disagree.** CNL and Sagkeeng have different positions on the In Situ Disposal (ISD) method for decommissioning. CNL is confident that ISD is safe and protective of the environment and of people. CNL would like to point out the average effective yearly dose rate from natural radiation (background) in Winnipeg is **4.1 mSv/a** (Canadian

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		potential exposures to hazards. • Relying on perpetual active institutional controls is inconsistent with Canadian and international guidance. For instance, the CNSC has stated "Long term management options should not rely on long term institutional controls as a safety feature unless they are absolutely necessary" (CNSC 2006). In the current situation, institutional controls will be required indefinitely after closure solely because CNL is proposing to leave hazardous materials in situ. • SFN draws attention to the fact that active institutional controls cannot realistically be expected to remain in place in perpetuity. In this regard, SFN asserts that the decommissioned site must be sufficiently protective of people and the environment, even without long-term institutional control. As a project that involves the disposal of long-lived radioactive wastes, the ISD alternative cannot possibly meet this expectation. SNF indicates that perpetual institutional controls will ultimately fail, thereby resulting in environmental impacts that are fundamentally unacceptable to Sagkeeng. SFN recommends that CNL reconsider viable alternatives to address this issue. [Please refer to SFN's submission for the reference quoted above Reduc].	environment without institutional control. Institutional controls provide a reasonable means to further reduce the risks from the facility below an already acceptable level (ALARA). The 300 year period is only selected as a reasonable point to assume institutional control failure for the purposes of demonstrating long term safety without institutional controls.	integrating them into the alternatives assessment in a meaningful way.	conduct environmental monitoring, of which, CNL invites Sagkeeng to become involved.	receiving environment. In addition, the future management (and physical constraints on access to the area for Indigenous peoples) are higher for ISD than for full removal options. It is these comparisons that Sagkeeng considers important, and we would argue that Canada should consider important. Sagkeeng appreciates CNL inviting us to get involved and we assume this will extend to the entire Whiteshell Laboratories and their vicinity. CNL is requested to provide further detail at our next meeting of what type of Indigenous monitoring program it is envisioning for the facility, so we can provide feedback.	Nuclear Safety Commission (CNSC) Fact sheet – Natural background radiation). The estimated peak Total Dose rate to humans for the Whiteshell Reactor Disposal Facility is **0.005 mSv/a** (Environmental Impact Statement (EIS) Table 6.7.1-15: Summary of Total Dose during the Post-closure Phase Human Health Valued Components). Hence the change in average dose rate to humans in our normal evolution scenario would be from **4.1000 to 4.1005 mSv/a or 0.012%.** This is likely less than the yearly variation in the average background radiation as measured in Winnipeg. The EIS considers today's land use as the baseline, but CNL will document Sagkeeng's preferred alternative in the Indigenous Engagement Report and EIS. CNL is interested to explore environmental monitoring with Sagkeeng and other Indigenous Communities to help inform the development of Indigenous participation in environmental monitoring on site.
76.	SFN (Jan 15, 2018)	SFN expresses the concern that the ISD approach is not amenable to "reversibility" if in the future there is a desire/need to implement a different remedial approach at the site. SFN notes that this could be triggered by an unplanned release (e.g., leakage from the reactor core) and/or a change in public policy / regulation. Removing the radioactive waste from the grouted monolith would become a significant challenge. SFN recommends that CNL provide a detailed description of the approaches that would need to be taken to mitigate any ISD failures that might occur in the future and/or implement any alternate remedial approaches after WR-1 has been grouted.	Monitoring will measure effectiveness of the facility. Several options exist to treat any detected abnormal condition such as installing additional barrier walls or utilizing groundwater pump and treat technology. In the highly unlikely event that the waste disposal facility is not performing as expected, reversibility is possible. The giant block can be sawn apart or demolished and waste retrieved. Because of the geology, the ground water moves very slowly towards the river, it takes a drop of water approximately 100 years to reach the river from where WR-1 sits. This slow movement provides the time necessary to investigate the issue and take corrective action should it be required.	SFN recommended that CNL provide a detailed description of the approaches that would need to be taken to mitigate any ISD failures that might occur in the future and/or implement any alternate remedial approaches after WR-1 has been grouted. In their response, CNL indicates that if the waste disposal facility fails to perform as intended, that the facility "…can be sawn apart or demolished and waste retrieved". Although SFN acknowledges that the probability of such a requirement is not high, implementing such a procedure in a safe fashion would be extremely challenging. CNL has not considered these challenges and impacts when selecting its preferred alternative. SFN asserts that this consideration must be incorporated into decision-making process when selecting the preferred closure alternative.	Since the likelihood of *In situ* decommissioning (ISD) failure is only a very remote possibility, there is no consideration of the challenges of remediating a failure, only the feasibility. In CNL's view, it is feasible to remediate or remove some or all of the WR-1 Disposal Facility (WRDF) in the very unlikely event it becomes necessary. Such a contingency would apply to any other alternative disposal option where the WR-1 waste would be placed, if the dismantling option were done as requested by Sagkeeng. It is arguable the WRDF would be more easily remediated because of its near surface location, as opposed to a deep geologic repository. But in either case, the facilities are designed and assessed to demonstrate that even in the case of multiple barrier failures, the system can still provide the required protection, through a concept known as defense-in-depth, making remediation unnecessary, or at the very least, highly unlikely. The ISD approach will implement multiple redundant barriers. The modelling has shown that failure or even full removal of one or two barriers does not have a substantive change in performance and the environment remains protected.	By extension, an occupational accident is also a low probability event given the mitigations that will be in place. Nonetheless, CNL decided to place a very heavy emphasis on occupational risks, but is ignoring the potential need for additional mitigations. A workshop would be of limited value. CNL is arguing that it would be possible to have an intervention if the system doesn't perform as intended. Sagkeeng agrees with that BUT, our point was that it would be occupationally dangerous, have impacts to the environment and would be very costly, and therefore contributes to the low attractiveness of ISD.	**Agree to disagree. CNL recommends closing this comment.** Sagkeeng's original comment expressed concern about the reversibility of the In Situ Disposal (ISD) option. CNL responded that in the highly unlikely event that the waste disposal facility is not performing as expected, reversibility is possible. Based on CNL's assessments, CNL stands by its assertion that the ISD option for WR-1 is safe and protective of the environment and people. CNL will document Sagkeeng's preferred alternative in the Indigenous Engagement Report and Environmental Impact Statement. CNL's proposal to directly engage with Sagkeeng members to help alleviate their concerns regarding ISD decommissioning was not accepted by Sagkeeng, who deemed it of

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					In place of producing a detailed description of technical approaches that could be employed to deal with a highly unlikely ISD failure, CNL recommends a workshop on site. CNL recommends this workshop take place with the SFN/CNL Indigenous Liaison, but others from SFN are very welcome. CNL can provide descriptions of soil and groundwater remediation techniques and can show SFN demolition equipment and approaches for cutting/breaking concrete. CNL has extensive experience in these areas. A workshop also will enable effective dialogue on this topic.		limited value. CNL will continue to work with Sagkeeng's Liaison Officer to engage Sagkeeng's membership. While CNL respects chief and council's wishes from CNL to engage with Sagkeeng's legal counsel, CNL cannot address concerns on the WR-1 that are being expressed on behalf of Sagkeeng's members without the ability to directly engage with those members. CNL contends that there are mitigation measures in place should some failure of one of them occur, and we believe direct discussions with the community would aid in their understanding of these protections and systems and increase their confidence that the proposed approach to decommissioning is safe for both the Community and the environment. In addition, CNL is proposing to involve Sagkeeng in hazardous materials and emergency response training to support any failure that might occur and to be able to respond and support other incidents and events as they might arise. CNL will also seek Indigenous feedback on their emergency response plan.
		Aboriginal Engagement					
116.	SFN (Jan 15, 2018)	SFN expresses deep concern with respect to the absence of Indigenous Traditional Knowledge and traditional use information in the draft EIS and the lack of meaningful engagement with Sagkeeng in establishing a baseline or conducting an effects assessment (or even considering Sagkeeng VCs). SFN notes that the manner in which this EIS was completed is not in keeping with the expectations for acceptable practice established by the Crown in its 'Interim Principles' document issued in January 2016, or in its commitments to better incorporate Indigenous interests into the Environmental Assessment (EA) process in the 2016-2017 EA process review.	Canadian Nuclear Laboratories recognized that Indigenous peoples had not been extensively engaged in relation to the overall WL site and WL site closure. As such, CNL approached engagement activities with the intent to provide sufficient background information and context, to establish relationships for future engagement efforts, and to support the overall environmental assessment process. CNL provided funding to SFN to undertake a Traditional Knowledge study which provided valuable information to the Project on modern and traditional land and resource use near the WL site. CNL has incorporated learnings into the EIS in Section 4 Indigenous Engagement and Section 6.8 Land and Resource Use. The study, titled "Sagkeeng Anicinabe Land Use and Occupancy Study Specific to Canadian Nuclear Laboratories' Proposed In Situ Decommissioning of	On the whole, greater detail is required by CNL to explain how the information described in Section 6.8 was verified, reviewed and consented to for use prior to finalizing any of the materials or information. As it stands, the information presented in the EIS that provides an assessment for traditional use in the Study Area is flawed, inaccurate, and largely inconsistent with the findings in the Sagkeeng TUS. The notes below address some of the insufficiencies and gaps within the EIS as they pertain to CNL's "incorporated learnings". **EIS Section 6.8.1: Scope of Assessment** The EIS concludes that "no primary pathways were identified in the land and resource use assessment" (EIA, p. 6-401). This is a surprising and disappointing conclusion, give that Sagkeeng identifies major interactions and pathways in the TLUOS, both in the Executive Summary (p. 4) and Section 5.1 (p. 89).	The responses below address some of the insufficiencies and gaps within the EIS as they pertain to CNL's "incorporated learnings". CNL will respond to every point SFN has made to address any concerns. Comment #1 - EIS Section 6.8.1: Scope of Assessment SFN states**: "The EIS concludes that "no primary pathways were identified in the land and resource use assessment"** (EIA, p. 6-401). This is a surprising and disappointing conclusion, given that Sagkeeng identifies major interactions and pathways in the TLUOS, both in the Executive Summary (p. 4) and Section 5.1 (p. 89)." The quote highlighted in bold above assigns this point as a conclusion. This was not a conclusion statement. Section 6.8.1.is the "Scope of the Assessment" and merely describes the	Sagkeeng also looks forward to these discussions in relation to the CNSC-funded study, which have implications for both alternatives means assessment and subsequent sections of the EIS. This is a decommissioning Project. It, by design, is supposed to make things better, not worse. That must be calculated across a large number of factors. One of those factors is the ability, long-term, for Indigenous peoples to reconnect with this currently highly alienated (but never abandoned) portion of the Sagkeeng Anicinabe cultural	**CNL recommends considering this comment at least partially-addressed and closing the comment.** Sagkeeng originally expressed deep concern with the absence of Indigenous Knowledge in the draft Environmental Impact Statement (EIS). In response, CNL has taken measures, such as funding Sagkeeng's Traditional Knowledge study, updating the EIS, particularly Section 6.8.1, as identified in our comments, providing Sagkeeng with a copy of the EIS, and has made further changes based on their feedback. CNL will provide Sagkeeng with an advanced copy of the Indigenous

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			the WR-1 Reactor at Whiteshell Laboratories" ("Sagkeeng Land Use and Occupancy Study" (Firelight Research Inc. and Sagkeeng Anicinabe, 2018), was prepared specifically for the proposed project. That Report involved interviews with thirty-three Sagkeeng members and identification of 519 site specific use values within the site specific, local and regional study areas, which extend out to 25 km from the Whiteshell site. The Report noted that: *"The site-specific data show that the Project is situated in an area that is highly-valued for fishing, harvesting wild rice, medicines, berries and other food plants, hunting wild game, trapping fur-bearing animals, as well as for participating in important cultural activities such as ceremonies, as well as sharing knowledge with younger Sagkeeng generations. Qualitative interview data clearly reveal the Study Area as central to Sagkeeng livelihood, cultural identity and connection to the land, waterways and resources, as it is an area that has been used and relied on by Sagkeeng for generations" (p. 3).* Values were generally labelled according to four categories: water; medicine, berries and other food plants; hunting and trapping; and Anicinabe Pimatiziwin. The Water category focused primarily on catch sites for numerous fish species such as: sturgeon, suckers, goldeneye, sunfish, carp, whitefish, pickerel (walleye), pike, catfish and sturgeon spawning areas. Water sites can also include wild rice harvest sites and drinking water sites. It should also be noted that Water is important as it was historically the key travel corridor and is still a major way in which harvesters access areas. The Medicine, Berries and Other Food Plants category included areas for harvesting medicinal plants and food products such as blueberries, plums, raspberries, strawberries, gooseberries, chokecherries, pin cherries, saskatoon berries, and low bush cranberries. The Hunting and Trapping category included known harvest and processing sites for animal species such as moose, white-tailed deer, beaver, muskrat, otter, rabbit, prairie chickens, squirrel, weasel, fox and also important wildlife sites such as mineral licks. The Report also organized some values according to the category, "Anicinabe Pimatiziwin". Anicinabe Pimatiziwin values are those that have a broader social, historical and spiritual significance and include: sacred places and gathering sites used by	The findings of the TLUOS highlight substantial concern over reduced confidence in water quality, reduced quality and edibility of fish species, decreased confidence in quality of wild rice, decreased quality and availability of berries, medicines and other food plants, decreased quality and availability of wildlife to hunt and trap, disturbance to Sagkeeng members' sense of place and connection to the land, disturbance to important cultural sites, and heightened insecurity about the integrity of the land due to the presence of hazardous nuclear materials – all as a result of the proposed Project. Water, in particular, is front of mind for many Study participants. As described in the TLUOS, there is a great deal of concern about how the proposed in-situ process may contaminate water and soil if containment efforts fail: "…the principal way the Project may affect the community is through the contamination of Water Resources and the soil/ground should containment efforts be compromised (see Sections 4.2.2, 4.3.2. 4.4.2 and 4.5.2). From the perspective of Sagkeeng members, ground and water contamination from radiation would have deleterious effects on a wide array of culturally important resources, from plants and medicines to fish and terrestrial animals." (TLUOS, p. 81). Even if CNL's position is that there will not be scientifically provable impacts on water quality, the onus is on the Proponent to also meaningfully assess the role that perceived risk will play on Sagkeeng members' willingness and ability to travel through, harvest and gather from, the Project affected area. This has not occurred to date and therefor primary pathways of effect on Sagkeeng use of the area into the future are missing from the revised draft EIS. The proposed in-situ approach and lack of alternatives provided in the assessment, as a great deal of uncertainty was expressed by Study participants about leaving the nuclear reactor in the ground, encased by grout. These concerns are highlighted in greater detail in Section 4.6 of the TLUOS, Project Interactions. Both the importance and potential for impacts must be presented alongside the potential for impacts as a result of the decommissioning process put forward in CNL's application. [VC issues are dealt with in comment #122 below]. **EIS Section 6.8.3.2: Temporal Boundaries** The temporal boundaries outlined in Section 6.8.3.2 do not consider change prior to present day, which is critical for understanding the extend of change in land and resource use. The EIS considers effects observed under	environmental assessment approach and methodology employed for land and resource use, which mirrors the overall environmental assessment approach. A primary pathway is defined as a pathway likely to result in an environmental change to measurement indicators identified for land and resource use VCs relative to the Base Case that could contribute to residual effects to land and resource use VCs. The base case for the assessment includes existing disturbances, including the existing WL facilities, operations, and decommissioning activities to date. The next two paragraphs from SFN describe the perceived risks SFN members have identified with respect to the proposed project." As noted in these paragraphs, "water" is a major concern because it is a pathway that can impact a variety of important natural resources. The modeling concludes that water is not expected to be negatively affected and therefore there is no risk to dependent natural resources. CNL is committed to ensure our operations have minimal impact the health of the surrounding ecosystems, including water. Thus we will be monitoring the site and will discuss SFN involvement in those longer-term monitoring plans in the near term. CNL acknowledges the concerns of Study participants and has attempted to take a proactive approach to address these perceptions and concerns through communication and engagement activities. CNL continues to work with the community such as through funding an Indigenous Liaison position to improve communications, particularly with Elders in Anishinaabemowin. CNL has also attempted to describe the concerns of stigma and psycho-social effects throughout the EIS. CNL looks forward to receiving the results of the CNSC funded study and having a dialogue on how the study results might be addressed with Sagkeeng. Comment #2 and #3 - EIS Section 6.8.3.2: Temporal Boundaries and EIS Section 6.8.4.2.5.1: Historic and Present Day Traditional Use The temporal boundary of the assessment deals with the assessment of project effects in the future. This section does not relate to the state of the existing baseline which is reflected in the base case for the project, inclusive of the existing	landscape. CNL states that "the assessment is not intended to describe how Sagkeeng's way of life was practiced in the past, prior to the existence of the WL site or WR-1 reactor". However, Sagkeeng holds that the EIS must consider relevant past use by Sagkeeng as part of the context in which the current proposed Project must be considered, because it is that aspiration to reconnect to this area that must be the yardstick against which the future with ISD is compared to the currently permitted, full removal scenario. Does one scenario allow for greater chance of reconnection? If so, this has to be part of the assessment in order for Canada and Sagkeeng to make informed consent decisions. From CNL's EIS Comment #4, it is unclear to Sagkeeng what the actual proposed revisions are and where they fit into this section of the EIS, from just this cell in a table. We would appreciate the ability to actually review the currently proposed section 6.8 in its totality, preferably in track changes from previous versions, and time to review and comment on it.	Engagement Report (IER) and capture Sagkeeng's position towards full dismantlement of the WR-1 reactor in the IER and Section 4 of the EIS. EIS Comment #4 - EIS Section 6.8.1.5.2.2.1: Historic and Present Day Traditional Use For further clarity, page 6-427 of the EIS states CNL will provide the additional text in bold: "The land use study involved interviews with 33 Sagkeeng members and identification of 519 site-specific use values within the site, local and regional study areas, which extend out to 25 km from the WL site. **As well, the study area extends downstream on the Winnipeg River into and beyond the outlet into Lake Winnipeg**."

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			Sagkeeng community members and their ancestors for ceremonial purposes and the transmission of traditional knowledge; camping sites, including those used as a base for fishing and hunting activities; trails and water routes, some of which have been used for multiple generations; and findings of archaeological materials. During the engagement process for the Project and from the Sagkeeng Land Use and Occupancy Study, Sagkeeng First Nation identified several interests and concerns in traditional land and resources use (further details are provided in Section 4.3.2.1). These issues are not always specifically linked directly to the Project, but rather the overall operation and closure of the WL site; however, due to their overall importance to the community they are noted herein: • Concerns about the long term effects of the WL site and the Project on water quality and fish. There is a perceived deterioration of fish quality in the Winnipeg River, which may in part be attributed to the paper mill that previously operated in Powerview-Pine Falls. • An interest in fish monitoring at locations in proximity to the community. • Wild rice and medicinal plants (calamus root, Laborador tea, wild ginger, and waterlily roots) collected by Sagkeeng First Nation members are present in the Whiteshell area. • Concerns about the transport of nuclear materials, particularly in the event of an accident and associated contamination within their traditional territory. • Interests regarding future land use in relation to the overall site closure. • In the Sagkeeng Land Use and Occupancy Study, Sagkeeng members identified a set of Valued Components (VCs) relating to Sagkeeng knowledge and use that may be impacted by the Project. These values included: water resources; medicines, berries and other food plants; hunting and trapping; and, Anicinabe Pimatiziwin. It is assumed that these are values of very high importance to Sagkeeng. Traditional land and resources use was identified as a Valued Component (VC) for the effects assessment in the EIS. CNL understands that traditional land and	"existing conditions, the timeframe during which Project activities are actively occurring and the duration of predicted residual effects. The duration of an effect is defined as the amount of time between the start and end of a Project activity or stressor (which is related to the Project phases) plus the time required for the residual effect to be reversed." The EIS lacks a consideration for any trend-over-time change prior to the present day, which is required for understanding the context of cumulative effects with respect to changes to - and vulnerability of – the resources Sagkeeng members rely upon. This step is critical for understanding the conditions prior to the Project existing, so that the magnitude of effects can be understood within the full scope of Project impacts and changes to the landscape. **EIS Section 6.8.3.3: Assessment Cases** The Base Case for the assessment inaccurately represents past changes as being reflected in current conditions. Current conditions cannot tell us what abundance of resources Sagkeeng relied upon in the past to practice our way of life on the land, or the proportion of that land and those resources that have been effectively alienated from us due to cumulative effects. Without a meaningful understanding of past conditions (i.e. what land use looked like in the Study Area prior to the existence of the WR-1 reactor), which has not been fully characterized in the EA, we cannot characterize the actual change without knowing what conditions were like in the past. This requires CNL to undertake further study, in collaboration with and ideally led by Sagkeeng, to more fulsomely understand the extent of use in the Study Area prior to the WR-1 reactor's existence.	WL facilities, operations, and decommissioning activities to date. CNL has heard Sagkeeng in oral presentations and in its TLUOS describe how the existing environment has been degraded over time. While CNL recognizes historical traditional use occurred on site, the base case for the project is inclusive of the existing WL facilities, operations, and decommissioning activities to date, meaning the assessment is intended to measure change from the current point in time. While the existing environment can be described in the EIS, the assessment is not intended to describe how Sagkeeng's way of life was practiced in the past, prior to the existence of the WL site or WR-1 reactor. EIS Comment #4 - EIS Section 6.8.4.2.5.1: Historic and Present Day Traditional Use CNL agrees that the SFN section of 6.8.4.2.5.1 should be verified by SFN and this is one of the reasons why an early review was provided to Sagkeeng. CNL has proposed a revision to the SFN section of 6.8.4.2.5.1 and it is provided for feedback. Each of the comments from Sagkeeng is addressed is described below. CNL would appreciate any further comments and editorial changes to this section. The term "inalienable" cannot be found in the SFN TLUOS so CNL isn't sure of the full context of this term but on many occasions CNL has heard Sagkeeng members talk about the interconnectedness of the Sagkeeng people to its traditional territory. The concept of Anicinabe Pimatiziwin also conveys the idea of the interconnectedness of the SFN people with their traditional territory. In the proposed re-write of this section, we have provided direct quotations from the TLUOS as these words more effectively describe the relationship than CNL could. The only reference to the TLUOS RSA on page 6-427 of the EIS states: "The land use study involved interviews with 33 Sagkeeng members and identification of 519 site-specific use values within the site, local and regional study areas, which extend out to 25 km from the WL site." This statement was meant to describe the extensive nature of the interviews with Sagkeeng members and it was not meant to fully describe		

			resources use is important for maintaining meaningful connections with cultural identity and community history and that it can also promote intergenerational connections within communities as knowledge is passed down from elders to community members, including youth.	**EIS Section 6.8.4.2.5.1: Historic and Present Day Traditional Use** Can CNL please confirm how it intends to verify the historical background information with Sagkeeng? It is Sagkeeng's position that all TLUOS references in the EIS should be subject to verification by our members; that process has not occurred to date. Greater detail should be provided about the inalienable relationship between Sagkeeng members and their traditional territory. The EIS description of the TLUOS RSA on page 6-427 is not accurately described, as it excludes the Winnipeg River downstream of the Study Area (as detailed in the TLUOS report in Section 3). This should be modified to reflect the correct RSA boundaries used in the TUS assessment. Page 6-428 of the EIS inaccurately describes VCs, and instead confuses them with activity classifications used for categorizing site-specific data *within* VCs. The VCs detailed in the TLUOS are: Water; Medicine, Berries, and Other Food Plants, Hunting and Trapping; and Anicinabe Pimatiziwin. As explained on page 22 in Section 3 of the TLUOS, "the VCs were chosen to represent the critical conditions or elements that must be present for the continued practice of Sagkeeng culture and livelihoods, and that may be impacted by the Project. As such, VCs can range from the direct presence of traditionally hunted animals and gathered plants, to continued habitation, travel, and cultural activities on the land. VCs are also designated to include intangible cultural resources, such as the transmission of knowledge across generations." CNL should revise this section to ensure its description of VCs are accurate, and furthermore, the VCs represented in the TLUOS need to be properly integrated into the EIS. Where those VCs are beyond CNL's understanding, such as Anicinabe Pimatziwin, the need to engage Sagkeeng meaningfully in the development of this EIS material becomes even more apparent. With respect to CNLs summary of the Sagkeeng issues pertaining to the project (EIS p. 6-248), there are issues with respect to both CNL's representation of the Study Area, as well as the summary itself of concerns. The list of concerns provided by CNL on page 6-248 is not comprehensive nor entirely accurate as to the concerns described by Sagkeeng Study participants. It is suggested that CNL instead quote the language directly from the TLUOS that details the project interactions and impact pathways as described in the TUS Executive Summary (p. 4) and Section 5.1 (p. 89), and then verify directly with Sagkeeng (through a process that can be set up with SFN) any findings related to impacts on Sagkeeng land and resource use.	the study areas used in the TLUOS. CNL recognizes that study area is irregular in nature and on the Winnipeg River uses are described into and beyond the outlet into Lake Winnipeg. CNL will revise the above text as follows: "The land use study involved interviews with 33 Sagkeeng members and identification of 519 site-specific use values within the site, local and regional study areas, which extend out to 25 km from the WL site. As well, the study area extends downstream on the Winnipeg River into and beyond the outlet into Lake Winnipeg." CNL appreciates the constructive comments with respect to the text on page 6-428 on the topic of the VCs used for the TLUOS. CNL has incorporated the conclusions of the TLUOS directly into this section and does not challenge the opinions of the points raised.		

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				A review on Section 6.8.5 (Project interactions and Mitigation) are discussed below in Line 186. The critiques above summarize serious flaws in the proponents traditional land and resource use assessment, which is not adequate as it fundamentally oversimplifies and ignores critical data and conclusions within the TLUOS. Without the proponent going through an appropriate verification of its conclusions with Sagkeeng, section 6.8 of the EIS will not be defensibly complete.			
117.	SFN (Jan 15, 2018)	SFN explains that Sagkeeng did not consent to the construction of a nuclear research facility on its traditional lands, nor does it consent to the disposal of radioactive wastes from that facility on its lands. SFN indicates that while CNL's Aboriginal Engagement Report identifies that their members and leadership have expressed alarm at the new idea of keeping the radioactive wastes onsite, CNL has nonetheless and without a compelling argument, ignored these concerns and plan to carry out the project as planned.	CNL continues to work with SFN to build a positive relationship and understanding of the project and provide the opportunity for CNL to learn from SFN on what is important to them. Based on feedback provided by SFN, CNL has proposed several initiatives to address SFN concerns. Examples include Indigenous monitoring at the site, improved community communications and an Indigenous Advisory Committee for the Project.	There is inadequate focus in the revised draft EIS on primary issues raised by Sagkeeng in multiple forums – namely, the inadequacy of the alternatives assessment and gaps in the assessment of effects on Sagkeeng land and resource use. As these are two of the most critical issues raised by Sagkeeng in writing and in meetings, they need to be properly "papered" by CNL as outstanding issues in Section 4 of the EIS. Much more detail, for example, is required both in Table 4.3.2-2 and in Section 2 of the EIS on Sagkeeng's concerns about ISD vs. the CSR approved "full removal" of materials from WR-1. Sagkeeng has provided additional documents in this response package to assist CNL in understanding our perspective on this topic. We look forward to CNL more proactively engaging with us moving forward as well.	CNL has heard Sagkeeng's concerns regarding both alternatives assessment and their specific preference for full disposal off site. We have offered to pay for the completion of Sagkeeng's Alternatives Assessment work, and we look forward to discussing the report and incorporating the report into or appending it to the EIS as appropriate as well as **updating Table 4.3.2-2.** We look forward to proactive and robust engagement with Sagkeeng going forward.	Regarding the alternatives assessment, to date (up until October 2020) CNL has rejected all of Sagkeeng's recommendations but CNL has never explained why they feel those recommendations are inappropriate. Sagkeeng requests that CNL explicitly disposition those recommendations. If CNL is not going to use them, CNL should explain why.	**CNL recommends closing this comment, pending Sagkeeng's review of the additional alternative means assessment and psycho-social impact assessment sections of the EIS.** CNL has reflected upon Sagkeeng's recommendations from both the Alternative Means Assessment and their Psycho-Social impact assessment. While we will continue with submission of the Environmental Impact Statement for in-situ disposal, CNL has identified some next steps that CNL believes will offset the concerns Sagkeeng has with this option. These include: development of an Indigenous Stewardship program that will support direct involvement in long term environmental monitoring, supporting a healing process such as a cultural camp that supports the resurgence of traditional activities, and re-examining economic development and employment opportunities for Sagkeeng members and businesses. CNL looks forward to discussing these measures to address Sagkeeng's concerns with Chief and Council.
118.	SFN (Jan 15, 2018)	SFN explains that Sagkeeng has and will continue to work on the basis that the Government of Canada is responsible for cleaning up the hazardous wastes at the WL site, regardless of any contractual relationships it may have entered into with CNEA or other parties. In this regard, SFN indicates that Canada cannot waive its fiduciary duties to: a) honour its prior commitment to remove the radioactive wastes from Sagkeeng lands; and b) ensure Indigenous interests and Aboriginal and treaty rights are fully considered and protected. SFN express the position that the current application fails to meet both of these	Atomic Energy of Canada Limited (AECL), a federal Crown corporation, retains ownership of the sites, facilities, assets and liabilities however following a restructuring process to a Government-owned, Contractor-operated model, AECL delivers its mandate through a long-term contract with the private sector (CNL) for the management and operation of its sites.	The response is totally inadequate. Sagkeeng identified three issues: 1. The irreconcilability of ISD with commitments for full removal of WR-1 wastes made by Canada as a result of the CSR; 2. The inadequacy of consideration of impacts on Treaty rights in the EIS and the CNSC-run EA process overall; and 3. The lack of consideration for how this proposed Project would impact on Canada's	1. CNL acknowledges that the proposed *In situ* decommissioning (ISD) is a significant departure from the generally understood decommissioning strategy for WR-1 as documented in the Comprehensive Study Report from 2001. It is because of this fact that the proposed ISD must undergo a separate environmental assessment under the Canadian Environmental Assessment Act (2012). Because it is a significant deviation, the impacts of the proposed plan	Sagkeeng disagrees that ISD meets expectations of best or even acceptable practice for decommissioning, as put forward by IAEA in the most recent review of CNSC's decommissioning guidance/regulations. CNL's commitment to protect human health and the environment could just as easily be met through full removal	**CNL cannot address Sagkeeng's concern due to irreconcilable differences and considers this comment closed.** The project is being considered under CEAA 2012 and not the Impact Assessment Act 2019. The WR-1 Environmental Impact Statement (EIS) considers the present conditions as the baseline, which is in accordance with CEAA 2012 and

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		requirements. SFN also notes that this is inconsistent with the federal government's repeated overtures that it is committed to meaningful reconciliation with Indigenous peoples.		commitment to reconciliation with Indigenous Nations. There is no information in the response, nor any updated information in the EIS, that covers these issues off in any meaningful way. These issues thus remain outstanding and completely unaddressed by CNL. For the record, Sagkeeng has requested that CNSC work with our Nation to set up a proper rights impact assessment framework at the Nation-to-Nation level for this proposed Project. In addition, we have provided additional information to CNL showing that consideration of impacts on both CEAA 2012 Section 5(1)(c) factors and Sagkeeng Treaty rights are important lenses through which assessment of alternatives must take place	must be examined and assessed against current human health and environmental protection standards, including any improvements that have been incorporated into those standards since 2001. CNL has determined that the WR-1 reactor is a good candidate for *In situ* decommissioning and meets the criteria laid out by the IAEA. 2. CNL's primary commitment is the protection of human health and the environment. This commitment is not diminished by the proposed ISD, but rather is enhanced as CNL must now meet modern expectations for environmental protection. SFN is encouraged to document in the CNSC's Rights Impact Assessment process any potential rights infringement or concerns they may have with the EA process. CNL is of the opinion that the proposed project and its associated mitigation and monitoring measures will not impact on rights based uses. CNL respects the fact that SFN may have a different viewpoint. 3. Both AECL and CNL are committed to building meaningful relationships with Indigenous peoples. We believe that we share common objectives of protecting the environment. While there may be different viewpoints in how this may be achieved, this does not negate the commitment to engaging meaningfully and learning from each other. Both AECL and CNL are also interested in engaging with Sagkeeng on broader issues related to future land use, which we see as an important component of meaningful SFN involvement in the long-term stewardship of the land. In addition, CNL would also like to have further discussions with Sagkeeng on a relationship agreement, which could include key elements of reconciliation. CNL has also funded an alternative means assessment to further include Sagkeeng's perspectives, worldview, and community values into the assessment process.	options or partial ISD/partial dismantling. It has no inherent reliance on ISD. In addition, if CNL is committed to meet modern expectations for environmental protection, it should voluntarily upgrade its environmental assessment to the modern expectations of IAA 2019 or, if CNL is not willing to upgrade, Canada as site owner, regulator and the party owing Sagkeeng the duty to consult, accommodate and protect our Constitutionally-protected rights, should require this assessment of a federal project be moved to the higher expectations of IAA 2019. Regarding AECL and CNL's interest in engaging on future land use, AECL and CNL are asked to commit not only to looking forward but also looking backward at historic harms and how they will be recognized and ameliorated/compensated for. There are nice statements about building meaningful relationships, but, other than providing funding, there has been no movement on matters of substance. SFN's input has not yet been factored into the assessment process. Please identify how it will be, for both new Sagkeeng studies.	historical consideration of the site are out of scope of the EIS for WR-1. CNL will document Sagkeeng's preferred alternative in the Indigenous Engagement Report (IER) and EIS in Section 4. CNL is confident we are following the guidance and regulations set out by the Canadian Nuclear Safety Commission. CNL's environmental assessment indicates that the In Situ Disposal (ISD) option for WR-1 is safe and protective of the environment and people. CNL has addressed the concerns regarding ISD to the best of its ability. As suggested Atomic Energy of Canada Limited (AECL) and CNL are committed to building meaningful relationships and exploring future end-state with Sagkeeng. We are confused by your suggestion that this engagement and input does not represent Sagkeeng. Please clarify. With respect to historical harms (which are out of scope of the EA), AECL can engage with Sagkeeng and help facilitate discussions with other government organizations. As Sagkeeng is probably aware, issues related to past harm, historical issues and legacy (including compensation) are led by Crown-Indigenous and Northern Affairs Canada.
119.	SFN (Jan 15, 2018)	SFN expresses the concern that there has been a lack of engagement and participation of Sagkeeng and provides the following comments: • The proposed disposal site is within the traditional territory of SFN. The land and waterways surrounding the site have historically been an important part of the economic well-being and transportation system for SFN. "A strongly held conviction among members is that the lands and waterways are the sustaining factors for all life. To members, the land and waters are indivisible and anything that is done to either will have far reaching effects for all	CNL acknowledges that the Whiteshell site is within the traditional territory of SFN. Prior to the WR-1 Project, Canadian Nuclear Laboratories recognized that Indigenous peoples had not been extensively engaged in relation to the overall WL site and WL site closure. As such, CNL approached engagement activities, commenced in 2016, with the intent to provide sufficient background information and context, to establish relationships for future engagement efforts, and to support the overall environmental assessment	Sagkeeng recognizes that CNL has been more engaging with us since our first comments in January 2018. For that we are appreciative. As stated by elders and Chief and Council, relationship is key. The relationship has a long way to go. The EIS, especially Section 4 but also Sections 2 and 6, in particular, do not reflect a strong collaborative relationship. In Section 2, for example, there is no evidence that CNL has confirmed the accuracy of its Indigenous engagement statements of issues and concerns. Sagkeeng has no record of being engaged in any verification of this	CNL thanks Sagkeeng for acknowledging our consultation efforts to date. We agree that building meaningful relationships is key and we agree that more needs to be done. To that end as discussed above, CNL has made numerous modifications to their submission to reflect Sagkeeng issues and concerns, and which demonstrate CNL learning and movement on these matters. Specifically, these changes are reflected in sections 4.4. 4.5. 6.8 of the EIS. In	CNL refers to 'numerous modifications to their submission'. Sagkeeng needs to see these revisions themselves, preferably in track changes. Please provide. CNL to date has not shown a willingness to reconsider any substantive aspects of the assessment based on Sagkeeng inputs.	**CNL considers this comment closed.** CNL will document Sagkeeng's concerns in the Indigenous Engagement Report (IER) and Section 4 of the Environmental Impact Statement (EIS). CNL will be moving forward with submitting the EIS for in-situ disposal and have identified mitigation

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		life" (SFN 2015). The project's location in very close proximity to the Winnipeg River, which drains north to Lake Winnipeg and the SFN reserve lands in between, creates a very high level of concern about cumulative effects over the long term on water quality along the lifeblood of SFN. • SFN has been in this area and will remain in this area, feeling any adverse effect from the WL site, long after CNL has planned to actively manage risks at the site. The draft EIS states that the area was used beginning in the Paleo Indian Period (ca. 11,000 – 7,000 years ago), following the retreat of the last ice age. In contrast, the proposed hazardous waste management facility has a design life of only 300 years. • There are several examples of remediation projects led by government agencies where meaningful efforts were taken to ensure interested parties, particularly Indigenous residents, were engaged and consulted throughout the decision-making / assessment processes. The Canada Deline Uranium Table (CDUT) to address contamination (including radioactivity) at the historic Port Radium Uranium Mine in the Northwest Territories is an example of a progressive and collaborative approach between Canada and the locally affected Indigenous population. The process involved numerous workshops, extensive community consultation, community liaison positions; a demonstrated willingness to adjust project plans….and was not rushed to meet a government timeline. • Unfortunately, in the case of the current proposal, CNL has given insufficient attention to engaging and consulting with SFN. While CNL has made some effort to communicate its plans to SFN leadership and membership, very little attention has been given to the following critically important aspects of engagement and consultation: a) Selection of closure objectives/priorities; b) Identification and assessment of alternatives, including identification of and Weighting of criteria; c) Assessment of impacts, including on traditional use and Aboriginal/treaty rights; and, d) Collection/use of TK (e.g., land use practices, dietary surveys, selection of VCs). • Consultation summary materials provided by CNL to Sagkeeng and to the CNSC reflect a weak level of engagement. For example, many of the issues raised by SFN Chief and Council and members at large are identified in the consultation record, but have merited no response from CNL. In particular, "crux" matters such as SFN's continued and fundamental opposition to ISD, clearly stated in meetings with CNL, AECL and CNSC, are ignored in CNL's response materials, while matters of less importance, but for which CNL has an easily palatable response, such as socio-economic engagement, are responded to. The "Consultation Report" itself includes	process. This included providing overall background information about the WL site, the previously approved WL Decommissioning Project, and the WR-1 Project. The process was designed to reflect the interest, issues and concerns expressed by First Nations and Métis, and to be adaptive in nature. Engagement with Indigenous peoples was designed based on feedback from the communities and included the following types of mechanisms: • meetings with leadership; • community meetings; • the production of community specific newsletters; • a site benchmarking trip; • the production of easy to understand graphics and poster boards; • provision of funding by CNSC and CNL for traditional knowledge studies; • tours of the WL site; • Industry days and workshops; • a three day Environmental Assessment Workshop funded by CNL which ended part way through at Sagkeeng's request; and • following the Environmental Assessment Workshop, funding of and participation in, traditional ceremonies at Turtle Lodge and at CNL's Whiteshell Laboratories site. Throughout the environmental assessment process, CNL has shared and worked with Indigenous communities on understanding the Project, including mitigation measures, and has considered the feedback Indigenous communities have provided. This information has been shared with the technical experts conducting the environmental assessment. In addition, CNL developed a community-based newsletter to share what they heard. The newsletter was designed to be a tool to review aspects of the Project along with responses and solicit additional feedback on the Project. In response to concerns about the in situ decommissioning approach and nuclear in general, CNL developed a site benchmarking trip to Hallam, Nebraska; a community that has hosted an in situ disposed reactor for nearly 50 years. CNL covered all costs for members of all interested Indigenous communities to visit the site to see firsthand what a typical entombed reactor looks like, and to engage with the local community, regulators, and the Utility that owns the site. A trip report was created using feedback from all participating communities. This report has been shared with all participating communities.	material. If CNL is committed to having Sagkeeng verify its engagement process with Sagkeeng prior to filing this EIS that will require face-to-face engagement with Sagkeeng representatives who were actually subject to the engagement, and is beyond the scope of this initial review. This lack of verification of Sagkeeng concerns and how they are expressed in the EIS takes on greater importance because, as noted elsewhere in our comments (e.g., at #117), some of the biggest, most intractable issues between Sagkeeng and CNL have been relatively glossed over in the engagement tracking table. A Commission Member reviewing that table would not get an accurate sense of the degree of concern raised by Sagkeeng in relation to leaving these radioactive materials in the ground in our territory. We thus don't find the engagement tracking in Section 4 to be accurate as to the depth of our concerns with the Project and it must be revisited and verified with us. The assertion made at pg. 4-6 of the revised draft EIS, that the site visit to Hallam somehow was CNL "addressing" stigma/psycho-social effects concerns is misleading at best. We have provided CNL with Mr. Tony Brown's memo from that site visit. It show that no Indigenous peoples who were impacted by that Project were present, that the Project was fundamentally different from the ISD currently proposed, and that there was no one present who could speak to key decision-related issues, among other factors. Instead of a site visit to Hallam, the ask that Sagkeeng made back in January 2018 was for the Proponent to actually study psycho-social impact risks associated with the Project in a fulsome manner, which requires actually engaging Sagkeeng members on their perceptions of alternative futures – one with full removal under the CSR, and one with radioactive materials left in the ground under ISD. When asked at our February 4, 2020, meeting if CNL did any work on psycho-social effects from the Project, CNL representatives replied that "no, but that would have been interesting". CNL (and CNSC) both refused to fund a proposed study which would have considered these issues in a reliable and methodologically sound manner. Sagkeeng's recommendation stands; this work is not merely interesting, but critical to understanding impact pathways from the ISD proposal that may see heightened long-term alienation of Sagkeeng from this part of our territory. In addition, Sagkeeng notes that we asked for more involvement in selection of closure objectives/priorities;	addition, CNL has expressed a desire to explore and develop a positive long-term relationship. With respect to the Hallam trip, it was CNL's intent to create an opportunity to increase knowledge and understanding about in-situ decommissioning. The trip involved participation from a number of Indigenous communities. The comment in the EIS about "addressing" stigma was reflective of positive feedback CNL received from those Indigenous people that participated in the trip. This feedback was recorded through surveys given to Indigenous participants after the trip. Unfortunately, while Sagkeeng did confirm their attendance prior to the trip, the representatives from Sagkeeng did not attend and no explanation or prior notice of their absence was ever provided to CNL. Fortunately, it was beneficial to have Mr. Brown attend and provide feedback to Sagkeeng on the events of the trip. One of the best outcomes of the benchmarking trip was the opportunity for CNL to nurture relationships with those that participated. While the trip was not intended to address all the concerns with respect to stigma or psycho-social effects, CNL believes that there was considerable knowledge transfer from the Hallam site visit and stands by its statements on the value of that trip. This was confirmed by comments made on the post trip survey by participants. CNL would be pleased to discuss the prospect of coordinating another visit to an in-situ site with SFN. At the time of preparing this response, the psychosocial study has been fully funded by the CNSC and Sagkeeng has indicated the report will be made available in October. CNL looks forward to receiving the report. The following paragraphs address each of the eight remaining concerns listed in Sagkeeng's comment: <u>Response to #1: The lack of CNL revisiting in a meaningful way the assessment of effects on Indigenous land and resource use based on the Sagkeeng TLUOS</u> CNL follows the Canadian Environmental Assessment Act, 2012 (CEAA 2012) which states the focus of assessment of effects under Section 5(1) (c) should be limited to 'current use' of lands and resources for traditional purposes." The project was assessed in the framework of the Canadian Environmental Assessment Act, 2012, which focused on effects to current use. CNL did provide the draft EIS to SFN to allow for the opportunity to review. CNL felt it was	In addition, Sagkeeng has no record of being provided with the October 2020 version of the draft EIS or Indigenous Engagement Report. Please provide those documents for Sagkeeng review. Sagkeeng appreciates increasing knowledge and understanding, but Hallam is a 60-year old facility and is not representative of best practices in closure. What CNL appears to be saying is that CNL respectfully disagrees with Sagkeeng's conclusion that Sagkeeng members are suffering from an ongoing and persistent alienation from a portion of our traditional territory because of the ongoing presence of Whiteshell, and that this will be extended into a longer-term future should ISD be the chosen decommissioning strategy that it would in a future will full removal of these materials, and the subsequent ability for Sagkeeng members to reconnect with this portion of its cultural landscape. It doesn't seem to matter to CNL that Sagkeeng has indicated otherwise, including in the recently produced Psychosocial Impact Assessment. The purpose of decommissioning has to be to make things better, not maintain the status quo or deepen the impacts and entrench ("entomb") them in place for all time. Therefore, a choice to move to ISD would need to show that it offers a better future than the current situation of alienation, fear and stigma associated with the site by Sagkeeng. CNL, perhaps knowing that this cannot be shown, has therefore decided not to consider this valid impact pathway, leaning on a narrow - some might say cynical - reading of an outdated environmental assessment legislation that has since been replaced by Canada. These issues remain of the	measures we will be taking to address Sagkeeng concerns to the extent we are able. There have been numerous opportunities for Sagkeeng to review the changes and we will provide a copy of the EIS when we have submitted it to the Canadian Nuclear Safety Commission, and an advanced copy of the Indigenous Engagement Report. <u>Below CNL provides further clarity on CNL's position regarding psycho-social perceptions of the project.</u> As you noted, Section 5(1)(c)(i) of CEAA 2012 provides that "environmental effects that are to be taken into account in relation to an act or thing, a physical activity, a designated project or a project are… (c) with respect to aboriginal peoples, an effect occurring in Canada of any change that may be caused to the environment on (i) health and socio-economic conditions." We understand 5(1)(c)(i) to require a consideration of effects to health and socio-economic conditions caused by changes to the environment by the Project. In the case of WR-1, there are no anticipated appreciable environmental effects and no changes to the environment from the state existing today if in-situ disposal is approved. Further, CNL has not received information from Sagkeeng establishing that the psycho-social concerns raised by Sagkeeng to arise from an environmental effect caused by the in-situ disposal of WR-1. For the purpose of clarity, please note that we are not commenting on psycho-social impacts generally or suggesting that psycho-social impacts could never be a factor under CEAA 2012. However, in the case of WR-1, CNL has not received information

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		only one meeting directly addressing the EA. All the rest are into meetings and "show and tell" (site visit) and an employment fair. • In summary, SFN has been given insufficient opportunity to contribute to this extremely important decision. SFN explains that they were not invited to be a participant in the development of the draft EIS, nor the design of the methodology and indicates that this is completely inappropriate given the impact the decision will have on the First Nation.	Other examples of how Sagkeeng's interests and concerns were considered and implemented for the Project include the following: • consideration of how the grout would degrade over time as an important criteria in understanding potential long-term effects to the environment; • consideration of the potential effects of climate change and natural disasters in the assessment process; • development of presentation materials that addressed community concerns about the handling and transportation of waste materials, including demonstrations of the monitoring equipment used on the WL site; • discussion of how future monitoring on the WL site could incorporate Indigenous interests, such as locations where the community fishes or harvests in proximity to the WL site; • arranging a site tour so that representatives of the community could get a better understanding of the Project and the WL site and its activities;. • hosting an industry day in the community to share information about employment and contracting opportunities; • creating an Indigenous affairs summer student position that was communicated at engagements and advertised in Indigenous communities interested in the Project; • seeking Indigenous input into CNL's species at risk program and providing a booklet both electronically and in hard copy (this is to be followed up with an environmental protection workshop at the WL site); • verification that CNL's environmental monitoring program does test fish species of interest; • commitment to assist in a one-time water sampling campaign; • Commitment to hosting an Indigenous communities environmental protection workshop to better understand how traditional knowledge could contribute to CNL's current and future Environmental Protection Program and begin to work on future involvement; • addressing concerns that information was hard to understand, CNL developed community specific, user friendly reports	identification and assessment of alternatives, including identification of and weighting of criteria; and assessment of impacts, including on traditional use and Aboriginal/treaty rights. The revised EIS does not include any engagement of Sagkeeng in any of the above-noted critical issues. Sagkeeng's remaining concerns with Section 6.8's treatment of effects on Sagkeeng land and resource use are dealt with in more detail elsewhere in our comments, but include: 1. The lack of CNL revisiting in a meaningful way the assessment of effects on Indigenous land and resource use based on the Sagkeeng TLUOS. 2. The lack of proper integration of Sagkeeng-defined VCs in the assessment of effects on Indigenous land and resource use. 3. The lack of conduct of the impact assessment on a Nation-by-Nation basis, instead pooling all Indigenous groups together for the purposes of the effects characterization process. 4. The lack of integration of Sakgeeng concerns about risk and stigma, and effects this will have on the "impact zone" around the Project area that will be alienated, in the assessment of effects on Indigenous land and resource use. 5. A complete lack of information about Sagkeeng's desired future use of lands and resources in the baseline and effects assessment. 6. No verification of any assessment of effects on Sagkeeng land and resource use with Sagkeeng, or engagement of Sagkeeng in any way in this assessment? 7. A lack of any retrospective data to establish the use and value of the project affected area to Sagkeeng prior to it being "taken up" by the Crown for the Whiteshell Labs facility. 8. The lack of "capture" of all the potential impact pathways from the project on Sagkeeng land and resource use identified in the TLUOS, into the EIS. These major gaps suggest the existing Section 6.8 of the revised draft EIS remains inadequate and merits revisiting between the parties. If indeed CNL is eager to learn from other projects like the CDUT and the Giant Mine, CNL is requested to engage with us on this prior to filing the EIS. We remain open to these conversations, but the time is now.	necessary to pass on the whole EIS to SFN to accomplish this as SFN's comments are far reaching across many chapters of the document. CNL has and is willing discuss the EIS and specific components of it in more detail. <u>Response to #2: The lack of proper integration of Sagkeeng-defined VCs in the assessment of effects on Indigenous land and resource use.</u> Overall, CNL maintains its view that the current VC of "Traditional Land and Resource Use by Indigenous People" is a broadly encompassing VC for traditional use that can adequately describe and assess potential effects on traditional land and resource use. Under that VC traditional use by SFN is described according to the five VCs employed in the Sagkeeng Land Use and Occupancy Study (p. 6-428). There is an inference in the question that because each of the VCs used in the traditional land use and occupancy study are not each stand-alone VCs in the EIS that somehow the values information is then not assessed. This is incorrect. The assessment of Project Interactions and Mitigation in section 6.8.5 considers all the values under the broader VC category of Traditional Land and Resource Use by Indigenous People. The description of historic and present-day traditional use is described in section 6.8 but each Indigenous community's use is clearly delineated into sub-sections in section 6.8.4.2.5.1. With respect to the assessment of effects, CNL has also considered the unique characteristics of each Indigenous community. CNL still respectfully comes to the same conclusion that traditional use practiced by Sagkeeng or any other Indigenous community/organization will not be affected by the proposed project because: CNL is not predicting effects on any of the biophysical resources upon which traditional uses are based; and, the proposed project wholly occurs within the Whiteshell site where there is currently no traditional use. <u>Response to #3: The lack of conduct of the impact assessment on a Nation-by-Nation basis, instead pooling all Indigenous groups together for the purposes of the effects characterization process</u> CNL has and will consider how traditional and resource uses such as trapping, hunting, fishing, gathering, and culture might be different among the various Indigenous communities/organizations. Certainly, each Indigenous community/organization will describe how it undertakes traditional use in a somewhat	highest concern to Sagkeeng but CNL (and AECL) appear to be purposively ignoring them. Meaningful dialogue is necessary, not excuses or platitudes. response, 'Response to #4', 3rd paragraph: We need to consider these impact pathways during this EA, and in the context of whether ISD is an acceptable, let alone preferable, solution to decommissioning WR-1, not delegate it to later discussions or a separate table. Sagkeeng is seeking a meaningful long-term relationship for planning, management, monitoring, and a compensatory framework for harms caused on us by this facility, but not at the cost of not finding the most appropriate decommissioning strategy for WR-1. We look forward to discussions on future land use and end state of the Whiteshell site, which have not to date been initiated. A good first step would be for CNL and AECL to identify what commitments they are willing to make in regard to long-term relationship, integrating Sagkeeng's recommendations for the Whiteshell facility made in our 2019 licencing submission. Concerning CNL's statement that Sagkeeng land and resource use does not currently occur on the WL property, is CNL asserting that the WR-1 Project and the Whiteshell Laboratories does not have an impact radius surrounding it, beyond the fenceline, also impacting on Sagkeeng traditional land and resource use? If so, on what basis is this assertion made? In regards to CNL suggesting that risk perception and behavioural modification are not valid pathways since people have been living with the reactor since 1965, CNL is requested to identify on what	from Sagkeeng establishing that the stigma identified by Sagkeeng to have resulted from an environmental effect created by the proposed activity, the proposed in-situ decommissioning of WR-1. While CNL also recognizes that Sagkeeng can advance any matters it wishes to advance, CNL submits that Sagkeeng has not established a nexus between its concerns of stigma and pre-existing concerns with the proposed activity, as required by CEAA 2012. <u>Concerning CNL's statement that Sagkeeng land and resource use does not currently occur on the WL property, is CNL asserting that the WR-1 Project and the Whiteshell Laboratories does not have an impact radius surrounding it, beyond the fenceline, also impacting on Sagkeeng traditional land and resource use? If so, on what basis is this assertion made?</u> CNL's assessment of the in-situ disposal option for WR-1 concludes WR-1 is safe and protective of people and the environment.

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			that summarized the Project, effects, engagement activities and mitigation measures to date, which served as a jumping off point for continued engagement and calibration on mitigation measures as the environmental assessment process continued; • addressing psycho-social and cultural concerns, CNL developed a site benchmarking trip to an in situ reactor in Hallam, Nebraska, to educate on how an in situ site is performing, is monitored and the effect on the local community; • provision of funding by CNSC and CNL for a Sagkeeng traditional knowledge study; • CNL entered into contribution agreements (MOU's) with SFN to help to define ongoing engagement goals and funded participation in review of the Project; and • CNL has funded a traditional consumption survey with Sagkeeng First Nation to help enhance Indigenous data in the EIS and validate the long-term safety assessment models for Indigenous people that harvest on site. A summary of CNL's efforts to engage Sagkeeng First Nation specifically has been included in Section 4 of the Environmental Impact Statement (EIS). During the engagement process for the Project and from the Sagkeeng Land Use and Occupancy Study, Sagkeeng First Nation identified several interests and concerns in traditional land and resources use (further details are provided in Section 4.3.2.1). These issues are not always specifically linked directly to the Project, but rather the overall operation and closure of the WL site; however, due to their overall importance to the community they are noted herein: • Concerns about the long term effects of the WL site and the Project on water quality and fish including an interest in fish monitoring at locations in proximity to the community. With regards to cumulative effects from other industries, the 1995 Winnipeg River Task Force report concluded that "It is unlikely that the AECL Whiteshell Laboratories has ever posed a significant threat to the health of Sagkeeng residents, nor is there apparently any prospect of such a threat in the future." • Wild rice and medicinal plants (calamus root, Laborador tea, wild ginger, and		different way and CNL has to the best of its ability described that. So section 6.8.4.2.5.1 has segmented these sections by Indigenous community/organization so their unique ways of practicing and describing traditional uses can be described. This is important because it wouldn't be appropriate to have a blanket description that is relevant for all groups. CNL has avoided such a pan-Indigenous approach. <u>Response to #4: The lack of integration of Sakgeeng concerns about risk and stigma, and effects this will have on the "impact zone" around the Project area that will be alienated, in the assessment of effects on Indigenous land and resource use</u> Based on the TLOUS, CNL has assumed that the Indigenous peoples' traditional use around the Whiteshell site will continue in the future. CNL is of the opinion that the project will not impact such uses. With the decommissioning of WR-1 and the overall site closure, there represents the potential opportunity for some of the Whiteshell lands to support traditional uses in the future. The land that will remain under institutional control as a result of the Project is less than 0.5% of the total Whiteshell site. The area stated is simply a factual measure of the surface of the project relative to the rest of the Whiteshell Labs site. "CNL is of the opinion that given the scope of the project, there is no inappropriate exclusion of projects effects. We believe SFN is likely referring to the fact that a very small portion of land will remain under institutional control for the next 300 years. This represents less than 0.1 hectares of the total land area of the 4,375 hectare Whiteshell Laboratories site. Furthermore, that land is not currently available for alternative uses." The above conclusions are drawn from the environmental impact assessment and CNL's understanding of the site. At the same time, CNL recognizes the feelings of perception and stigma that SFN members have shared and does not want to underplay or discredit them. CNL recognizes that these are strongly held feelings by the community. CNL wants to address these concerns through a broader forum of long-term relationship building.	basis it is unilaterally rejecting risk perception and resulting behavioural modifications as a valid impact pathway in this EA. Is CNL unaware of any environmental assessments under CEAA 2012 where risk perception played a key role? Has CNL researched this topic? What experts in human environmental impact assessment came to this conclusion on behalf of CNL? We look forward to your feedback on this foundational issue. In reference to CNL's response regarding section 6.8.5, we must express confusion. In its cover letter attached to this list of EIS comment responses, CNL indicated that it has refiled the EIS with the CNSC. However, we are being encouraged to go back and read an earlier document from December 2019? Are the December 2019 document and the October 2020 document one and the same? Please provide the most recent version of the EIS, filed with CNSC, for our review and comments. Regarding CNL's continued use of a "public website and other media mechanisms to share information and receive feedback ", we have provided comments previously in relation to items in this table that cover Sagkeeng's remaining concerns about these responses. CNL proposes to use robust communication of environmental monitoring data as a mitigation for perception-based impacts. There is no evidence that CNL's existing risk communication and overall communication programs have reduced fear and stigma associated with the site. In addition, the Psychosocial Impact Assessment has explicitly stated that such communication, on its own, will not be sufficient to address the fear and stigma associated with the site. How will these be	

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			waterlily roots) collected by Sagkeeng First Nation members are present in the Whiteshell area. • Concerns about the transport of nuclear materials, particularly in the event of an accident and associated contamination within their traditional territory. • Interests regarding future land use in relation to the overall site closure. • In the Sagkeeng Land Use and Occupancy Study, Sagkeeng members identified a set of Valued Components (VCs) relating to Sagkeeng knowledge and use that may be impacted by the Project. These values included: water resources; medicines, berries and other food plants; hunting and trapping; and, Anicinabe Pimatiziwin. Traditional land and resources use was identified as a Valued Component (VC) for the effects assessment in the EIS. Traditional land and resources use is important for maintaining meaningful connections with cultural identity and community history. Traditional land and resource use can also promote intergenerational connections within communities as knowledge is passed down from elders to community members, including youth. Through engagement activities with Indigenous groups, CNL has discussed potential environmental effects and mitigation measures. The final EIS includes information on which groups engaged with CNL and how their input was addressed. CNL is committed to continuing to engage with SFN in order to share information and learn from one another. CNL is interested in hearing about the specific ideas and thoughts SFN has with respect to projects such as: "The Canada Deline Uranium Table (CDUT) to address contamination (including radioactivity) at the historic Port Radium Uranium Mine in the Northwest Territories" and learn about how ideas other projects might offer could be incorporated into our relationship. CNL is interested in initiating an Indigenous Advisory Committee to provide an on-going mechanism for engagement, input and information sharing. CNL has also requested establishing a Long-term Relationship Agreement with SFN to reaffirm CNL's commitment to continue to move forward with our relationship, as well as to set up a mechanism for funding future activities.		<u>Response to #5: A complete lack of information about Sagkeeng's desired future use of lands and resources in the baseline and effects assessment.</u> CNL is interested in engaging with Sagkeeng on broader issues related to future land use, which we see as an important component of meaningful Sagkeeng involvement in the long-term stewardship of the land. AECL, as the site owner, is also interested in participating in these discussions. The requirement for CNL for the WR-1 *In situ* Decommissioning Project is to assess the effects of the project on current land use. As SFN is aware, Sagkeeng land and resource use does not currently occur on the WL property. There is no requirement for CNL to assess the effects of the project on a land use that is not currently existing. However, independent of the WR-1 decommissioning project, CNL wishes to engage with SFN on future land use and end state of the Whiteshell site and is planning for formal engagements. In the meantime, CNL will to continue to move forward with the WR-1 *In situ* Decommissioning Project in order to actually pursue other possible alternative uses for the site. CNL has stated clearly that perceptions that may alter behaviour do not represent an environmental effect as considered under CEAA (2012). Communities have been living with the existing reality since 1965, from an active reactor to shut down and in the process of being decommissioned. These decommissioning activities are proposing to make the people and the environment safer, to create future access to the site and to involve the Sagkeeng in a long-term meaningful way. By decommissioning the site, these activities could be contributing to improved safety of humans and the environment compared to the baseline conditions. Under CEAA (2012) there would be no pathway for concerns about risk, fear and perceptions in terms of representing actual environmental effects. However, CNL treats this concern very seriously and through funding support, the provision of further educational materials, and ongoing engagement, such as communications through the CNL funded Indigenous Liaison, is making efforts to help address this issue with Sagkeeng, other Indigenous communities and the general public.	improved now? Why have they not been improved in the past? response, 'Response to #5', 6th paragraph: Some of this hasn't been presented in earlier comment responses by CNL. The additional material appears to have been provided simply to reinforce prior conclusions reached unilaterally by CNL, without consideration of Sagkeeng perspectives. response, 'Response to #5', 9th paragraph: This implies that Sagkeeng members falls into the category of "a small number of users". Is this the case? What evidence has CNL gathered that it will only be a small number of users that would prefer full removal? We would appreciate if these assertions, critical to CNL's arguments in favour of ISD, were backed by evidence. response, 'Response to #5, 14th paragraph: CNL acknowledges this a major concern but refuses to recognize it as a valid impact pathway? Shouldn't environmental assessment focus on the heart of matters, including both biophysical and human environmental impacts? We call this type of environmental assessment, where "major concerns" are surfaced and then effectively ignored by the Proponent, "catch and release", and it does nothing to reduce the major concerns and can, in fact exacerbate them if the people living in and using the Project affected area feel like they are being ignored or patronized. response, 'Response to #5', 19th paragraph: But is not willing to modify the project if ISD is a less preferable way to deal with this recognized major concern that full removal options, which are technically and economically feasible? Saying to people that "we hear this is a major concern for you, but we are going ahead with our plan even though there	

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					The EIS Project Interactions sections do address the topic of perceptions, fear and stigma and proposes mitigation and monitoring measures to address them. We have copied these statements from the current EIS so that SFN can review them directly. In section 6.8.5 which is the Project Interaction and Mitigation section and one goes to 6.8.2.2 under Secondary Pathways the issue of fear and stigma is discussed. SFN is encouraged to read the Conclusion section. Specifically, please go to page 6-447 of the December 20th, 2019 version that was provided to SFN. There is one bullet on that page and the following text is provided below. The text relevant to the point raised by Sagkeeng is highlighted in bold and states: "The Project may change the perceived suitability of the LSA for outdoor recreation and tourism and traditional land and resources." "The WL site was established in the 1960s with WR-1 becoming operational in 1965. Since that time, there have been nuclear research and more recently, decommissioning activities at the site. The area around the WL site in the LSA is currently used for agricultural activities, wildlife harvesting activities, fishing and private residences. This has not altered land and resources use in proximity to the WL site with activities, as such deer hunting, agricultural activities, fishing and other uses of the Winnipeg River are still popular. The presence of the encased WR-1 is not expected to cause changes in these existing activities, although a small number of users may perceive areas in proximity to the site as less optimal than if the reactor had been removed in its entirety. The Project will be engineered to demonstrate long-term safety through a combination of site characteristics and engineered design features and to isolate and contain contamination inside the reactor vault and limit releases of hazardous substances, including radiological substances. According to the ERA, thresholds for airborne and waterborne contaminants will not be exceeded as a result of the Project (EcoMetrix 2019). Therefore, there is no need to change land use in land released by AECL for unrestricted use or on the land in the LSA around the WL site; however, the presence of an encapsulated reactor and associated perceptions may make engaging in activities in the LSA less desirable for some users.	are other viable plans that give you less concern"; is this the path to a meaningful relationship and credibility that CNL and AECL are seeking? This does not seems like a viable path toward relationship and reconciliation to Sagkeeng. response, 'Response to #5', 20th paragraph: The logic used here appears to be "Since you aren't using the site now, you can't complain if you're prevented from using it indefinitely", even if it is a preferred area for TRLU and rights practices. We encourage CNL to come prepared to speak to its understandings of the implications of the Sagkeeng Alternatives Assessment and the Psycho-social Impact Assessment for the question of whether a future with ISD is demonstrably better or worse for Sagkeeng members, at our future meetings. We believe there is strong evidence in these two studies that ISD is not preferable from a Sagkeeng perspective or from a perspective of what is better for impacted Indigenous communities. Regarding CNL's response to point #6, is CNL committed to integrating the results of all three studies into the revised EIS, subject to verification by Sagkeeng? We disagree that a credible assessment of whether off site effects will occur has been conducted, especially in relation to Sagkeeng rights and traditional land and resource use. CNL has not established the degree to which in the base case, CNL members are already alienated from areas "off site" - outside the fenceline - nor has CNL conducted a proper assessment of what a future with ISD will do to continue those effects of alienation, both	

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					To mitigate perceptions related to the suitability for use of the WL site and the lands around it, CNL will support robust communication of environmental monitoring results to confirm the safety of the WL site and help address concerns about future uses. CNL also seeks to work with Sagkeeng on how they would like to be involved in environmental monitoring and has held preliminary discussions on this topic. Sharing of monitoring results will be extended to Indigenous peoples, however the exact mechanism of these efforts will be jointly defined with these Indigenous Communities. In addition to personal outreach, Canadian Nuclear Laboratories will continue to use a public website and other media mechanisms to share information and receive feedback from Indigenous peoples and the immediate local communities through the duration of the Project. Future communication mechanisms to keep local communities and Indigenous peoples informed will be determined as necessary, and in consultation with them. Overall, with mitigation in place, Project effects on land and resource use are expected to be negligible. These pathways are therefore characterized as secondary." CNL has also addressed this concern about perceptions in section 6.8.7, the Conclusions section where it is stated: "In addition, to mitigate perceptions related to the suitability for use of the WL site and the lands around it, CNL will support robust communication of environmental monitoring results to confirm the safety of the WL site and help address concerns about future uses. CNL will continue to engage with local communities, municipalities and Indigenous peoples" (p. 6-449). In section 6.9.6.1.2 under Application Case Results CNL has stated: "The permanent presence of the encapsulated WR-1 will change the perceived suitability of the WL site for the future uses due to the perceived risk associated with the long-lived radiological hazards of the reactor vessel. This is a major concern for communities in the LSA. …. CNL will support robust communication of environmental monitoring results to confirm the safety of the WL site and help address concerns and mitigate perceptions about the site's suitability for future uses" (p. 6-502 to 6-503). In Section 12.7 CNL has stated: "CNL will implement the Environmental Assessment Follow-up Program for WR-1 to verify the accuracy of predicted environmental	on and off site. The evidence provided by Sagkeeng indicates that: 1. there is existing alienation effects both on and off site (i.e., there are off site effects from the facility already); and 2. that a future with ISD holds a higher probability that both on and off-site rights and TLRU effects will continue to be adverse for a much longer time frame than a future with full removal. Those are valid - indeed central - considerations in the context of this EA.	

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					effects and determine the effectiveness of mitigation that has or is to be implemented. In addition, to mitigate perceptions related to the suitability for use of the WL site and the lands around it, CNL will support robust communication of environmental monitoring results to confirm the safety of the WL site and help address concerns about future uses. In addition, CNL has supported the conducting of Traditional Knowledge and Land Use studies. The carrying out of such studies has assisted in better understanding modern and traditional land and resource use near the WL site. CNL is aware that some of the Indigenous communities have continuing concerns about the potential effects of the Project and more broadly the WL site and the potential effect on traditional land and resource use and more specifically on the wildlife, fish and plants upon which such use is based. As such, CNL is committed to involving such organizations in monitoring and to communicating with them over the long-term to address on-going concerns. Overall, CNL will continue to engage with local communities, municipalities and Indigenous peoples." (p. 12-13) CNL has also undertaken specific engagement activities to better address this point. The Hallam trip to Nebraska with invited Indigenous participants (including SFN) was particularly organized to help address this topic. This point is mentioned on page 4—6 of the EIS. CNL has highlighted all of the above text in order for SFN to understand that it does consider the topic of fear and stigma to be a real concern and CNL wants to address it. CNL is willing to undertake processes specific to Indigenous communities and SFN to address this concern. CNL is committed to continue to engage on this topic with SFN, to understand better their concerns and address them to the extent possible. That process would be aided by SFN sharing the results of the study they are undertaking on this topic and being funded by the CNSC. CNL made its best efforts to incorporate all the necessary information on existing land use from SFN and apologizes if some specific information was not described in the EIS. Certainly, there is recognition of existing traditional uses continuing to be important in the future. The requirement for CNL for the WR-1 In-situ Disposal Project is to assess the effects of the project on current land use. As SFN is aware, Sagkeeng land and		

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					resource use does not occur on the WL property. There is no requirement for CNL to assess the effects of the project on a land use that is not currently existing. CNL is interested in engaging with Sagkeeng on broader issues related to future land use, which we see as an important component of meaningful Sagkeeng involvement in the long-term stewardship of the land. AECL, as the site owner, is also interested in participating in these discussions. <u>Response to #6: No verification of any assessment of effects on Sagkeeng land and resource use with Sagkeeng, or engagement of Sagkeeng in any way in this assessment</u> CNL welcomes the opportunity to discuss the assessment of effects on Sagkeeng land and resource use with Sagkeeng. CNL is funding an Alternative means assessment led by Sagkeeng and looks forward to discussing the results of this assessment. The CNSC is also funding a psycho-social assessment led by Sagkeeng and CNL looks forward to discussing the results of the assessment with Sagkeeng as well as discussing how best to incorporate the findings into the EA process. <u>Response to #7: A lack of any retrospective data to establish the use and value of the project affected area to Sagkeeng prior to it being "taken up" by the Crown for the Whiteshell Labs facility.</u> CNL has heard Sagkeeng in oral presentations and in its TLUOS describe how the existing environment has been degraded over time. While CNL recognizes historical traditional use occurred on site, the base case for the project is inclusive of the existing WL facilities, operations, and decommissioning activities to date, meaning the assessment is intended to measure change from the current point in time. While the existing environment can be described in the EIS, the assessment is not intended to describe how Sagkeeng's way of life was practiced in the past, prior to the existence of the WL site or WR-1 reactor. <u>Response to #8: The lack of "capture" of all the potential impact pathways from the project on Sagkeeng land and resource use identified in the TKLUOS, into the EIS.</u> Sagkeeng has done an excellent job at describing traditional and land use in the study area for the base assessment case. Sagkeeng has provided feedback on their VCs of importance through the TKLUOS, the alternative means workshop, letters		

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					from Chief Henderson, at community meetings, at ceremonies both at Turtle Lodge and on the Whiteshell Laboratories site, and at other engagements with CNL. CNL's project assessment has shown that off-site effects will not occur and therefore primary pathways are not affected. CNL is also supportive that CNSC is funding a study by SFN to examine psycho-social effects and looks forward to learning more about Sagkeeng's community views and discussing how to incorporate the results of this assessment into the EA process. The requests by SFN for further proactive and robust consultation and engagement has been heard and are being responded to by CNL. CNL looks forward to continuing this dialogue with Sagkeeng.		
120.	SFN (Jan 15, 2018)	SFN expresses the concern that there is a lack of assessment of psycho-social impacts in the draft EIS and provides the following comments: • There are multiple examples in Canada where the mere presence of hazardous waste has exerted an adverse psychological impact on Indigenous peoples (e.g., the abandoned Port Radium and Giant Mines). This includes affecting traditional practices, collection of traditional foods, general land use, etc. Depending on the approach to waste management that is taken, such impacts can persist even after remediation. The risk of long to permanent term psycho-social adverse effects and territorial alienation are highest in instances where hazardous materials are maintained in situ, rather than moved to a purpose built facility, because the radiation will stay in place (despite prior promises) and be released for literally thousands of years. • The current EIS has placed virtually no emphasis on this aspect that is critically important to SFN. For example, no consideration is given to the psycho-social impacts and chronic stress that the continued presence of hazardous materials will have on SFN members. • The construction of a radioactive waste disposal facility requiring perpetual care within SFN traditional territories will be a major source of long-term anxiety for SFN members. No efforts have been made by CNL to identify, evaluate and mitigate these impacts. SFN recommends that CNL include psycho-social impacts of nuclear waste disposal (never originally envisioned for this site) in a reassessment of effects on SFN and other receptors in relation to human health and well-being VCs, including reference to the plethora of existing literature on this subject. See Appendix 2 of SFN's submission, which identifies key factors and issues to consider, and identifies some critical actions that may be required for a proper	When all of the potential pathways from the Project to traditional land and resources use were considered, such as changes to water quality, to fish, to wildlife, to vegetation, or to human health, there were no potential measurable effects identified. The fact that the WL site has had restricted access over the last six decades, has also meant that no traditional land and resource harvesting has occurred in proximity to the proposed Project, although it is evident from engagement activities and the TK study that activities have persisted in the Whiteshell area, the Winnipeg River and downstream to Lake Winnipeg. It is anticipated that the Project will not prevent continued use of these areas to continue well into the future. The ISD approach reduces the potential risks to the environment and people by providing a robust seal that will allow for safe, continued radioactive decay. In-situ decommissioning limits risks to workers and the environment that would be presented through alternative approaches involving the dismantling, removal and transportation of reactor systems. While there is no requirement in the Federal Environmental Assessment process to assess psycho-social impacts, CNL appreciates the submission from SFN on Psycho-Social Impacts and is interested in discussing further to better understand the recommendations made in this Appendix. CNL's provision of additional resources to SFN has been done in a spirit of promoting closer co-operation, understanding, and dialogue on topics SFN has raised including monitoring and capacity support. As characterized above, CNL considers the proposed approach as reducing risk, but acknowledges that negative perceptions might exist and therefore wants to continue to dialogue providing educational	Table 4.3.2-2 in the revised draft EIS identifies an existing Sagkeeng concern with the original draft EIS as a lack of examination of psycho-social impacts, but the revised draft EIS, especially in sections 6.7 through 6.9, does not consider the validity of psycho-social impact pathways, nor has CNL conducted any research into this matter or engaged Sagkeeng further on it since January 2018. CNL's response at left highlights that it feels the federal environmental assessment process does not require consideration of psycho-social impacts. This, despite the fact that Health Canada has recognized for many years the importance of examining psycho-social impacts of contaminated sites on affected peoples, especially Indigenous peoples with deeper connections to the land and reliance on country foods. CNL goes to say it appreciated Sagkeeng's submission on psycho-social impacts, and is willing to further engage on this topic. Sagkeeng's submission was made two years ago, and CNL has not engaged Sagkeeng on this topic as yet, nor put any resources into identifying potential psycho-social impacts associated with the Project. Again, this despite the fact that CNSC, AECL and CNL openly acknowledge that people have a high degree of concern, fear and stigma in relation to radioactive materials and nuclear waste disposal. Why hasn't any engagement of Sagkeeng by CNL on this topic occurred in the interim? When will this engagement occur? No consideration is given in the EIS to impacts on Indigenous well-being from psycho-social effects, even though this is a credible "primary pathway" that could impact on Indigenous health and well-being, given a future with ISD is one that could lead to a much longer time period of alienation and fear/stigma associated with the site, than a future under the current approved "full removal" plan.	CNL is supportive that CNSC is funding a study by SFN to examine psycho-social effects and looks forward to learning more about Sagkeeng's community views. According to a Health Canada Guide on addressing psychosocial factors through capacity building (https://www.canada.ca/en/health-canada/services/environmental-workplace-health/reports-publications/contaminated-sites/addressing-psychosocial-factors-through-capacity-building-guide-managers-contaminated-sites.html), taking a community capacity approach to engagement will help to addressing the psychosocial concerns of the 'affected' communities. CNL has funded an Sagkeeng Indigenous liaison position to help facilitate wider communications to Sagkeeng's membership in supported of increasing their knowledge and understanding of the project and to help mitigate potential psycho-social concerns. CNL believes engaging with Indigenous communities and understanding their thoughts and concerns is an important part of the environmental assessment process. CNL is committed to engaging with Sagkeeng and discussing the results of their psychosocial assessment in order to meaningfully understand their concerns regarding any perceived psychosocial impacts and working through possible mitigation options. CNL wants to learn from the Indigenous communities that CNL is working with. This means allowing Indigenous communities and organizations to pursue lines of inquiry that offer a much different perspective than CNL's.	response, 2nd paragraph: But there are no mandated requirements to modify projects based on that input so CNL has not made any modifications to its proposed ISD plan? This is very frustrating to Sagkeeng for obvious reasons. response, 5th paragraph: This argument is not accepted by or acceptable to Sagkeeng. Canada made a mess of the site and now they have to clean it up. Arguing that the project should be viewed only as a "good thing" because it involves a clean up is disingenuous and disrespectful to Sagkeeng and our Constitutional rights to use this area in the future. This EA needs to focus on what a future with ISD looks like versus the future contemplated when the CSR was completed in 2002. Full removal remains a viable option, and so ISD must be shown to be preferable to full removal. It is not just about cleaning up the site, it is about the least impactful way of cleaning up the site. It is about not passing on liabilities to future generations. It is about what ways of cleaning up the site have the most likely ability to not continue impacts on	**CNL cannot address Sagkeeng's concerns due to irreconcilable differences and considers this comment closed.** CNL will document Sagkeeng's concern in the Indigenous Engagement Report and Environmental Impact Statement. CNL's assessment concludes that the in-situ disposal option of WR-1 is safe and protective of the environment. In addition, CNL has identified 3 specific areas where they are prepared to move to address Sagkeeng specific concerns. We have listened, reflected upon Sagkeeng concerns, but based on other factors explained earlier (i.e., no licensed disposal facility, public funds, etc.) CNL will need to agree to disagree with Sagkeeng.

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		assessment of effects, and for management of psycho-social effects during decommissioning and long-term institutional control.	and awareness opportunities and sharing information. CNL will continue to engage with SFN and looks forward to understanding and helping to implement SFN specific processes as outlined in Appendix 2. To that end, CNL has provided resources to SFN to help facilitate such dialogue and understanding including hosting SFN community members and consultants for numerous site tours at the Whiteshell site as well as funding participation in a tour and engagement of a similarly entombed reactor in the Hallam, Nebraska CNL is also aware of educational opportunities that the regulator provides, along with an independent environmental monitoring program. CNL enabled and hosted Sagkeeng to conduct water, pipe and sacred fire ceremonies on the Whiteshell site as a means to allow greater connection to the land.	No verification work was conducted with Sagkeeng as to the adequacy of the identified Valued Components and indicators for the socio-economic environment. This leads to serious gaps. For example, not included as a non-medical determinant of health in section 6.9.4.2.6.4, is any recognition of the role that spirituality, connection to land, and ability to practice Treaty rights freely on ones territory has on Indigenous health. If this were considered, a very different picture would emerge of the potential for primary pathways of effect on Indigenous well-being from the proposed Project. In addition, we note that Section 6.7 in the revised draft EIS on Human and Ecological health (the same can be said for Section 6.9 in relation to Community Well-Being) does not examine potential Project impacts on population health, including Indigenous population health, from non-medical related health determinant factors, of which psycho-social impacts, high perceived risk, and place-based fear and stigma are just a few factors. Overall, Indigenous determinants of health were not integrated into this Section, nor was Sagkeeng engaged by CNL in the identification of relevant VCs or indicators related to Indigenous determinants of health. The assessment of effects on community well-being does not distinguish between Indigenous and non-Indigenous peoples, even though the factors that contribute to their respective well-beings may differ widely. In a related issue, no effort was made to work with Sagkeeng to identify critical factors to Sagkeeng well-being.	CNL recognizes that it has a significant challenge in communicating all of its proposed work including the WR-1 In-Situ Disposal Project to Indigenous communities and public stakeholders. At Whiteshell, CNL is making active changes such as hiring an Indigenous liaison to help the organization gain new perspectives and insights and improve its understanding of Indigenous perspectives on the world. The WR-1 *In-situ* Disposal Project is an assessment of the change of the site from its present (existing) condition to its end state. The existing conditions include the WR-1 and all the other facilities and activities that occur on the Whiteshell site. The assessment is not an assessment of what conditions were like prior to the development of the Whiteshell site by AECL in the 1960s. The WR-1 project is an enabling project that allows AECL and CNL to move the Whiteshell site to a reduced footprint and environmental impact, even though that impact is already very low. As such, the environmental remediation of the site creates a reduced amount of waste and activity at the site will result in an even lower risk to human health and the environment and likely create greater access to the land as compared to the current conditions.	Sagkeeng rights and TLRU. if all options can be completed safely, it is about avoiding the long-term, "cementing in place" of existing adverse effects that have been described by Sagkeeng in multiple submissions. Canada owes it to Sagkeeng to find the best path forward, not just one that is preferred by CNL. The reality is that ISD may very well make things worse for Sagkeeng than other alternative means to decommission the site; why is this not a focus of the assessment? Sagkeeng appreciates efforts by CNL to support community capacity building and will continue to engage CNL and AECL on this topic and other beneficiation opportunities to offset the inevitable and existing impacts of the Whiteshell Laboratories on our people. That said, we have to ask the question - "What is a more powerful means to address psycho-social concerns at the community level; hiring an Indigenous liaison position, or following a trauma-informed decommissioning pathway that listens to the community and removes the primary risk agent"? It is self-evident that it is the latter, not the former, that would make a real, tangible difference to risks of future psycho-social harm to Sagkeeng members.	
121.	SFN (Jan 15, 2018)	SFN expresses the concern that there has been a lack of assessment of potential impacts on Aboriginal and treaty rights and provides the following comments: • Subsection 2.4 and Section 7 of CNSC's Generic EIS Guidelines outlines the information requirements related to gathering, understanding and assessing potential adverse impacts of the project on potential or established Aboriginal or treaty rights. • Further, Section 3.2, paragraph 14 of the CNSC's Record of Decision for Canadian Nuclear Laboratories (CNL) on the Scope of Environmental Assessments for Three Proposed Projects at Existing Canadian Nuclear Laboratories (March 8, 2017) states, "...CNL has committed to notifying CNSC staff of any concerns raised by Indigenous groups with respect to any impact on potential or established	CNL has endeavoured to listen and learn from SFN regarding their concerns in particular regarding potential impacts to SFN Indigenous and treaty rights. The EIS has been updated to capture this information in Section 4, in particular in Table 4.3.2-2.	Section 4 of the EIS is not the only place where Aboriginal and treaty rights are relevant, nor does Section 4 properly characterize Sagkeeng Treaty rights. The TLUOS had plenty of material to integrate in the EIS, but this was not integrated. For example, the entirety of Section 4.5 (impacted baseline), Section 4.6 (project interactions) and Section 5 (summary of impact pathways) of the TLUOS detail both the existing impacts on Sagkeeng Treaty rights and potential for additional impacts from the Project. It can be reiterated that Sagkeeng VC are elements of Sagkeeng Treaty Rights, and any past, present, or reasonably foreseeable impact on Sagkeeng VCs are in fact a negative effect on their rights.	CNL is aware that SFN is undertaking a Rights Impact Assessment with respect of the WR-1 project, which is being funded by CNSC. CNL thinks this is an appropriate step as CNSC will be asked to assess any potential impacts on rights based on the Commission Hearing into the project as a whole. CNL would appreciate being kept informed of the results of discussions between CNSC and SFN.	Sagkeeng commits to keeping CNL apprised of the status of the rights impact assessment.	**Closed.**

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		Aboriginal and/or treaty rights, as well as any proposed measures to address concerns raised." (page 3) However, SFN notes that the draft EIS lacks any information that characterizes and assesses potential project effects on SFN's Aboriginal and treaty rights. At minimum, SFN explains that the draft EIS must include an assessment of potential impacts to SFN Aboriginal and treaty rights, including but not limited to the following: 1. Description of SFN rights-based activities and interests in proximity to the project; 2. Potential project impacts on SFN rights-based based activities and interests; 3. Identification of potential mitigation measures; and, 4. Assessment of severity of potential impacts on SFN Aboriginal rights and treaty rights. SFN recommends that CNL provide a supplementary submission providing an assessment of potential project impacts on the Aboriginal and treaty rights of the SFN. For SFN's overview of essential steps of a treaty/Aboriginal rights-impact assessment, please see the Appendix A in their submission.		Sagkeeng has requested that CNSC set up an appropriate Nation-to-Nation framework for the conduct of impacts on Sagkeeng Treaty rights in relation to this Project.			
122.	SFN (Jan 15, 2018)	Section 7.0 of CNSC's Generic EIS Guidelines states: "The draft EIS will include VCs suggested by Aboriginal groups for inclusion in the draft EIS, whether they were included, and the rationale for any exclusions". SFN notes that the draft EIS does not contain information relevant to this requirement. SFN recommends that CNL provide a supplementary submission outlining the process conducted by CNL for consulting with SFN to identify VCs for inclusion in the draft EIS, a summary of that consultation process including SFN's final list of candidate VCs, and CNL's rationale for the exclusion of any of the VCs.	CNL has engaged with several Indigenous groups with respect to the Value Components (VC) considered in the Environmental Impact State (EIS). CNL has engaged with the SFN both in the community and at the CNL site. During these engagements CNL presented, used poster boards, hand outs and discussed VC's and noted what was heard or what was provided back in writing. On several occasions SFN community members expressed deep concern for the water, plants and animals. CNL incorporated this into the VCs. CNL provided funding for completion of a traditional knowledge and land use (TKLU) study which provided further opportunity for CNL to learn from SFN on components of value. Section 4 and 6.8 of the EIS have been updated to reflect this information. titled	The VCs represented in the EIS have are said to "reflect identified concerns, professional judgment and/or standard practice in environmental assessment" (EIA, p. 6-403). It is important to clarify that the VCs represented in the EIS are not the same as the VCs identified in the TLUOS, which were determined through discussions and interviews with Study participants (i.e, Sagkeeng members). The VCs within the TLUOS have been verified by Sagkeeng through community verification meetings, following their drafting. It is apparent that no such process has been followed by CNL in its VC development. It is unclear what process was used to verify the EIS VC categories with Sagkeeng and their appropriateness for use. Given that the VCs described in the TUS have been identified directly by Sagkeeng members, it is recommended that all these VCs are considered within the EIS. The VCs identified within the Sagkeeng TUS are: water; medicine, berries and other food plants; hunting and trapping; and Anicinabe Pimatiziwin. As detailed in the TLUOS in Section 3.1 (p. 22), "the VCs were chosen to represent the critical conditions or elements that must be present for the continued practice of Sagkeeng culture and livelihoods, and that may be impacted by the Project. As such, VCs can range from the direct presence of traditionally hunted animals and gathered plants, to continued habitation, travel, and cultural activities on the land."	CNL does not agree that there is an inherent contradiction between the TLUOS having different VCs from the EIS. CNL thinks it is completely understandable that SFN chose its own VCs representing the critical conditions or elements that must be present for the continued practice of Sagkeeng culture and livelihoods, and that may be impacted by the Project. CNL provided funding to SFN to undertake its own TLOUS without any preconditions on how that work should be undertaken or presented. CNL apologizes if its description of SFN traditional use was not as fulsome as SFN would like. In response CNL has made significant edits to the EIS to remedy that concern. For this EIS, CNL has chosen traditional land and resource use as one VC and in that description of and assessment of effect CNL has and will consider how traditional and resource uses such as trapping, hunting, fishing, gathering, and culture might be different among the various Indigenous communities/organizations. Certainly, each Indigenous community/organization will describe how it undertakes traditional use in a somewhat different way and CNL has to the best of its ability described that. So section 6.8.4.2.5.1 has segmented these sections by Indigenous groups so their unique ways of practicing and describing traditional uses can be described. This is	We don't have the current version of the EIS so cannot speak to this response in any level of detail. We will reserve comments until we can review the appropriate sections of the updated EIS. The focus on currency of use is not helpful in the context of a remediation/reclamation project designed - by CNL's own assertion - to make things better on that site. We have to look at the differential effects of viable alternatives on future effects ON SITE as part of this environmental assessment. Part of the reason behind the project is supposed to be to make the area more useable than it is now - suggesting that comparing the degree to which different alternatives, including ISD, will impact on future use within the fenceline is invalid, is not acceptable to Sagkeeng. Is CNL saying "Sagkeeng doesn't use the area now, so it doesn't matter whether ISD doesn't make it more likely that Sagkeeng can use the area in the future"?	**CNL considers this comment closed.** CNL will provide a copy of the Environmental Impact Statement when submitted to the Canadian Nuclear Safety Commission as discussed. CNL can provide no further explanations to those already provided as to why they have conducted the assessment as they have.

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				The EIS has neglected to consider the full scope of Sagkeeng's VCs within its assessment, which are necessary for the continued practice of Sagkeeng culture and livelihoods. The VCs identified in Sagkeeng's TUS are not properly reflected or characterized in the EIS. For instance, the EIS use of Traditional Land and Resource Use by Indigenous people is, as a whole, an overly simplistic and inaccurate representation of resources required to sustain Sagkeeng culture and livelihood. As elicited within the TLUOS, traditional land and resource use is complex and multidimensional, made of multiple tangible and intangible elements that contribute to Sagkeeng way of life. Specific activities such as fishing, hunting, wild rice gathering, passing on knowledge to younger generations, ceremonial sites, etc. are critical to supporting Sagkeeng culture and identity. These values are unfortunately undermined and watered down when classified within a broad VC category such as "Traditional Land and Resource Use by Indigenous people".	important because it wouldn't be appropriate to have a blanket description that is relevant for all groups. CNL has avoided such a pan-Indigenous approach. With respect to the assessment of effects CNL has also considered the unique characteristics of each Indigenous community. CNL still respectfully comes to the same conclusion that traditional use practiced by Sagkeeng or any other Indigenous community/organization will not be affected by the proposed project because: CNL is not predicting effects on any of the biophysical resources upon which traditional uses are based; and, the proposed project wholly occurs within the Whiteshell site where there is currently no traditional use.		
123.	SFN (Jan 15, 2018)	SFN indicates that deep consultation with Sagkeeng is required given the context of proposed, permanent impacts to SFN's established treaty rights. SFN explains that the Crown's duty is further deepened by the ongoing Treaty Land Entitlement negotiation process that involves the resolution of outstanding treaty land commitments, a factor that could potentially be negatively impacted by the Project. In spite of this context, SFN indicates that it appears that only one meeting has been held with Sagkeeng specifically related to impacts to SFN's opportunity to exercise their Aboriginal and treaty rights within the vicinity of the project area. It would appear, from this section that CNL and the Crown have not undertaken sufficient substantial discussion of potential interactions between the project and SFN rights, severity of potential impacts, or mitigation and avoidance measures to address these potential impacts. SFN recommends that CNL provide a supplementary submission that provides detailed characterization of the past, current and future rights-based practices of the SFN within the vicinity of the project, providing a project-rights interaction matrix. Potential project impacts include, but are not limited to the following: • Improper use of non-native re-seeding stock during reclamation; • Noise, air emissions during decommissioning/reclamation activities; • Additional traffic along project access road with potential wildlife collisions, hunting pressures;	Based upon the assessment completed to date, CNL is of the opinion that the project will not result in any impacts to SFN's established Treaty rights, however CNL signed an MOU with SFN to provide capacity funding to host meetings where CNL and SFN can collaborate and collect rights based information within the vicinity of the project. As engagement activities have progressed over three community based meetings and a community site tour, relationships with the community have developed, and issues and concerns have been raised. CNL is not aware of SFN's Treaty Land Entitlement negotiation process or how the AECL property might be connected to such a process. CNL is willing to discuss this matter further with CNSC, AECL and SFN. As indicated above, CNL would like to engage more directly with SFN on its concerns including all the topics identified here, specifically: (1) native re-seeding stock; (2) emissions; (3) traffic; (4) influx of workers; (5) risk perception; and, (6) access to lands. CNL has proposed the development of an Indigenous Advisory Committee (IAC) with SFN. The above topics could be discussed through the IAC.	CNL maintains the opinion that the Project will not result in adverse effects on Sagkeeng Treaty rights and way of life. It is important to clarify that the findings of the TLUOS do not support this opinion, which we further note has not been supported by any assessment of effects on (or even proper characterization of the extent of) Sagkeeng Treaty rights by CNL. In relation to impacts on Treaty rights, Section 4.6 of the TUS details the anticipated Project Interaction that will occur with Sagkeeng identified VCs if the WR-1 Reactor Decommissioning Project were to occur. This includes specific concerns about the possibility of containment failure and its potential effects on waterways and waterbodies, beyond the Project Footprint and into the RSA. Of particular concern for Sagkeeng members is the adjacent Winnipeg River. The TUS describes the Winnipeg River as being an important waterway for Sagkeeng member's fishing and harvesting wild rice activities, as well as for traveling to access important harvesting sites and their broader territory. These findings suggest that the potential for emissions, waste, contamination, or any other potential impact from the proposed Project does indeed have the potential to adversely impact Sagkeeng Values and the surrounding environment beyond the Project Footprint. Also emphasized in the TLUOS is the potential for risks to extend beyond the physical risks of contamination. This includes potential for impacting important and intangible Sagkeeng values, such as sense of place, identity, transmission of knowledge to younger generations, and attachment to the land as a result of	CNL has appreciated that SFN has shared many insights into its community, way of life and world views. These have been expressed both personally in various sessions and through documentation such as the TLOUS. With respect, CNL maintains its position that the proposed Project will not result in adverse effects on Sagkeeng Treaty Rights for the same reasons as it has already identified in this response. CNL still comes to the same conclusion that traditional use practiced by any of the Indigenous communities will not be affected by the proposed project because: CNL is not predicting effects on any of the biophysical resources upon which traditional uses are based; and, the proposed project wholly occurs within the Whiteshell site where there is currently no traditional use. CNL appreciates SFN's comments in the second paragraph about the specific concerns SFN members have over the possibility of containment failure and potential effects. CNL's main priority is to continue to operate the Whiteshell site in as safe and environmentally responsible manner as possible. However, the incident that SFN is describing is an extremely unlikely event and is not part of the proposed project. Such an accidental and unlikely event can't be used as a basis for coming to a conclusion that the proposed project which doesn't involve a containment breach would	We appreciate the opportunity to provide insights into our community. However, "listening" without "acting" is really just allowing Sagkeeng to "blow off steam". Such statements are not in any way useful to relationship building. Sagkeeng requires action, not platitudes. response, 3rd paragraph: Is it correct to state that CNL has acknowledged that containment will eventually fail? As stated previously, it is Sagkeeng's position that a federal project, paid for by the federal government and on lands owned by AECL and where the primary focus is to clean up a mess of Canada's own making, must live up to the most modern impact assessment regime. In the case of IAA 2019, the requirement from CEAA 2012 that impacts on Indigenous peoples need to be caused by a change to the environment in order to be a focus of the assessment, has been replaced by recognition that impacts on Indigenous	**CNL considers this comment closed due to irreconcilable differences.** The WR-1 Environmental Assessment is adhering to the rule of law and the Project is being assessed under CEAA 2012. CNL commits to documenting Sagkeeng's concern in the Indigenous Engagement Report

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		• Influx of workers, increased hunting, fishing competition; • Perception of risk - to water, wildlife (perceived linkage to cancer rates in community); and, • Permanent loss of use and access to treaty use lands.		the Project (TLUOS p. 86 – 87). As stated in the TLUOS, the psychological effects that may arise from the proposed *in situ* decommissioning project reach beyond that of a physical project Footprint and extend into the intangible cultural elements of Sagkeeng way of life. Potential for Project interactions and effects should be considered beyond a physical geographic Footprint and also understood in a broader context of impacts to cultural continuity. Given the evidence described in the TLUOS in great detail, it is not reasonable or accurate for CNL to conclude that "the project will not result in any impacts to SFN's established Treaty rights". We also note that CNL's willingness to meet on the outstanding issues flagged needs to occur prior to the filing of the EIS. Sagkeeng remained available to meet on these topics for the past two years.	have an adverse effect on traditional use and SFN established rights. As well, CNL is of the opinion that a perception of a possible effect is not an effect as considered under CEAA 2012. That being said, CNL does see that its role is to engage with SFN and discuss the likelihood of accidents and malfunctions and the fears and concerns SFN has. CNL has made efforts to try to help SFN to better understand the likelihood of these. The trip to Hallam Nebraska was a good example of trying to provide SFN a better understanding of an In-Situ reactor project. Having SFN members visit the WR-1 site is another example. CNL is willing to continue to work with SFN on addressing these concerns and suggests that a session devoted specifically to accidents and malfunctions might be of assistance in addressing some of these concerns. The CNSC, as the holder of the duty to consult regarding the proposed project, has initiated a rights impact assessment with Sagkeeng First Nation. The conclusions of that assessment will be reviewed and compared to the assessment conducted by CNL for the environmental impact statement.	health, social and economic conditions of any type must be considered, if they are related to the Project. This includes fear, stigma, and risk perception. This is the standard of today that must be applied to this environmental assessment, including in respect to accidents and malfunctions. In addition, CNL has already been requested above to identify whether it is suggesting that no environmental assessment conducted under CEAA 2012 has considered risk perception as a valid impact pathway; we would appreciate if CNL could provide further evidence to support its assertion that risk perception is somehow automatically eliminated from CEAA 2012 environmental assessments.	
124.	SFN (Jan 15, 2018)	SFN references a conference paper [1], co-written by Robert A. Helbrecht (a former Director of Decommissioning at AECL WL site) and Daniel J.M. Grondin in 2002, that records Sagkeeng's significant interest and involvement in the 2001-2002 federal CSR process, and a range of recommendations and agreements that resulted from the process between SFN and AECL at the time. A key public concern at the time the CSR was conducted is noted in this paper as, "removal of waste from the site and the need for disposal facilities", and described as follows: "This issue relates to the local community reluctance to have waste remain at the site in the absence of on-going research activity with related community benefits" (page 15). One of the key commitments to Sagkeeng made by AECL in 2002 and recorded in this paper includes AECL's agreement to: "involve the Sagkeeng in the monitoring program to acquire samples and to be trained in analysis. The timing proposed was to initiate involvement shortly after project implementation" (page 17). However, SFN indicates that this section of the draft EIS does not refer to any of the consultation processes undertaken with SFN and other local communities at this time, key concerns that were raised, or to the conclusions or recommendations stemming directly from those	The consultation process at the time had some basic tenets, establish a communication protocol to facilitate information exchange, build a long term relationship and involve SFN in areas of interest. A description of all key issues and concerns raised by SFN can be found in the CSR section 10.5 and 10.6. At that time several key themes were identified along with the resulting action. The first was to establish a mutual mechanism to exchange information for on-going communication with Sagkeeng. Initial meetings established a communication protocol. Over time Sagkeeng indicated that they were very busy engaging with other industrial and government representatives and that they did not feel the need to communicate routinely with AECL. However, they indicated interest in communicating with the regulators, so a combined approach with CNSC was discussed. The second was the challenge around SFN reviewing highly technical documents such as licensing documentation. SFN indicated that they did not have the resources or expertise to interpret complex licensing and status documentation and asked WL staff not to send these reports. At the time several engagements were set up both in the community and at the site to help engage SFN and to help them	Sagkeeng's comments on the adequacy of the engagement process to date and the way it is described in Section 4 of the revised draft EIS are provided in other portions of this comment tracking table.	Acknowledged.		

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		consultations or to any resulting agreements between SFN and AECL in regards to mitigation/restoration measures and monitoring activities. SFN explains that this omission is a serious deficiency in the consultation record. SFN recommends that CNL provide a supplementary submission that describes the consultation process that took place in 2001/2002, including description of all key issues and concerns raised by local communities, including SFN, as well as commitments, recommendations, or conclusions that resulted from this process. References: [1] Grondin, D.J.M. and R. A. Helbrecht, Decommissioning of a Nuclear Research Facility in Canada: Application of the Federal EA Process, WM'02 Conference, February 24-28, 2002, Tucson, Arizona.	understand the information and provide feedback. SFN was also asked to engage with the CNSC and the programs for assistance they had in place, to help SFN understand the documents. SFN expressed interest in employment and/or training in environmental monitoring work at WL. At the time effort was made to offer jobs and co-op positions to SFN community members. WL job postings were and still are routinely distributed to the band office. Through the EA process for the WR-1 Project, CNL has met several times with SFN to share information on the Project and hear their concerns. This information has been captured in the updated EIS.				
125.	SFN (Jan 15, 2018)	The current proposal to significantly alter the decommissioning strategy as proposed by AECL in 2001, reviewed under a federal CSR and approved in the 2002 CNSC licensing decision, SFN explains constitutes a "strategic, higher level decision" that will have a serious impact on SFN's Aboriginal rights and treaty rights. SFN notes that the causal relationship between the current proposed project and SFN's rights is that, if approved, lands that under the 2002 decommissioning plan would be returned to use by SFN members for exercise of treaty rights within 60 years, would instead be placed off-limits and subject to ongoing restrictions and monitoring for a 300-year period, or essentially, permanently. SFN indicates that the assessment of the impact of this proposed change to the decommissioning strategy on SFN's Aboriginal and treaty rights has not been provided in this section. SFN recommends that CNL provide a supplementary assessment of the effects of the proposed revision to the decommissioning strategy on SFN's future opportunity to conduct rights-based activities within and adjacent to the project area. SFN proposes that CNL utilize a scenario analysis that compares potential opportunities for use of the area under the 2002 strategy and the newly proposed strategy.	The EIS conservatively assumes that traditional activities, such as hunting and/or fishing continue to take place within the area near the site. When all of the potential pathways from the Project to traditional land and resources use were considered, such as changes to water quality, to fish, to wildlife, to vegetation, or to human health, there were no potential measurable effects identified. The total land mass remaining under institutional control as a result of the Project will be less than .5% of the actual WL site. Remaining land will be available for future use. Eventual land use decisions with the future disposition of the site are with Atomic Energy Canada Limited (AECL).	Section 4.6 of the TLUOS details potential Project interactions with Sagkeeng values related to water, fish, wild rice, medicines, berries and other food plants, hunting, trapping, and Anicinabe Pimatiziwin. While the TLUOS does not quantitatively attempt to define a "measurable effect" to these values (an exercise that is both culturally inappropriate and contradictory to understanding the inherent value of resources to sustaining Sagkeeng land use, culture and way of life), the existing and perceived effects from contamination have been made clear in that document. The statement that CNL makes with respect to "total land mass remaining under institutional control as a result of the Project will be less than 0.5% of the actual WL site. Remaining land will be available for future use", fails to consider the impacted baseline conditions detailed in the TLUOS (Sections 4.2.2, 4.3.2, 4.4.2, 4.5.2). Furthermore, such a statement overlooks the long-term effects of an impacted baseline conditions on both the resources of the area, and Sagkeeng member's ability to freely use the land that is presently occupied by the WL site. The TLUOS described the impacted baseline conditions in the in the Study area (TUS Sections 4.2.2, 4.3.2, 4.4.2, 4.5.2), which include alienation due to access prevention, impacts to the soil vegetation, and water from contamination, loss of critical habitat for plants and medicines to grow healthily, decline in the quality of water, fish, and wildlife for harvesting, lost opportunities to transmit important cultural knowledge, and more. While having the land made available is desirable and a promising approach to future use, it should not be confused with being a simple resolution to remediating the magnitude of pre-existing impacts from existing development activities that have been occurring in the Study Area for more than fifty years. Furthermore, any assessment where land is lost entirely to Sagkeeng members is considered a loss in itself. An	CNL has assessed the project in comparison to the existing conditions. The assessment is not an assessment of the project against the conditions prior to AECL establishing the facility on site. As such, CNL within this EIS, assessed the conditions with respect to traditional land and resource use against those pre-development conditions. CNL stands by its response to the comment and that contemporary traditional land use has the potential to be expanded with the closure of the Whiteshell site. As responsibilities for concerns regarding pre-development impacts, taking up of lands, and other historical land matters rests with the federal government, those matters should be directed to that party. We reiterate our interest in entering into long-term relationship discussions with Sagkeeng in order to continue to build the relationship as well as discuss long-term land issues.	CNL is requested to review its estimation re: increased land use in the ISD case in the future, as against the findings of the Sagkeeng Alternatives Assessment and the findings of the Psycho-social Impact Assessment. This review should be conducted in meaningful engagement with Sagkeeng. And we note that there is no consideration or feedback on Sagkeeng's statement in our comment that "CNL appears to have confused physical footprint with zone of influence, which will in fact likely be much larger for any ISD future. CNL has not calculated or engaged Sagkeeng on how much area will be effectively rendered unuseable by Sagkeeng, once perceived risks are added to absolute physical restrictions. This is the more critical calculation to any defensible assessment of effects on Sagkeeng's future use." response, 2nd paragraph: We are assuming this sentence is incorrect, based on CNL's prior arguments. Please clarify. Sagkeeng's position, of course and stated clearly for some time, is that the chosen decommissioning type for WR-1 must demonstrate convincingly that it will make things better for future traditional use, not just as against current, damaged	**CNL considers this comment closed.** CNL will engage Sagkeeng on the end-state of the Whiteshell Laboratories site. This is out of scope of the WR-1 Environmental Impact Statement. CNL will continue to work with Sagkeeng to share monitoring information and create direct involvement opportunities in that process to demonstrate that the area would be safe for the continuance of traditional activities.

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				assessment that states that only 0.5% of land will remain under institutional control might sound low; however this portion it is still considered to be a complete loss to Sagkeeng members ability to freely exercise their Treaty Rights and way of life. Even if small, the loss of any portion of land is no less is a continuance of alienating Sagkeeng members from freely accessing their territory and preventing them from exercising their rights on their land. In addition, and perhaps more importantly, there is every reason to believe that the area that will be alienated from future use by Sagkeeng will be much larger than the area that is fenced off or subject to some other form of controlled access, in a future where radioactive materials are buried under the ground. CNL appears to have confused physical footprint with zone of influence, which will in fact likely be much larger for any ISD future. CNL has not calculated or engaged Sagkeeng on how much area will be effectively rendered unuseable by Sagkeeng, once perceived risks are added to absolute physical restrictions. This is the more critical calculation to any defensible assessment of effects on Sagkeeng use.		conditions (a ridiculously low bar), but also against other viable decommissioning alternatives (the relevant consideration to decision-making on a preferred alternative by Canada if Canada is upholding the Honour of the Crown). response, 3rd paragraph: CNL is a creation of Canada for the sole purposes of a GO-CO contractual relationship. AECL is responsible for the site and is therefore on the hook for this proposed project. BUT CNL is saying that SFN needs to air its grievances with Canada, not CNL? And if SFN were to go to Canada to critize ISD would they say SFN needs to talk to CNL since they're the proponent? We again ask who holds the Honour of the Crown in this instance. What "party" is CNL referring to here?	
126.	SFN (Jan 15, 2018)	CEAA 2012 CULRTP guidance (page 4) indicates that "current use" includes: "uses by Aboriginal peoples that are actively being carried out at the time of the assessment and uses that are likely to occur in a reasonably foreseeable future provided that they have continuity with traditional practices, traditions or customs… [and] uses that may have ceased due to external factors should also be considered if they can reasonably be expected to resume once conditions change." SFN explains that the proposed project, if approved, would greatly diminish future opportunities for Sagkeeng to exercise Aboriginal and treaty rights (and CULRTP) within the vicinity of the project area. SFN indicates that the assessment of potential impacts of Crown conduct on the ability to exercise rights in the future is required both to meet the Crown's common-law duty to consult, as well as to meaningfully assess potential effects on CULRTP. SFN identifies CNL's failure to adhere to both of these federal requirements, and best practice for assessment of impacts on traditional use of lands and resources by Indigenous peoples, including a lack of any data collection, meaningful consultation with Sagkeeng on the issue of their land uses, land of consideration of past and desired future uses, and overall inadequate consideration of this required assessment pursuant to CEAA 2012 section 5(1)(c).	The Environmental Impact Statement (EIS) assumes that traditional activities, such as hunting and/or fishing continue to take place within the area near the site. When all of the potential pathways from the Project to traditional land and resources use were considered, such as changes to water quality, to fish, to wildlife, to vegetation, or to human health, there were no potential measurable effects identified. The fact that the WL has had restricted access over the last six decades, has also meant that no traditional land and resources have occurred in proximity to the Project, although it is evident that traditional activities have persisted in the Whiteshell area, the Winnipeg River and downstream to Lake Winnipeg as documented in the SFN TK study. It is anticipated that the Project will not prevent continued traditional use of these areas to continue well into the future. It is important to note that the total land mass remaining under institutional control as a result of the Project will be less than .5% of the actual WL site. Remaining land will be available for future use.	CNL states that " there were no potential measurable effects identified" in its assessment on traditional land and resources use, which included changes to water quality, to fish, to wildlife, to vegetation, or to human health. This statement is unfounded given the level of detail provided in the TLUOS Section on Impacted Baseline conditions in the Study Area (TLUOS Sections 4.2.2, 4.3.2, 4.4.2, 4.5.2), which include impacts to both tangible resources (i.e. water, fish, wild rice, berries, medicines and food plants, wild game and fur bearing animals, etc.), and intangible resources (such as the continuation of Sagkeeng culture, ceremonies, burial sites, and passing on knowledge to younger generations, etc.).	CNL has assessed the project in comparison to the existing conditions, as they exist today at the Whiteshell Laboratories site and the regional study area. The assessment is not an assessment of the project against the conditions prior to AECL establishing the facility on site. As such, CNL within this EIS assesses the conditions with respect to traditional land and resource use against those pre-development conditions.	response: Again, we presume this is a mis-statement by CNL ("against those pre-development conditions"), unless CNL is talking about pre-decommissioning conditions. Sagkeeng's opposition to ignoring change over time to date is already on the public record and again here.	**CNL considers this comment closed.** As per our response, the assessment is not an assessment of the project against the conditions prior to Atomic Energy of Canada Limited (AECL) establishing a facility on site.

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		SFN recommends that CNL provide a supplementary assessment of the effects of the proposed project on future use by SFN for rights-based activities within and adjacent to the project area.		Furthermore, the attempt to "measure" effects is not applicable given that there is no baseline measure of pre-development conditions available to compare current conditions to. It is not clear what CNL is measuring for or against in this context. We recommend CNL revisit with Sagkeeng and give greater consideration in the final EIS the site-specific values and qualitative information detailed by Sagkeeng on the Importance, Impacted Baseline, and potential Project Interactions described in detail by Study participants in Section 3 and Section 4 of the TLUOS. Restricted access to their lands is detailed by Sagkeeng TLUOS participants as one part of the impacted baseline of the WL site that has impacted their use in the Study Area (TLUOS p. 45), however access restrictions and impacted baselines in do not mean an absence of use or value to Sagkeeng. *See also Sagkeeng's response comment #125 above.*			
		Environmental Effects - Land and Resource Use					
184.	SFN (Jan 15, 2018)	SFN explains that key elements of the proposed facility have a design life of only 300 years. In contrast, SFN notes that Sagkeeng and other Indigenous peoples have used the lands surrounding the WL site for thousands of years. SFN indicates that "this land use continues today and will extend far into the future, long after the proposed radioactive waste containment will have failed. When this occurs, hazardous radioactive wastes will be dispersed in the environment, causing impacts to land, water, traditional foods and people. These impacts will last for thousands of years. These are the fundamental truths of this plan, which represents a backslide from the previously approved plan to remove these dangers from our territory, a plan which has been changed without meaningful Crown consultation, and was hatched by a Proponent whose motives are unclear to us."	The overall design of the Whiteshell Reactor Disposal Facility (WRDF) accounts for the slow degradation of reactor components and barrier materials based on the available data and conservative assumptions. Peak dose is used as the performance criteria for comparison with the dose acceptance criteria, not clearance levels, and is used to determine the assessment timeframe and the required lifetime of the engineered barriers, as outlined in G-320. Over 99% of the radioactivity is found within the reactor core steels and zirconium alloys which will corrode very slowly in the expected alkaline environment. The corrosion rates used in the modelling are estimated based on neutral pH conditions and are very conservative. Sensitivity studies were performed to examine the impact of a change in corrosion rates, and found that any reduction in corrosion rate, because of the alkaline environment, produced a comparable reduction in peak dose rate. The lifetime of barrier materials (cap, foundation, grout) is a source of some uncertainty because it is difficult to confidently predict future environmental conditions. However this has been examined through sensitivity analyses in the Groundwater Solute Transport Modelling. The base case assumes that the concrete barriers complete their first degradation step (hydraulic conductivity is doubled) within 500 years. The sensitivity cases assume that time is reduced to 250 years, and show no significant changes to peak releases. Both time frames are	Sagkeeng has not been compellingly shown by CNL that the ISD proposal to leave radioactive materials brought in from outside, in our territory forever, when the existing commitment from Canada is to take it out, is somehow preferable. Assumptions related to technology that has not stood the test of time, when the most important factor is time in this case, is not acceptable. Other facilities have been developed and are planning to be developed to handle these type of wastes; to manage Canada's nuclear legacy. This is not one of them. ISD does not pass muster in relation to ALARA, international standards, technical or community alternatives preference, "willing host", and other relevant decision factors. And Sagkeeng has shown that ANY radiation left in place, can have serious implications for future use and rights practices by our members. Engagement between the parties moving forward has to refocus on these key issues.	CNL is interested in conducting a workshop on the *In situ* decommissioning for WR-1 with Sagkeeng to facilitate understanding on the concept, the science behind it, and how it is protective of the environment and people. Given that there are no permanent disposal facilities currently existing in Canada and no planning within Canada at this time to develop one, complete dismantlement, would simply move the waste from one territory to another and not provide a permanent solution. The WR-1 *in situ* decommissioning proposal meets the conditions for in situ disposal as set forth by the IAEA and western science demonstrates that it will be protective of the humans and the environment. We look forward to further engagement on this topic including a discussion with SFN once their Alternative Means assessment is complete.	response, 1st paragraph: Sagkeeng would consider a workshop where all technically and economically feasible alternatives can be discussed in a meaningful dialogue, not just ISD, and they be discussed in light of the findings of the Sagkeeng Alternatives Assessment and Psycho-social Impact Assessment (and any new evidence CNL wants to bring forward). response, 2nd paragraph: AECL is requested to identify why this is not occurring. Sagkeeng has already identified inconsistences of CNL's statements regarding ISD, as against what IAEA has actually recommended.	**CNL considers this comment closed.** CNL is moving forward with submitting the Environmental Impact Statement for in situ disposal for WR-1. CNL's assessment of the in situ disposal option for WR-1 has shown that it is safe and protective of the environment and of people. Sagkeeng and AECL are setting up a meeting in the new year.

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			considered conservative based on the available literature and other analogues. Other sensitivity studies examined the effects of sudden failures such as a crack in the foundation wall, and show there is very little effect on the overall releases. The overall system is designed to mitigate releases until after the peak dose rate has occurred (~1000 years), and account for variability in what are already considered conservative assumptions of barrier degradation and component corrosion. Because the failure of the barriers is already considered conservatively, a specific target design life is not necessary. The safety assessment predicts no impact to land, water, traditional foods or people.				
185.	SFN (Jan 15, 2018)	SFN expresses the position that the spatial boundaries of the assessment are inappropriate for assessing potential impacts to CULRTP. SFN indicates that the Local Study Area (LSA) must include the access road, due to potential increased traffic during decommissioning activities. In addition, the RSA must be expanded to include the full scope of SFN's traditional territory (including provincial parks, ecological reserves, wildlife management areas, and regional municipalities, all of which place restrictions on the exercise of SFN's harvesting rights and CULRTP). SFN recommends that CNL revise the RSA and LSA for the CULRTP accordingly and re-submit the assessment of potential effects based on these revisions.	Canadian Nuclear Laboratories considers the local study area (LSA) and regional study area (RSA) included in Section 6.8 of the Environmental Impact Statement (EIS) appropriate for the effects assessment on various aspects of land and resource use. The LSA and RSA in Section 6.8 were defined based on the potential for Project effects on land and resource use, including consideration of Project activities such as traffic. According to Section 6.8.3.1, the LSA is defined as the area within which there is potential for "measurable changes resulting from the proposed Project activities" while the RSA "represents the area where potential effects on land and resource use are expected to be experienced at a broader scale." The LSA for Traditional Land and Resource Use by Indigenous People includes the main access road (i.e., Ara Mooradian Way) (see Figure 6.8.3-1). The potential effects of increased traffic related to the project are considered on a broader geographic scale (see Figure 6.9.3-1 for the spatial boundaries for the socio-economic assessment) and are discussed in Section 6.9. Project-related traffic is specifically addressed in the context of Public Safety (Section 6.9.4.2.7) and Community Infrastructure and Services (Section 6.9.4.2.5), the study areas of which are more extensive than the LSA and RSA for land and resources use. Based on the assessment, increased traffic related to the Project is expected to result in minor changes to the environment and a negligible effect relative to the existing Base Case. With respect to the RSA, Project effects, including those associated with traffic, are not anticipated beyond the boundary of the current RSA. As such, expanding the RSA boundaries will not change the conclusions currently contained in Section 6.8.	**EIS Section 6.8.3.2** For the Sagkeeng TLUOS, which is specific to the proposed decommissioning activities of the WR-1 reactor only, the Project Footprint does *not* encompass the entire Whiteshell Laboratory site. The RSA and LSA are subsequently defined by spatial boundaries around the Project. Footprint. This is not accurately reflected in CNL's submission, and should be amended. The spatial boundaries used in the EIS are different than the spatial boundaries reflected in the Sagkeeng TLUOS. As mentioned on page 23 of the TLUOS, the Study Area for the TLUOS includes the Project Footprint (within 250 m of the Project, and where available, related physical works, access routes, and activities), Local Study Area (LSA; within 5 km of the proposed Project Footprint), and Regional Study Area (RSA; within 25 km of the proposed Project Footprint, including the Winnipeg River downstream of the Project)" (TUS, p. 23). The Project Footprint is defined by the Project components identified by CNSC in October, 2018, and does not include the entirety of the Whiteshell Facility. The EIS instead defines its LSA and RSA as per the entirety of the Whiteshell facility, with a 1 km extension around the WL site boundaries for its LSA. The RSA in in the EIS includes "the Local Government District (LGD) of Pinawa in its entirety and the stretch of the Winnipeg River from the WL site downstream to the northern boundary of the Town of Lac du Bonnet (i.e., to capture recreational use of the Winnipeg River by residents of Lac du Bonnet)." It is not clear as to why effects on the Winnipeg River beyond Lac du Bonnet are not considered in the assessment. The Sagkeeng TLUOS takes position that the RSA is intended to encompass cumulative effects, which may cause additive or synergistic effects with impacts to the same community values that the Project would affect. This includes areas further downstream on the Winnipeg River, given the	CNL stands behind its rationale for the study areas as expressed in the initial response to Comment #185. These spatial boundaries do differ from the spatial boundaries utilized in the Sagkeeng TLUOS and CNL does not see any inherent problem in the differing areas. CNL is pleased that Sagkeeng extended its boundaries in order to ensure that at a minimum the EIS study areas were covered. The fact that use was reported over a wider area demonstrates Sagkeeng's continual interest in land and resource use. The comment is made in paragraph #3 that; "It is not clear as to why effects on the Winnipeg River beyond Lac du Bonnet are not considered in the assessment. The Sagkeeng TLUOS takes position that the RSA is intended to encompass cumulative effects, which may cause additive or synergistic effects with impacts to the same community values that the Project would affect. This includes areas further downstream on the Winnipeg River, given the likelihood that impacts to a mobile river are likely to extend further downstream than Lac du Bonnet." As indicated in the initial response, the LSA is defined as the area within which there is potential for "measurable changes resulting from the proposed Project activities" while the RSA "represents the area where potential effects on land and resource use are expected to be experienced at a broader scale. In other words, CNL has selected study areas as to where the maximum extent of effects from the project might be experienced. It is perfectly acceptable that the Sagkeeng TLUOS has identified use beyond these areas. CNL also accepts that SFN may have perceptions of effects that go further	Downstream effects would be a relevant topic for the setting up of a meaningful, properly funded, and at least co-Indigenous led risk communication program in relation to the Whiteshell Laboratories. CNL is requested to identify its commitments to such a program.	**CNL considers this comment closed.** CNL will involve Sagkeeng in discussions and development of a long-term environmental monitoring initiative. Discussions on specific elements including communication can discussed at that time.

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				likelihood that impacts to a mobile river are likely to extend further downstream than Lac du Bonnet. It is recommended that CNL redefine its spatial boundaries to reflect those of the TUS, which are specific to the Project components described in its application, and to more accurately reflect the potential for effects on Sagkeeng rights, use, and occupancy in the Study Area.	downstream. CNL would be pleased to discuss this subject further as requested.		
186.	SFN (Jan 15, 2018)	SFN notes that a projects inclusion list has not been provided for assessing cumulative effects on CULRTP. However, SFN indicates it is clear that there are numerous past and present projects/activities (e.g., paper mill at Powerview-Pine Falls, hydro-electric dams on the Winnipeg River, provincial parks, etc.) that continue to present adverse effects on CULRTP within SFN's traditional territory. SFN recommends that CNL provide a supplementary submission that provides a listing of all past and present projects and activities that pose legacy and current cumulative effects with SFN territory (including but not limited to the Winnipeg River).	Past and present activities overlapping the local and regional study areas are considered in the effects assessment and represent the existing environmental conditions (i.e., Base Case). The Base Case reflects the effects of existing disturbances, such as forestry, transportation, agricultural, mining, and residential and recreational development. Current effects from the existing Whiteshell facilities and operations, for example, are considered part of the Base Case. The Reasonably Foreseeable Developments (RFDs) Case scenario includes the project plus additional reasonably foreseeable developments in the region that have not yet been approved. Developments and activities that are currently under application review, have officially entered a regulatory application process were considered reasonably foreseeable. The land and resource use RSA is the combined area of the terrestrial and aquatics RSAs, which have been used for the assessment of the groundwater, surface water, aquatic and terrestrial environments. The RSA represents the area within which the maximum geographical extent of potential effects of the Project may interact with the effects of other existing or reasonable foreseeable developments. The RSA is defined to capture effects on the terrestrial and aquatic environments as a result of the Project (e.g., habitat loss, sensory disturbance for wildlife and changes to habitat from surface water quality, changes in groundwater and surface water quality, habitat loss and changes in abundance, distribution and disturbances to wildlife and fish), as these effects have the potential to result in subsequent effects on land and resource use. Effects from the Project are not anticipated outside of these RSAs; therefore, the revised land and resource use RSA is sufficient to capture potential effects from the Project in conjunction with other reasonably foreseeable developments on land and resource use valued components, which includes traditional land and resource use. The RFDs that overlap with the land and resource use RSA and considered in the cumulative effects assessment include the continued decommissioning of the	Again, CNL promotes the fallacious assumption that knowing existing environmental conditions suggests you also know how much change has occurred on those conditions from a pre-existing condition. This is inaccurate and one of the reasons that Sagkeeng has called for a "pre-Whiteshell Labs" baseline and associated change over time conditions assessment, which the Proponent has not provided to date. Without understanding the changes that have occurred and, for Sagkeeng, how much has been lost already, it is impossible to complete a legitimate assessment of effects on Indigenous land and resource use, well-being or Treaty rights. Section 8.7 of the EIS does not adequately characterise cumulative effects on Sagkeeng land and resource use. This is primarily due to CNL's conclusion that there were no primary pathways identified within the Section 6.8 project-specific effects assessment, despite Sagkeeng defining these in its TLUOS in the Executive Summary (p. 4) and in Section 5.1 (p.89). A secondary rationale for CNL not adequately incorporating a cumulative effects assessment is that they limit their assessment to that of their self-defined RSA, which does not consider downstream effects of the Winnipeg River. Somehow, CNL has found, with inadequate evidence, without appropriate community verification processes, and in the face of what the TLUOS concludes, that a future with in-situ development will have no additional measurable adverse effects versus a future where all the radioactive materials are taken off Sagkeeng lands. We find this statement absurd on its face. In review of Table 6.8.5-1 of the EIS, there are several issues at hand with CNL characterizing certain project activities as being secondary pathways. • CNL states that "the project is already located in an undisturbed area" (EIS p. 6-439) and treats this as an appropriate mitigation or management measure, of which it is neither. Sagkeeng rejects the idea that because Canada has already damaged the Whiteshell area, that means it should be allowed to cement that damage in place for time immemorial. • The EIS classifies the project activity of "Installation of concrete cap and engineered cover over grouted WR-	As part of the environmental assessment, CNL assesses the impact of the WR-1 *In-Situ* Decommissioning Project against the existing environment or base case. As previously indicated, the land and resource use RSA is the combined area of the terrestrial and aquatics RSAs, which have been used for the assessment of the groundwater, surface water, aquatic and terrestrial environments. The RSA represents the area within which the maximum geographical extent of potential effects of the Project may interact with the effects of other existing or reasonable foreseeable developments. The RSA is defined to capture effects on the terrestrial and aquatic environments as a result of the Project (e.g., habitat loss, sensory disturbance for wildlife and changes to habitat from surface water quality, changes in groundwater and surface water quality, habitat loss and changes in abundance, distribution and disturbances to wildlife and fish), as these effects have the potential to result in subsequent effects on land and resource use. Effects from the Project are not anticipated outside of these RSAs; therefore, the revised land and resource use RSA is sufficient to capture potential effects from the Project in conjunction with other reasonably foreseeable developments on land and resource use valued components, which includes traditional land and resource use. The RFDs that overlap with the land and resource use RSA, and considered in the cumulative effects assessment, include the continued decommissioning of the remaining WL facilities and remediation of affected lands on the WL site. CNL has further reviewed the TLUOS study and specific sections as requested by Sagkeeng First Nation, and made additional adjustments and revisions to the EIS based on that further review. CNL is committed to dialogue with Sagkeeng First Nation about the adjustments.	We will need to see the EIS in order to have an informed discussion on this topic. We will reserve further judgment until we actually see these materials.	**CNL considers this comment closed.** CNL will provide the Environmental Impact Statement when it is completed for submission.

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			remaining WL facilities and remediation of affected lands on the WL site. With regards to cumulative effects from other industries, the 1995 Winnipeg River Task Force report concluded that "It is unlikely that the AECL Whiteshell Laboratories has ever posed a significant threat to the health of Sagkeeng residents, nor is there apparently any prospect of such a threat in the future." Given that this conclusion was determined after the WR-1 reactor was shut-down, fuel removed and liquids drained, and prior to decommissioning plans from 2002, there is no reason to speculate that the prospect of a threat in the future has changed.	1 Area and final WL site restoration" as a secondary impact pathway. However based on the concerns and uncertainties raised by Study participants about the feasibility of in-situ containment efforts: "ground and water contamination from radiation would have deleterious effects on a wide array of culturally important resources, from plants and medicines to fish and terrestrial animals" (TUS p. 81). Sagkeeng has a real and genuine concern about burying and leaving radiological material in the ground indefinitely. It is therefore reasonable to assume this is a primary pathway, given the likelihood for measurable effect on Sagkeeng VCs is high. The proponent is urged to revisit the pathways identified in the TLUOS, and conduct a more fulsome cumulative effects assessment based on the pathways and project interactions identified within the TLUOS. Overall, because of what Sagkeeng considers to be faulty reasoning by CNL, no primary pathways have been identified between the ISD Project and Sagkeeng land and resource use, well-being or population health. As a result, there is effectively no cumulative effects assessment conducted on these valued components as they relate to Sagkeeng. Thus, no accurate portrayal of the vulnerability of Sagkeeng to additional adverse effects from the Project has been generated, nor do we get an accurate sense of total cumulative effects on the above-noted values from all sources in the revised draft EIS. Sagkeeng believes that a reconsideration of Project-specific effects pathways is required between the parties prior to the issuance of a defensible EIS.			
187.	SFN (Jan 15, 2018)	This section of the draft EIS indicates that the assessment CULRTP was entirely conducted through desktop research and non-research "engagement processes" with Aboriginal groups. SFN expresses the position that this approach is highly deficient and does not meet the current standard of assessment of potential project effects on CULRTP (and rights-based practices) within Canada. In addition, SFN expresses the view that the results of the analysis for interactions between the project and CULRTP VCs are invalid for the following reasons: • Lack of baseline information for SFN CULRTP; • Lack of consideration of SFN future CULRTP within proximity of research; • Inappropriate exclusion of wide range of project effects with potential to interact with SFN CULRTP, including exclusion of "restricted access" from consideration as a residual effect; and,	CNL has revised the Environmental Impact Statement (EIS) based on additional engagement with SFN including SFN's Traditional Land Use and Occupancy Study. CNL has prepared the EIS in accordance with CNSC requirements and have made best efforts at completing the Land and Resource Use section. CNL continues to listen to ideas SFN has on how the assessment could be improved and SFN can point to other environmental assessment processes where the assessments are more akin to what SFN is looking for. More specifically, CNL does offer some specific thoughts on the points raised by SFN. • Lack of baseline information for SFN's current use of lands and resources for traditional purposes (CULRTP) – CNL assembled the baseline information that was available at the time of the original draft EIS and has been updated within the revised EIS.	Some revisions have been made to the revised draft EIS Section 6.8 on the basis of the Sagkeeng TLUOS. Those revisions are extremely minor and cosmetic, and they do not appear to have had <u>any effect</u> on the effects assessment process itself, which was still conducted entirely by the Proponent and its consultants, without any engagement of Sagkeeng. This means that the expectations of current standards for assessment of potential project effects on Indigenous land and resource use in Canada still have not been met,[6] and from Sagkeeng's perspective, the insights from our members in our over 130 page TLUOS have effectively been ignored. Among the remaining issues with the Proponent's assessment of effects on Sagkeeng Indigenous land use include: 1. Sagkeeng's land use has not been assessed independently; rather it is pooled with other	CNL has made its best efforts to incorporate what it has learned from SFN into its EIS and is committed to continued engagement and documentation of SFN's concerns, issues, and questions in future updates to the Indigenous Engagement Report. SFN will have an opportunity to verify, validate, and review these documents through the remainder of the environmental assessment and licence amendment process. CNL appreciates the honest comments from SFN. The project is being assessed under CEAA 2012 and therefore CNL has written the EIS to that standard. CNL appreciates the reference to the First Nations Major Project Coalition's Guidance. Responses below align with the list of remaining issues Sagkeeng identified with CNL's assessment of effects on Sagkeeng Indigenous land use.	response, 1st paragraph: We will need to see the EIS to determine whether any changes of substance have been made. We would appreciate the opportunity to actually validate the Sagkeeng-relevant sections of the EIS, not merely the IER. What does "CNL appreciates the honest comments" mean? Did CNL review the Major Project Assessment Standard or make any revisions based on that best practice? Please advise. response, 'Points #1 and #2, 3rd paragraph, 5th sentence: Meaningful Indigenous-led monitoring is an important	**CNL considers this comment closed.** The WR-1 Environmental Assessment is adhering to the rule of law and the Project is being assessed under CEAA 2012. CNL commits to documenting Sagkeeng's concern in the Indigenous Engagement Report.

[6] See for example, the First Nations Major Project Coalition's Guidance Appendix 5 on Indigenous Land Use Assessment, available at https://secureservercdn.net/45.40.145.201/14x.5f4.myftpupload.com/wp-content/uploads/2021/04/FNMPCMPASGuidanceappendices-FINALJanuary2020.pdf

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		• Lack of community consultations/research to validate assumptions of interactions and potential success of mitigation measures in addressing potential impacts on CULRTP. SFN recommends that CNL provide a supplementary assessment of the effects of proposed project on SFN CULRTP within and adjacent to the project area, including documentation of pre-industrial baseline, "current conditions baseline" that includes past and current projects/activities within the region that continue to affect CULRTP, project-activities interaction matrix, and use of current best practices relating to community-led TKLUS.	• Lack of consideration of SFN future CULRTP – CNL has assumed that the Indigenous peoples' traditional use around the Whiteshell site will continue in the future CNL is of the opinion that the project will not impact such uses. With the decommissioning of WR-1 and the overall site closure, there represents the potential opportunity for some of the Whiteshell lands to be used for traditional uses in the future. While this is a discussion that would need to involve AECL, CNL is willing to facilitate such discussions if SFN is interested. The land that will remain under institutional control as a result of the Project is less than 0.5% of the total Whiteshell site. • Inappropriate exclusion of a wide range of project effects with potential to interact with SFN CULRTP, including exclusion of "restricted access" from consideration as a residual effect – CNL is of the opinion that given the scope of the project, there is no inappropriate exclusion of projects effects. We believe SFN is likely referring to the fact that a very small portion of land will remain under institutional control for the next 300 years. This represents less than 0.1 hectares of the total land area of the 4,375 hectare Whiteshell Laboratories site. Furthermore, that land is not currently available for alternative uses. • Lack of community consultations/research to validate assumptions of interactions and potential success of mitigation measures in addressing potential impacts on CULRTP – CNL supported and provided funding for a Traditional Knowledge study which provided information back to CNL on components of value to SFN. This information was incorporated into Section 4 and 6.8 of the updated EIS. With respect to the point: *"SFN recommends that CNL provide a supplementary assessment of the effects of proposed project on SFN CULRTP within and adjacent to the project area, including documentation of pre-industrial baseline, "current conditions baseline" that includes past and current projects/activities within the region that continue to affect CULRTP, project-activities interaction matrix, and use of current best practices relating to community-led TKLUS."* CNL notes that environmental impact assessments in Canada are based on existing conditions and not a historical/pre-industrial baseline. There is no requirement from the CNSC to undertake such an assessment. It would also be very difficult to try to determine what the pre-industrial baseline is. However, CNL does appreciate that SFN may want to document historical use by its community in the	Indigenous land and resource use in Section 6.8 and 8.7; 2. CNL has pulled some raw data and a bit of text out of the Sagkeeng TLUOS on the general types of uses of the Project area, along with general concerns (reinterpreted through the Proponent's lens) about the site. This type of cosmetic 'cut and paste' selective integration of TLUOS material manages to almost completely mask the concerns raised by Sagkeeng members about past, present and likely (especially in an ISD future) future alienation and loss of use in the Project-affected area. 3. CNL provides no evidence that it vetted its reinterpretation of Sagkeeng's TLUOS into the "revised" effects assessment in sections 6.8 and 8.7 with the Nation itself. For the record, the provision of this opportunity to Sagkeeng to review the draft revised EIS <u>does not</u> constitute a proper engagement and verification process on this assessment. Sagkeeng requires the Proponent to engage us in a full and proper reassessment of effects on Sagkeeng land use in a consultative forum; this takes time, Proponent will, and resources. 4. The lack of adoption of Sagkeeng's Anicinaabe Pimatziwin VC is just one example where Sagkeeng VCs have not been properly integrated into the assessment of effects on Indigenous land and resource use. As a result, no baseline or effects assessment on Anicinabe Pimatziwin has been conducted. 5. The CNL section 6.8 is less than 50 pages, and includes all Indigenous and non-Indigenous land and resource use considerations by the Proponent. Section 8.7 is less than two pages. There is little evidence of rigour in either section. Instead there is evidence of a series of untested Proponent assumptions, not verified by CNL with Sagkeeng, about whether and how Sagkeeng will use the site in the future. These assumptions need to be verified (or refuted) by actually talking to Sagkeeng members about them in a consultative forum. We are disappointed this is all CNL felt it could draw from our TLUOS and other information sources. We believe the TLUOS offers much more than has been integrated into the revised draft EIS. 6. The statement that EIS in Canada are based on existing conditions does not accurately reflect expected practice at this time,	<u>Points #1 and #2</u> While SFN land and resource use description is included in the common 6.8 section, CNL has given thought and consideration to each of the individual Indigenous community/organization during the assessment. Section 6.8.4.2.5.1 has been segmented separately by each Indigenous group to recognize the unique land and resource use of each community. CNL re-iterates its opinion that CEAA 2012 does not require assessments to be done based on perceptions of psycho-social effects. CNL is assessing the proposed effects of the project against the current base case or existing situation. The scope of the environmental assessment does not include the assessment of the effects of the original development of the Whiteshell facility. CNL recognizes that SFN has a differing opinion on these fundamental points, within the context of this EIS. That being said, CNL appreciates these comments from a broader perspective beyond the WR-1 In Situ Project. CNL believes these opinions of SFN are important within the context of building a longer-term relationship with Sagkeeng. CNL recognizes that the Pathway Analysis outlined in Table 6.8.5-1 is not specific to each Indigenous group. CNL's opinion is that impacts on traditional land and resource use can potentially occur as a result of the direct effects of such activities on the use itself; or on effects on biological or ecological resources that may impact how much harvest can occur. CNL has carried out that examination, and with all Indigenous communities, the conclusion is that there still will not be an effect on traditional land and resource use. But this is not to say that the unique issues and concerns raised by Indigenous communities such as Sagkeeng were somehow glossed over in doing this. There are statements in the Pathways Analysis such as: "CNL is committed to involving Indigenous peoples during the monitoring stage of the Project in order to assess potential effects on fish and wildlife resources and changes to vegetation and water quality upon which traditional uses are dependent." CNL is committed to working with all and each individual Indigenous group to be involved in monitoring and to better engage on how to manage potential project effects and mitigation. <u>Point #3</u> CNL did provide the draft EIS to SFN to allow for the opportunity to review. CNL felt it was necessary to pass on the whole EIS to SFN to accomplish this as SFN's comments are far	element of any future for Whiteshell Laboratories. However, monitoring is not mitigation in and of itself. If impacts can be avoided or reduced by choosing a remediation process that is more likely to see lower adverse effects from the facility in the future that should be chosen rather than relying entirely on monitoring. Further discussion required. CNL says they provided a draft EIS for review. We remain confused on this point. Is the October 2020 version of the EIS the same as the December 2019 version? If not, please provide the updated version for Sagkeeng review. It is virtually impossible to provide adequately substantive feedback on comments that refer to the EIS when we have not seen the updated EIS. response, 'Point #6': Sadly, CNL is leaning heavily on its perception of limits of CEAA 2012, rather than attempting to overcome these deficits. Sagkeeng's position is clear - a federally funded project on a site for a federal government owner, should be subject to an assessment that meets the spirit and intent of the existing legislation. There is no punitive value on any commercial interests to assessing this project as against the spirit and intent of IAA 2019, which was the material referenced in Point #6. Is AECL and Canada as a whole saying that even though CEAA 2012 wasn't good enough anymore, that this project isn't important enough to be assessed in the way that Canada deems critical in 2020? We are not sure what CNL, AECL or CNSC have to fear from IAA 2019; can you clarify?	

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			region and that there may be broader purposes for such an assessment.	especially in relation to impacts on CULRTP (which by extension impact on Treaty rights). For example (and we can share many other examples if CNL is willing to engage), the Impact Assessment Agency of Canada requires in the consideration of impacts on Indigenous rights that historic conditions and trends-over-time be conducted first to establish the critical cumulative effects context for Indigenous rights. 7. As noted elsewhere in our comments, CNL's assumptions about past use cannot be credited. At pg. 6-401, CNL suggests that "The existing environment represents historical and current land and resource use". It is in fact impossible to tell the amount of change from a pre-industrial environment on how people use it without knowing how people used it prior to that time period. That is why Sagkeeng asked for a pre-disturbance baseline; what was Sagkeeng use like prior to the 1960s? The Proponent has not accepted that request; thus the cumulative effects context has not been properly established. 8. The Proponent has not engaged Sagkeeng in the identification or verification of impact pathways likely to occur in a future with WR-1 in place on site. For example, we find it impossible to credit the unilateral finding by the Proponent that there are no "primary pathways" found in relation to Indigenous land and resources use from the Project, when our members have raised strong concerns that cementing radioactive materials in place will increase both the degree and timeline of alienation of Sagkeeng members from the site. This is mentioned in passing in one sentence in section 6.8 and therein the assumption is made that this impact will only be on a small number of users, rather than an entire Indigenous group, Sagkeeng. Section 6.8 needs to be subject to the requested collaborative forum between Sagkeeng and CNL to identify and verify the status of all impact pathways. 9. CNL's reference to only 0.5% of the Whiteshell site being impacted by cementing the radioactive materials in WR-1 in place underground represents a complete misunderstanding of how impacts on Indigenous land and resource work. The impact zone – the area of alienation – may well be much larger than the area that the Proponent claims will be physically impacted.	reaching across many chapters of the document. CNL has and is willing discuss the EIS and specific components of it in more detail. <u>Point #4</u> We have made efforts within the EIS to understand and incorporate the concept of Anicinaabe Pimatziwin and we invite Sagkeeng to provide further detail and explanation to CNL. CNL suggests that the Indigenous Liaison could work with CNL staff to explore the concept of Anicinaabe Pimatziwin. <u>Point #5</u> In order to document feedback provided during engagement, CNL has incorporated additional information from Sagkeeng to improve the EIS. This includes a new description of Sagkeeng Traditional Land and Resource Use. The EIS is an assessment of the project against the base case or existing environment. It is not an assessment with a pre-Whiteshell development baseline. That is not part of the proposed undertaking. CNL's view is that traditional land and resource use can be potentially enhanced over the present situation as the site is slowly decommissioned, which the WR-1 In-Situ Decommissioning Project will support. <u>Point #6</u> CNL would be pleased to see the examples of these projects conducted under CEAA 2012. <u>Point #7</u> CNL is not prepared to conduct a pre-disturbance baseline assessment as it is not required per CEAA 2012 for the environmental impact assessment. <u>Point #8</u> Sagkeeng has done an excellent job at describing traditional and land use in the study area for the base assessment case. Sagkeeng has provided feedback on their VCs of importance through the TKLUOS, the alternative means workshop, letters from Chief Henderson, at community meetings, at ceremonies both at Turtle Lodge and on the Whiteshell Laboratories site, and at other engagements with CNL. CNL's project assessment has shown that off-site effects will not occur and therefore primary pathways are not affected.		

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				This much larger impact zone has not been established by the Proponent, nor have the factors (perceived risk, fear, stigma, concerns about contamination, lack of community credible information, the fact that the impacts are occurring underground and therefore cannot be determined using typical sensory observations, among others) been established. CNL should start actually asking Sagkeeng members how large an area will be impacted with an ISD future, rather than making uncredited and non-credible assumptions. As a result of these serious gaps in section 6.8 (which bleed over into section 8.7), Sagkeeng's original comment remains unresolved. Sagkeeng calls for CNL to actively engage the community in a reassessment of effects of the proposed Project on Sagkeeng's Indigenous land and resource use.	Point #9 Based on the TLOUS, CNL has assumed that the Indigenous peoples' traditional use around the Whiteshell site will continue in the future. CNL is of the opinion that the project will not impact such uses. With the decommissioning of WR-1 and the overall site closure, there represents the potential opportunity for some of the Whiteshell lands to support traditional uses in the future. The land that will remain under institutional control as a result of the Project is less than 0.5% of the total Whiteshell site. The area stated is simply a factual measure of the surface of the project relative to the rest of the Whiteshell Labs site. "CNL is of the opinion that given the scope of the project, there is no inappropriate exclusion of projects effects. We believe SFN is likely referring to the fact that a very small portion of land will remain under institutional control for the next 300 years. This represents less than 0.1 hectares of the total land area of the 4,375 hectare Whiteshell Laboratories site. Furthermore, that land is not currently available for alternative uses." The above conclusions are drawn from the environmental impact assessment and CNL's understanding of the site. At the same time, CNL recognizes the feelings of perception and stigma that SFN members have shared and does not want to underplay or discredit them. CNL recognizes that these are strongly held feelings by the community. CNL wants to address these concerns through a broader forum of long-term relationship building.		
188.	SFN (Jan 15, 2018)	SFN notes that Section 1.6.2 of the draft EIS asserts to adhere to CEAA's Technical Guidance for Assessing Physical and Cultural Heritage or any Structure, Site or Thing that is of Historical, Archeological, Paleontological or Architectural Significance under the Canadian Environmental Assessment Act, 2012. This guidance states that changes to cultural landscapes and geographic locations that are linked to Indigenous spiritual and cultural practices must be assessed. However, SNF indicates that this section and the draft EIS as a whole entirely omits any consideration or assessment of project effects on SFN intangible cultural heritage. SFN recommends that CNL provide a supplementary assessment of the effects of proposed project on SFN's	CNL is willing to consider any thoughts SFN may have with respect to intangible cultural heritage. While this may not be exactly the same as the Technical Guidance that indicates that changes to cultural landscapes and geographic locations that are linked to Indigenous spiritual and cultural practices must be assessed, CNL believes this is an important notion that deserves consideration. However, CNL is unaware of any Indigenous spiritual and cultural practices that are associated with the site of the WR-1 reactor. CNL would note that from a visual perspective the proposed undertaking would most likely be considered a positive change in the visual landscape as a somewhat more natural area will be the end product of the proposed project.	One of the VCs in Sagkeeng's TLUOS is Anicinabe Pimatiziwin, which "includes the connection between the Study Area, Sagkeeng culture, sense of place and identity, the transmission of knowledge between generations, performing ceremonies, and the importance of burial sites, gathering places, travel routes, and the petroglyphs at Bannock Point" (TLUOS, p. 66). It represents both tangible and intangible components of Sagkeeng culture, and how that connects to the Study Area. The importance of Anicinabe Pimatiziwin is detailed at length in Section 4.5.2 of the TLUOS, and provides detailed qualitative data on the above-mentioned components of Anicinabe Pimatiziwin to participants in the Study Area. Page 69 of the TLUOS specifically describes the importance of the Project Footprint for practicing	Thank you for this comment. CNL does want to let SFN know that it is making its best efforts to better understand Sagkeeng culture and more specifically ensure that the concept of Anicinabe Pimatiziwin is understood by its staff and broader team. SFN notes that this "includes the connection between the Study Area, Sagkeeng culture, sense of place and identity, the transmission of knowledge between generations, performing ceremonies, and the importance of burial sites, gathering places, travel routes, and the petroglyphs at Bannock Point". This Comment originated from an original concern over the lack of documentation on SFN cultural heritage and specifically links to physical heritage such as cultural landscapes.	Regarding the proposed language for section 6.8.4.2.5.1, we will want to see the actual EIS to understand how this additional text fits into the context of the section in question. Preliminarily, was CNL's finding that "the proposed project wouldn't have negative effects on cultural heritage resources and practices and traditional uses" and the "project could have a potentially positive effect" verified by the culture holders themselves?	**CNL considers this comment closed.** CNL will provide a copy of the Environmental Impact Statement upon its completion. Our statement was made based on the presumption that environmental remediation on site and future access could result in increased Indigenous use of the area.

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		intangible cultural heritage, including effects on SFN cultural landscapes or locations linked to community legacy, spiritual and cultural practices.	It is possible that SFN is referring in this case more to the changes to the landscape and intangible cultural heritage that were brought around from the initial development of the Whiteshell site. This topic was addressed in the traditional knowledge and land use studies that is discussed in response to Comment #187.	ceremonies, which was also recorded as site-specific data. A total of 185 site-specific Anicinabe Pimatiziwin values were mapped by participants in the Study Area, including 18 site-specific Anicinabe Pimatiziwin values in the Footprint. The two maps provided in the TLUOS (p. 65 and 65) display the site-specific Anicinabe Pimatiziwin values. Given the extent of detail provided in the TLUOS on Sagkeeng's Anicinabe Pimatiziwin in the Study Area, both site-specific and qualitatively, it is recommended that CNL review the TLUOS Sections 4.1 and 4.5 again in greater detail and through engagement with Sagkeeng, and then revise its conclusions about Indigenous cultural and spiritual practices in the Study Area and Project Footprint. The TUS provides substantive evidence of Sagkeeng Anicinabe Pimatiziwin values throughout the Study Area, including the Project Footprint. In addition, while in Section 4 (and overall in Section 6 as well), while CNL identifies that it engaged in ceremony on two occasions, there is nothing in the revised draft EIS indicating whether CNL learned anything about Sagkeeng's cultural and spiritual connection to the land, or the laws and norms that Sagkeeng uses in how we connect to territory. The revised EIS should examine the spiritual and cultural connection of Sagkeeng to our territory and to this site in a meaningful way; Sagkeeng remains available to support CNL in this relationship-building process.	Furthermore, SFN has pointed out in this comment that there have been historic ceremonies and cultural activities and practices that have occurred both in the entire study area of TLOUS and specifically the project footprint. As such, CNL is proposing some additional text be added to either section 6.8.4.2.4 on Archaeology and Cultural Sites and/or to 6.8.4.2.5.1 on Traditional Land Use. The proposed language is as follows. CNSC and CNL funded SFN to undertake a large TLOUS. Amongst other things that study documented the importance of the concept of Anicinabe Pimatiziwin and they study area (the study area of the TLOUS not the EIS study area): "The Study Area was described by Study participants as an important area for supporting Sagkeeng Anicinabe Pimatiziwin, which includes the connection between the Study Area, Sagkeeng culture, sense of place and identity, the transmission of knowledge between generations, performing ceremonies, and the importance of burial sites, gathering places, travel routes, and the petroglyphs at Bannock Point" (TLUOS, p. 66). SFN has noted in comments to CNL that it represents both tangible and intangible components of Sagkeeng culture, and how that connects to the Study Area. On page 69 of the TLOUS a number of SFN members and participants in the TLOUS described the importance of the study area and the project footprint, particularly with respect to historic ceremonies that occurred there. "The importance [of ceremonies to the Sagkeeng way of life] is that as our ancestors and ourselves have a direct connection with Mother Earth … We're all connected one way or the other. We need each other in order for us to sustain a livelihood here … for us it's a spiritual connection to all of creation and that's what this area [Whiteshell Laboratories] signifies for me because it reminds me of those things that were taken away from us long time ago" (S01 2018) (p. 68 – 69). "And that's [ceremony] what happened there [Project Footprint] when the, the ceremony, when that ceremony was over and then people would come together … So this is a very sacred place, this was a very sacred place. And I still, and I still think that it is a very sacred place" (S12 2018) (p. 69).		

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					"So, this [Project Footprint] was chosen for that particular [ceremonial] place as well too, 'cause it was away from civilization in all four directions, you know. There wasn't that much people in either direction so this was a good place to do those things, you know" (S12 2018) (p. 69). The authors of the Report go on to note that: "One of the interview participants described how neighbouring nations from as far as Ontario would travel to the Study Area for ceremonies with Sagkeeng, including at the Whiteshell Laboratories site. Some of these ceremonial gatherings would last for several days at a time and were important for maintaining connections between families and neighbouring nations" (p. 69). "And then, I guess most of the time the reason why [people from] Ontario came there was because they were invited to come into their, their ceremonies in there [Project Footprint], their healing ceremonies and stuff like that, eh. And I think when I look at this map here, when I look at this map, you know, most of those ceremonies were mostly done in that area there exactly where that spot [nuclear reactor] is ... So, everybody would meet in there and they'd have a, they'd have a four-day ceremonies in there. So that was a very traditional place where that, they put this place [Whiteshell Laboratories] here. (S12 2018) So this, this [Project Footprint] was a very sacred ground where, where this place is, a very sacred ground to Anicinabe people, Ontario, the east, the west and us here, of course, in the middle. So they meet there, in a, in a certain time that would be in September … I remember lots of, hundreds of tepees and stuff like that around that area, in that area where we're looking at. And they weren't mixed to, you know, the Ontario people are one, one spot. Sagkeeng was one spot and Fairford was one spot. They had, they had this big bonfire and that's where they'd meet when, when the ceremonies was over. But in the meantime everybody was, basically almost, almost quiet like, you know, while the thing was going on, while the ceremonies was going on. So that was a, a very sacred place this place here, you know" (S12 2018) (p. 69). The TLOUS goes on to discuss the various forms of celebration (e.g., Sundance, Moondance) that would occur at various spiritual sites within the study area of the TLOUS. The TLOUS does an excellent job at drawing the connections between specific places and the cultural practices of SFN.		

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					In this Comment, SFN goes on to note that: "it is recommended that CNL review the TLUOS Sections 4.1 and 4.5 again in greater detail and through engagement with Sagkeeng, and then revise its conclusions about Indigenous cultural and spiritual practices in the Study Area and Project Footprint. The TLUOS provides substantive evidence of Sagkeeng Anicinabe Pimatiziwin values throughout the Study Area, including the Project Footprint." CNL recognizes that historically SFN practiced cultural activities in the project footprint (prior to 1963) and further review of the TLUOS has added to our understanding of SFN historic use of the area. After additional careful consideration of this additional information, CNL has come to the conclusion that the proposed project wouldn't have negative effects on cultural heritage resources and practices and traditional uses because the project does not occur outside of the WRL site. In fact, the project could have a potentially positive effect in that it will result in lands being returned to and for traditional uses, where for over half a century those lands were unavailable. CNL and AECL have indicated their willingness to discuss their Long-Term Relationship and would like to continue this conversation.		
189.	SFN (Jan 15, 2018)	This section of the draft EIS concluded that there is no "linkage pathway" between the project and cultural heritage; and between dust and noise effects and CULRTP. As noted in previous SFN comments, due to deficiencies in the characterization of CULRTP and flaws in the identification of impact pathways and omissions of potential effects, SFN argues that this conclusion is not supportable and should be revisited. The discussion, on page 6-381 of the draft EIS, excerpted below is provided by SFN as an example of the flawed conclusions in this section: "Land and resources use are restricted on site, although continue to persist in locations adjacent to the WL site…Project activities, including site preparation, WR-1 Building demolition and operation of the batch mixing plant, are expected to increase the level of nuisance factors (dust and noise) in the LSA; however they are not expected to have a substantial effect on an individual's land and resource use experience or on harvested species because of mitigation and management practices put in place for the Project." SFN expresses the concern that this conclusion is not based on any baseline of current conditions of use, or on any input from SFN in regards to intangible cultural heritage and/or effects of project noise/dust on preferred use of the vicinity of the project for harvesting.	CNL stands behind the conclusions identified in the referenced quote but are willing to discuss this point in more detail with SFN. CNL is of the opinion that the proposed undertaking with the appropriate mitigation will not result in effects that would impact on land and resource use and/or cultural resources adjacent to the site. Any effects with the proposed undertaking will occur within a very small footprint of the Whiteshell site. CNL could organize a meeting with SFN and bring relevant experts to the community to discuss these effects. CNL is also willing to involve SFN in long-term environmental monitoring in order to better understand and help manage any potential negative environmental effects. With respect to cumulative effects it is noted in Section 8.3.7 that: "The Project, in combination with the decommissioning and reclamation of the WL site is also anticipated to contribute to positive effects on the environment, which will indirectly positively affect land and resource use within the RSA (e.g., less industrial activity that could affect outdoor recreation, hunting, fishing, trapping, and plant and berry gathering). Consequently, cumulative effects from the Project in combination with the decommissioning of the remaining infrastructure and support facilities, and reclamation of the	CNL defines its cumulative effects assessment as corresponding to the Local Government District of Pinawa and the stretch of the Winnipeg River down to the townsite of Lac du Bonnet (EIS p. 8-10). While no cumulative effects assessment was completed in the Sagkeeng TLUOS (outside of scope), the area CNL has defined for its cumulative effects assessment is highly conservative, and smaller than the RSA boundary used within the TLUOS. It	CNL disagrees with the assertion that the cumulative effects study area is conservative. CNL fully acknowledges that its study area for cumulative effects is smaller than the RSA for the TLUOS. CNL has based its study areas on the geographical limits of effects of the project on various components of the environment. The study area limits are imposed because CNL does not see any reasonable way effects can occur beyond those points. As such, drawing the study area further downstream or to encompass the whole TLUOS would not result in any different conclusions. CNL did not have any concern with SFN drawing its study area boundaries for the TLOUS beyond its own EIS study area boundaries. CNL thought it was better for Sagkeng to develop these on their own and perhaps in the future there may be some other project at WL where a wider area may be considered. As such, CNL saw it as a way of ensuring a broader area was covered. With respect to the second paragraph CNL stands by its statement in the EIS that states: "The Project, in combination with the decommissioning and reclamation of the WL site, is also anticipated to contribute to positive effects on the environment, which will positively affect land and resource use within the RSA (e.g., less industrial activity that could affect outdoor recreation, hunting, fishing, trapping and plant	response, 6th paragraph, 1-2nd sentence: Please identify the text in CEAA 2012 that says the Proponent, the Crown agency and the parties to the EA are not allowed to consider stigma and existing concerns in an environmental assessment. Again, Sagkeeng raises its strong objection to CNL's extremely narrow reading of what should be included in environmental assessment and encourages CNL and AECL to focus on best practice rather than narrow practice of EA. The latter does not lead to relationship building with Indigenous peoples. Sagkeeng continues to hold that any decisions on whether to accept ISD must include full and proper comparisons to other technically and economically feasible alternatives, including the full removal alternative that is still the subject of existing licences at the facility. The consideration of benefits and risks of each, as we see an example here from ISD and	**CNL requests this comment be considered partially-addressed and closing this comment.** CNL has provided additional information to clarify CNL's position on perceived psycho-social concerns. CNL commits to documenting Sagkeeng's concern in the Indigenous Engagement Report. The WR-1 Environmental Assessment is adhering to the rule of law and the Project is being assessed under CEAA 2012. For the purpose of clarity, as you noted, Section 5(1)(c)(i) of CEAA 2012 provides that "environmental effects that are to be taken into account in relation to an act or thing, a physical activity, a designated project or a project are… (c) with respect to aboriginal peoples, an effect occurring in Canada of any change that may be caused to the

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		Based on a supplementary community-based study of project-CULRTP interactions and mitigations, SFN recommend that CNL provide a revised assessment of potential project impacts on CULRTP, taking into consideration cumulative effects.	affected areas at the WL site are anticipated to be negligible."	Can CNL please clarify how they verified its conclusions on "positively affect[ing] land and resource use within the RSA"? It is not clear how CNL came to such a conclusion, given that there are many other factors that contribute to preferred land use areas, not simply just the lack of activity or infrastructure. It simplifies a complex cultural system that requires more than just surface area to freely exercise their rights, practice their culture and way of life. Certainly, perceived risk and concerns about contamination, among other factors relevant to Sagkeeng land and resource use in a future with ISD, have not been considered in making the above-noted statement. The revised draft EIS also states: "Consequently, cumulative effects from the Project in combination with the decommissioning of the remaining infrastructure and support facilities, and reclamation of the affected areas at the WL site are anticipated to be negligible." Again, it is unclear how CNL came to this conclusion or if they verified this with Sagkeeng, given that the findings in the TLUOS do not support this statement. While a cumulative effects assessment was not conducted for the TLUOS, the potential for the Project to indirectly affect Sagkeeng VCs are high. For example, downstream effects on the Winnipeg River were detailed extensively in the TLUOS in Section 4.6. These effects include both perceived and actual contamination from the Project affecting the water quality and edibility of fish, which is a staple food source for Sagkeeng. Impacts such as these are not negligible, and should not be characterized as such by CNL. *See also our comments on #188 above.*	and berry gathering). Consequently, cumulative effects from the Project in combination with the decommissioning of the remaining infrastructure and support facilities, and reclamation of the affected areas at the WL site, are anticipated to be negligible" (8.3.7). CNL's statement is premised on the fact that with the decommissioning and reclamation of the site and overall reduction in activity and environmental impact this logically leads to an overall improvement in environmental conditions and potentially additional land available for land and resource use. CNL acknowledges that SFN has perceptions of stigma and concern with the WL site but those are existing concerns and not actual effects that can be considered under CEAA 2012. Furthermore, CNL would think that those perceptions might get reduced as the site is further decommissioned. Separately, as discussed, CNL takes these concerns seriously and will continue to work with SFN to address these concerns and perceptions to the extent possible. CNL appreciates the fact that SFN participants in the study have commented about concerns with respect to downstream effects. CNL appreciates the comments that the individuals have made and wants to work to alleviate concerns where possible, but as stated above, analysis of the perceived effects of a hypothetical release event was outside the scope of this EIS.	CNL's perspective only, should be conducted with other interested parties in order for Canada to make an informed decision on its preferred decommissioning process. Counter to CNL's position, ISD does not "logically lead" to Sagkeeng members being willing to use the affected area and its surroundings for traditional land and resource purposes. ISD logically cements a risk into the ground in place in perpetuity, that causes fear and stigma and avoidance activities to Sagkeeng members. Only full removal "logically" would see high potential for reduction in this fear and stigma by Sagkeeng members. Any statement to the contrary defies logic, given what we know about Sagkeeng values and Psychosocial Impact Assessment. response, 6th paragraph, 3rd sentence: That's what CNL thinks but it isn't what SFN is saying in relation to ISD. Why does CNL still dismiss Sagkeeng's concerns and impact pathways, even with almost three years of our raising these issues, and the filing of our two most recent submissions - the Alternatives Assessment and the Psycho-social Impact Assessment?	environment on (i) health and socio-economic conditions." We understand 5(1)(c)(i) to require a consideration of effects to health and socio-economic conditions caused by changes to the environment by the Project. In the case of WR-1, there are no anticipated appreciable environmental effects and no changes to the environment from the state existing today if in situ disposal is approved. Further, CNL has not received information from Sagkeeng establishing that the psycho-social concerns raised by Sagkeeng to arise from an environmental effect caused by the in situ disposal of WR-1. In the case of WR-1, CNL has not received information from Sagkeeng establishing that the stigma identified by Sagkeeng to have resulted from an environmental effect created by the proposed activity, the proposed in situ decommissioning of WR-1. While CNL also recognizes that Sagkeeng can advance any matters it wishes to advance, CNL submits that Sagkeeng has not established a nexus between its concerns of stigma and pre-existing concerns with the proposed activity, as required by CEAA 2012.
190.	SFN (Jan 15, 2018)	SFN indicates that the assessment in this section of the draft EIS has minimized the impact of the project in its effect of reducing the overall percentage of the WL footprint that would be returned to potential use by SFN for CULRTP and other activities. Page 6-384 of the draft EIS states: "Under the original decommissioning plan, a smaller percentage of the site (the waste management area) would have had restricted access than with the Project; however, the area with anticipated restricted access under the Project is still small when compared with the remainder of the WL site....Although a smaller proportion of the WL site will be available for unrestricted use as was previously anticipated because of the Project, it is still anticipated that the majority of the site would be safe and appropriate for other use. Overall, this will result in an increase in the amount available for future use in the LSA. As such, these pathways are categorized as secondary."	CNL is of the opinion that the characterization is valid and correct. However, CNL understands that SFN and other regional communities might prefer that all the waste be removed from the site. Based upon the assessment undertaken CNL is of the opinion that the proposed project will not adversely impact future traditional use activities in the area and as the text suggests more land may become available for traditional use. CNL recognizes that there may be community concerns and wants to continue to meet with SFN to listen and work through those concerns.	CNL states that "Based upon the assessment undertaken CNL is of the opinion that the proposed project will not adversely impact future traditional use activities in the area and as the text suggests more land may become available for traditional use." As noted elsewhere in our comments, the findings of the Sagkeeng TLUOS do not support this opinion of CNL that no adverse effects will result from the Project. The potential for affecting future use in the area is not determined solely though land availability, but is influenced by a variety of factors such as an impacted baseline, disruption to VCs and Anicinabe Pimatiziwin, perceived impacts, and reasonably foreseeable future developments in the area, among others. Simply having "land available for traditional use" does not mean this land is viable or desirable for use by Sagkeeng, given the multitude of other tangible and intangible factors that contribute to meaningfully exercising Sagkeeng rights and way of life. And we note that the desirability of this	CNL appreciates concerns expressed throughout the TKLUS and acknowledges that those concerns are real for Sagkeeng community members. The Environmental Assessment demonstrates that *in situ* disposal (ISD) of the WR-1 reactor is protective of humans and the environment. CNL would like to work with the community to understand their perspective further but also to help them to feel better about the safety of ISD. As mentioned above, CNL would be happy to receive a copy of Sagkeeng's psycho-social analysis when it is completed, and to discuss the results. To improve communications, CNL has funded an Indigenous Liaison position for Sagkeeng and will work closely with the Indigenous Liaison to facilitate this knowledge transfer and continue to work to address psycho-social fears and stigma. In addition to the past community meetings, benchmarking trip,	Sagkeeng will be pleased to discuss the realities of how fear and stigma are most likely to be continued into the future with ISD, as against other alternative means to decommission the Project, as shown in both the Sagkeeng Alternatives Assessment and the Psycho-social Impact Assessment.	**CNL has suggested some measures to address these as possible.** CNL has provided additional information to clarify their position on psycho-social concerns. CNL does not consider psycho-social impacts as a primary pathway. CNL believes the best path forward to address psycho-social effects is through education and participation in CNL's environmental monitoring activities. Section 5(1)(c)(i) of CEAA 2012 provides that "environmental effects that are to be taken into account in relation to an act or thing, a physical

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		SFN argues that this characterization is incorrect and should be revised to reflect the concerns of SFN and other regional communities to have all waste removed from the site, and how this project has the potential to adversely impact future use of the area - in perpetuity - as well as heighten community perception of risk related to use and harvesting of country foods from the Winnipeg River and adjacent area. SFN recommends that the conclusions of this section of the draft EIS should be revisited in light of a supplementary community-based study of project-CULRTP interactions and mitigations.		land for future use by priority rights holding Indigenous peoples, is a factor that has not been seriously considered in the Section 2 Alternatives Assessment. Section 4.6 of the TLUOS details the anticipated Project Interaction that will occur with Sagkeeng identified VCs if the WR-1 Reactor Decommissioning Project (as detailed in its application) were to continue. This includes specific concerns about the possibility of containment failure and its potential effects on waterways and waterbodies, beyond the Project Footprint and into the RSA. Of particular concern for Sagkeeng members is the adjacent Winnipeg River. The TLUOS describes the Winnipeg River as being an important waterway for Sagkeeng member's fishing and harvesting wild rice activities, as well as for traveling to access important harvesting sites and their broader territory. These findings suggest that the potential for emissions, waste, contamination, or any other potential impact from the proposed Project does indeed have the potential to adversely impact Sagkeeng Values and the surrounding environment beyond the Project Footprint. Also emphasized in the TLUOS is the potential for risks to extend beyond the physical risks of contamination. This includes potential for impacting important and intangible Sagkeeng values, such as sense of place, identity, transmission of knowledge to younger generations, and attachment to the land as a result of the Project (TLUOS p. 86 – 87). As stated in the TUS, the psychological effects that may arise from the proposed *in situ* decommissioning project reach beyond that of a physical project Footprint and extend into the intangible cultural elements of Sagkeeng way of life. Potential for Project interactions and effects should be considered beyond a physical geographic Footprint and also understood in a broader context of impacts to cultural continuity. The evidence in the TLUOS suggest that while the Study area remains important to Sagkeeng for past, present, and desired future use, there remains a great deal of concern regarding the integrity of the land on which the Project resides due to concerns about waste disposal and contamination. Study participant's detail (Section 4.6) how negative interactions in the past with nuclear activity has heightened concerns about VC being negatively affected by the proposed plans to cement radioactive materials in the ground. Furthermore, the proposed decommissioning activities contribute to the stigmas about the overall safety of the Study Area for Sagkeeng use, which is described by Study participants in the TLUOS (Section 4.6). The idea of indefinitely storing nuclear materials in the earth has	ceremony, workshops and site tours, CNL is committed to further actions to support a greater comfort by Sagkeeng community members regarding the project.		activity, a designated project or a project are… (c) with respect to aboriginal peoples, an effect occurring in Canada of any change that may be caused to the environment on (i) health and socio-economic conditions." We understand 5(1)(c)(i) to require a consideration of effects to health and socio-economic conditions caused by changes to the environment by the Project. In the case of WR-1, there are no anticipated appreciable environmental effects and no changes to the environment from the state existing today if in situ disposal is approved. Further, CNL has not received information from Sagkeeng establishing that the psycho-social concerns raised by Sagkeeng to arise from an environmental effect caused by the in situ disposal of WR-1. In the case of WR-1, CNL has not received information from Sagkeeng establishing that the stigma identified by Sagkeeng to have resulted from an environmental effect created by the proposed activity, the proposed in situ decommissioning of WR-1. While CNL also recognizes that Sagkeeng can advance any matters it wishes to advance, CNL submits that Sagkeeng has not established a nexus between its concerns of stigma and pre-existing concerns with the proposed activity, as required by CEAA 2012.

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				raised serious concerns about the feasibility of containment efforts proposed by the proponent. In Section 4.6, study participants describe their apprehensions about grouting feasibility, and whether or not a containment failure could even be prevented. These concerns may contribute to prolonged land alienation, which is considered to be a critical – CNL ignored - adverse effect from the proposed Project.			
191.	SFN (Jan 15, 2018)	SFN argues that although the assessment in this section of the draft EIS has acknowledged that the project may have the effect of heightening a perception of risk regarding use of the project footprint and adjacent area and downstream portions of the Winnipeg River, overall the assessment has dismissed community concerns as being attributable to "a small number of users" (page 6-385) that can be mitigated through "robust communication of environmental monitoring results to confirm the safety of the WL site and help address concerns about future uses" (page 6-386). Further, although CNL notes that currently no communication model exists for the project to disseminate information to Indigenous communities, it concludes that with "mitigation in place (i.e., communication measures to mitigate perceptions), Project effects on land and resource use are expected to be negligible." SFN expresses the position that the draft EIS's outright dismissal of community concerns and as illegitimate perceptions that simply require "correction" through the communication of monitoring results, serves to underline the failure of CNL, through its very limited consultation efforts with SFN and other Indigenous communities, to apprehend and appreciate community concerns related to the project, and in particular why communities in the region want the waste to be completely removed from the facility.	CNL believes that with mitigation in place, any negative environmental effects associated with the undertaking will not result in off-site effects on traditional land and resource use. Furthermore, more land may become available for traditional land and resource use as the Whiteshell site is closed. CNL recognizes that some individuals have and may maintain perceptions of risk or concern. CNL is not being dismissive of the community concerns and recognizes that some people might perceive the in situ disposal as representing an on-going risk. CNL sees it as part of its mandate, but also has a strong desire, to continue to communicate and accurately explain potential risk and effects to rights bearing Indigenous communities.	The TLUOS extensively details the fears and stigmas that Study participants have with respect to the feasibility of containment efforts proposed by the proponent. In Section 4.6, study participants describe their apprehensions about grouting feasibility, and whether or not a containment failure could even be prevented. "As previously highlighted, many Study participants stressed a deep sense of insecurity and uncertainty regarding the Project and its likelihood of success in containing nuclear contaminants from the reactor. Interviewees expressed apprehensions about whether grouting was a feasible means of containment and whether there were any guarantees that containment would not fail, affecting current and future generations … Sagkeeng members questioned the integrity of the grouting system, including its vulnerability to earthquakes, erosion, and to the effects of time (TLUOS, p. 81-82) The potential for perceived risk and ongoing alienation from Sagkeeng lands is a serious consideration that ought to be assessed more thoroughly by the proponent in the EIS. Section 6.8.5 of the EIS concludes that no primary pathways exist, but there is no consideration of perceived risk, fear, stigma – all of which guide Indigenous use and occupancy of the Study Area. Perceived risks ought to be treated seriously in the EIS as they have real outcomes, and the proponent simply hasn't integrated this realization into its effects assessment.	CNL recognizes that the TLUOS extensively documents the fears and stigmas of study participants. CNL supports the documentation of these fears and stigmas by Sagkeeng community members in the psycho-social effects study that is funded by the CNSC. CNL does want to address concerns Sagkeeng has with respect to the proposed WR-1 *in situ* decommissioning project. CNL has done its best to communicate and will continue to explore communication and engagement opportunities to address concerns. CNL would be pleased to discuss in more detail any aspect of its mitigation plans. CNL would be pleased to hold series of technical discussions on issues that SFN raises including: grout, future changes to the environment, risks, environmental monitoring, etc. As indicated previously CNL does want to address concerns of perceived risk, fear and stigma. There are references to this concern discussed in the EIS and CNL has committed itself to addressing these concerns with Indigenous communities and non-Indigenous people alike.	Unless and until CNL and AECL recognize that fear and stigma and risk perception are viable and legitimate causes of impacts on Sagkeeng rights, traditional land and resource use, and health/well-being, CNL's suggestion that it wants to address these concerns will be hollow in nature. Does CNL now recognize these as viable effects for the purposes of this environmental assessment?	**CNL considers this comment closed.** CNL will document Sagkeeng's concerns in the Indigenous Engagement Report and in Section 4 of the Environmental Impact Statement. CNL believes the best path forward to address psycho-social effects is through education and participation in CNL's environmental monitoring activities. CNL does not consider psycho-social impacts as a primary pathway. To further clarify our position, Section 5(1)(c)(i) of CEAA 2012 provides that "environmental effects that are to be taken into account in relation to an act or thing, a physical activity, a designated project or a project are… (c) with respect to aboriginal peoples, an effect occurring in Canada of any change that may be caused to the environment on (i) health and socio-economic conditions." We understand 5(1)(c)(i) to require a consideration of effects to health and socio-economic conditions caused by changes to the environment by the Project. In the case of WR-1, there are no anticipated appreciable environmental effects and no changes to the environment from the state existing today if in situ disposal is approved. Further, CNL has not received information from Sagkeeng establishing that the psycho-social concerns raised by Sagkeeng to arise from an environmental effect caused by the in situ disposal of WR-1. In the case of WR-1, CNL has not received information from Sagkeeng establishing that the stigma identified by Sagkeeng to have resulted from an environmental effect created by the

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							proposed activity, the proposed in situ decommissioning of WR-1. While CNL also recognizes that Sagkeeng can advance any matters it wishes to advance, CNL submits that Sagkeeng has not established a nexus between its concerns of stigma and pre-existing concerns with the proposed activity, as required by CEAA 2012.

B.2 Manitoba Métis Federation

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		EIS					
		Alternatives Means of Carrying out the Project - General					
44.	Manitoba Métis Federation (MMF) (Dec 19, 2017)	MMF expresses the concern that the draft EIS has not presented evidence of the dose rates to workers currently in the building when performing maintenance or monitoring, or what the doses to workers were when removing the fuel from the WR-1 or transporting the fuel to its current location, and what the doses will be when transporting the fuel off-site (or where the fuel will be moved to). MMF explains that this information is required to make informed decisions about the preferred options for the WR-1. If this information is available in supporting documents, MMF indicates it should be summarized here. MMF proposes that other alternatives, such as leaving the reactor in place until a permanent national depository is available, should be re-considered, and effects of these options on worker	CNL operates under a decommissioning licence from the Canadian Nuclear Safety Commission (CNSC). As part of that licence, CNL is required to monitor all doses to workers and to ensure radiological doses to workers are maintained below regulatory and administrative limits, and kept as low as reasonably achievable. CNL has been compliant with these requirements throughout its decommissioning activities to date. All of the alternatives would be performed within the same regulatory framework and all can be performed safely with the appropriate mitigative measures in place. The alternatives assessment (Section 2 of the EIS) has been	**Partially Addressed** The purpose of using high level and intermediate level disposal facilities is to isolate the waste from the biosphere and reduce the risk to the public and the environment to virtually zero. It's true that moving the waste from the surface at one place to the surface at other place keeps the risk constant (depending on exposure to the public), but the goal should be to reduce the risk of exposure to zero/background. The ISD would reduce the risk from the current levels to people on the WL site, and exposure would be low but not zero.	Canadian Nuclear Laboratories (CNL) acknowledges MMF's position that the ideal would be to reduce risk to zero for all. All four alternatives that were considered carry some risk. Further, purpose built disposal facilities do not eliminate risk completely. Waste handling and transportation risk exists with those options. Operational risk also exists. CNL agrees the risk is low. CNL is demonstrating through the Environmental Assessment, that in situ disposal is protective of the public and the environment now and into the future; thereby achieving the As Low As Reasonably Achieveable (ALARA) principle. CNL believes taking care of the liability now rather than leaving for future generations also contributes to the ALARA principle	**Addressed.** The ISD reduces the immediate radiation risk but it can be argued that it extends the risk to future generations as it releases small amounts of radioactivity over an extended period of time. It is true that there is increased risk to workers and the public from transportation and waste handling, however CNL is experienced in the management of risks from these activities and, given oversight of the CNSC, should be able to combine the WR-1 waste with other nuclear waste in a safe manner. Removal of the WR-1 would reduce the radiation exposure to future users of the site to background levels and reduce the need for monitoring for future generations.	

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		safety should be identified and considered. The MMF has expressed an interest in having Manitoba Métis Community (MMC) citizens build capacity and knowledge in the decommissioning activities, over the lifecycle of the project. As such, it is noted that the potential effects of various options for decommissioning on the workers is of interest and concern to the MMF. Additionally, the draft EIS (page 2-15) states: "While the complete removal of the facility will result in positive effects to the environment, the environmental liabilities associated with the removed wastes will be transferred to another offsite facility that has not been constructed yet. It is not yet known if this future facility will be within an industrial setting or a green-field site which could result in additional adverse environmental effects (e.g., vegetation clearing required at a green-field site)." Given that any potential off-site facility is unknown, and removal has not been sufficiently detailed or considered as an option for decommissioning throughout the draft EIS, MMF indicates it isn't clear whether removal of the WR-1 would result in adverse environmental effects that would be more significant than the current ISD plan. MMF notes that a future facility would presumably consist of more than removing vegetation from the site, however with such a location underdetermined, any potential effects are speculative and uncertain.	revised to provide clarity on the expected impacts and uncertainties associated with each Alternative. The assessment reviews the uncertainty associated with future assumptions, and the transfer of the risks from one site to another. In the case of off-site storage, the risks associated with the waste are not reduced by removing them from the WL site; they are relocated to another site. The statement highlighted by the reviewer indicates the uncertainty around such a facility and the potential for additional effects not currently anticipated for other options such as ISD. It is a comment about the uncertainty in future assumptions rather than an attempt to assess actual predicted impacts. CNL concurs that future effects are unknown for a future facility, but it is reasonable to assume that it will have similar or greater impacts if built from new. Regarding the building of capacity and knowledge in Manitoba Métis Citizens, CNL is proud to have 45 staff (~13%) at the Whiteshell Labs project self-identify as Indigenous. Of those, 13 produced proof of Métis citizenship. These employees are working on a world class nuclear decommissioning project,	CNL also mentions ALARA for the workers on the site but CNL doesn't apply that to the public. Removing the remainder of WR-1 and putting it into a disposal site (isolated from the biosphere) would be the equivalent of the ALARA principle for the public.	and is the responsible thing to do. At this time, it is unknown when or if a permanent storage solution for intermediate level waste will be available.		

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		MMF recommends that CNL consider and provide information about the effects on workers of alternative decommissioning options that do not involve ISD. [Please refer to page 33 of MMF's submission for more information].	building experience and knowledge that is easily transposed to other jobs in Manitoba, Canada or around the world. Further, CNL sends our job postings to MMF in an attempt to attract and recruit Métis Citizens. CNL is also actively working with MMF to explore procurement opportunities and how CNL and MMF can work together. The intent of both recruitment and contract opportunities are to help build capacity within MMF citizens. The removal of spent fuel from the reactor (completed in the 1990s and early 2000s), the current storage of fuel at the Concrete Canister Storage Facility, and the planned transfer of the fuel to a similar facility at Chalk River Laboratories is out of scope of the proposed ISD Disposal Facility and therefore not part of the Environmental Assessment.				
45.	MMF (Dec 19, 2017)	MMF expresses the view that it appears the accelerated timeframe to decommission the WL site by 2024 is the key component for the plan to decommission the WR-1. MMF expresses the concern that this timeframe may not allow for consideration of other alternative decommissioning or disposal options that have less potential for contamination effects on the local environment, and correspondingly less potential impacts to the MMC and	CNL's objective is to manage historical nuclear liabilities at the Whiteshell Laboratories site in a safe and compliant way. Accelerated decommissioning and closure of sites is generally the strategy employed in the industry world-wide. The original planned closure date was September 2024 for the Whiteshell Laboratories. This included the assumption that	**Partially addressed** CNL has extended the time frame for decommissioning WR-1 to include time for engagement with MMF and others and to modify Version 1 of the EIS. A summary of CNL's consideration of alternatives to ISD is presented in the EIS but the assumptions behind many of the decisions (e.g.	When CNL performed the Project Alternative Means analysis, neither cost nor schedule was considered as a criteria. Therefore, the estimated cost and schedule for each option was not presented in detail in the Environmental Impact Statement. CNL is willing to meet with the MMF and Shared Value Solutions to better understand any remaining concern in this regard. CNL performed a dose constraint calculation regarding dismantling of	**Addressed** The MMF agrees that a workshop with CNL is reasonable step for understanding the alternatives proposed, current schedule, worker safety and other outstanding issues.	

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		other members of the public. MMF notes that the ISD option is the only alternative identified by CNL which will allow the decommissioning of the site by 2024. MMF recommend that all parties involved - CNSC, AECL and CNL - should consider extending the timeframe for site decommissioning if it provides the best solution to WR-1 decommissioning. [Please refer to pages 32-33 of MMF's submission for more information].	the proposed in situ decommissioning of the Whiteshell Reactor #1 (WR-1) demonstrated, through the environmental assessment process, that it is protective of the environment and people. The approach requires approval by the Canadian Nuclear Safety Commission before any work can commence. Since submission of the draft EIS, plans have been updated and decommissioning of the Whiteshell site is now anticipated to be complete early in 2027. CNL has thoroughly investigated other decommissioning options as well, as required as part of the environmental assessment process. All considered options are presented in the Environmental Impact Statement (EIS). Section 2 was updated to incorporate feedback from Indigenous Communities and the public. The timeframe to address intervenor comments and update the EIS was extended by approximately one year to allow more Indigenous and public engagement. The Commission Hearing is now expected in the spring of 2021.	cost) are not presented. This is important due to the challenges associated with accurately costing the monitoring program for the next 100 to 300 years of institutional control. The MMF needs to be able to review these assumptions in relation to the safety of the MMC living near WL and downstream of the facility. One aspect for consideration of the alternatives presented by CNL is the dose to workers during the removal of the calandria. MMF's comments regarding risk to the workers is to allow MMF to consider increased exposures from removing WR-1 relative to other activities, such as maintaining the building, transporting fuel and other tasks, as well as dose to the public now and in the future. Safety is critical, but the elevated risk to working with the intermediate level waste of the WR-1 is not clear in the EIS.	the reactor core components (calandria, fuel channels, etc), but has not performed a dose estimate. While the dose to workers can be controlled, there is clearly much higher dose potential when the bioshield is removed and cutting and handling of those materials occurs. There is also an increase to industrial risk from dismantling; especially working at heights, working with asbestos containing materials, cutting and handling materials, hoisting waste out of the facility and potential for falls/trips and struck by/struck against events. CNL is offering a workshop to the MMF to work with our subject matter experts in occupational safety and health, nuclear health physics, and waste management to explore the details around each alternative. This should provide the information needed by MMF to understand risk with the alternatives.		
		Alternatives Means of Carrying out the Project - Evaluation Approach					

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62.	MMF (Dec 19, 2017)	This section of the draft EIS indicates that "traditional, cultural and heritage importance to Aboriginal peoples'" was considered in the selection of VCs, yet no traditional knowledge (TK) or land use by the MMC has been included in the draft EIS. MMF notes that the MMC has longstanding use of the lands and waters in the vicinity of the project that continue to be of ongoing importance to the MMC in exercising their constitutionally protected harvesting and other rights. These rights have the potential to be impacted by the decommissioning activities and yet have not been considered by CNL, nor have accommodation or mitigation measures been discussed with MMF. It is recommended that a Traditional Knowledge and Land Use Study (TKLUS) with the MMF be undertaken to determine and understand Métis-specific land use and interests in the project study area. MMF also indicates that further discussions of accommodation and / or mitigation measures may be needed. [Please refer to page 25 of MMF's submission for more information].	CNL agrees that a Traditional Knowledge and Land Use study by the MMF is the best way to document Métis knowledge into the EA process. The draft Environmental Impact Statement had incorporated Indigenous feedback and information available at the time into the selection of Valued Components for the Environmental Impact Statement (EIS). This came from a variety of Indigenous sources as well as public domain information. CNL met with the MMF in November 2016 to inform them of the project. This included presenting on the Valued Components along with the agreement by the MMF to review the Valued Components after CNL supplied the list on December 7, 2016. In January of 2019, a traditional knowledge and land use study, titled "Whiteshell Reactor #1 Decommissioning Manitoba Métis Traditional Knowledge, Land Use and Occupancy Study (TKLUOS) was prepared by Shared Values Solutions (SVS) for the MMF specifically for the proposed project. The results of the study were included in the EIS. A total of ten Métis harvesters were surveyed for the study resulting in the identification of 424 locations of Land Use and Occupancy Values (LUOs). Two	**Addressed**			

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			study areas were used in the study; the first is a Study Area that includes 100 m on either side of the Winnipeg River from Seven Sisters Generating Station to the mouth of the Winnipeg River, Lac du Bonnet, and the Lee River. The second is a 25 km radial Study Area around the WR-1 Reactor site. A total of 192 LUOs were mapped within 25 km of the site and 75 were within 100 meters of the site. The LOUs included: access routes, fishing locations, trapping/snaring locations, gathering, commercial guide or land use, TEK knowledge, changes to the environment, hunting, demographic, cultural, and, other land-use (i.e. ice fishing huts). Values were collected temporally by organizing values by: the last 10 years, 10 years prior, or both. The SVS Report provided an excellent overview of the types of traditional knowledge, land use and occupancy values that were collected in the interviews with Métis knowledge holders. This information included the following: Current and childhood residences, Hunting and trapping sites, Fishing locations, including species and temporal scope of fishing activity, Gathering of plants for food, medicinal plants and natural materials, including use				

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			of gathered materials, Commercial fishing, trapping, and other land uses for income, Culture and heritage resources, sacred sites, archaeological sites, areas of economic importance, other special sites, and contemporary gathering places, Locations of overnight sites including cabins, other types of structures and camping sites, Land and water access routes, Traditional Ecological Knowledge, including locations of fish spawning areas, seasonal mammal habitats and migration routes, bird habitat, wetlands, salt licks, important plant habitat and other significant ecological features, thoughts, perceptions, concerns, and unanswered questions about the WR-1 Reactor decommissioning project, and, hopes for the future of the Manitoba Métis Community. In the Report (p. 2) SVS noted that: “it can be said with confidence that members of the Manitoba Métis Community rely on and use the lands and waters around the WR-1 Reactor site for various cultural and traditional purposes, including actively exercising their s. 35 harvesting and other Aboriginal rights.” On page 24, SVS goes on to comment that: “Despite the noted limitations set out in this report, SVS is of the position				

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			that the Study provides a reasonable representation of the Manitoba Métis Community's patterns of LUO within the Study Areas." CNL would note that despite the small sample size, the conclusion that Métis citizens rely on the lands and waters around the Whiteshell site is likely an accurate portrayal. Additional information about the Manitoba Metis Federation's persecpectives as shared during the engagement process for the Project have been included in Section 4.3.2.4 of the EIS. CNL has agreed to provide capacity funding for community meetings to support the sharing of information about the project to Manitoba Métis Citizens and the results of the TKLOU study. Further, CNL funded the MMF to conduct a harvested food intake study with Métis Citizens. The food intake study was completed and incorporated into the EIS.				
		Alternatives Means of Carrying out the Project - Alternative #2					
67.	MMF (Dec 19, 2017	MMF expresses the position that the complete removal of the facility (Alternative #2) would improve the perceived suitability of the site for future socio-economic MMC interests because long-lived radioactive material will no longer be present within the former WR-1 building footprint. In addition, the complete	CNL appreciates the feedback from MMF regarding their expressed preferred option to fully dismantle the WR-1 facility, and the implied packaging and transportation of waste to a different site in Canada for interim storage or disposal. CNL has proposed the	**Partially Addressed** The MMF acknowledges and appreciates the positive steps for information sharing and consultation that CNL has taken. The challenge lies in the ultimate acceptability of *in situ* decommissioning	CNL acknowledges and respects MMF's stated position and commits to ensuring this is clearly documented in the final Environmental Impact Statement. CNL further commits to ongoing engagement with the MMF with the intent to offer more information, site visits and other	**Partially Addressed** The MMF acknowledges CNL's commitment to documenting our position in the final EIS. The MMF is open to working with CNL and participating in further engagement. Actions which improve environmental protection, monitoring,	**CNL recommends closing this comment due to differing positions on the decommissioning of WR-1 reactor.** CNL acknowledges and respects MMF's position on their preferred method of decommissioning for the WR-1 reactor (i.e., MMF's preference for full removal).

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		removal may allow this portion of the site to be released for unrestricted use which would allow safe use of the land for traditional land use activities and interests by the MMC such as hunting, berry picking, and medicinal plant gathering. MMF expresses the concerns that CNL is choosing the ISD alternative (Alternative #3) due to estimated project cost differences (in excess of $100 M difference) rather than selecting a decommissioning alternative that is ecologically preferred or least impactful on the rights of Indigenous communities or best aligned with the long-term use and sustainability of the area for the MMC. MMF recommends that further meaningful consultation and engagement with the MMC must occur, to identify their interest and preference in the complete removal of the facility, as outlined in the CSR and as identified in Alternative #2. This consultation and engagement should occur through the MMF and in accordance with MMF Resolution No. 8. [Please refer to page 26 of MMF's submission for more information].	combined approach of partial dismantling and partial in situ decommissioning of the reactor facility. This is based on several criteria including protection of the environment, safety of the public, safety of workers, project cost and solutions for waste handling. The Environmental Impact Statement demonstrates that the in situ decommissioning approach is protective of people and the environment. In addition, there is no identified impact on the rights of Indigenous peoples as a result of the project. While outside the scope of this Environmental Assessment, it may be of interest to the MMF that CNL is also the WL Closure Land-use and End-state Plan, along with appropriate criteria for site remediation and clean-up activities for the WL site and offers to engage MMF for feedback and input during this process. The WL Closure Land-use and End-state Plan will define the post-closure end-states, the post-closure land-use classifications and allocation, and the physical release criteria that must be met at the site closure. These end-state definitions and land-use classification and allocation are applicable to all project decommissioning activities being carried out under the WL	to the Red River Métis's Manitoba Métis Community (MMC). Long term, the MMC will be the ones faced with the risk of nuclear contamination on the Whiteshell Laboratories site. As a result, it's the position of the MMF that complete removal and remediation (Alternative #2) should be pursued.	activities as requested by the MMF that may contribute to reducing concerns about the proposed in situ disposal approach.	management, and involvement of the MMC are encouraged. Ultimately, our position on this matter remains unchanged: the complete removal of the WR-1 facility should be undertaken.	CNL will submit the EIS for WR-1 In-situ disposal to the regulator because our assessment concludes it is safe and protective of the environment and protective of people. While CNL agrees to disagree with MMF on this item, we are committed to continuing a meaningful dialogue and engagement with MMF through the decommissioning process that extends beyond the EA process for WR-1 and respecting MMF's resolution #8. <u>Addressing concerns</u> • CNL will clearly document MMF's position in the Environmental Impact Statement and IER being submitted to the CNSC 2021 February. • In addition, CNL and MMF have agreed to host a series of workshops with MMF's technical experts to discuss environmental monitoring for WR-1 and to discuss CNL's alternative means assessment. • CNL and MMF had a workshop to discuss opportunities for collaboration on environmental protection, monitoring, and capacity support to the MMF as well as supporting MMF stewardship initiatives. CNL will continue the dialogue on these initiatives. CNL also will continue to engage with MMF on the decommissioning of Whiteshell laboratories and on key

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			Closure Project, including the WR-1 Project. CNL is committed to a long-term and meaningful relationship with the MMF and continues to value the feedback provided by the MMF. To enable this, CNL has committed to and provided capacity funding for the MMF, in addition to the funding provided by CNSC. In general this has included the following: • in kind access to technical experts on our staff; • reimbursement of some out of pocket expenses to participate in engagement activities such as site visits, tours, regional community open houses; • basic costs to support open houses, such as refreshments, hall rental, production of print materials; and • capacity fund for an MMF citizen to spend time observing CNL's environmental monitoring program and provide community feedback				decommissioning activities such as future land use and endstate as well as on any topics or areas of interest to the MMF.
		Alternatives Means of Carrying out the Project – Summary and Conclusion					

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79.	MMF (Dec 19, 2017)	With respect to Table 2.6.3-1, a summary of estimated project costs, the preferred option of ISD has been identified by CNL as the cheapest and quickest method to decommission the WR-1, but MMF notes there is no explanation of individual costs. For example, monitoring of Alternative #1 is stated to be $1M, but $7M for Alternative #3; however it is unclear what the units are. MMF indicates that Alternative #3 has no surveillance after 2024 and no further details are provided. Presumably monitoring will continue on the site after 2024 as part of the site license and because of the legacy contamination in the lagoon, LLW Waste Management Area (WMA), cesium ditch, etc., however, MMF explains it is not clear whether the cost estimates include this ongoing monitoring. MMF recommends that more complete costing details to be provided, including identifying individual costs and whether ongoing monitoring has been included. In addition, there needs to be greater transparency about allocated costs. Also, estimates of how costs are allocated 100 to 300 years in the future should be described, along with an explanation of how future costs are being estimated for the next 100 years [Recommendation 4.3.8a]. MMF recommends that the cost estimates be audited and validated by an independent source [Recommendation 4.3.8b].	The monitoring programs considered in the Alternative Assessments are exclusive to the WR-1 project and do not include the monitoring that is planned for the remainder of the site. The Comprehensive Study Report, which enables decommissioning of the Whiteshell Labs site, includes an Environmental Assessment Follow-up Program. This is a commitment made by AECL and executed by CNL that provides ongoing environmental monitoring. CNL currently analyzes thousands of environmental samples per year. This program is committed to continue, following site closure. Additional monitoring identified for the WR-1 project will be done over and above the current monitoring program. The proposed monitoring program for the WR-1 project includes the following: Physical Monitoring – Physical monitoring will include semi-annual visual inspection of the WR-1 areas for subsidence, erosion and animal or other intrusions, with decreasing (or increasing) inspection frequency as the performance of the engineered controls are demonstrated. Maintenance activities will be performed as needed to repair damaged areas. A storm water	**Not Addressed** The MMF specifically requested more complete information about the cost for monitoring programs including the timeframe for these costs into the future. This information is important to understand the scope of monitoring and timescale for which it will be occurring. This would facilitate comparison of the varying levels of monitoring required for each Alternative. The MMF requests that CNL provide the information on cost of specific monitoring programs. This can be integrated with the information on monitoring activities provided in the response by CNL.	CNL proposes 100 years of active institutional controls and monitoring. The monitoring will be completed to verify that non-radiological and radiological clearance and release criteria continue to be met. For Alternative #3 (In Situ Disposal (ISD)) the estimated cost for the Whiteshell Reactor 1 (WR-1) post closure environmental monitoring is $7.3 million and includes the following: A total of 21 wells would be sampled bi-annually for the first 25 years. • Two well nests up-gradient with three wells each for a total of 12 samples annually. • Five well nests downgradient with three wells each for a total of 30 samples annually. • Forty-two samples annually will be analyzed for general water quality and indicator parameters and most mobile radionuclides. Total number of samples for this period is 1050. Sampling frequency will adjust to annual sampling in years 26 to 50 post-closure with same number of wells and analytical suite. Twenty-one samples will be analysed annually for a total number of samples of 525 during this period. Sampling frequency will adjust to samples collected every 2 years for years 51 to 100 with the same number of wells and analytical suite. A total number of samples of 525 for this period.	**Partially Addressed** The MMF appreciates the detailed breakdown of costs for groundwater monitoring that has been provided by CNL. This is the information and level of detail that the MMF needs to adequately understand the scope of monitoring. Based on the information provided, the cost for environmental monitoring of Alternative #3 is estimated at $7.3 million for 100 years. However, it appears that only groundwater monitoring has been factored in. CNL must clarify how the cost for other monitoring, including physical, surface water, sediment, and soil and vegetation (such as described in the previous response from CNL) has been factored into the costs for each alternative	**CNL requests that MMF accept this comment as fully addressed with the additional information provided below.** CNL will continue to engage with MMF on environmental monitoring for WR-1, for site wide monitoring, and to discuss environmental monitoring initatives MMF is pursuing to determine how we can work together. The costs for the monitoring activities associated with wider Whiteshell Laboratories (WL) decommissioning project, are not included in the alternatives 1 through 4 listed in Table 2.6.2-1 of the EIS. Specific cost for the monitoring activities mentioned including the physical, surface water, sediment, and soil monitoring are included in the wider WLdecommissioning project and are not foreseen to vary from alternative to alternative. CNL also intends to include MMF in environmental monitoring activites and review of CNL's environmental protection program, to ensure traditional and land use knowledge is included in our environmental monitoring program.

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		[Please refer to pages 33-34 of MMF's submission for more information].	management plan is being prepared and maintained. Groundwater Sampling – Semi-annual water level measurement and water quality measurements will be included in the Environmental Assessment Follow-Up Program (EAFP). The frequency of recurrence of water sampling will be reviewed based on performance data. The number and location of wells, and parameters measured, may change based on an annual review of the data. Testing will determine if any radiological or non-radiological contaminants are released from the ISD facility, and confirm if the concentrations of released contaminants are within the range predicted in the EA (which are concentrations well below established benchmarks for the protection of humans and the environment). No changes to groundwater are predicted to occur for the first 25 years based on the predicted contaminant transport in the Decommissioning Safety Assessment Report. Surface Water sampling – Surface water (Winnipeg River) and ditch system water will be sampled on a semi-annual basis at one upstream and two downstream locations as part of the EAFP. Frequency of		$1,000 per sample is estimated equaling $2,100,000. Sampling labour, materials and supplies and waste management is estimated at 16 hours X 2 samplers per sampling round for a total of 100 sampling events equaling 3,200 hours at $150/per hour equals $480,000. An annual summary report would be developed for the first 50 years and transition to a two year report for the final 50 years of post-closure. A total of 75 reports would be generated with a per report cost of $50,000 for a total cost of $3,750,000. Well maintenance would be performed over the entire period as necessary. Total well maintenance is estimated at $1,000,000. This estimate is in 2020 costs with no escalation included. These costs are specific to WR-1, and do not include costs estimated for the wider Whiteshell Laboratories (WL) decommissioning project, which is out of scope of this environmental assessment. CNL has not developed post closure monitoring plans for the other alternatives evaluated. For partial ISD, a similar environmental monitoring program would be implemented. For full dismantling, the monitoring program would be significantly simpler, shorter and lower cost. For the sake of clarity and transparency, CNL reiterates that		

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			recurrence will be assessed based on performance data. River Sediment Sampling – Sampling of the river sediments will be conducted. Air Emissions Monitoring – Passive tritium in air network monitoring (semi-annual change out) will be included as part of the EAFP. Monitoring locations (~4) will be selected to be within the main upriver and downriver wind rose sectors, at the site boundary and on-site mainly to monitor airborne tritium plumes potentially originating from the WR-1 entombed reactor. Soil and Vegetation Sampling – Should the surface and/or groundwater results reach Environmental Effects levels then CNL would undertake additional monitoring including, but not limited to, soil, vegetation, fish and wildlife. Remedial action plans will be prepared so that remedial action can be executed in a timely manner. Annual Safety Review and Environmental Monitoring Report – A Progress Report on the EAFP specific to the Project will be prepared each year and will include a summary of the environmental monitoring results and the safety considerations of the waste left in-situ. Cessation of a monitoring activity would occur once it can be shown that an		there is a current Environmental Assessment Follow-Up Program in place for the Whiteshell Laboratories site. This will continue post closure. The information provided above is specific to the current assessment for the proposed is situ disposal of WR-1.		

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			effect has stabilized or has been reduced to a level where it is no longer considered significant by regulatory requirements or community concerns. Any proposals on modifications to the monitoring program will be communicated to the CNSC. Public Information activities – The need for maintaining communication mechanisms during the Institutional Control period is recognized as being important. Public information activities required as part of CNL's Public Information Program will be part of the EAFP and will be summarized as part of the annual EAFP progress report for the Project. With respect to the costs included in the WR-1 EIS, there are detailed basis of estimates for the evaluated options. Some of these estimates have been produced by third parties and some by CNL. All have been supplied to Natural Resources Canada as a deliverable to the Nuclear Legacy Liabilities Program. That program has undergone audits by a third party as well.				
		Project Description					
		Project Description – General and Project Overview					
83.	MMF (Dec 19, 2017)	MMF indicates that it is not clear what the project schedule is for construction / decommissioning activity. Loud decommissioning activity (i.e., jack hammering to	The following text was added to Section 1 of the Environmental Impact Statement (EIS):	**Partially addressed** a) The MMF acknowledges and appreciates the additional	CNL is committed to working with MMF to address further concerns regarding species at risk and wildlife of Traditional importance. CNL has a rigorous environmental	**Addressed** Pending the review and acceptance by the MMF of the proposed process for	

<table>
<tr><th>No.</th><th>Source</th><th>Comment Summary
(All original submissions can be found on the Canadian Environmental Assessment Registry, Reference #80124)</th><th>Response (to be completed by CNL)</th><th>Evaluation of response (March 25, 2020)</th><th>Response and Next Steps</th><th>Evaluation of response (September 30, 2020)</th><th>Responses and Next Steps (December 17, 2020)</th></tr>
<tr><td></td><td></td><td>remove deeply imbedded contaminants in concrete as indicated in Table 6.6.5-1 on page 6-264 of the draft EIS) is expected. Consequently, MMF expresses their considerable concerns over the potential disturbance and displacement of sensitive species at risk (SAR) and to wildlife of traditional interest and importance to the MMC.

MMF recommends that CNL identify what consideration, if any, will be given to limit construction activity during sensitive timing periods for SAR, migratory birds and wildlife species of traditional importance to the MMC, such as during ungulate calving periods. It is recommended that a plan be developed to limit construction activity during sensitive timing periods as to minimize the potential for disturbance and displacement of species and wildlife in the project area [Recommendation 3.2.9a].

MMF recommends that CNL provide clear communication and notification (minimum of 21 days) of the finalized construction scheduling to MMF for distribution to their membership, with follow-up communication on a weekly basis for any scheduling changes.
There is concern that Manitoba Métis harvesters may have their harvesting rights and activities impacted when they travel to the Project area to hunt, and then find that the area they are travelling to is subject to construction activity which has disturbed or displaced the wildlife they are</td><td>CNL plans to start decommissioning activities related to the WR-1 Building in 2021 subject to Project approval. The Project site will be turned over for institutional control in 2025, which is assumed to last for 300 years. Active controls (e.g., ground water monitoring and site inspection) will be required for the first 100 years. This timeframe is consistent with that required for other disposal projects (ranging from 100 to 300 years), including similar projects under CNSC jurisdiction. The planned schedule for the proposed decommissioning activities is provided in Table 1.2-1.
Table 1.2-1: WR-1 Decommissioning Project Phases and Schedule
<table>
<tr><th>Phase</th><th>Activity</th><th>Duration</th></tr>
<tr><td rowspan="3">Closure</td><td>Preparation for In Situ Decommis-sioning</td><td>2020 to 2024</td></tr>
<tr><td>Grouting of Below-grade Systems and Structures</td><td>2022</td></tr>
<tr><td>Removal of Above-grade Structures</td><td>2022 to 2023</td></tr>
</table></td><td>information on demolition activities (e.g. concrete vs. metal jack hammering), including high-level information on timing and extent of noise, but remains concerned about potential sensory disturbance to SAR and wildlife of traditional importance.

While the schedule in CNL’s response (and EIS Table 1.2-1) provides an overview of which decommissioning activities will take place during which years, it does not provide enough information on the seasonal timing of construction activities within each year. Please provide MMF with a more detailed WR-1 decommissioning schedule that outlines this. Specifically, the MMF requests that CNL avoid</td><td>program that takes into consideration all aspects of the environment, including migratory birds, species at risk, and other animals that live on/near the site (e.g., turtles, deer). CNL proposes to conduct a workshop with the MMF Environmental Monitor on this program. CNL also invites MMF to propose other activities that could further reduce or eliminate concern.
CNL has provided MMF with a letter (2019 August 13) committing to notifying President Chartrand about decommissioning activities that may have the potential to impact MMF citizens in their Traditional interests. MMF is reviewing the proposed process for communication and notification of decommissioning activities. Upon acceptance, this will be documented in the Indigenous Engagement Report, a supporting document to the Environmental Impact Statement.
A more detailed project schedule for WR-1 has been supplied to the MMF to aid in their analysis of potential disruptive activities.</td><td>communication and notification of decommissioning activities.</td><td></td></tr>
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		planning to hunt or harvest [Recommendation 3.2.9b]. [Please refer to page 27 of MMF's submission for more information].	<table><tr><td></td><td>Installation of Engineered Cover</td><td>2024</td></tr><tr><td></td><td>Final Site Restoration</td><td>2024</td></tr><tr><td></td><td>Preparation for Institutional Control</td><td>2025</td></tr><tr><td>Post-closure</td><td>Institutional Control (Active)</td><td>2025 to 2125</td></tr><tr><td></td><td>Institutional Control (Passive)</td><td>2125 to 2325</td></tr><tr><td></td><td>Post-Institutional Control (Passive)</td><td>Be-yond 2325</td></tr></table> CNL agrees that there will be noise created during certain portions of the decommissioning activities. The impact potential effect to Species at Risk and wildlife has been considered as part of the EA (EIS Section 6.1.2). A qualitative discussion of potential effects from noise (i.e., sensory disturbance) on wildlife was provided in Section 6.6 Terrestrial Environment. Decommissioning activity will be primarily limited to daytime hours and noise will be short-term and sporadic. Much of the building proposed for demolition is constructed of metal, which results in much less noise than concrete	undertaking disruptive activities, such as concrete jack hammering, during sensitive periods for SAR and wildlife species of traditional importance (e.g. breeding bird windows, ungulate calving periods, etc.). This information may be included in CNL's Environmental Protection Program (900-509200-STD-006, Management of Land, Habitat and Wildlife). The MMF requests that CNL provide this document to the MMF for further review. b) Once a process for communication and notification of decommissioning activities is agreed upon with the MMF, please revise the updated EIS to reflect this. The MMF expects to receive communication			

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			hammering. Decommissioning of the WR-1 Building will be completed in a controlled manner, and no blasting will be required. The loudest decommissioning activity will be jack hammering of concrete. This activity will partially occur in the interior of the building envelope, which will serve to reduce the level of noise outside the building, and in the surrounding Regional Study Area where there may be wildlife present. An environmental review is conducted prior to project activities (as per CNL's Management Control Procedure 900-509200-MCP-001, Environmental Review of Non-Routine Work) and will include an assessment to potential impacts to wildlife and effective controls will be put in place to eliminate or minimize impacts. The amount of noise that occurs outside the controlled site area is expected to be minimal. CNL's Environmental Protection Program also has a documented process (900-509200-STD-006, Management of Land, Habitat and Wildlife) to ensure it meets its legal obligations with respect to Wildlife including SAR. Land owned by AECL and operated by CNL is managed in an environmentally responsible manner.	and notification (minimum of 21 days) of the construction schedule with follow-up communication on a weekly basis regarding scheduling changes.			

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			CNL will support communication of decommissioning activities and environmental monitoring results to confirm the safety of the WL site and help address concerns about future uses CNL and MMF have initiated discussions on notifications to the MMF about specific activities of interest identified by the MMF.				
85.	MMF (Dec 19, 2017)	As indicated in Section 3.1.2 of the draft EIS, the rationale for ISD relies on maintenance and monitoring of the installation for 300 years and states that "control" will last "indefinitely". MMF indicates that it is not clear how CNL is prepared to make this commitment for the post-closure phase after 2124 or, in particular, after 2324. MMF notes that environmental regulations change with each government, and it is possible that future governments may choose not to allocate funding to maintaining and monitoring the WL site. MMF argues that there is no way to guarantee future commitment of resources. [Please refer to page 34 of MMF's submission for more information].	The Canadian Nuclear Safety Commission's (CNSC) mandate requires that extensive measures be implemented to protect health, safety, security and the environment. To fulfill this mandate, the CNSC requires licensees to make sufficient provisions – even before operations begin – for the eventual decommissioning and termination of licensed activities. Financial guarantees are an essential tool that helps enforce this mandate. The Nuclear Safety and Control Act (NSCA) stipulates that every licence application must include a description of a proposed financial guarantee. This means that licensees of all nuclear facilities, including those for used nuclear fuel and radioactive waste management, as well as nuclear power plants, and uranium mines and mills, must provide a guarantee that sufficient financial resources are available to fund all	**Addressed**			

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			approved decommissioning activities should the licensee not be available to fulfill its obligations. These include: • dismantling, decontamination and closure of the facility • any post-decommissioning monitoring or institutional control measures that may be required • subsequent long-term management or disposal of all wastes, including used fuel • CNL has supplied a letter of financial guarantee to the CNSC as part of the licensing submission.				
		Project Description – Project Components					
97.	MMF (Dec 19, 2017)	During reclamation, CNL has stated that the project site and final vegetation cover will be graded to promote drainage from the site to the Winnipeg River and an engineered cover will be installed over the former footprint of the WR-1 Building to minimize water infiltration and migration of contaminants to underlying aquifers. The engineered cover will not provide a barrier for release of contamination explicitly, but rather will be installed to limit additional water infiltration into the system and protect the barriers that are in place by resisting intrusion into the sub-surface structure. Therefore, MMF	CNL appreciates the feedback on the design of the final system and encourages MMF to continue to be involved in providing further input as the project progresses. Containment is achieved through the combined natural and engineered barriers to assure safety following the decommissioning of the WR-1. Systematically, these natural and engineered barriers consist of the grout, building foundation, bioshield (a six to seven foot thick concrete casing around the reactor core), concrete, natural barriers, and the engineered	**Partially addressed** The engineered cover serves only to provide a barrier to wildlife and limit water infiltration. The impermeable barrier which this structure protects should be installed around the entire below-grade facility. At minimum it should be extended vertically to protect the sides of the facility from groundwater infiltration.	Implementation of an impermeable barrier on the vertical surfaces of the reactor foundation is costly and introduces unnecessary risk to workers, returning little benefit for containment of waste. The safety case has demonstrated that the existing and proposed engineered barriers will provide effective containment of the waste. Of note related to this, the groundwater naturally flows down through the overburden soil to the bedrock and then westward along the bedrock/soil interface. CNL would be happy to provide a presentation to Shared Value Solutions and MMF to demonstrate the safety case for the WR-1 in situ	**Partially addressed** Prevention or reduction of groundwater infiltration into the decommissioned and entombed below-grade facility is a key measure to address future long-term offsite contamination issues. An upgradient impermeable vertical installation, for example a grout curtain or cut-off trench, installed to bedrock should be evaluated as a mitigation measure for horizontal groundwater infiltration, and could be implemented without having to install it directly on the upgradient vertical surfaces of the reactor foundation.	**CNL requests that MMF accepts this comment as fully addressed with the additional information provided below and pending the workshop with MMF's technical staff to discuss ground water infiltration and monitoring well placement.** CNL and MMF have agreed to participate in a technical workshop to discuss MMF's suggestion of installing an upgradient impermeable vertical installation (grout curtain or cut-off trench). Our technical staff have reviewed MMF's suggestion of including a grout curtain and have provided a response knowing that further dialogue would occur during the

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		recommends that for the same reason, this impermeable barrier should be installed around the entire grouted below-grade facility. [Please refer to page 26 of MMF's submission for more information].	cover. The majority of remaining radioactivity (>99%) resides in the molecular structure of the pipes and tank that make up the reactor core components. Very slow corrosion of these materials also is a barrier to migration of contaminants. The proposed Whiteshell Reactor Disposal Facility (WRDF) design creates a robust and reliable system to allow the remaining activated metals to decay to safe levels, protecting the environment and local residents.		disposal and to discuss any further concerns regarding the waste facility design.		workshop mentioned above and that this information could help inform MMF's technical staff prior to that workshop: The addition of an upgradient impermeable vertical grout curtain or cut off trench is unlikely to have a measurable advantageous effect with regard to the performance of the Whiteshell Reactor Disposal Facility (WRDF). • The horizontal groundwater hydraulic gradients on the Whiteshell main campus are relatively neutral as presented in Section 2.4.2 Hydraulic Conductivity of the Groundwater Flow and Solute Transport Model Report (CNL 2020a). Hence a vertical grout curtain or cut off trench would be of very little value in reducing the already low horizontal groundwater flow. • In addition the life expectancy of the grout curtain would be similar if not shorter than the existing high strength low permeability structural concrete that was used in WR-1. Once this grout curtain degrades it would also represent a preferential hydraulic pathway for groundwater flow. Hence the installation of such a feature is not considered to be advantageous or recommended. • The potential impact of a grout curtain should be put in context of what we are exposed to everyday living in Manitoba. In Winnipeg, Manitoba, the

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							average effective yearly dose rate from natural radiation (background) in Winnipeg is **4.1 mSv/a** (CNSC Fact sheet – Natural background radiation). The estimated peak Total Dose rate to humans for the WRDF is **0.0005 mSv/a** (EIS Table 6.7.1-15: Summary of Total Dose during the Post-closure Phase Human Health Valued Components). Hence if the upgradient grout curtain was 100% effective in reducing horizontal ground water flow and release from the WRDF entirely, which it will not be, the maximum theortical reduction in dose rate to man would be less than 0.012% of the normal background radiation we experience everyday living in Manitoba. References: CNL. 2020a. WR-1 Groundwater Flow and Solute Transport Modelling. WLDP-26000-REPT-005. Rev 2. https://nuclearsafety.gc.ca/eng/resources/fact-sheets/natural-background-radiation.cfm https://nuclearsafety.gc.ca/eng/pdfs/Fact_Sheets/Fact-Sheet-Background-Radiation-eng.pdf
98.	MMF (Dec 19, 2017)	The draft EIS (pages 3-34 and 6-266) indicates the following statement on several occasions: “The surrounding grounds that were disturbed during demolition and decommissioning activities will be graded and restored with a grass seed mixture, but	CNL thanks MMF for their suggestion and agrees that native seed mixes should be used. The EIS was updated accordingly to reflect this. A seed mix has been identified and is proposed for the WR-1	**Partially Addressed** The MMF appreciates the opportunity to further review information on the proposed seed mix for the WR-1 project, and further suggests that CNL prepare	The final disturbed area of the proposed WR-1 project will be approximately 100 m by 100 m. To remediate, the area will be graded and covered with topsoil. To integrate with the surrounding	**Not Addressed.** It is unclear from CNL’s response whether they will be providing MMF with a *detailed* site revegetation *plan*. CNL’s most recent response does not outline	**CNL requests that MMF accepts this comment as fully addressed with the additional information and commitment on next steps as provided below.**

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		information on the approach and/or seed mix has not been provided." MMF recommends that native seed mixes be used for reclamation in the project area. MMF indicates that the incorporation of native floral and grass seed mixes in re-vegetation efforts would further enhance habitat/forage for wildlife, particularly for pollinators. [Please refer to page 26 of MMF's submission for more information].	project. CNL extends the offer to MMF to review the seed mix specification and provide feedback regarding its application.	a detailed site revegetation plan. Once ready, please provide detailed decommissioning vegetation restoration plan to the MMF for review. Additional capacity funding may also be required to facilitate this. The MMF expects that this plan will include a species list of native plants, proportions used in seed mixture, site preparation and methodology of reseeding, and a monitoring plan. CNL should also be mindful of potential introduction and/or spread of invasive species during site restoration and include appropriate consideration for this in the plan.	area, the recommended seed blend is the Pickseed Prairie Reclamation Blend comprised of 25% slender wheatgrass, 20% tall fescue, 20% Birdsfoot trefoil, 15% creeping red fescue and 20% perennial ryegrass. Monitoring to ensure adequate germination and cover will occur and over-seeding will be done as needed in the following season. CNL invites the MMF to assess this seed blend and verify acceptability to MMF. If capacity funding is needed to support the review and feedback, please advise CNL.	all of the information that was requested previously. For example, there is no information on seeding methodology including approach (e.g. drill seeding, broadcast seeding, hydroseeding, etc.), timing (e.g. spring, summer, immediately upon completion of the concrete cap and engineered cover regardless of season), equipment used (e.g. tractor, hand-held seeder) or rates (e.g. how many kg of seed will be planted per hectare?). There is also no information on CNL's plan for preventing the introduction and spread of invasive species (e.g. mechanical control, chemical control, preferred species-specific treatment options). The information that has been provided does not include sufficient detail for MMF to complete a fulsome evaluation of CNL's chosen approach. For example, there is no information on how often monitoring (to ensure adequate germination, or for invasive species establishment) will occur. MMF understands that the area will be graded and covered with topsoil, but will there be any soil decompaction or seedbed preparation effort? The MMF appreciates information on the CNL's recommended seed blend but is concerned that it includes Bird's-foot trefoil (*Lotus corniculatus*),	CNL commits to closely engaging with MMF on the revegetation of the Whiteshell Laboratories site and to discussing areas for collaboration on the revegetation and providing capacity funding to MMF to ensure they can meaningfully engage on this topic. CNL will also provide MMF with the *detailed* site revegetation *plan* once it has been drafted. As MMF suggested, CNL will only use native seeds in our revegetation efforts.

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						which is a non-native species that has the potential to become problematic under certain conditions. The MMF requests that CNL only use native seed in their revegetation efforts. The MMF requests that CNL provide a detailed revegetation and monitoring plan when available (i.e. as a Management Plan Appendix that is attached to the EIS, or a Standing Operating Procedure developed by the contractor who will complete the work). Capacity funding will be needed to support this additional review.	
		Aboriginal and Public Engagement					
		Aboriginal Engagement					
114.	MMF (Dec 19, 2017)	Drawing on land use and occupancy data held by the MMF, and based on the MMC's constitutionally protected rights and the requirements of CEAA 2012, the following potential issues and concerns were raised, in relation to the rights and interests of MMC, from MMF's review of the draft EIS: • Potential negative impacts to the current use of lands and resources for traditional purposes, including impacts to the exercise of Métis rights by MMC citizens, must be avoided, mitigated, or accommodated. • Potential negative impacts to the health of MMC citizens—including, but not limited to those conditions reliant on the current use of lands and resources for traditional purposes—must be avoided, mitigated, or accommodated. • Potential negative impacts to	With any project, the potential to impact on traditional rights based uses such as hunting, trapping, fishing and gathering can occur in two ways. First, direct effects on traditional uses can occur via activities associated with the undertaking. These might include an actual loss of land area for a given project or disturbance effects on traditional use because of noise, traffic and other disturbance effects associated with the undertaking. Second, effects may occur indirectly whereby effects might negatively impact on biological resources (i.e. wildlife, fish) resulting in diminished harvests.	**Not Addressed** The WR-1 reactor was initially intended to be fully decommissioned and removed to an approved long-term disposal facility. The proposed change by CNL means that there will be low-level risk from contamination at the site for generations to come. This includes waste within the entombed WR-1 reactor, in the sewage lagoon and at the Waste Management Area/Landfill. This will have consequences on current and future land use. For example, it is likely that many citizens of the MMC will forgo using this site	For clarification, there is no change to the intended plan presented in the 2002 Comprehensive Study Report (CSR) with respect to the sewage lagoon and Waste Management Area. The proposed change from the CSR strictly relates to the in situ disposal of the WR-1 reactor. While CNL's position is that the proposed in situ disposal of the facility, including dismantling and removal of all above grade structures, will reduce environmental risk, CNL acknowledges that MMF citizens have their own perception of risk associated with the reactor, both in the current baseline conditions and the proposed disposal facility. The proposed design safeguards the environment and the public and	**Partially Addressed** MMF acknowledges that the proposed change relates to the in- situ decommissioning of the reactor, and maintains the position that this will result in a low-level risk from contamination at the site for generations to come. Even if there is improved confidence in this modelling and there is a low-level contamination, the risk will still be present and have the potential to adversely impact the MMC and their ability to exercise their rights. The MMF also maintains the position that perceived risks lead to real behavioural changes (e.g. MMC avoiding hunting, travelling, camping in a portion of their traditional lands as a result	**CNL requests that MMF accepts this comment as fully addressed with the additional information and commitment on next steps as provided below.** CNL recommends closing this comment pending the results of the rights impact assessment. CNL has provided an explanation as to why they disagree with MMF's position, but is willing to discuss this further after review of the results of the rights impact assessment. This is a remediation project that will improve the current baseline conditions and open up land for public and Indigenous use. Our assessments conclude there will be no environmental or biophysical impacts from the in-situ disposal of the WR-1 reactor, i.e., the in-situ disposal facility will not negatively

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		collective MMC informal, and formal, socio-cultural and economic systems associated with the trade and sharing of resources or products from traditional land-use must be avoided, mitigated, or accommodated. • Potential negative impacts to MMC individuals commercial and subsistence harvesting rights and activities associated with traditional land-use must be avoided, mitigated, accommodated or compensated. • MMC citizens must be able to equitably participate in the economic benefits and opportunities associated with the construction, operations, and maintenance of the Project. • Through ongoing consultation and specific roles and/or employment, the MMF must be able to participate in the environmental monitoring and management of the Project in all stages.	CNL has shown that there is no offsite impact related to loss or change of land that impacts traditional activities as a result of the WR-1 Decommissioning Project. Secondly, offsite impacts related to other disturbances (dust, noise, traffic) are restricted to the closure phase of the project and are restricted to onsite. For more details, please refer to the responses to comment #83 for noise impacts and #153 for nuisance dust impacts. All of the project's activities will occur within the fenced Whiteshell property, on which no traditional activities currently occur. There are no effects predicted on air, water or biological resources. Therefore, CNL believes that there is no impact on traditional or modern day Métis land and resource uses or practices. Because there are no impacts or activities that occur off-site that might impact Métis uses, CNL believes that Métis rights with respect to land and resource use off-site are also unimpacted. As always CNL is open to discussing these effects and any other concerns associated with the Whiteshell Laboratories and surrounding area. With respect to the health of Manitoba Métis citizens	based on the knowledge of contaminants that exist. Moreover, the perceived risk may have negative health effects on MMC citizens who live, hunt, travel, camp, or otherwise use the area, including the Winnipeg River. Lastly, it is possible that the modelling completed has underestimated the risk or the containment structures may fail, resulting in direct impacts on environmental receptors upon which the MMC rely (e.g. fish, wildlife, Winnipeg River). Each of these situations represent impacts to Métis rights and/or the exercise of those rights that must be avoided or accommodated. To address the issues noted herein and move forward discussions about the Project, the CNL must continue to engage with the MMF to identify and evaluate current land use and potential future land use impacts associated with the Project on the Métis rights and interests of the MMC, including the exercise of those rights. Moreover, CNL must engage with the MMF for development of a **long-term relationship agreement** which would govern ongoing	mitigates impacts to receptors of importance to the MMF. Further, CNL acknowledges that there is a low probability for contamination and all modelling results have an associated uncertainty; however confidence is improved through: 1. Multiple methods of estimation 2. Conservative assumptions 3. Adherence to accepted best practices 4. Examination of effects of uncertainty through model sensitivity analysis CNL is committed to ongoing engagement with the MMF and specifically is planning to engage with the MMF during the fall of 2020 on Whiteshell's Land Use and End State plan. CNL has provided (2020 June 11) a draft Long Term Relationship Agreement (LTRA) to the MMF for consideration to promote a productive, long-term relationship; facilitate engagement and collaboration; and identify how MMF information and knowledge will be shared, used and protected. Until such time that impacts have been identified and confirmed, this LTRA would not include an impact/benefit agreement. CNL is committed to consider all reasonable funding requests from the MMF to address project-specific activities and engagements.	of CNL's initiative to operate and then decommission a nuclear reactor). This represents an identified and confirmed impact to Métis rights, which warrants consideration of an impact benefit agreement. The MMF acknowledges receipt of the draft Long Term Relationship Agreement and appreciates CNL's willingness to discuss the governance of ongoing consultation, engagement, and accommodation through this avenue.	impact the land, the water, the flora, or the fauna. Once decommissioning is complete, Métis citizens may have access to land they haven't had easy access to for the past 60 years. By continuing to engage and involve MMF in environmental monitoring on site and continuing to discuss support for MMF's own environmental monitoring initiatives, we hope this will reduce fear and stigma Métis citizens may have from CNL's Whiteshell Laboratories site and the in-situ disposal of WR-1. CNL would like to point out the average effective yearly dose rate from natural radiation (background) in Winnipeg is **4.1 mSv/a** (CNSC Fact sheet – Natural background radiation). The estimated peak (i.e., worst case) Total Dose rate to humans for the proposed WR-1 Disposal Facility is **0.0005 mSv/a** (EIS Table 6.7.1-15: Summary of Total Dose during the Post-closure Phase Human Health Valued Components). Hence the change in average dose rate to humans in our normal evolution scenario would be from 4.1000 to 4.1005 mSv/a or 0.012%. This small incremental amount is insignificant to human health.

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			(MMC), CNL has compared the results of the MMF harvester survey to CNL's estimates in its harvester model. The Manitoba Metis Federation (MMF) intake rates are significantly lower than the model shown in the EIS. Therefore, CNL's harvester model is conservative and there would be no concerns with respect to current consumption levels of MMF harvesters. With respect to economic benefits and opportunities associated with the construction, operations, and maintenance of the Project, CNL would be pleased to speak to the MMF more on this topic. CNL has hosted an Indigenous industry day and added provisions to its procurement process that encourages the use of Indigenous and local small and medium sized businesses and are continuing to explore ways to work together. CNL human resource staff have engaged with Métis Employment and Training and share all open job positions. CNL is interested in pursuing mutual opportunities with the MMF at the Whiteshell property, including further funded observation of the environmental protection program by a Manitoba Métis citizen, as was done in 2019.	consultation, engagement, and accommodation.			

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115.	MMF (Dec 19, 2017)	MMF recommends that CNL provide opportunities to the MMC to build capacity and knowledge in decommissioning activities and reclamation of project components. Opportunities to build MMC capacity and knowledge in efforts that are of importance to the Manitoba Métis, such as participation in seeding, planting and monitoring in follow-up programs should be explored with the MMF. [Please refer to page 28 of MMF's submission for more information].	CNL is proud to have 45 staff (~13%) at the Whiteshell Labs project self-identify as Indigenous including 13 staff that self-identified as Métis by producing their Métis card. These employees are working on a world class nuclear decommissioning project, building experience and knowledge that is easily transposed to other jobs in Manitoba, Canada or around the world. CNL continues to work with MMF to identify and build opportunities, including environmental monitoring and contracting.	**Addressed**			
127.	MMF (Dec 19, 2017)	MMF indicates that the wildlife VCs selected in the draft EIS focus on SAR, as per regulatory requirements, with no inclusion of wildlife species and habitats of traditional and cultural importance to the MMC. MMF indicates they have expressed interest in Indigenous values and rights, as identified in the "Summary of Key Interests and Concerns for the Manitoba Metis Federation" (Table 4.3.2-8 of the draft EIS) with regards to VCs for the project. CNL has determined in Section 6.8.5.2.1 (page 6-381) of the draft EIS that the "Project is not expected to have a substantial effect on an individual's land and resource use experience or on harvested species with because of mitigation and management practices put in place for the Project", however without conducting a full effects assessment	A traditional knowledge and land use (TKLU) study titled, "Whiteshell Reactor #1 Decommissioning: Manitoba Métis Traditional Knowledge, Land Use and Occupancy Study" was completed and provided to CNL in January 2019. CNL supported carrying out the study to assist in better understanding modern and traditional land and resource use by MMC near the WL site. CNL and the MMF have also worked out a contribution agreement, including an MMC consumption survey. The consumption survey results identified MMC species of traditional and cultural importance. This has been utilized in both evaluating the VCs for the project and to	**Addressed**			

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		with applicable mitigation measures for traditionally valued species of the MMC specifically, MMF does not believe that CNL can make this determination with respect to effects on the MMC. MMF recommends that CNL complete a thorough effects assessment on species of traditional importance to the MMC identified in a project-specific Traditional Knowledge and Land Use and Occupancy Study (TKLUOS). MMF indicates that CNL should also include monitoring and follow-up programs for potential effects to culturally important terrestrial species, including objectives and any monitoring measures (i.e., thresholds) that will be implemented to verify the predictions of effects and evaluate the effectiveness of proposed mitigation measures. [Please refer to page 25 of MMF's submission for more information].	validate the Harvester model for the modelling.				
		Environmental Effects					
		Environmental Effects – EA Approach					
136.	MMF (Dec 19, 2017)	This section of the draft EIS states: "Project-specific effects can be quantified (e.g., incremental changes to ground and surface water quality, air quality, and fish and wildlife habitat). Because the socio-economic status of different communities, subpopulations and individuals may vary, a socio-economic effect may have positive aspects and negative aspects. An effect on a biophysical discipline is typically constrained to being negative or positive."	Section 6.5.4.2.2 of the EIS has been revised to include site-specific data (gill net summaries) from within the vicinity of the WL site. This data correlates with the previously included information on the fish community in the area so no further revision of the report is required. The intent of this statement was to explain that there are differences between the	**Addressed** However, it should be noted that there is a difference between modelling exposure in non-human species and predicting low dose rates and concluding that receiving populations are "protected". There are no reference sites with which to compare the "health" of the receiving population. Also, there are no surveys			

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		MMF explains that this introductory text is meant to provide support to later conclusions in the drat EIS, but MMF indicates that this statement overstates the levels of confidence in the analysis. For example, project-specific effects to fish and wildlife habitat are identified; however, MMF notes that the subsequent analysis does not quantify effects to fish and wildlife habitat. In fact, MMF states there are no formal surveys of fish and wildlife habitat for the WL site described in the draft EIS, and no methods for estimating effects to habitat, either in 2024 or in the future. This presents problems for later conclusions in the draft EIS, such as, for example, related to the protection of fish and fish habitat (Table 6.1.2.1); while identified as an issue to be assessed and considered in the draft EIS, the subsequent analysis does not specifically address changes to fish habitat in the Winnipeg River. MMF notes that it estimates the radiation dose to fish in the river (and the concentration of non-radioactive chemicals) and concludes that doses will not cause effects in adult fish. Later in the draft EIS (page 6-215) it is stated that "fish habitat is generally similar throughout the RSA [Regional Study Area]" However, MMF indicates it provides no evidence for this conclusion. MMF notes a consideration of the evidence from the scouring (near the plant site) and depositional zones (further downstream) in several places in the river could be considered as it relates to supporting or refuting this	assessments completed for the biophysical environment and the socio-economic environment. The use of wildlife and fish habitat was merely an example of measurement indicators that can be quantified. Recent fish habitat surveys have not been completed and are not required as there are no Project activities that will interact with fish habitat directly. Monitoring of surface and groundwater is planned. Also of note as part of CNL's current licence (NRTEDL-W5-8.04/2018) with the CNSC, CNL will continue to implement the current Environmental Assessment Follow-up Program for the WL site to verify the accuracy of environmental effects and determine the effectiveness of mitigation measures that have or are to be implemented. The current program includes river sediment sampling at two upstream and ten downstream locations, and water quality monitoring and collecting fish tissues at one location upstream and two locations downstream for fish tissue, and three locations downstream, for water quality of the WL site. Follow-up monitoring during the post-closure phase to confirm radionuclide concentrations in surface water quality will also verify the	of the abundance, distribution, body condition or general "health" of the Whiteshell receptor populations (e.g., white-tailed deer). The EIS only estimates an absorbed dose rate and that is the only parameter used to estimate effects in VECs.			

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		conclusion. MMF recommends that the draft EIS be reviewed, particularly the text in the "Assessment" section (Section 6) for conclusions that overstate its accuracy or imply that the analysis will be rigorous and predict impacts with any accuracy or precision. For example, no surveys of fish or wildlife distribution have been conducted for the draft EIS so MMF argues the text should not imply or include conclusions based on surveys that have not been undertaken. MMF notes that logbooks by staff are not accurate indicators of wildlife presence, abundance, or distribution at the site; etc. [Recommendation 4.3.10a]. MMF recommends, to the extent that the conclusions identified in Section 6 require surveys or assessment activities that have not be undertaken regarding the project site and/or effects, these formal surveys, assessments etc. should be undertaken by experienced personnel. MMF further recommends that risk assessment models for the WL site should use site-specific surveys of species distribution for both the aquatic and terrestrial environments to provide some conceptual support for the models. The Ecological Risk Assessment (EcoRA) uses data from other studies and anecdotal reports to estimate exposure and does to VCs. These surveys or assessment activities should, as much as possible, be at locations specific to the project site	accuracy of environmental effects for the aquatic environment. If exceedances of benchmarks/guidelines are measured for contaminants in Winnipeg River surface water or groundwater, additional monitoring would be initiated and could include expanded sampling of sediments and fish. Nest surveys were completed, and no barn swallow nesting activity was found on the outside of the WR 1 Building (Section 6.6.5.2.2). In addition, a detailed pre-disturbance survey for nesting barn swallows will be conducted in the summer preceding the initiation of decommissioning activities in the WR-1 Building. The statement "fish habitat is generally similar in the RSA" is intended to be just that, a general statement. Further detail on fish habitat is provided in Section 6.5.4.2.5. Completion of additional baseline studies for fish will not increase the confidence in the predictions, as the EIS assumes that there is a project interaction present. Therefore, mitigation is implemented to reduce or eliminate the potential for effects. As discussed in Section 6.5.5 and 6.6.5, pathways are identified that have the potential to affect fish and wildlife. The mitigation and environmental				

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		and not drawn from other locations that may or may not provide comparable data (for example, fish community data on page 6-216 is drawn from other locations in the Winnipeg River and it is unclear if the fish population at the project site are similar or comparable to the location of this data source) [Recommendation 4.3.10b].	design features implemented for the project are standard, proven practices (most of which are already implemented at the site) and therefore, confidence in these to limit effects to fish and wildlife is high. For wildlife, the assessment assumes that species at risk are present. As such, a detailed pre-disturbance survey for nesting barn swallow will be conducted in the summer preceding the initiation of decommissioning activities in the WR-1 Building. If they are found nesting on the WR-1 Building, appropriate mitigation measures would then be put into place in consultation with Environment and Climate Change Canada (ECCC) and in accordance with habitat protection provisions and permitting requirements under SARA. In addition, a survey for roosting bats will be conducted in the summer preceding the initiation of decommissioning activities. Pre-disturbance searches for hibernating little brown myotis will be conducted during the winter prior to the initiation of decommissioning to confirm the absence of hibernating individuals inside the below-grade floors of the WR-1 Building. As per the Canadian Environmental Assessment				

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			Agency's guidance document "Determining Whether a Designated Project is Likely to Cause Significant Adverse Environmental Effects Under CEAA, 2012" (2015), environmental effects are identified by comparing the current state (health, status or condition) of a valued component to the predicted future state of the valued component with the project in place. The assessment has been completed in accordance with this guidance document. The ERA was completed following N288.6 which requires assessment of exposure in the areas where receptors will be exposed. The future dose rates are estimated using an environmental pathways model in combination with a groundwater flow and solute transport model. These models were developed and calibrated based on historical and current site conditions, and in consideration of geological, hydrogeological, hydrological, meteorological, and source characterization data that has been collected since the establishment of WL. Exposure was assessed for the time of maximum loadings to the river for each COPC during the post-closure period. For total radiation dose, the peak doses for individual radionuclides				

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			were summed, without regard to breakthrough time. Considering the conservatism in the estimation of releases, and in the groundwater model and ERA, it's reasonable to conclude that doses arising from the Project will be protective of the environment.				
137.	MMF (Dec 19, 2017)	MMF indicates that Section 6 of the draft EIS is intended to leave the impression that the risk assessment methods used here are rigorous and that the conclusions on exposure and effects are fully justified. However, MMF expresses the concern that most of the text glosses over the fact that conclusions are made without justification, a rationale or supported by data specific to the WL site. For example, phrases in Section 6.1.5 such as "either because there was no linkage initially or because environmental design features or mitigation will remove the pathway, are not advanced for further assessment" or "pathways determined to have no linkage to a VC or those that are considered secondary are not expected to result in environmentally significant effects on the assessment endpoint of VCs" result in pathways being removed without sufficient justification. MMF expresses the position that statements and conclusions must be based on evidence if they are to be relied on to support conclusions that there will be no, or limited, impacts on factors of importance to the MMC, its rights, interests or health and well-being.	The intent of Section 6.1 is to provide a general overview of the assessment approach for the Environmental Impact Statement (EIS). Because the approach may vary between disciplines, detailed descriptions are provided in each discipline section. The majority of mitigation and environmental design features implemented for the project are standard, proven practices, most of which are already implemented at the site. (e.g., use of storm drains to manage site runoff, use of dust suppressants). As such, confidence in these environmental design features and mitigation practices to limit effects to the environment is high and are based on proven practice rather than just professional judgement. Rationale for classification of a pathway as either no linkage or secondary is provided within each discipline section. Text was added where required to clarify which mitigation measures are proven practice and already	**Addressed**			

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		MMF recommends that the draft EIS be reviewed and revised so that statements of professional judgement are based on and linked to evidence. [Please refer to page 35 of MMF's submission for more information].	implemented on site. For those mitigation measures where there is some uncertainty in the performance (i.e., grout performance), these pathways are considered as primary and have been carried forward for further evaluation (as in the hydrogeology section). Monitoring will be completed to verify the effectiveness of these mitigation measures as described in the monitoring and follow-up section.				
		Environmental Effects – Geological and Hydrogeological Environment					
		Environmental Effects – Surface Water Environment					
142.	MMF (Dec 19, 2017)	This section of the draft EIS states: "Although the installation of the engineered cover at the WR-1 Building is expected to slightly alter the drainage rates and flow patterns and discharge volume to the Winnipeg River; the changes are expected to be within the natural range of variation" MMF express the concern that the data used to justify this statement is limited to only a few years during which CNL has managed the site. MMF indicates that it is unclear whether these assumptions will withstand the passage of time, particularly over 300 years given climate change and possible land-use changes in the area. It is unlikely that the surrounding environment and the land use will remain the same. The flow of the Winnipeg River may change with drier or wetter climate, and changes in the dams on the river. MMF explains that	Conclusions on the effect of the engineered cover on the drainage and flow patterns of the river are supported given the footprint of the engineered cap is considered to be relatively small when taken into account the drainage area it resides within. Further, the natural variation flow patterns in the Winnipeg River is a cumulative effect of its drainage basin which outweigh the plausible flows from the engineered cover. The uncertainty in the river levels and flow rate were examined using a sensitivity analysis in the Groundwater Flow and Solute Transport models (Sensitivity Case #13 'Low River Stage'), where it was assumed the river levels were	**Partially addressed** CNL has addressed part of the complex system. The key watershed characteristics of the WL facility are: • Close to (< 500 m) Winnipeg River flowing with high discharge • Flow directions of both surface water and ground water are towards the Winnipeg River • The thickness of the surficial over burden soil is about 20 m with about 5 m thick basal sand	CNL thanks MMF for their recommendations to undertake a water-shed scale study of surface and ground water. Extensive reference information exists in the region, much of which was collected by Atomic Energy of Canada Limited (AECL)/CNL during the siting and operation of the WL site (since the late 1950s) and the Underground Research Facility. Both sites have very detailed ground water and surface water characterization. CNL has completed the necessary additional studies to support the WR-1 project environmental assessment. Further, potential variability in these water systems, including climate change and geomorphology, has been considered in the post closure modelling (Groundwater Flow and	**Partially addressed** The MMF requests a technical workshop with CNL and our consultants, Shared Value Solutions Ltd, in order to further explore and address this issue. The workshop should be documented, and any documentation shared with the MMF for comment/approval before it is included in the record of consultation. We fall back on basic EA principles when it comes to this issue: the project/technology for entombment of the reactor is novel and the impacts and effectiveness of mitigation and design measures are difficult to predict with certainty given the timescales of the project. A primary way that offsite impacts may occur is through surface	**CNL recommends closing this comment as fully addressed pending the completion on the technical workshop between MMF's technical staff and CNL.** CNL plans to continue to work with the MMF on long-term interests such as of environmental monitoring by sharing monitoring results, seeking input on our current environmental protection program and implementing improvement based on feedback received from MMF and discussing potential remediation as necessary. CNL has agreed to a technical workshop with MMF and their consultants, Shared Value Solutions Ltd, in order to further explore and address this issue of ground water monitoring. CNL has provided MMF with a draft agenda for this workshop and will send MMF draft

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		this uncertainty will also affect the project description and other aspects of the project over time as they are described, assessed and form conclusions in the draft EIS. MMF recommends that the draft EIS be revised to explicitly include acknowledgement that the uncertainty of the estimates increases over time. It is not possible to make conclusions on environmental and climatic conditions 300 years in the future with any certainty and the draft EIS should identify this limitation [Recommendation 4.3.4a]. [Please refer to page 32 of the MMF's submission for more information].	dropped by 1.5 m from the current low stage of the River to simulate a "dry river" scenario. The results of the sensitivity analysis showed that the model results are relatively insensitive to such a situation for the contaminants of concern, as they are controlled by their release from the waste form and not the groundwater flow conditions. As such, the conclusions of the assessment are not likely to change due to uncertainty in future river flow conditions. The uncertainty in the river flow path, and its potential migration towards the Whiteshell Reactor Disposal Facility through river bank erosion is examined using a sensitivity analysis in the Groundwater Flow and Solute Transport models (Sensitivity Case #1 'Preferential Pathway') where it was assumed the flowrate along the current transport path to the river is increased by 10 times, (effectively removing 90% of the distance). The results of the sensitivity analysis showed that the model results are relatively insensitive to such a situation for the contaminants of concern, as they are controlled by their release from the waste form and not the groundwater flow conditions. As such, the conclusions of the assessment are not likely to change due to	close to the bed rock • Ground water recharge occurs 3 km east of WL campus Further to that, currently, climate change adaptation/mitigation strategy is based on the recurring Assessment Reports. Considering the situations above and the time frame of 300 years, in order to understand the natural variation, a detailed surface-ground water modelling should be undertaken at a watershed scale incorporating climate change projection for the area. This would allow a much greater degree of certainty for predictions provided within the EIS.	Solute Transport Modelling Rev 2). At this time, CNL is not committing to perform additional work in this area.	water-groundwater interactions and, therefore, a primary means by which the Manitoba Métis Community's rights, traditional use, health and socioeconomic conditions may be impacted is through effects on the downstream watershed. We continue to insist on the importance of addressing our recommendation for a watershed-scale study as detailed in earlier comments.	documention (i.e., agenda, meeting notes, action items, etc.). Accordingly, CNL has conducted very detailed ground water and surface water characterization. Potential variability in these water systems, including climate change and geomorphology, has been considered in the post closure modelling (Groundwater Flow and Solute Transport Modelling Rev 2). In addition, CNL has selected sites along the Winnipeg River downstream watershed that would be most impacted by an the Whiteshell Reactor Disposal Facility (WRDF). These locations are discussed in Table 6.1.2-1 Valued Components Selected for the Effects Assessment. Farm A is the closest existing farm downstream on the east bank of the river and is the most conservative potential water user. Farm A includes year-round occupants, with livestock, located near the east bank of the Winnipeg River. All water for Farm A is drawn from the river. The groundwater flow from the the Whiteshell site encompassing the potential plume is assumed to be 100% released to the river and hence the surface water-groundwater interactions at this location represents the maximum impact location for the entire downstream watershed. Reference CNL. 2020. In Situ Decommissioning of WR-1 at the Whiteshell Laboratories Site – WR-1 Groundwater Flow and Solute

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			uncertainty in future river migration. As part of the closure of the WL site, a storm water management plan is in development using best management practices and taking into consideration the impact of the site's drainage following the demolition of the infrastructure (e.g., buildings, roads, catch basins, storm drainage system). Alternate drainage works (e.g., swales, ditches, culverts) along with aligning landscaping to the lines and grades to ensure proper drainage is achieved would be an output of this plan. Typically, the storm water will be directed to the Winnipeg River utilizing existing topography's drainage paths (creeks) to the greatest extent possible. The storm water management plan will evaluate: • the post-closure topography applying the appropriate runoff coefficients; • the impacts due to the reduction/elimination of existing drainage works; • the rainfall event impacts on peak flow rates to the new drainage works; and				Transport Modelling. WLDP-26000-REPT-005. Revision 2.

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			• the integration of remedial drainage works with the existing drains and creeks. As described in Section 10, decommissioning activities are encompassed by the existing Emergency Preparedness and Response plan, and the site design event (e.g., water conveyance structures and collection sumps) is 1 in 100 year 24-hour precipitation event. The assessment further considered the potential failure of the Seven Sister Dam in conjunction with a maximum precipitation event, referring to the Comprehensive Study Report previously completed for the site and decommissioning activities. The previous assessment work concluded that the WR-1 Building/WL Site would not be flooded. The detailed design of the engineering cover and site, including grade to promote positive drainage from the site during post-closure, has been prepared. The EIS and the current DSAR have been developed based on conservative and generic design parameters derived from previously completed detailed design work for similar projects.				
147.	MMF (Dec 19, 2017)	This section of the draft EIS states: "CNL's current environmental monitoring program includes	The recommendation provided by MMF is appreciated and will be considered during the	**Partially Addressed** The MMF appreciates that the information provided	CNL has prepared a draft Environmental Assessment Follow-up Program and is happy to provide	**Addressed-** pending review of the draft FUP by the MMF.	

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		collecting water samples at one location upstream and three locations at varying distances downstream of the WL site. Surficial sediment is also collected at two locations upstream, at the outfall, and nine locations downstream. In addition, CNL has committed to collecting cores in depositional areas in 2026, 2046, and 2066 at Sylvia Lake and upstream and downstream of the waterbody Lac du Bonnet." MMF indicates that it is unclear if the collection of samples as described is adequate to detect changes in water chemistry if the WR-1 releases radionuclide and non-rad components more quickly than predicted. MMF notes that past monitoring programs may be considered to justify or refute the conclusion that the collecting sampling plan and timelines are sufficient to guard against the risks involved. Collecting cores every 20 years is unlikely to detect changes in water chemistry or deposition of contaminants and won't allow for quick adaptive actions to correct releases. MMF recommends that CNL consider data from past monitoring programs to justify a sampling schedule that will allow detection of any releases. Where indicated by these past monitoring programs, a sampling plan collecting cores more frequently than every 20 years should be implemented.	development of the final monitoring program design. In addition to the sediment and surface water samples, semi-annual groundwater quality measurements will be included in the environmental monitoring plan executed as part of the Environmental Assessment Follow-Up Program (EAFP) for the site. This program will include wells in the vicinity of, and down gradient to, WR1. CNL-WL will determine the initial monitoring locations and frequency of sampling based on the WR1 Environmental Risk Assessment and Detailed Safety Analysis Report to ensure early detection of any contaminants of potential concern. Testing of the groundwater will determine if any radiological or non-radiological contaminants are released from the monitored facility (WR1), and confirm if the concentrations of released contaminants are within the range predicted in the EA (which are concentrations well below established benchmarks for the protection of humans and the environment). A description of the routine annual sediment sampling and enhanced sampling was included in Section 11 of the EIS. A Progress Report on the Environmental Assessment	has been incorporated into the EIS and will inform the monitoring program. The MMF requests that final Environmental Assessment Follow-Up Plan (EAFP) be shared with the MMF for review and input. If CNL commits to sharing this document and accepting input from the MMF (with reasonable funding to support the review), this issue can be considered *addressed*.	it to the MMF for review and input on how we can reflect Métis knowledge into the Plan. The document is attached. CNL invites MMF to provide a cost estimate and schedule to conduct their review. CNL commits to providing reasonable funding to support the review.		

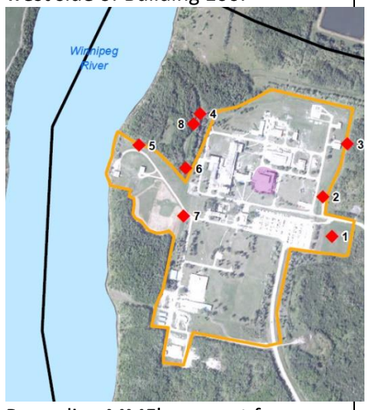
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		[Please refer to page 36 of MMF's submission for more information].	Follow-up Program is prepared each year and submitted to all stakeholders. It includes a summary of activities carried out and an assessment of the significance of the results and whether or not the EAFP objectives have been achieved. Enhancements or modifications to the program are implemented based on the results and feedback from the stake holders. The current monitoring program has been accepted by CNSC staff. Stopping a monitoring activity would occur once it can be shown that an effect has stabilized or has been reduced to a level where it is no longer considered significant by regulatory requirements or community concerns. Any proposals on modifications to the monitoring program will be communicated to the CNSC Work Package #6 Establish and Maintain Project Communications Mechanisms with Indigenous Communities and the Public. Work package #5 focusses on river sediment monitoring. The protocols for this work package will be approved by the regulator to ensure that area of testing is sufficient to determine the impact of the sediment on the river. The above information was incorporated into the EIS.				

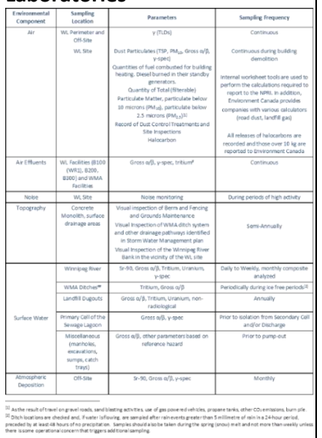
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		Environmental Effects - Aquatic Environment					
148.	MMF (Dec 19, 2017)	This section of the draft EIS states: "From 1976 to 1982, downstream fish flesh concentrations of Cs-137 were greater than upstream concentrations for all fish species. However, the estimated dose from fish consumption (<0.005 mSv/a) remained far below (0.01%) the occupational dose limit, so the fish remained safe to eat (AECL 1983). Concentrations in water decreased subsequent to improvements to effluent treatment at the ALWTC in 1982, similar to levels observed between 1962 and 1972 (AECL 1983)." MMF notes that this is a significant observation which connects releases of Cs-137 from the plant to fish consumed by fishers. MMF indicates that the data presented in Table 6.5.4-1 was collected from 2010 to 2015 but does not include the data prior to 2010 even though AECL has been monitoring fish since 1976. MMF notes that presumably this data is available and would provide additional details regarding the concentrations of contaminants in fish over longer periods of time. MMF explains that such information would be relevant to the consideration of the long-term effects of contamination on fish populations, over the 300 years of the project decommissioning, and the potential adverse effects on members of the MMC who harvest and consume fish as part of a traditional	It is not common Environmental Risk Assessment (ERA) practice to specifically assess uptake to fish through a food web. Instead a bioaccumulation factor is used to estimate uptake from all exposure pathways (i.e., ingestion of sediment and food items, uptake from water). This latter approach is specified in CSA Standard N288.6-12 and was followed in the ERA. The assessment included contaminants that were predicted to reach the Winnipeg River from the WR-1. The radionuclides that were measured in sediment were not predicted to reach the river in the groundwater model. However, for radionuclides predicted to reach the river from WR-1, partitioning to sediment as exposure via sediment were considered in the ERA. The assessment updated to include existing radionuclide concentrations in sediment. CNL has provided details of the historic concentrations of Cs-137 in fish. This data, from 1970 to 2017, has been included in the Environmental Impact Statement (EIS). More detailed information regarding fish monitoring as part of WL Environmental Protection Program can be	**Addressed**			

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		diet. The total incremental dose due to fish ingestion was identified as 1.14 x 10-4 mSv/a for adults. MMF expresses the view that additional information for this assessment is required, including, sample sizes, species consumed, amount of fish consumed, and the other nuclides assessed. This information is vital for estimating exposure in MMC citizens, and others harvesting fish as radionuclides are released from WR-1. MMF recommends that CNL provide and include a summary of the details of the historic concentrations in fish and the amount of fish consumed in the risk assessment models in the draft EIS. Monitoring of fish species has been conducted since the early 1970s but only the later data have been used for the assessment. The exposure models should use site specific data on species caught and amounts consumed, not generic values from the Canadian Standards Association (CSA) standard. [Please refer to pages 35-36 of MMF's submission for more information].	found in its series of annual reports that are publicly available and can be sent to MMF if requested.				
150.	MMF (Dec 19, 2017)	This section of the draft EIS indicates that benchmark dose to non-human species from the United Nations Scientific Committee on the Effects of Atomic Radiation (UNSCEAR) and CSA are used; however, MMF explains there have been more quantitative assessments completed. MMF states: "Environment Canada	The Technical Subcommittee (TSC) for N288.6 has reviewed the various approaches to derivation of radiation benchmarks for biota. Based on this review, the UNSCEAR (United Nations Scientific Committee on the Effects of Atomic Radiation; 2008) benchmarks were	**Addressed** (as the screening doses are significantly below the guideline).			

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		and the AECB used more conservative benchmark values for the Priority Substances List assessment for the protection of the environment around nuclear facilities (EC 2001). Specifically, the Radiation Benchmarks used in Section 6.3.2 are very selective in the literature that it uses to rationalize the UNSCEAR 1996 values, which are seriously outdated. EcoMetrix 2017, in Table 7-2 - Assessment endpoints, measurement endpoints, etc. includes a line of evidence for the radiological dose of growth, survival and reproduction that is not supported by the UNSCEAR benchmark. More conservative benchmarks are more protective and are considerably more quantitative. A more quantitative approach by the European Community (cited by Ecometrix) combined a detailed literature review, species sensitivity analysis and an added safety factor of 5, consistent with the assessment of other contaminants, to provide a chronic incremental screening dose of 10 µGy/h for the protection of all ecosystems (protective of 95% of species) using the ERICA approach (Brown et al. 2008, Garnier-LaPlace and Gilbin 2006, Garnier-LaPlace et al. 2006). It was recognised that this dose rate could also allow some cytogenetic effects in sensitive vertebrate species (Sazykina 2005, Sazykina et al. 2009).” Given the uncertainties in predicting background and incremental doses in the future, MMF recommends that a more conservative benchmark be	recommended. The Environment Canada / Health Canada (2003) benchmarks are in the same range, except for the fish value, which derives from a study in a Chernobyl cooling pond and is potentially confounded by high historical exposures. The ERICA (environmental risks from ionising contaminants: assessment) screening value of 10 uGy/h was also reviewed, and was found not to be suitable as a definitive benchmark value for risk assessment.				

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		used. [Please refer to pages 36-37 of MMF's submission for more information].					
152.	MMF (Dec 19, 2017)	Of the four alternatives assessed, ISD represents the highest risk to local aquatic systems because contaminated materials will reside permanently within the local environment. MMF expresses the position that permanent storage of radioactive contaminated material must be monitored indefinitely. MMF explains that once the containment system fails, decaying radioactive material will have a direct pathway for contamination of groundwater. Over time, this contamination will likely migrate to surface water (e.g., through seepage to the Winnipeg River <500m), posing risks to aquatic wildlife and humans who consume these organisms. For example, based on predictions of mass loadings to the Winnipeg River, it is expected that Carbon-14 and Tritium are expected to be particularly high, with maximum groundwater concentrations (at point of discharge) of 147 Bq/L and 3,760 Bq/L respectively. The latter of which is expected to occur within 68 years during post-closure. Due to the risks associated with contaminated groundwater, MMF indicates that a robust monitoring program must be in place. MMF explains that CNL plan to conduct surface water monitoring and surficial sediment monitoring to test for contaminants during closure and post-closure. However, MMF notes	CNL has an Integrated Environmental Monitoring Program designed to track radiological and non-radiological contaminants throughout the different compartments of the geosphere, atmosphere, and biosphere and consists of three distinct programs: the Effluent Verification Monitoring Program (EVMP), the Environmental Monitoring Program (EMP) and the Groundwater Monitoring Program (GWMP). The current monitoring activities for the WL site and those proposed for WR-1 are described in Section 11 of the EIS and are summarized in Table 1 below. The Integrated Environmental Monitoring Program is dynamic in nature meaning that it is continually evolving based on various sources of information received. Should groundwater testing of wells in the vicinity of WR-1 indicate abnormal results an investigation would be initiated. This investigation would include sampling and analysis to determine/confirm the source of the contaminant and the extent of the contamination. This would include sampling at additional locations and for several	**Partially Addressed** CNL has provided additional information in the updated EIS which address many data gaps previously identified by the MMF. However, there remains some deficiencies with the design of monitoring. The Proponent has not identified any additional surface water monitoring stations beyond what was described in the initial EIS. We reiterate the need for additional surface water sampling. We suggest these occur at the effluent outflow, the groundwater seep, 25 m, 100 m and 500 m downstream on the Winnipeg River. The Waste Management Area holds low and intermediate nuclear waste, which has been stored at various points through the life of the Whiteshell Labs project lifetime. This includes storage of radioactive and non-radioactive contaminants as part of site closure (EIS, Section 3.5). Due to the risks associated with long-term storage of these hazardous	The MMF has proposed surface water (e.g., Winnipeg River) sampling for the WR-1 post-closure monitoring program occur at the existing effluent outflow, the estimated location of groundwater seep, and locations of 25 m, 100 m, and 500 m downstream. CNL assumes this recommendation takes effect following completion of the project and continues through the proposed 100 year post closure monitoring period. Prior to site closure of the WL, the process water effluent line will be remediated and decommissioned. There will be no effluent outflow post-closure from WR-1. Therefore, that sampling location will not exist. CNL does not accept MMF's suggestion to collect surface water near a groundwater seep location that may occur in the Winnipeg River, and at positions 25 m, 100 m, and 500 m downstream. Groundwater monitoring is the most effective way of evaluating the performance of the WR-1 Disposal Facility. CNL has installed ground water well nests at 5 locations between WR-1 and the Winnipeg River. Upgradient well nests have also been installed at 3 locations east of Building 100. The wells have been installed at various depths to align with the site stratigraphy. Ground water	**Partially Addressed-** It is acknowledged and appreciated that CNL has offered to involve the MMF in monitoring of the Waste Management Area perimeter ditches for water quality. MMF will review the Regulatory Oversight Reporting for the site in order to get clarity and provide any comments related to this issue. While your response suggests that the presence of the groundwater seep requiring monitoring has not been established, we point out that it was detailed in the EIS (Figure 6.4.2.1. and Section 6.4.2.6.1.1 Groundwater Release Rates) as a known and prominent groundwater discharge point to the river. Given the potential for preferential groundwater flow and increased loading to the river as a result, we continue to assert that the outflow point of the seep to the river and/or a groundwater monitoring well close to the river but upstream of any influence from surface water intrusion from the river, with port elevations that intersect the seep, is an important location for water quality monitoring. This is in addition to those well locations already in the monitoring network.	**CNL recommends closing this comment as fully addressed pending the completion on the technical workshop between MMF's technical staff and CNL.** CNL has agreed to have a workshop with MMF and their technical consultants, Shared Value Solutions, to discuss MMF's recommendations for additional boreholes. CNL is amenable to revising their current proposed monitoring plan to include additional ground water monitoring boreholes based on feedback from MMF at the workshop.

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		that it is unclear at what intervals this monitoring will occur. Moreover, the locations for water quality monitoring follow-up program are not sufficient. The nearest downstream surface monitoring location to the groundwater seep is 2 km downstream from the site boundary (monitoring station DS, Figure 6.4.2-3). MMF indicates this is unlikely to detect any contamination except from extreme events, nor to show any gradient or distribution of contamination. MMF recommends that CNL clarify the location, frequency and timing at which surface water and sediment sampling will occur. MMF indicates this data must be presented in text and in the form of a map (similar to Figure 6.4.2-3) with locations of all proposed follow-up monitoring locations clearly marked. MMF also notes this must be accompanied by a description of the frequency of monitoring proposed for these stations [Recommendation 4.1.1a]. MMF recommends that additional surface water monitoring stations be planned closer to the location of groundwater emissions, given that the nearest downstream surface water and sediment sampling station in the Winnipeg River is too far for monitoring contamination of groundwater seepage. At minimum, MMF suggests these occur at the effluent outflow, the groundwater seep, 25m, 100m and 500m downstream on the Winnipeg River	matrices (water, soil, sediment). The impacted area would be mitigated through soil removal and/or treatment of groundwater (permeable active barrier) to the extent practical to minimize adverse environmental impacts. The need for removal of the structure/source of contamination would be considered. Mitigative actions shall be directed on a case-by-case basis by CNL staff as described in with 900-509200-STD-005, Environmental Incident Reporting, Investigation and Mitigation The current Environmental Assessment Follow-up Program for the site has been updated to include work tasks for the preparation of remedial action plans in alignment with 900-509200-STD-005, Environmental Incident Reporting, Investigation and Mitigation. This will ensure that remedial action can be executed in a timely manner. Table 1 provides additional information on the monitoring activities at Whiteshell Laboratories (WL-509200-OV-001, Whiteshell *Laboratories Integrated Environmental Monitoring Program Framework*, CNL). **Table 1** **Summary of Effluent and Environmental Monitoring**	wastes adequate monitoring must be in place. For this reason, CNL must describe adequate water quality monitoring from perimeter ditches to ensure the safety of this water.	sampling will provide timely and effective monitoring. The well nests are identified by red diamonds in the following image. Building 100 that houses WR-1 is highlighted in pink. Following site demolition of all structures, CNL plans to install a near-field well nest closer to the west side of Building 100.  Regarding MMF's request for additional information on the perimeter ditch water quality monitoring, CNL notes this is out of scope of the WR-1 environmental assessment. The Waste Management Area is located north-east of WR-1 and there is no surface or ground water interactions that occur between the sites. However, CNL would like to offer that an Environmental Monitor from the MMF participate in the ditch water monitoring campaign that occurs regularly around the WL Waste Management Area.		

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		[Recommendation 4.1.1b]. MMF recommends that water quality in trenches/ditches from the WMA be monitored actively during closure and post-closure. In addition, MMF requests that CNL provide additional details on locations and frequency of monitoring associated with the WMA. MMF notes that there should be clear adaptive management and contingency plans for responding to degrading water quality in these features such as capture and additional treatment [Recommendation 4.1.1c]. [Please refer to pages 19-20 of MMF's submission for more information].	**Activities at the Whiteshell Laboratories**  [1] As the result of travel on gravel roads, sand blasting activities, use of gas powered vehicles, propane tanks, other CO_2 emissions, burn pile [2] Ditch locations are checked and, if water is flowing, are sampled after rain events greater than 5 millimetre of rain in a 24-hour period, preceded by at least 48 hours of no precipitation. Samples should also be taken during the spring (snow) melt and not more than weekly unless there is some operational concern that triggers additional sampling. Environmental Component Sampling Location Parameters Sampling Frequency Air WL Perimeter and Off-Site γ (TLDs) Continuous WL Site Dust Particulates (TSP, PM_{10}, Gross α/β, γ-spec) Continuous during building demolition Quantities of fuel combusted for building heating, Diesel burned in their standby generators. Quantity of Total (Rhenoble) Particulate Matter, particulate below 10 microns (PM_{10}), particulate below 2.5 microns ($PM_{2.5}$)[1] Internal worksheet tools are used to perform the calculations required to report to the NPRI. In addition, Environment Canada provides companies with various calculators (road dust, landfill gas) Record of Dust Control Treatments and Site Inspections Halocarbon All releases of halocarbons are recorded and those over 10 kg are reported to Environment Canada Air Effluents WL Facilities (B103 (WRE1), B209, B200) and WMA Facilities Gross α/β, γ-spec, Tritium[2] Continuous Noise WL Site Noise monitoring During periods of high activity Topography Concrete Monolith, surface drainage areas Visual inspection of Berm and Fencing and Grounds Maintenance Visual inspection of WMA ditch system and other drainage pathways identified in Storm Water Management plan Visual Inspection of the Winnipeg River Bank in the vicinity of the WL site Semi-Annually Surface Water Winnipeg River Sr-90, Gross α/β, Tritium, Uranium, γ-spec Daily to Weekly, monthly composite analyzed WMA Ditches[2] Tritium, Gross α/β Periodically during ice free periods[2] Landfill Dugouts Gross α/β, Tritium, Uranium, non-radiological Annually Primary Cell of the Sewage Lagoon Gross α/β, γ-spec Prior to isolation from Secondary Cell and/or Discharge Miscellaneous (manholes, excavations, sumps, catch trays) Gross α/β, other parameters based on reference hazard Prior to pump-out Atmospheric Deposition Off-Site Sr-90, Gross α/β, γ-spec Monthly				
153.	MMF (Dec 19, 2017)	CNL has identified "No Linkage Pathway" to residual effects from runoff during closure (page 6-186). However, MMF indicates "there is an issue with this evaluation because there could be large loads of contaminated material and dust during active closure. These could be from building demolition, excess piping or other contaminated materials. If there is a significant precipitation or snowmelt while this material is present, it could result in a slug of contaminated runoff to the Winnipeg River. CNL has assumed that this would not occur because best practices would be in place. This includes, water management, containment barriers, and water testing." MMF recommends that CNL prepare an Environmental Protection Plan	As part of CNL's environmental protection program, there are requirements and processes in place for the Management of Land, Habitat and Wildlife (900-509200-STD-006). This procedure outlines the mitigation strategies and actions that are to be employed to prevent contaminated run-off from the site to receiving waters. The procedure also outlines the mitigation strategies for dust control to be employed to prevent the emissions of particulate matter that may have an impact on air quality. A post closure storm water management plan is being developed and regular site inspection and grounds maintenance is included as	**Partially Addressed** The MMF requests that the final post closure storm water management plan and Environmental Assessment Follow-Up Plan (EAFP) be shared with the MMF for review and input. If CNL commits to sharing this document, this issue can be considered *addressed*.	CNL is happy to share the updated draft Environmental Assessment Follow-up Program. The WR-1 post closure storm water management design is being integrated into a site-wide storm water management plan. CNL commits to sharing that plan with MMF when it is complete (estimated winter 2020). CNL suggests a workshop with MMF on both documents once MMF has had the opportunity to review them.	**Addressed** The MMF appreciates the willingness by CNL to share the Environmental Assessment Follow-up Program (received on August 20, 2020) and updated Site-Wide Storm Water Management Plan. Secondly, the MMF appreciates and agrees to participate in a workshop with CNL once the documents have been reviewed. This comment can be considered Addressed, however, the MMF may have further comments on these plans once the review has been completed.	

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		(EPP) outlining in detail the mitigation strategies and actions that will be taken to prevent contaminated runoff from the site to receiving waters during closure. In addition, MMF indicates that the EPP be provided to them for an opportunity for review. Failing this, MMF explains it will be necessary to incorporate potential effects of increased contamination to the Winnipeg River because of runoff, into the EA process. [Please refer to page 20 of MMF's submission for more information].	tasks in the Environmental Assessment Follow-Up program.				
154.	MMF (Dec 19, 2017)	Beginning during post-closure and continuing for up to 500,000 years, groundwater contaminated from contact with the below grade building materials and WR-1 will leach steadily into the Winnipeg River. Radionuclides released can result in harm to aquatic wildlife. In the Goldsim (version 11.1) mass balance and transport model for groundwater, MMF notes that only radionuclides with half-lives longer than 1 day were modelled. MMF explains that this excludes a large number of potentially damaging radionuclides which, if present in large quantities could contribute to radiological effects on aquatic wildlife in the Winnipeg River. Moreover, MMF indicates that certain radionuclides with short half-lives may decay into daughter radionuclides with longer half-lives that continue to emit radiation. For example, I-135 with a half-life of 6.5 hours can decay through β− decay into Xe-135 and Cs-135, the latter of which has a half-life	The radionuclide decay chains specified in the GoldSim model consider all isotopes (regardless of half-life) as defined by ICRP (2008). The short-lived radionuclides, defined as radionuclides with half-lives of less than one day, are assumed to be in secular equilibrium with their daughter products. During the solute transport simulation these are essentially "skipped" in favour of their daughter product, and were therefore not included in the model output or reporting. A list of such radionuclides is provided in Table 4-1 under the "Nuclides Modelled by Secular Equilibrium" column. The short-lived progeny are included in parent dose coefficients, so their contributions to dose are appropriately captured. The secular equilibrium assumption for short-lived	**Addressed**			

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		of 2.3 million years. Thus, by excluding short-lived radionuclides from the modelling, CNL is potentially ignoring important sources of radioactive contamination and underestimating the potential risk to the aquatic environment. MMF recommends that the mass balance and transport model for groundwater include all radionuclides, including those with half-lives shorter than a day. [Please refer to page 20 of MMF's submission for more information].	radionuclides is considered appropriate given that the groundwater velocities within the bedrock pathway are low (~1 m/d). As such, transport distances for short-lived radionuclides would be short compared to the overall pathway distance.				
155.	MMF (Dec 19, 2017)	In their evaluation of the potential effects of surface water contamination (dispersion modelling), MMF notes that CNL only evaluated concentrations of radionuclide and non-radionuclide contaminants at the Nearfield (50 m downstream) and Farm A (approximately 3,100 m downstream) locations. As a result, CNL were able to assume complete mixing of contaminants and utilize large dilution rates. For example, the dilution rate used for evaluation of contaminants for the nearfield site was 300,000:1. However, at the point where contaminated groundwater is being released into the Winnipeg River, MMF explains the dilution will be much less. MMF indicates that this will result in higher concentrations of contaminants in the water column (than shown in Tables 6.4.2-12 and 6.4.2-13 in the draft EIS) and in sediment (shown in Tables 6.4.2-14 and 6.4.2-15 in the draft EIS).	The model used in CSA N288.1 is a steady-state two-dimensional advection dispersion equation. The dispersion equation is a point source and does not take into account that a groundwater influx will occur over shoreline and river width distances. In the Surface Water Quality section of the Environmental Impact Statement (EIS) there is discussion on the uncertainty of using the dispersion equation (Section 6.4.2.7). It is estimated that the groundwater influx will be over 95 m along shore. The spatial extent could extend 200 m into the river. With this area source (95 x 200 m), the dilution would be estimated to be 283,000:1 if the plume rises 1 cm from the bottom and 1,400,000:1 if the plume rises 5 cm from the bottom.	**Addressed**			

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		MMF states: "This is of concern for all contaminants, but particularly for highly toxic contaminants for which concentrations in groundwater are above applicable guidelines such as cadmium and lead. These contaminants released through the groundwater seep may have locally high concentrations that could bioaccumulate in fish and benthic invertebrates causing harmful effects. Moreover, the accumulation of these contaminants in fish tissues represents a potential pathway for human consumption, including affecting MMC citizens who rely on fishing and harvesting aquatic resources for subsistence and as part of a traditional diet and lifestyle." By evaluating the concentrations of contaminants at the Nearfield location rather than in the immediate vicinity of the groundwater release, CNL is underestimating the potential effects of this project. To evaluate these effects, MMF requests that CNL produce a dispersion model to predict the concentrations of contaminants between the point of groundwater release into the Winnipeg River and the Nearfield location (between 0 and 50m). These higher concentrations should be used to calculate contaminant concentrations in sediment within the mixing zone for groundwater seepage. This updated and more localized information would enable CNL to evaluate the potential effects within the immediate area of effect near the seep and whether any contaminants are above regulatory	Therefore, using the dispersion equation with a 50 m distance, which results in a 300,000:1 dilution, is reasonable. The Environmental Risk Assessment (ERA) was completed following N288.6 which requires assessment of exposure in the areas where receptors will be exposed. We recognize that sessile organisms at the point of groundwater discharge, such as infauna benthic invertebrates, may be more directly exposed to groundwater. The assessment will be adjusted to reflect this. Fish are more mobile and are exposed to river water in a nearfield area; they do not live in groundwater and should not be assessed as such. Exposure was assessed for the time of maximum loadings to the river for each COPC during the post-closure period. For total radiation dose, the peak doses for individual radionuclides were summed, without regard to breakthrough time. Considering the conservatism in the estimation of releases, and in the groundwater model and ERA, it is reasonable to conclude that doses arising from the Project will be protective of the environment.				

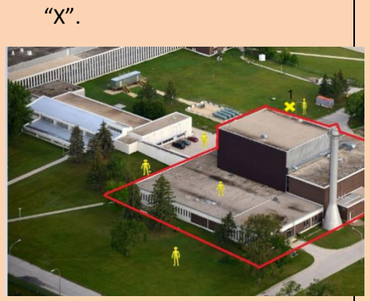
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		guidelines for either surface water or sediment [Recommendation 4.1.4a]. MMF requests that if concentrations of contaminants (radiological and non-radiological) are found to be higher than what has been predicted at the Nearfield and Farm A locations, CNL update the Human Health Risk Assessment (HHRA) and EcoRA to evaluate the potential impacts of these higher concentrations [Recommendation 4.1.4b]. [Please refer to page 21 of MMF's submission for more information].					
156.	MMF (Dec 19, 2017)	As part of the existing licence for the WL site, CNL engages in monitoring of fish tissue at upstream and downstream locations from the project site. However, MMF notes that as indicated on page 6-231 of the draft EIS, CNL is not planning to monitor fish tissues for contaminants during the closure and post-closure phases. MMF explains that "many individuals from the MMC fish regularly along the Winnipeg River for game species such as walleye, lake whitefish, smallmouth bass, and northern pike. The risk of health effects from consuming these contaminants is thus a serious concern for these fishermen and their families." Due to the importance of fishing and fish consumption to the MMC, MMF explains it is critical that monitoring of fish tissue occur and be designed accordingly so that the predictions of low contamination can be verified. MMF requests that CNL engage in	Monitoring of fish is part of both the current Environmental Monitoring program at WL and the Environmental Assessment Follow-up Program at WL. This information has been added to Section 11 of the Environmental Impact Statement (EIS). The data collected from this sampling is assessed and reported on each year in the Annual Environmental Monitoring report and Annual Progress Report on the Environmental Assessment Follow-up Program. CNL will continue to monitor fish tissues annually during the closure phase. CNL will consider the suggestion to monitor fish every ten years during post-closure. CNL will have adaptive management plans in place to include fish monitoring more frequently if	**Partially Addressed** The MMF appreciates the additional information and consideration for monitoring by CNL. The MMF requests that CNL provide an update regarding the decision to monitor during post closure.	CNL has decided that fish monitoring will continue annually for three years post closure and will continue beyond that point only if water sampling results are above benchmark levels. All fish tissue monitoring results will be reported annually in the WL Environmental Monitoring Annual Progress Report.	**Partially Addressed** The MMF requests that CNL update Table 2 of the Environmental Assessment Follow-up Program to clearly state the commitment for monitoring fish tissue described in these responses. Specifically, it should be stated that monitoring will occur: • At three locations on the Winnipeg River • Annually during Closure • Annually for three years during Post-Closure • Fish tissue monitoring should resume during Post- Closure if water sampling results are above benchmark levels.	**CNL recommends closing this comment as fully addressed pending MMF's review and confirmation that Table 2 of the Environmental Assessment Follow-up Program was updated.** CNL accepts MMF's recommendations and has updated Table 2 of the Environmental Assessment Follow-up Program to clearly state the commitment for monitoring fish tissue.

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		monitoring of fish tissues during the closure and post-closure (institutional control) phases and have adaptive management plans in place to address unanticipated levels of contaminants in edible portions of fish in exposure areas. MMF recommends that the sampling locations currently used for monitoring associated with the existing license be maintained. In addition, MMF suggests that monitoring should occur every year during closure and at least every 10 years during post-closure. [Please refer to pages 21-22 of MMF's submission for more information].	water quality data indicates the need. Stopping a monitoring activity would occur once it can be shown that an effect has stabilized or has been reduced to a level where it is no longer considered significant by regulatory requirements or community concerns. Any proposals on modifications to the monitoring program will be communicated to the CNSC				
		Environmental Effects – Terrestrial Environment					
160.	MMF (Dec 19, 2017)	This section of the draft EIS indicates that baseline terrestrial data for the WL property was gathered through incidental observations by staff and through targeted surveys for SAR in 2015. A desktop review was also completed to identify potential SAR within the RSA; however, MMF explains that Traditional Ecological Knowledge (TEK) or harvesting rights, practices and the needs of MMC land users were not considered. MMF recommends that CNL conduct multi-season (spring/summer/fall/winter) baseline terrestrial surveys to provide a less biased and more comprehensive measure of site characteristics and an accurate representation of the ecological components potentially affected by the project. MMF explains this would provide a more	A traditional knowledge and land use (TKLU) study titled, "Whiteshell Reactor #1 Decommissioning: Manitoba Métis Traditional Knowledge, Land Use and Occupancy Study" was completed and provided to CNL in January 2019. CNL supported carrying out the study to assist in better understanding modern and traditional land and resource use by MMC near the WL site. CNL has supported the carrying out of such studies to assist it in better understanding modern and traditional land and resource use near the WL site. The harvester considered in Section 5.8 represents an Indigenous receptor who may harvest near the site. CNL	**Partially Addressed** a) CNL has not provided a response to MMF's recommendation regarding multi-season baseline terrestrial surveys. Please provide a detailed rationale as to why these have not been completed or are not required. This would assist MMF in understanding impacts to the MMC's traditional use and health from the project.	CNL has considered and included input from MMF and the Traditional Knowledge and Land Use (TKLU) study provided to CNL. The TKLU was reviewed to ensure that any additional plant or animal species, or other environmental components identified by the MMF were already encompassed by the selected Valued Components (VCs). If a species had been identified by MMF that was not adequately represented by a current VC, the VCs would have been adjusted, or additional VCs would have been added to ensure adequate coverage of potential impacts. There are two methods to selection of VCs: 1. Perform multi-season baseline surveys to determine what species are present on site and focus	**Partially Addressed** It is unclear how the plant and animal species of importance to MMF identified in the TKLUS were incorporated into the EIS VCs, specifically for the Terrestrial Environment Assessment (EIS, Section 6.6). Terrestrial Environment VCs include: • Barn swallow • Golden-winged warbler • Bats (Little brown myotis, Northern myotis) • Snapping turtle Terrestrial ecological values identified in the MMF TKLUS include (but are not limited to): • Grouse, geese, ducks (hunted species)	**CNL recommends closing this comment as fully addressed pending completion of the proposed workshop with MMF's technical team and CNL to discuss MMF's value components.** CNL has provided additional information on how plant and animal species of importance to MMF identified in the TKLUS were incorporated into the EIS VCs and the Terrestrial Environmental Assessment. CNL intends to further engage with MMF and their technical team by hosting a workshop to discuss this topic further. The EIS assesses impacts to plant and animal species in two ways: 1. Direct impact on the habitat, and the health and viability of populations within it. (Section 6.5

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		comprehensive assessment of potential impacts to native vegetative species and species of traditional importance to the MMC [Recommendation 4.2.1a]. MMF recommends that CNL engage them to identify and consider the MMC's extensive TEK, harvesting rights, current exercise of rights and ongoing needs and interests, during or in addition to the baseline surveys recommended above. MMF explains that there needs to be recognition of and accommodation measures provided for the Métis who live within the vicinity of and/or harvest within the project assessment areas as part of determining the significance of net effects as a result of the project [Recommendation 4.2.1b]. [Please refer to pages 24-25 of MMF's submission for more information].	partnered with the MMF to conduct Harvester food intake surveys with Manitoba Métis Citizens that harvest in the area of the Whiteshell Laboratories. The information provided confirmed VCs for the project and was used to validate the assumptions made for wild game, fish and plant ingestion rates for subsistent receptors. This information is included in the updated revision of the ERA and EIS.	b) Given the completion of the Traditional Knowledge study, land use and occupancy study, CNL should incorporate the results from the TEK component (e.g., wildlife polygons, wildlife observation points) into baseline studies and assessment sections of the EIS (Section 6.6). Manitoba Métis land users possess in-depth localized traditional ecological knowledge of the project areas that should be considered alongside the findings of baseline terrestrial surveys. Food intake surveys with the MMF, while valuable, cannot substitute focused baseline surveys to determine ecological components potentially affected	assessments on those species identified by the survey. 2. Assume all species at risk species may potentially be on site regardless of verified sightings, and select VCs that are representative or bounding of all relevant species on site. CNL took a conservative approach and performed the latter and therefore a multi-season terrestrial baseline study would not produce additional valued components. CNL selected valued components using a representative species approach. All Species At Risk Act species were included in the list of potential VCs. VCs were selected as the most vulnerable or sensitive receptors in a category (i.e., aquatic plants, sediment dwellers, bottom feeders, migratory birds, big game). Assessing impacts to these VCs provides a representation of the impacts to other similar species. The comment from the MMF also indicates that the MMF is recommending that these multi-season surveys should be occurring at harvest areas identified by MMF in the TKLU study. Specifically the point was made that: "CNL should incorporate the results from the Traditional Ecological Knowledge (TEK) component (e.g., wildlife polygons, wildlife observation points) into baseline studies and	• White-tailed deer (hunted species) • Furbearers such as marten, rabbit, squirrel, weasel (trapped species) • Food and medicines including blueberries, cranberries, pin cherries, Saskatoon berries, strawberries, choke cherries, raspberries, wild plums, fiddleheads, hawthorn nuts, Labrador tea (gathered species) MMF requests more detailed rationale on how the above values are represented by the Terrestrial Environment VCs above. MMF is not requesting that multi-season surveys occur at specific harvest areas, as identified in the TKLUS. For clarification, the MMF is asking that terrestrial ecological values identified in the TKLUS are selected by CNL as VCs (or be adequately represented by other VCs) in the Terrestrial Environment section (not just the Land and Resource Use section) of the EIS. In the absence of this happening, multi- season baseline surveys (e.g. assessments of the wildlife and vegetation communities present on site) are recommended because they have the potential to capture a broader range of	Aquatic Environment, and 6.6 Terrestrial Environment) 2. Impact on humans as a result of interaction and utilization of the potentially impacted environment (Section 6.7 Human and Ecological Health) The potential direct impacts on aquatic and terrestrial environments as assessed in Section 6.5 and 6.6 of the EIS. These sections assess representative species in the Aquatic and Terrestrial Environment that are more likely to be impacted by changes to the environment. The VC's selected for these assessments are typically SARA species that are most likely to have significant impacts resulting from the project. That is to say, if it is demonstrated that the project has no impact on these sensitive representative species, then there is likely no impact to the ecosystem as a whole, and the project is not likely to impact the health and viability of plant and animal populations that the MMF citizens would exercise their harvesting rights on. Furthermore, in assessing the impact of the project on Human and Ecological health in Section 6.7, the assessment looks at plant and animal species that form part of the expected 'food chain' for a 'Farmer' as well as a 'Harvester'. The Harvester receptor is representative of a person living a hunter-gatherer lifestyle, and harvesting at the site. The Harvester receptor eats **fish**, **water fowl**, **hare, and deer, and**

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				by the project. Please refer to recommendation above regarding the potential need for additional baseline information on the terrestrial environment and SAR presence within the project's study areas.	assessment sections of the Environmental Impact Statement (EIS) (Section 6.6)." While it is not clear, we have assumed that the three season surveys that are being suggested would be vegetation surveys. All of these points are outside of the Whiteshell site as there is no harvesting within the Whiteshell site, and CNL does not anticipate any effects beyond the perimeter of the site. CNL understands the concern of MMF harvesters about having safe country food for consumption. CNL wants to work with MMF in having greater involvement at the CNL site in terms of a long-term relationship including involvement in long-term environmental monitoring. CNL has and wants to continue to involve MMF in that monitoring and also communicate directly with MMF harvesters that may have concerns about contamination in country foods where they harvest. As this comment seemed to prioritize the concern as one of vegetation, CNL does see the importance of being aware of plant species of interest/concern to the MMF. As part of a long-term relationship CNL would see the value in being aware of the specific plant species of interest to MMF. CNL would be willing to provide resources for future engagement sessions with MMF citizens who harvest specific plants. Again, CNL does not see that the proposed project will have any effect on	species, including non-SAR of potential importance to MMF, which might be otherwise overlooked during targeted surveys or desktop analyses focused on SAR. For further clarification, MMF's key request is that terrestrial ecological values of importance to the MMC (identified in the TKLUS) are adequately characterized and assessed in the Terrestrial Environment EIS, and that this can be done in a variety of ways (e.g. VC scoping, multi-season baseline surveys). In addition to this, the absence of *mapped features* in a TKLUS report should not necessarily be used to conclude that there is an absence of *use* elsewhere. Absence of mapped features might instead indicate that there was not enough time during interviews to map everything the participant wanted. TKLU studies are notably limited in this way. The presence of certain mapped features, could actually indicate that the MMC has broader use of the area that has yet to be documented due to lack of other funding or opportunities.	**weekay and berries** (Table 6.7.1-9 and Table 6.7.1-12). **This assessment looks at the impacts to those specific intake species in order to assess overall human health. The assessment shows no significant impact to humans or the species they harvest, in either the closure (Table 6.7.2-8) or post-closure (Table 6.7.2-10) phase of the project.** The selection of these species is based partly on information from CSA Standard N288.1 which outlines intake parameters for critical group receptors, as well as from food intake survey's performed by CNL with MMF. **These selected species represent the same categories of harvested foods that the MMF has provided in the TKLUS**. The assessment provides a clear indication that there will be no residual effects to the environment, the plants, the animal populations, or MMF Citizen's harvesting rights and safety.

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					plants outside of the Whiteshell site, we do see the value in being aware of the specific plants of interest to the MMF and consider possibly monitoring for such plants in the future on-site.		
161.	MMF (Dec 19, 2017)	CNL has identified that wildlife collisions with vehicles will be monitored, for which adaptive management measures will be considered, however MMF indicates that no thresholds have been provided. MMF recommends that CNL provide adaptive management thresholds at which additional wildlife collision mitigation measures will be applied. [Please refer to page 26 of MMF's submission for more information].	CNL WL will adopt a threshold of 1 individual of a species at risk found dead on the road. If this threshold is met a wildlife patrol would be initiated on WL main access road. The role of this patrol would be to slow down traffic and watch for wildlife on the road (dead or alive). The wildlife patrol would be needed between May 1st and Sept 30th only during the traffic hour.	**Partially Addressed**. MMF acknowledges the additional information on adaptive management thresholds and mitigation measures for SAR. Does CNL also plan to implement any adaptive management thresholds for non-SAR wildlife of importance to MMF (e.g. deer, furbearers, game birds, etc.)? The MMF recommends that a similar approach be taken for non-SAR wildlife, though thresholds higher than mortality of one individual would be acceptable. The MMF also requests to be informed when these thresholds are exceeded and further mitigation measures, such as the wildlife patrol, are required/implemented.	All wildlife mortality is monitored on the plant road and the results of this monitoring are included in the annual Environmental Monitoring report. During 2019, there were five wildlife mortalities on the plant road that included two deer, a porcupine, a groundhog and a crow. No mortalities of species at risk occured. There are no established mortality thresholds for non-species at risk species and, at this time, CNL will not implement thresholds. Wildlife mortality is tracked and if there is a trend, an assessment of the operations will be conducted and mitigation plan developed.	**Addressed**	
162.	MMF (Dec 19, 2017)	CNL has identified that bat surveys will be conducted in the year prior to initiation of project decommissioning, during the 'appropriate season', and over multiple visits if necessary. MMF indicates that additional measures could be implemented to mitigate effects of disturbance and mortality to SAR bat species which are not considered in the draft EIS.	CNL is required to comply with the regulations under the Federal Species at Risk Act and The Endangered Species and Ecosystems Act (Manitoba). CNL has a process in place to identify and consider impacts to Value Components on its site, including bats.	**Not Addressed** a) The proponent should complete additional visual and acoustic bat emergence surveys, using both passive recorders and qualified biologists in the	a) A bat exit survey for WR-1 (Building 100) was conducted in 2020 July using visual observation, passive acoustic surveys, and echotouch meters. A thermal camera was also used. Monitoring started 30 minutes before sunset and ended 2 hours after sunset. A second exit survey will be	**Addressed**	

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		MMF recommends that CNL identify the exact timeframe and frequency at which bat monitoring surveys will be completed. MMF notes that "the seasonal and daily pattern of bat activity and the use of different types of roosts at different times of the year will impact the appropriateness of survey methodologies. The optimum time for dusk surveys at buildings, particularly during early summer is for two hours after the first bats emerge as this will cover the emergence period as well as the first return to the roost for some species. The time of first emergence varies between species, with noctules leaving around sunset and others leaving about 1 hour after sunset. Bats using underground structure at the site during the summer may not emerge until later, upwards of 4 hours after dark. Towards dawn, many bats swarm outside their roosts and surveys beginning about 90 minutes before sunrise and continuing until 15 minutes after sunrise ('sunrise surveys') is recommended (Mitchell-Jones, 2004)" [Recommendation 4.2.10a]. During this time, MMF recommends that continuous automated bio-acoustic detectors linked to data-loggers be used, so as to minimize missing the presence of SAR bats in the project area. MMF recommends that the location and installation of the replacement roosts (bat boxes) should be chosen to	In June of 2015, CNL conducted a survey for bats on the WL property. The survey included 160 hrs of recording time over 22 sites throughout the 'built up' area of WL. Recordings were taken using SM3 passive recorders by Wildlife acoustic, recorders were set to begin recording a half hour before sunset and continue recording until a half hour after sunrise. Recorders were triggered by sounds between 16 and 192 kHZ to ensure all Manitoba bat species were captured and to eliminate low audible noises. The results of these surveys indicated that the bats detected were not using buildings as maternity or day roosts during the summer, but were recorded as they were flying through the open areas to forage and to travel between roost sites and the river and other foraging areas. The information gathered during these surveys allowed CNL to identify areas of high and low bat activity that will be useful if any alternative habitat should be required due to decommissioning activities. In the EIS CNL referred to conducting bat surveys in the 'appropriate season' because depending on the decommissioning timeline, the survey timing will change. As outlined by the MMF submission, bat roosting varies	field, and site assessment to determine the presence or absence of bat roosts with the WR-1 building. If bat roosting is confirmed, then a roost survey should be performed to confirm presence/absence of SAR bats. Little brown myotis have high site-fidelity to hibernation and summer roosts although, they have been documented to switch sites between and within years (Syme et al., 2001), therefore additional surveys would provide confidence of presence/absence of these sites in the project area (Norquay, 2019). b) Decommissioning of the WR-1 building should take place when these bats are not generally hibernating (from May to September)	conducted in 2020 August. Next season (2021) surveys will occur in June, July and August. The survey plan and the resulting data analysis is developed/completed by a qualified biologist. CNL can share the results of the surveys, including any potential identification of species at risk bats, if requested by MMF. MMF is also invited to participate in any of the exit surveys. The following image shows the location of observers and the passive acoustic monitors that are marked by an "X".  b) No bats have been observed hibernating in Building 100. Detailed surveys to determine if a hibernaculum is present will be conducted using thermal imaging and visual inspections during the winter of 2021. c) CNL uses the bat boxes from the Canadian Bat House (https://canadianbathouses.com/). This Canadian company is the only one to offer bat boxes certified by Bat Conservation International. In order to provide different thermal		

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		maximise the chances of the bats finding and adopting it. Care should be taken to install boxes close to existing flight lines and have an entrance close to appropriate / preferred habitat types. Many bat species prefer to fly in dark areas straight into vegetation, so external lighting on the site close to boxes should be avoided [Recommendation 4.2.10b]. MMF recommends that if SAR bat species are identified during pre-decommissioning surveys, demolition of the facility should stop until individuals have left the area, roosts/nests are no longer active and/or adoption of habitat off-sets (bat boxes) have been confirmed [Recommendation 4.2.10c]. [Please refer to pages 27-28 of MMF's submission for more information].	depending on the time of year therefore, until the exact timeline of demolition is determining the survey time remains fluid. Depending on the season of demolition a winter or a summer survey will be required to determine if any bats are utilizing the building as habitat. If demolition occurs in the winter, a survey for hibernating bats within the building will be conducted. This survey will begin with a visual search using a thermal camera and a spotlight as bats have few movements while hibernating. If bats are found through visual inspection, passive recorders will be set up in and around the building to record bats as they leave the building in the spring allowing CNL to identify the species of bats present. If demolition will be occurring in the summer, a survey will be conducted in a similar manner as described above, using passive recorders and recording from before sunset until after sunrise to ensure all bat activity is captured. If alternative roosts is required, bat boxes will be installed as close as possible to the demolished habitat to a maximum of 1 km away, and within 1 km of good quality foraging habitat. Well-lit areas will be avoided when possible; however, the priorities will be	and only after appropriate alternative roosting sites are constructed and confirmed to be in use by bats. If the proponent encounters SAR bat species during decommissioning, the decommissioning process of the WR-1 building should cease until those species are no longer present on the site. Please include details regarding bat box construction, maintenance and site selection rationale – including factors constituting "good quality foraging habitat" in the EIS. Accepted guides on bat house construction should be followed (Tuttle et al., 2013; Bat Conservation International, 2020).	conditions, 2 bat boxes should be installed at each location on a post and back to back. So if the bat box becomes too hot on one side, the bat can climb into the box located on the other side. The bat boxes at Chalk River Laboratories have been used since 2017 and bats occupancy is increasing year after year. Good foraging habitat is different based on sex but is represented by areas where there is an abundant source of insects. Open areas and marshy areas are considered good foraging habitat. The Recovery Strategy published by Environment and Climate Change Canada provides a good description of the foraging habitat for the Little Brown Myotis as follows. Foraging Little Brown Myotis are most often associated with open habitats, such as ponds and roads and open canopy (0-50%) forests (Segers and Broders 2014), but have also been recorded gleaning prey within forests (Ratcliffe and Dawson 2003, Jung et al. 2014) and using vegetation along lake and stream margins (Fenton and Barclay 1980). *Environment and Climate Change Canada, Recovery Strategy for Little Brown Myotis, Northern Myotis, and Tri-colored Bat.* *https://www.registrelep-sararegistry.gc.ca/virtual_sara/files*		

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			proximity to current habitat and foraging habitat. By conducting surveys prior to demolition activities any bats using the building will be identified with sufficient time to provide mitigation measures before decommissioning activities begin.		*/plans/rs_LittleBrownMyotisNorthernMyotisTricoloredBat_e_proposed.pdf* *Fenton and Barclay, 1980, Myotis lucifugus. Mammalian Species 142: 1-8. Available at https://academic.oup.com/mspecies/article/doi/10.2307/3503792/2600557* *Jung et al., 2014, Concluding remarks: what do we need to know about bats in northwestern North America?, Northwestern Naturalist 95(3): 318-330. Available at http://www.adfg.alaska.gov/static/home/library/pdfs/wildlife/propubs/jung_etal_2014_concludingremarkswhatdoweneedtoknowbatsnwnorthamerica.pdf* *Ratcliffe and Dawson, 2003, Behavioural flexibility: the little brown bat, Myotis lucifugus, and the northern long-eared bat, M. septetrionalis, both glean and hawk prey, Animal Behaviour 66(5): 847-856. Available at https://www.semanticscholar.org/paper/Behavioural-flexibility%3A-the-little-brown-bat%2C-and-Ratcliffe-Dawson/95c419c766b46842e15dda8e857231298e049e95* *Segers and Broders, 2014, Interspecific effects of forest fragmentation on bats, Canadian Journal of Zoology 92(8): 665-673. Abstract available at https://www.researchgate.net/publication/275403995_Interspecific_effects_of_forest_fragmentation_on_bats*		

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163.	MMF (Dec 19, 2017)	CNL indicates that chemical and radiological contaminant release will be monitored as part of follow-up monitoring during the closure phase to verify effects predictions and to provide information for use in adaptive management measures to address unforeseen effects. Adaptive management approaches have been proposed, yet MMF indicates that thresholds at which implementation of these approaches have not been provided in the draft EIS. MMF recommends that CNL provide adaptive management measures and thresholds being considered for follow-up monitoring. [Please refer to page 28 of MMF's submission for more information].	CNL will assess monitoring data against established limits for parameters/contaminant of potential concern based on information in Detailed Safety Analysis Report including the findings from the WR-1 Ecological Risk Assessment. These limits are concentrations well below established benchmarks for the protection of humans and the environment. Should a parameter/contaminant of potential concern reach concentrations outside the range predicted in the Environmental Impact Statement (EIS) or Detailed Safety Analysis Report (DSAR) including the findings from the WR-1 Ecological Risk Assessment (ERA) (which are concentrations well below established benchmarks for the protection of humans and the environment) the frequency of sampling would increase and additional locations would be sampled to pinpoint the source of the increasing parameter. Conversely, stopping of a monitoring activity would occur once it can be shown that an effect has stabilized or has been reduced to a level where it is no longer considered significant by regulatory requirements or community concerns. Any proposals on modifications to the	**Partially addressed** CNL states that elevated levels would result in increased sampling but does not indicate if it would, or could, address the source of the contamination. The original comment was also based on the question of whether the water sampling program would have the ability to detect a statistically significant change in the concentration of a nuclide in released water within a reasonable time frame. For example, if water was sampled on an annual basis, could the program detect elevated levels (10 or 20% higher) above the normal level of uncertainty that be early indicators of future trends.	In the unlikely event that contamination was released at levels that were not acceptable (at or approaching a level that would exceed a regulatory limit), CNL does have the ability to address the source of contamination through various methods, including "pump and treat" processes, adsorbing curtain walls, excavations, etc. It is expected that none of these will be required, as the predicted releases, even in the case of a disruptive event, are far below levels at which health effects or environmental impacts would be expected to occur. There are many variables that contribute to the determination of a predicted release level for a contaminant. Many of these variables change from year to year (such as precipitation). The models use averages, long term trends, and conservative assumptions to attempt to "not underestimate" predicted releases. As such, measurements in any one particular year, depending on the environmental variables, may not provide any indication of trends or problems. However, these results, combined with previous results, will provide trend information to verify performance of the facility over time. The accuracy of the actual measurements is sufficient to have confidence that the sampling results can determine actual contaminant concentrations.	**Partially Addressed** CNL provides a reasonable approach to managing the ISD if radiation releases exceed expected or modelled concentrations in groundwater (e.g., excavation, "pump and treat," etc.). It is important to point out that these activities may have to be conducted sometime in the next few centuries when CNL may no longer be viable and future generations may need to address any poor performance of the sealed facility. Regulators need to determine if this burden on future generations is acceptable. It would also build confidence in the monitoring program if CNL recognised that relying solely on the "accuracy" of the environmental concentrations might not be sufficient to quickly address performance issues of the stored ISD. Powerful monitoring programs are usually based on statistical models that are, in turn, based on site-specific analytical data that allow the managers of the site to respond quickly when concentrations exceed performance targets. As there have been no long-term ISD installations (>50 years), and very few structures built in the last 100 years with predicted life expectancies of 100+ years, the uncertainties in the long-term performance of the ISD design are very high.	**CNL recommends closing this comment as fully addressed pending completion of the proposed workshop with MMF and CNL to discuss CNL's environmental monitoring plan.** *Response to methods for addressing the source of contamination which CNL could implement in the event of a contamination release.* It is difficult to provide additional specific information on implementation, effectiveness and especially cost for migitation measure in the unlikely event of contamination because these factors will vary depending on what evidence of releases is present in the monitoring results, and when that evidence is apparent. For example, 'pump and treat' could involve Filtering, Ion Exchange processes, Evaporation or Solidification of contaminated water. All of these have varying degrees of effectiveness and cost, but no clear choice on how to proceed could be made without a clear indication of what contamination is present, and at what levels. Moving forward, as site conditions and monitoring dictate, or as new technology emerges, CNL will adaptively manage site practices and monitoring programs to meet the defined objectives. CNL will continue to follow proper protocol and inform MMF if an event should occur as per their Resolution #8 as well as provide any additional information about CNL's response.

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			monitoring program will be communicated to the CNSC.		In any case, as part of oversight of the monitoring program, results of the sampling are reported annually through the Environmental Assessment Follow-up Program, which is provided to the CNCS, local communities, and the public upon request.	The MMF requests additional information on the methods for addressing the source of contamination which CNL could implement in the event of a contamination release (e.g. pump and treat, adsorbing curtain walls, excavations etc.). The MMF is interested in discussing details such as implementation, effectiveness, cost, and mobilization schedule for the methods described. This information can be provided in written responses and during a future workshop hosted by CNL. This workshop may be integrated with others that have been suggested by CNL (see comments # 45, 83, 153).	*Addressing MMF's comment about the uncertainties in the long-term performance of the ISD design are very high.* For the ISD of WR-1, the long term performance of the facility does have some uncertainty. For example, the length of time that the concrete foundation will remain intact is uncertain. However, the existence of concrete structures in Manitoba that extend beyond 100 years is evidence of potential longevity of these structures. The remaining structures of the old Pinawa Dam are evidence of a robust concrete structure that has remained largely intact after more than 100 years of river erosion, freeze-thaw cycles, and even military target practice. The uncertainty is in how much longer such structures can last. Under the right conditions, they could last thousands of years. Or, if conditions are not just right, 100 or so years may be the limit of its lifespan. The WR-1 assessment acknowledges and incorporates these uncertainty around the lifespan of concrete structures into the assessment. We do this by making varying assumptions about how long it will last, as part of what is termed a 'sensitivity' analysis. These analyses look at what would happen if the concrete lasted thousands of years, or less than 100, and then compares the difference in the estimated release from the WR-1 Disposal Facility. When the lifetime of the

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							grout, foundation walls, and concrete cap were varied, there was no significant difference in the expected release rate over time from the reactor. This is an indication that the life of the foundation, grout and cover, are not critically important to the performance of the facility in the long term. CNL has reinforced this by stating that the grout's main purpose is just to stabilize the structure to prevent subsidence over time, and is not relied upon as a critical safety barrier to release. The sensitivity analyse indicates the corrosion rate of reactor components is an important factor in the long term performance of the facility. Unlike concrete degradation time, the corrosion rate of metals under varying conditions has been well studied and does not have the same level of uncertainty. Corrosion rates for WR-1 reactor components are measured in millionths to almost billionths of a metre per year under neutral groundwater conditions. The assessment conservatively assumes that the groundwater that enters the WRDF will be neutral (pH ~7). This won't actually be the case for a very long time, as the cementitious materials in the foundation, grout and cover will create a high pH environment (~12). Under these conditions the already incredibly slow corrosion of the reactor core is even further reduced. In this case the uncertainty is around how long that high pH condition will last. But

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							again, the uncertainty is addressed by making different assumptions to understand how important the uncertainty is, and making the right assumptions to ensure the performance of the system isn't over estimated. Overall, the uncertainty around the long term evolution of the facility, the life of the foundation grout and cover, and the corrosion rates of the reactor components, are all accounted for in the model estimates, by using appropriate assumptions that ensure the failure of these protections are understood, regardless of when they may occur.
164.	MMF (Dec 19, 2017)	MMF identifies that there are ongoing concerns with airborne contaminants that could deposit to soil, and water, where they could affect vegetation and wildlife/wildlife habitat of interest and importance to the MMC. MMF poses the following question: what emergency response protocols are in place to notify the MMC in the event that monitoring values exceed radiation benchmark values and applicable environmental guidelines? It is recommended that an Emergency Response Plan be developed by CNL in consultation with MMF, to notify its members in the event of radioactive leaks and airborne monitoring exceedances. [Please refer to page 28 of MMF's submission for more information].	CNL has emergency response plans in place for onsite and offsite events. CNL has commenced discussions with MMF on appropriate communication measures, specific to the MMF for such events and provided a proposed notification process (Aug 2019) for their consideration. With respect to the WR-1 Project, there are no measurable pathways to air beyond the decommissioning phase of the project. Mitigations will be implemented during this phase based on CNL procedures and implementing lessons learned/best practices from the extensive decommissioning that has occurred on site already.	**Addressed**			

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165.	MMF (Dec 19, 2017)	"Changes in radiation and radioactivity levels during post-closure phases were predicted for wildlife VCs living on or near the WL site. However, because species of traditional importance (i.e., commonly harvested by the MMC such as moose, deer, waterfowl, etc.) to the MMC were not specifically identified or considered as part of the post-closure plan, there are ongoing concerns regarding potential effects and exposure to animals in the long-term, and in particular that some specific species of importance to the MMC may not have been identified or considered." MMF recommends that CNL re-run the effects assessment of radioactive exposure to wildlife species of traditional importance to the MMC, as per the TKLUOS recommendation. [Please refer to page 27 of MMF's submission for more information].	CNL has assessed Valued Components, or equivalent analogues, based on traditional knowledge supplied by the MMF through the Traditional Knowledge Land Use and Occupancy Study. Doses to deer (closure phase) and waterfowl (post-closure phase) were assessed in the Environmental Risk Assessment (ERA). Their doses are far below any effect level. The waterfowl was not assessed in the closure phase since there was no significant aquatic source (i.e., water pathway becomes relevant in the post-closure phase). The deer was not assessed in the post-closure phase since its exposure would be minimal (only from drinking river water). Thus, we do not believe there is any potential for adverse effect on these animals.	**Not addressed** It's unclear to the MMF why in the closure phase enough drinking water was available to deer via the Winnipeg River yet there was insufficient aquatic habitat available in the same river for waterfowl (which excluded waterfowl from risk assessment). Subsequently, in the post-closure phase, enough aquatic environment for waterfowl was available, yet this source was not used for drinking by deer, thus excluding deer from risk assessment. a) The proponent should clarify rationale used for excluding these species harvested by the MMC (waterfowl and deer) from risk assessment during the selected phases of closure and post-closure plans. b) Moving forward, monitoring of both groups (deer and waterfowl) should continue into the decommissioning phase. Monitoring deer and waterfowl for risk associated with radionuclide	a) The two phases of the project, Closure (physical demolition, grouting, and construction of the waste facility) and Post-closure, have distinctly different pathways for potential impacts to the environment. This is because the two phases have different potential release mechanisms. During the Closure phase, potential releases are limited to the terrestrial pathway. Since the Closure phase duration is quite short, and for the majority of the time period during Closure the building will be dry, releases to groundwater are not reasonably possible. Hence with no release to the groundwater there will be no release to the aquatic pathway and no impact on aquatic specific species. In summary, the habitat for waterfowl is available during the Closure phase but there is no consequence to the waterfowl since there are no releases to the aquatic pathway. In essence the waterfowl has not been excluded but there are no reasonably potential impacts to aquatic species during the Closure phase because there will be no contamination of the aquatic pathway. Conversely, during the Post-closure phase potential	**Addressed** CNL makes the case for including a different set of species in the Closure and Postclosure phases but it seems reasonable that a more comprehensive model, including a greater number of species in Postclosure, would help to reduce the uncertainty of possible changes in exposed species in the future. It is likely that species in the area may change markedly during the monitoring phase under the impacts of climate change and normal evolution of the landscape around the Whiteshell site. CNL commits to continuing its testing of wildlife killed in the vicinity of Whiteshell Laboratories (probably a condition of its current site licence), which will provide assurance to the MMC of an effort to ensure the continuing high quality (i.e. no contamination) of the local wildlife. Perhaps a summary of the results of the monitoring of wildlife over the history of the Whiteshell site could be added to the EIS to act as a background or reference for future monitoring programs. Site-specific monitoring data for both aquatic and terrestrial species would provide assurance on contamination levels and also show the numbers and species that have been surveyed over the history of the Whiteshell site	

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				exposure would bring peace of mind to the MMC as use of deer and waterfowl as country food sources continues. Otherwise, there is a risk of an impact to the exercise of the MMC's Aboriginal/inherent rights. c) There is no evidence or indication that TKLUOS data has been incorporated into design of monitoring or follow-up programs of traditionally important species. No mention of monitoring measures/thresholds to verify predictions of effects or evaluate mitigation measures on traditionally important species have been given.	releases are only reasonably expected to groundwater. Given that the vertical groundwater movement is downwards to the bedrock, no interaction between the surface "terrestrial environment" is expected. Hence with no release to the surface there will be no release to the terrestrial pathway and no impact from this pathway on terrestrial specific species such as deer. In summary, the deer was not assessed in the Post-closure phase since its exposure would be minimal (only from drinking river water). The assessment has demonstrated that there is no potential for adverse effect on these animals. b) CNL acknowledges the peace of mind that is accomplished with MMC by continued monitoring and reporting. CNL will continue to monitor ground and surface water (Winnipeg River) for comparison with background levels and guidelines including Health Canada's Canadian Drinking Water Guidelines and the Canadian Council of Ministers of the Environment guidelines for the protection of aquatic life. Should these values and thresholds be exceeded, the monitoring of receptors such as water fowl and other traditional species will be measured. CNL currently and	(e.g., numbers of otters, fishers, martens, beavers, etc.).	

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					will continue to collect and analyze terrestrial animals such as deer, bear, grouse, fox, martin, otter, muskrat, fisher, beaver, and porcupine that have been road killed in the vicinity of the site. CNL is confident that monitoring of the groundwater around the Whiteshell main site in the vicinity of the WR-1 reactor will provide ample advanced indication of the performance of the disposal system long before any releases to the aquatic environment. c) CNL has provided the MMF the proposed Post-closure monitoring plan for the WR-1 project and invites comments regarding Traditional knowledge and land use that is relevant to the plan. During 2019, an MMF Environmental Monitor observed 4 days of site environmental monitoring and CNL is committed to continuing this program in 2020 and beyond. Important traditional plants (e.g., berries, mushrooms) were identified during one of the site visits. CNL collected some species for analysis and is reviewing the existing environmental monitoring plan to determine if it adequately covers those important Indigenous species or if the plan can be modified to do so.		

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					Canadian Water Quality Guidelines for the Protection of Aquatic Life – Site-Specific Guidance, CCME. *http://ceqg-rcqe.ccme.ca/download/en/221* *Guidelines for Canadian Drinking Water Quality Summary Table.* *https://www.canada.ca/content/dam/hc-sc/migration/hc-sc/ewh-semt/alt_formats/pdf/pubs/water-eau/sum_guide-res_recom/summary-table-August-15-2019-eng.pdf*		
		Environmental Effects - Human and Ecological Health					
167.	MMF (Dec 19, 2017)	The draft EIS (page 6-297) acknowledges that: "Harvesters represent traditional users of the area who may be exposed through harvesting of country foods." MMF indicates that the draft EIS and ERA TSD make a series of assumptions about land use location, duration, and frequency of harvesting activities. MMF expresses the view that the time spent by traditional harvesters at the WL site in the exposure model is very restrictive. The HHRA for the harvester assumes land use practices in 2324 to be similar to those in 2024 but MMF notes these may be completely different. MMF argues that it should be possible to conduct several land use practices using the transport models to determine if time of residency in the area and a more traditional diet will affect exposure. The draft EIS further states: "Recreational users such as swimmers, anglers, and boaters that occasionally carry out recreational activities along	The Harvester is assumed to consume wild game, fish and berries all from the vicinity of the WR-1 site (1/3 at site, 1/3 downstream/upwind and 1/3 upstream/upwind). The quantity of wild game in the original ERA was recommended by Health Canada 2010 for indigenous populations. The quantity of fish was recommended by Health Canada 2007 for subsistence consumers. The quantity of berries is the entire fruit and berry portion of Canadian diet as given by CSA N288.1. CNL partnered with the MMF to conduct Harvester food intake surveys with Manitoba Métis Citizens that harvest in the area of the Whiteshell Laboratories. The information provided confirmed VCs for the project and was used to validate the assumptions made for wild game, fish and plant ingestion	**Partially addressed** CNL uses generic guideline values from Health Canada and CSA and not site specific, or eastern Manitoba specific, data for traditional harvesters. Surveys of traditional users in eastern Manitoba indicate that moose is a significant food source (and includes an aquatic pathway -plants - for exposure) but white-tail deer is the VEC used. Modelling of these additional food sources could change exposure scenarios to humans in the future.	The White Tailed Deer was selected as the Valued Component (VC) representing deer and other related species such as moose. The deer was selected because it is well known to exist on-site and is the major population in its taxonomic/ ecological group. To address the concern expressed by the MMF on behalf of Métis Citizens, CNL will perform additional modelling using moose as a VC. CNL will make the results of the analysis available to the MMF and other interested parties.	**Addressed** Food surveys of First Nations in southeastern Manitoba have shown that moose are a preferred land mammal, when they are available. Changes in species abundance and distribution in the Whiteshell area over the next hundreds of years could result in moose increasing in abundance. Moose are usually a dominant species in site environmental assessments because of their consumption of aquatic plants that might show contamination from discharging groundwater or surface water through the aquatic pathway.	

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		the Winnipeg River at locations close to the WL site, as compared to the most critical group locations (Farm A and Farm F), are not directly considered for the assessment because these activities are not representative of population groups in the area." Given the potential for the change in land use over time, MMF argues these recreational activities should be considered as part of the assessment. As the project site and surrounding area become available for these uses, there is the potential for the recreational use of the area by the MMC to increase. MMF recommends that land use studies be conducted to determine if time of residency in the area and a more traditional diet will affect exposure [Recommendation 4.3.18a]. In addition, MMF recommends that recreational users and the potential increase in the recreational land use of the area should be considered in the land use studies undertaken [Recommendation 4.3.18b]. [Please refer to page 38 of MMF's submission for more information].	rates for subsistence receptors. This information was included in the next revision of the ERA and EIS. Recreational receptors are not specifically considered, for the reasons stated. However, the farmer in the post-closure scenario used the river for swimming (includes sediment exposure) and fishing and thus has similar exposure pathways to the recreational users. As the farmer also drinks the river water and uses it for irrigation and bathing, the recreational exposures are expected to be lower than those for people who either farm or harvest on and around the site.				
168.	MMF (Dec 19, 2017)	MMF indicates that the draft EIS identifies the harvesting practices of First Nations proximate to the project site, and the potential effects on the harvesting and other rights of First Nations. For example, Table 6.7.1-1 identifies how "Sagkeeng FN harvest wild rice and medicinal plants in the area." As is identified throughout their review, the MMC has constitutionally protected rights and interests, and	A traditional knowledge and land use (TKLU) study titled, "Whiteshell Reactor #1 Decommissioning: Manitoba Métis Traditional Knowledge, Land Use and Occupancy Study" was completed and provided to CNL in January 2019. CNL supported carrying out the study to assist in better understanding modern and	**Partially addressed** CNL has taken several steps to incorporate MMF knowledge and activities into the EIS but the models, and a single land use study, do not completely incorporate the scope of land use activities for the MMF. In particular, the EIS needs to predict the	CNL's use of current lifestyle habits to assess impacts to human receptors is in line with regulatory requirements. REGDOC 2.11.1 states: "The habits and characteristics that are assumed for the human critical group should be based on reasonably conservative and plausible assumptions that consider current lifestyles and	**Addressed** A critical group that represents a traditional Indigenous lifestyle needs to reflect a reasonable representation of the diet of a family that harvests fish, birds, wildlife and plants locally, and consumes water on-site for everyday uses. While it is true that changing the relative proportion of the dietary species	

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		exercise those rights and interests in the vicinity of the project area. Much like First Nations, MMF explains that these rights and interests and the health and wellbeing of the MMC stand to be impacted by the project activities and resulting accumulation of contaminants in the environment and resources relied on by the MMC. Métis may have similar concerns and wish to harvest wild rice from depositional areas of the Winnipeg River downstream of WL site, which needs to be taken into account by CNL and included in the draft EIS. MMF recommends that CNL work with them to identify and consider the rights, interests and activities of the MMC that may be impacted by the project. MMF explains that these need to be included in the draft EIS, along with a consideration of how these harvesting activities and practices may be impacted by the presence of contaminants and consequently affect the health and well-being of the MMC. In addition, MMF notes that accommodation and mitigation options may be required. [Please refer to page 37 of MMF's submission for more information].	traditional land and resource use by MMC near the WL site. CNL has agreed to provide capacity funding for community meetings to support the sharing of information about the project to Manitoba Métis Citizens and the results of the TKLU study. CNL also partnered with the MMF to conduct Harvester food intake surveys with Manitoba Métis Citizens that harvest in the area of the Whiteshell Laboratories. The information provided confirmed VCs for the project and was used to validate the assumptions made for wild game, fish and plant ingestion rates for subsistent receptors. Both studies have been incorporated into the Environmental Impact Statement.	potential impact of changes in exposure from changes in land use in the future. Changes in traditional food items, amounts consumed, changes in nuclide levels released from the ISD would provide information on the range of potential doses received by users of the land. The deterministic models currently used could be improved by a wider range of scenarios or by incorporating distributed parameters for transfer factors, dose conversion factors, food preferences (e.g., moose, deer, fish, specific plants such as wild rice) and other values defining exposure.	available site-specific or region-specific information." Given that the expected exposure to a harvester receptor is several orders of magnitude below levels where human health impacts could be expected, it is not expected that adjusting the ratios of lifestyle parameters (ex., 30% fish diet to 60% fish diet) can have a significant enough impact on results to change any conclusions of the assessment.	won't make a substantive change in the radiation received from the site, a comprehensive model that includes a varied local diet and unrestricted living on the site after the institutional control of the site has ended would provide the MMC with confidence that the risk from living on the site is low, and equivalent to living anywhere else on the Winnipeg River. That risk should include internal and external exposure to all sources of radiation on-site.	
173.	MMF (Dec 19, 2017)	Table 5-20 of the ERA TSD identifies that the dominant contributor to the total dose is C-14 through the ingestion of terrestrial plants and animals, and fish, except for the 3-month-old drinking formula, which has tritium as the dominant contributor to dose. MMF poses the following question: why is the dose not	For radiological constituents of potential concern (COPC), human receptors were chosen in accordance with the CSA Standard N288. CNL also considered a 3 month old as a human receptor for the farms to align with CNL's Derived Release Limit (DRL) report. For	**Addressed**			

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		calculated for the nursing infant of the harvester? MMF indicates that the hazard quotients (HQs) derived for constituents of potential concern were below the protective benchmark for all receptors, with the exception of a toddler harvester during post-closure, which slightly exceeded the benchmark. For the toddler harvester, the total ingestion HQ slightly exceeded 0.2 for lead (HQ = 0.24) (page 6-314 of the draft EIS). The draft EIS further identified that "with the exception of a toddler harvester during post-closure, which slightly exceeded the benchmark. If only the Project contribution is considered, the HQs are reduced even further and hazard quotients are well below for all receptors (the Project contribution to the total is 0.0021% for cadmium and 0.00002% for lead)." MMF explains that this gap in the modelling scenario is significant as there does not appear to be a pathway for the nursing infant for the harvester scenario. MMF notes that a rationale for this was not located, nor was a description of the infant diet for the harvester. MMF assumes that the "harvester" is represented by a family with adults, a toddler and a breastfeeding infant, however this assumption needs to be confirmed and clearly identified in the draft EIS. Given the reliance of the MMC on harvesting activities, and the importance of protecting and preserving the harvesting rights and	non-radiological COCs we have followed Heath Canada's guidance, which includes the human receptors of an adult and a toddler. The exposure factors for the harvester, including infant, were presented in Section 4.2.4 and Section 5.2.4 of the ERA. The 3 month infant has now been included in Table 4-6. Additional text was added to clarify other exposure factors. Considering the dose to the 3 month old nursing infant as compared to the adult, child, and 1yr infant at the farms in Closure and Post-Closure, we expect that the differences between them would be similar for the harvesters. Specifically, the ratio of doses between Farm infant (cow's milk and food) and Farm 3-mo nursing infant (exposed via mother eating local food), is expected to represent the ratio between the Harvester infant and the Harvester 3-mo nursing infant. Therefore, from the doses in ERA Table 5-20, we expect the dose to Harvester 3-mo nursing infant to be approximately 6.95E-4 mSv/a.				

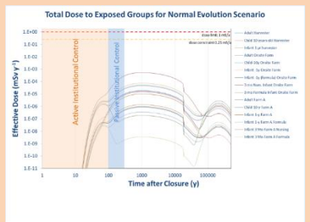
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		activities of the MMC for future generations of Métis harvesters, the data related to pathways for contaminates between adults and nursing infants is significant in terms of potential long-term health effects on members of the MMC. MMF indicates that further information is needed, including the diet for the infant harvester, and the identification of the family grouping considered, the pathway for the nursing harvester, etc. [Please refer to pages 38-39 of MMF's submission for more information].					
176.	MMF (Dec 19, 2017)	MMF explains that the safety case for the WR-1 decommissioning relies to a large extent on the conclusions of the 2001 CSR for the WL site. Two areas with elevated radioactivity were expected to remain on the WL site: the contaminated Winnipeg River sediments and the LLW WMA. The conclusions from that study were based on the assumption that all High Level Waste (HLW) would be removed from the site and sent to a national disposal site within a number of years. As no facility has been selected or developed, leaving the HLW would change the conditions of the CSR for the WL site, and as such MMF indicates it should be re-examined as it forms the basis of the long-term plan for the site. Although the WR-1 decommissioning is a separate component of the CSR, MMF argues that the exposure models should be assessed in terms of the	Cumulative effects of past, present and reasonably foreseeable projects, including the decommissioning of WL, have been considered in the Environmental Impact Statement (EIS). The proposed WR-1 project has no impact on the plan for the High Level Waste. There is no HLW remaining in the WR-1 reactor. All HLW is safely stored in dry concrete canisters on site. The HLW will be transported to the Chalk River Laboratories site where it will remain in interim storage until a national disposal facility is constructed. The shipments will be complete by 2023.	**Partially addressed** This comment from the MMF was originally based on the view that the remnants of WR-1 were considered high level nuclear waste, but it has been suggested by CNL and the CNSC that the calandria and associated remnants are considered to be intermediate level waste. Regardless, radioactivity potentially released to the environment from the ISD should be considered in the EIS in combination with other sources of radiation on the WL site (e.g., the WMA, the sewage lagoon, contaminated sediments in the Winnipeg River). One way to accomplish this is to update the CSR (now 20 years old), incorporating	The WR-1 assessment does take into account existing concentrations where overlaps occur with the WR-1 project. Following closure, the WR-1 release pathways are to groundwater, sediment and surface water. Existing concentrations have been incorporated into the Environmental Risk Assessment, and the results are presented as "total concentrations" and "project contributions". In many cases the project contribution is a small fraction of existing concentrations. The results presented in the Environmental Impact Statement are the cumulative effect of the project and the existing concentrations in the environment. The peak dose rate from WR-1 contributions (on-site farm, nursing 3 month infant receptor) is on the order of $5x10^{-4}$ mSv/year, approximately 0.05% of the	**Addressed** CNL's response is reasonable but the combining of doses from the WMA and ISD is not clear from the EIS. Transport of nuclides (i.e., which nuclides, timing of maximum concentrations, transport pathways, etc.) from the WMA are not discussed at length in the EIS. In fact, it is not clear if the WMA will remain in place or be transported to another site. Nor is it clear that the dose from the current contamination in sediment is added to the dose from nuclides exiting the ISD (although the Cs-137 in sediment will decline with a half-life of 31 years and so will decay before significant amounts of nuclides move from the ISD). The EIS for the ISD was conducted on the basis of the Comprehensive Study Report (2002) which recommended	

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		other sources of radioactivity on the site (LLW WMA, Winnipeg sediment, sewage lagoon and other sources of radioactive and noon-radioactive contaminants). [Please refer to page 30 of MMF's submission for more information].		predictions for releases from the ISD. The presence of stored nuclear waste at WL will impact future use of the site and models of exposure for human health and the environment should include exposure to all sources of radioactivity.	1 mSv/year Canadian regulatory limit, and 0.16% of the 0.3 mSv/year guideline from REGDOC 2.11.1 Volume III, (also International Atomic Energy Agency (IAEA) SSR-5) to account for other sources of exposure. Since WR-1 accounts for such an insignificant portion of the WR-1 "share" of that dose limit, and since the Waste Management Area assessment will be subject to the same regulatory requirements, there is not expected to be any significant cumulative effect of either project on one another. *CNSC, REGDOC-2.11.1, Volume III: Assessing the Long-Term Safety of Radioactive Waste Management.* *http://nuclearsafety.gc.ca/eng/acts-and-regulations/regulatory-documents/published/html/regdoc2-11-1-v3/index.cfm* *IAEA Safety Standards, Disposal of Radioactive Waste, SSR-5.* *https://www-pub.iaea.org/MTCD/publications/PDF/Pub1449_web.pdf*	leaving the WR-1 in place for several decades until radioactivity declined further. The dose model for a critical group living on the site should include dose from ground water (e.g., wells) and surface water plus external dose from spending time near the WMA and any other radiation sources.	
177.	MMF (Dec 19, 2017)	MMF explains that the draft EIS does not discuss the other sources of radioactivity currently stored on the site. The CSR indicates that, after decommissioning, there will be two sources of radioactivity that remain on the site: the contaminated Winnipeg River sediments and the LLW WMA. MMF indicates that there is no mention of these radiation sources or their influence on the risks from the WR-1 decommissioning in the draft EIS. MMF argues that these existing sources of radioactivity present the	Cumulative effects of past, present and reasonably foreseeable projects, including the decommissioning of WL as described in the CSR, have been considered in the Environmental Impact Statement (EIS). The proposed WR-1 project has no impact on the plan for the High Level Waste. There is no HLW remaining in the WR-1 reactor. All HLW is safely stored in dry concrete canisters on	**Partially addressed** This comment from the MMF was originally based on the view that the remnants of WR-1 were considered high level nuclear waste, but it has been suggested by CNL and the CNSC that the calandria and associated remnants are considered to be intermediate level waste. Regardless, radioactivity potentially released to the	The WR-1 assessment does take into account existing concentrations where overlaps occur with the WR-1 project. The long-term plan for the Winnipeg River sediment is documented in the Comprehensive Study Report and therefore not reproduced in the WR-1 Environmental Impact Statement (EIS). There will be no irradiated fuel remaining on the WL site after closure. The fuel will be	**Addressed** Same comment as above. The EIS leaves the impression that radiation dose and hazards for the WMA, sewage lagoon, contaminated sediment are assessed independently from the WR-1. If internal and external doses to the critical group are assessed cumulatively (which is not clear from the EIS) then this issue has been addressed.	

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		potential for additional radioactive material and effects that requires consideration as it may result in additional cumulative effects on the environment and specifically the MMC members that rely on the natural environment for the exercise of their rights and subsistence. The draft EIS (page 2-2) further identifies that the "decommissioning approach for the WL site as described in the Comprehensive Study Report (CSR) was to remove all facilities entirely from the WL site with the exception of LLW trenches in the Waste Management Area, which may be managed through on-site in situ disposal (AECL 2001). Over a 10-year period, multiple buildings and facilities at the WL site have been decommissioned and the occupied space has been remediated, in an effort to meet this objective". MMF indicates that the Winnipeg River sediment is not mentioned here although it was identified in the CSR as remaining after site closure. MMF notes it is also not clear what the long-term plans are for the irradiated fuel remaining on-site. Although the draft EIS is written specifically for the WR-1 ISD, MMF recommends that it be reviewed in the context of the larger site and other sources of contamination. At the very least, MMF recommends that the description of the site and exposure models should include all sources of contamination and their management plans including identifying the long-	site. The HLW will be shipped for additional interim storage at the Chalk River Laboratories site until a national disposal facility is constructed.	environment from the ISD should be considered in the EIS in combination with other sources of radiation on the WL site (e.g., the WMA, the sewage lagoon, contaminated sediments in the Winnipeg River). One way to accomplish this is to update the Comprehensive Study Report (now 20 years old), incorporating predictions for releases from the ISD. The presence of stored nuclear waste at WL will impact future use of the site and models of exposure for human health and the environment should include exposure to all sources of radioactivity.	transported to the Chalk River Laboratories site for ongoing dry storage in concrete canisters until a deep geologic disposal facility is constructed in Canada. WR-1 release pathways are to groundwater, sediment and surface water. Existing concentrations have been incorporated into the Environmental Risk Assessment, and the results are presented as "total concentrations" and "project contributions". In many cases the project contribution is a small fraction of existing concentrations. The results presented in the EIS are the cumulative effect of the project and the existing concentrations in the environment. The peak dose rate from WR-1 contributions (on-site farm, nursing 3 month infant receptor) is on the order of $5x10^{-4}$ mSv/year, approximately 0.05% of the 1 mSv/year regulatory limit, and 0.16% of the 0.3 mSv/year guideline from REGDOC 2.11.1 Volume III, (also International Atomic Energy Agency (IAEA) SSR-5) to account for other sources of exposure. Since WR-1 accounts for such an insignificant portion of the WR-1 "share" of that dose limit, and since the Waste Management Area assessment will be subject to the same regulatory requirements, there is not expected to be any significant cumulative effect of either project on one another. *CNSC, REGDOC-2.11.1, Volume III: Assessing the Long-Term Safety of Radioactive Waste Management.*		

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		term plans for the irradiated fuel currently on-site and the Winnipeg River sediment. [Please refer to page 32 of MMF's submission for more information].			*http://nuclearsafety.gc.ca/eng/acts-and-regulations/regulatory-documents/published/html/regdoc2-11-1-v3/index.cfm* *IAEA Safety Standards, Disposal of Radioactive Waste, SSR-5. https://www-pub.iaea.org/MTCD/publications/PDF/Pub1449_web.pdf*		
178.	MMF (Dec 19, 2017)	The draft EIS and associated documentation indicate that land use plans and institutional control are clearly defined and will continue during post-institutional period (300+ years) and will be designated for other uses after 300 years. The draft EIS also acknowledges that the government might not maintain control over the site in which case monitoring programs might not continue and that people may "be present on-site and make some use of local resource". Given this uncertainty, MMF notes that predicting social, political and environment conditions 300 years into the future is very problematic. In terms of exposure modelling and access to the site, MMF indicates that it would be more conservative to adopt a model that allows for no controls and unrestricted access to the site. The long-term plan or "end use" for the WL site is also unclear, and where possible MMF explains this should be clearly identified in the draft EIS as this "end use" state will be of importance to the MMF and ultimately affect what traditional uses and activities can be carried out there by MMC citizens. MMF recommends that the draft EIS	WR-1 was shut down in 1985 and placed into storage with surveillance (SWS) in 1995. The activity in the reactor has been reduced by over 95.5% since 1985. The total activity in the Whiteshell Reactor Disposal Facility (WRDF) in 2025 will be about 1 x 10^{15} Bq. The Environmental Risk Assessment (ERA) shows that radioactive water (contains hydrogen-3 or tritium) entering the ground water makes up almost all of the expected releases from the WRDF for the first 150 years. The solute modelling predicted that a maximum of 7,500 Bq/day of tritium might be released from the WRDF once it fills tritium originally in the WRDF in 2025. After the first 150 years, carbon-14 (C-14) becomes the dominant potential release nuclide for the next 10,000 years. After 1,000 years the expected release from the WRDF is as high as 300 Bq/day. Over 10,000 years, the WRDF contains 99.888% of the C-14 originally in the WRDF in 2025.	**Not addressed** CNL repeats the results of the modelling exercises but has not responded to the issue of institutional control, which is possibly a matter for the CNSC to consider. Part of the rationalisation for the ISD option is the monitoring and surveillance for 300 years however there are no assurances that such a program could remain in place for that length of time. As CNL states "…if the institutions involved have the resources and desire to do so." Environmental legislation in Canada has changed markedly in the last 50 years and several programs in the US have been modified and reduced under the current administration. There is no guarantee that programs will be in place to monitor environmental nuclide levels from the ISD and validate model predictions. Also there are no examples of decommissioned	To clarify, there are two distinct parts to institutional control. 1. Active control – Monitoring, inspections, sample collection 2. Passive control – Federal land ownership, deed restrictions, property records. Active control is carried out from 0-100 years post-closure. 100 years was selected because it encompasses the time frame where one would expect to see an initial release of Tritium (first nuclide to potentially be released according to the models). The intent of this period is to verify performance of the facility against assessment predictions. 100 years is a reasonable amount of time to assume these activities can be maintained. This 100 year period is a minimum, and controls will persist until the CNSC or other authority having jurisdiction agrees that active monitoring is no longer necessary. Passive controls are in place from 0-300 years. 300 years was selected as it is a reasonable amount of time to assume the institutions that	**Addressed** CNL has proposed a monitoring program for up to 300 years, although the final plan and the nature of the monitoring plan will be determined by the CNSC. The proposed plan is contingent on acceptance by the CNSC and continued stable funding from government. It is unlikely that the CNSC will be present in its current form in 300 years (how many government agencies are the same now as 300 years ago?) and funding for monitoring will be contingent on government resources. Reducing infrastructure on the Whiteshell site will help reduce costs and the burden on future generations.	

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		be revised to include, as a possibility, an institutional control model with no controls and unrestricted access to the site, to take into account the uncertainty of the end state of the WL site [Recommendation 4.3.15a]. MMF recommends that, if possible, the long-term plan or "end use" of the WL site should be clearly identified, including a timeline leading up to this end use state. Limitations on the MMC use of the lands and resources resulting from this anticipated "end use" state should be clearly identified [Recommendation 4.3.15b]. [Please refer to page 37 of MMF's submission for more information].	Totalling all of the nuclides that might be released from the WRDF over the first 10,000 years, the maximum amount could be as high as 7,600 Bq/day for the first 150 years, lowering to no more than about 330 Bq/day. These releases account for only 0.03% of the total activity in the WRDF in 2025. The facility will prevent over 99.97% of the radioactivity in WR-1 from being released to the environment. The 300 year time frame was selected based on a reasonable assumption of the reliability of institutional controls, not the half-life of the radiological material. Beyond 300 years, there is less confidence that institutional controls can be relied upon as a barrier. As such, 300 years was selected as the limit beyond which the ISD structure must be safe without reliance upon human intervention. The 100 year 'Active Monitoring' period was selected to ensure that sufficient opportunity is provided to verify the Whiteshell Reactor disposal Facility (WRDF) is performing as expected. The solute transport modelling indicates that in the unlikely event of a failure of the ISD primary barrier, very low levels of contaminants would be detectable within the first	facilities in which the solute transport models have been verified over an extended period of time (e.g., decades) to support the ISD option.	maintain such controls, (government, record archives, etc.) will remain in place. This 300 year period is again a minimum period, and controls will persist until the CNSC or other authority having jurisdiction agrees that passive controls are no longer necessary. In the assessment of the Normal Evolution Scenario, these controls are not accounted for. Doses are presented for an on-site farmer and on-site harvester starting immediately post-closure. These institutional control timeframes are only considered in the application of the Human Intrusion, and on-site drinking water well disruptive event scenarios. In these cases, the intrusion events are assumed to occur at year 100, as soon as a regular on-site presence is no longer in place. The 300 year passive control is not relied upon for safety in any scenario, and is simply an additional reasonable mitigation that CNL has proposed to optimize the proposed in situ disposal approach, and keep impacts from the facility As Low As Reasonably Achievable (ALARA). While outside of the scope of the WR-1 environmental assessment, CNL commits to involving the MMF in the review of the proposed WL Land Use and End State Plan and providing capacity to do so if required. Solute transport models are used to predict expected performance of		

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			100 years. The results of the 100 year active monitoring period will support the discussions to reduce, or even stop active monitoring in the future, once sufficient data is available to provide further confidence that the WRDF is performing as expected. None of the above precludes the option of extending the active monitoring period or institutional control period beyond 300 years if the institutions involved have the resources and desire to do so. However, this EIS conservatively assumes that institutional control is lost beyond 300 years from closure to ensure the potential bounding effects of the WRDF can be assessed. CNL is willing to explain in detail its environmental monitoring program.  Total Activity in WR-1 as a Function of Time		a waste facility in the effective containment of hazardous materials. Post closure monitoring validates those predictions through regular monitoring of and around the facility. The United States of America performed in situ disposal of 3 reactors in the late 1960s that are good analogues for the proposed WR-1 project. These reactors have been monitored for approximately 50 years and have shown the decommissioning approach to be safe and effective. The Hallam reactor in Hallam, Nebraska was decommissioned in 1969 (US DOE, 2020a). After entombment, a surveillance and monitoring program was initiated in 1970 which included analyzing groundwater samples from deep production wells (groundwater from the regional aquifer at depths greater than 180 ft) (US DOE, 2020b). In 1990, there was concern about the possibility of shallow groundwater coming in contact with buried radiological materials along the buried walls of the reactor. A monitoring program in the shallow perched groundwater zones in the vicinity of the Hallam Nuclear Power Facility was established. Groundwater monitoring was conducted on an annual basis at the Hallam site through June 2007 and reducing in frequency afterward (US DOE, 2020b). In 2006, a U.S. Department of Energy report recommended that groundwater monitoring be discontinued because analytical		

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					results since 1970 had demonstrated no impact to shallow perched groundwater and there was no current or anticipated unacceptable risk to human health and the environment. The two other reactor projects, similar to WR-1, that have shown in situ disposal to be safe and effective are the BONUS reactor located in Puerto Rico (decommissioned 1970) and the Piqua Reactor in Ohio (decommissioned 1969). Information on these projects can be found on the US Department of Energy web site (US DOE, 2016, 2019, 2020c, 2020d). References: *U.S. Department of Energy, 2016, "Long-Term Surveillance and Maintenance Plan for the Boiling Nuclear Superheater (BONUS) Reactor Facility, Rincón, Puerto Rico", LMS/BON/S01091-0.1, 2016. https://lmpublicsearch.lm.doe.gov/lmsites/s01091_bonus_ltsp.pdf (updated in 2022)* *U.S. Department of Energy, 2019, "Long-Term Surveillance and Maintenance Plan for the Piqua, Ohio, Decommissioned Reactor Site", LMS/PIQ/S00076-2.0, 2019. https://lmpublicsearch.lm.doe.gov/lmsites/s00076_ltsm.pdf (updated in 2022)* *U.S. Department of Energy, 2020a, "Fact Sheet: Hallam, Nebraska, Decommissioned Reactor Site", 2020. https://www.energy.gov/lm/articles/hallam-nebraska-*		

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					decommissioned-reactor-site-fact-sheet (updated 2021) *U.S. Department of Energy, 2020b, "Long-Term Surveillance Plan for the Hallam, Nebraska, Decommissioned Reactor Site", LMS/HAL/S03478-3.0. https://lmpublicsearch.lm.doe.gov/lmsites/s03478_hal_ltsp.pdf (updated 2022)* *U.S. Department of Energy, 2020c, "Fact Sheet: Piqua, Ohio, Decommissioned Reactor Site", 2020. https://www.energy.gov/lm/articles/piqua-ohio-decommissioned-reactor-site-fact-sheet (updated 2021)* *U.S. Department of Energy, 2020d, "Fact Sheet: BONUS, Puerto Rico, Decommissioned Reactor Site". https://www.energy.gov/lm/articles/bonus-puerto-rico-decommissioned-reactor-site-fact-sheet (updated 2021)*		
179.	MMF (Dec 19, 2017)	Section 6.7 (6-279 to 6-344) The draft EIS (page 6-288) states: "Results of the Comprehensive Study Report (AECL 2001) indicated that no public health threats were predicted from the decommissioning and reclamation activities for the WL site. Releases are well within regulatory limits for the protection of human health and regular monitoring provides that any aberrations are detected immediately (AECL 2001)." The draft EIS (page 6-294) further identifies that the "Results of the Comprehensive Study Report ["CSR"] indicated no residual effects on public health are expected as a result of the closure of the WL	The Environmental Risk Assessment (ERA) was revised to include the Winnipeg River sediment concentrations in combination with the predicted effects from the WR-1 Project. CNL is in the process of developing the overall Detailed Decommissioning Plan for the WL Site. A performance assessment will be prepared for LLW trenches in the WMA as part of this Detailed Decommissioning Plan. CNL is also preparing a proposed WL Closure Land-use and End-state Plan, along with	**Partially addressed.** The reports on final end-state of the site and closure land-use that are under development and have not been reviewed as part of the EIS. MMF looks forward to reviewing and discussing the final condition of the site and the Detailed Decommissioning Plan with CNL and CNSC. A summary of all remaining sources of contamination, both stable and radioactive, will help reviewers determine current and future status of	CNL notes that the WL Closure Land Use and End State plan is outside of the scope of the WR-1 environmental assessment. Similarly, the site Detailed Decommissioning Plan is also out of scope. Beyond the WR-1 project, CNL is planning engagement activities on the Whiteshell End State and looks forward to receiving input from MMF. The Detailed Decommissioning Plan for WL can be provided for MMF's information once the CNSC has completed their review. This is anticipated to be late 2020 or early 2021.	**Addressed**	

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		site." MMF argues that this is a misrepresentation of the results of the CSR: The CSR determined that there would only be the LLW WMA and the Winnipeg River sediment as the two remaining sources of radioactivity on the site. All HLW was to be removed to a national disposal site that would isolate the waste from the biosphere. Because of those assumptions, there would be no long-term impact on public health at WL site. Those assumptions have now been changed with the long-term ISD storage of WR-1. MMF recommends that the ISD of the WR-1 should be analyzed in terms of the sources of radiation on the site (LLW WMA, the Winnipeg River sediment, lagoon, etc.). Also, the CSR should be re-visited with updated data. [Please refer to pages 37-38 of MMF's submission for more information].	appropriate criteria for site remediation and clean-up activities for the WL site. The proposed WL Closure Land-use and End-state Plan will define the post-closure end-states, the post-closure land-use classifications and allocation, and the physical release criteria that must be met at the site closure. Once the document is ready, CNL intends to meet with the MMF to review, discuss and receive feedback from the MMF on the proposed Plan. End-state definitions and land-use classification and allocation will be applicable to all project decommissioning activities being carried out under the WL Closure Project, including the WR-1 Project. Reference G-320 provides guidance on establishing dose criteria when assessing impacts from waste disposal. The public limit of 1mSv/year is provided, in addition to guidelines stipulating the consideration of impacts from other sources, known or reasonably predicted. G-320 recommends a limit of 0.3mSv/year be used as the assessment criteria, to ensure that effects from WR-1, even when combined from other exposure sources, do not pose a risk to people or the environment, now or in the foreseeable future. The Whiteshell Reactor Disposal	the site, and potential land use.			

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			Facility (WRDF) has established a dose limit of 0.25mSv/year. Each of the alternative decommissioning strategies described in Section 2 of the Environmental Impact Statement (EIS) are expected to meet the dose limit of 0.25 mSv/year for the public. For the ISD option, no member of the public is expected to be exposed to a dose above 0.001 mSv/year as a result of the WRDF (see figure below). This is 0.1% of the regulatory limit of 1 mSv/year. Disruptive events such as failure of the WRDF and the digging of water wells near the WRDF, were shown to raise this expected dose to about 0.25 mSv/year for the local public groups (farming and living on-site). The proposed WR-1 project has no impact on the plan for the High Level Waste. There is no HLW remaining in the WR-1 reactor. All HLW is safely stored in dry concrete canisters on site. The HLW will be shipped for additional interim storage at the Chalk River Laboratories site until a national disposal facility is constructed.				
180.	MMF (Dec 19, 2017)	MMF indicates that the draft EIS and the ERA TSD both often use the term “conservative” when describing uncertainty without explanation or evidence. For example, page 7.1.6 of the ERA TSD states: “The EcoRA problem formulation is conservative in its assumptions to accommodate	The EIS was reviewed for consistency in the use of the term “conservative” when describing uncertainty of various aspects of the project and ensure it is expressed relative to another set of conditions.	**Addressed**			

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		uncertainties and meet the objective of protecting ecological health during the post-closure period" and "There is uncertainty in the radiological and non-radiological release rates to the surface water environment; however, the estimates are expected to be conservative." Also, in a previous section of the ERA TSD, entitled "Uncertainty in Exposure Assessment", MMF notes that sentences such as "this is considered appropriate" and "dose coefficients were obtained from reputable sources" are not convincing and cannot be reviewed. Page 6-344 of the draft EIS states: "Although uncertainties in the assessment exist, conservatism has been included in the modelling so that residual effects are not greater than predicted…Overall, residual effects are considered to be not significant for all ecological health VCs during the closure and post-closure phases. Monitoring and follow-up programs include implementation of CNL's existing Environmental Monitoring Program. These activities will verify effects predictions for ecological health." MMF argues that there needs to be some support for these types of statements. MMF indicates that evaluating conservatism needs to be expressed relative to another set of conditions. Here it is stated, without support. For the statement on page 6-344, MMF explains there is no support for the observation of "residual effects are not greater than predicted" without some reference.					

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		MMF recommends that the draft EIS be reviewed for consistency in the use of the term "conservative" when describing uncertainty of various aspects of the project. In addition, evaluating conservatism needs to be expressed relative to another set of conditions. [Please refer to page 39 of MMF's submission for more information].					

B.3 Brokenhead Ojibway Nation, Black River First Nation and Hollow Water First Nation

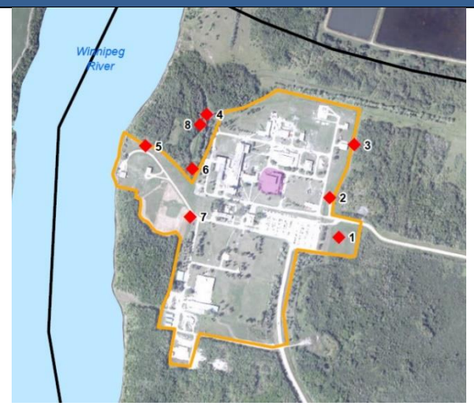
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		EIS				
		Indigenous Engagement				
113.	Black River First Nation, Brokenhead Ojibway Nation, and Hollow Water First Nation (January 22, 2018)	Black River First Nation, Brokenhead Ojibway Nation and Hollow Water First Nation shared a list of the comments heard during a two-day community gathering meeting with CNL in February 2017. Questions and concerns raised were with respect to the following topics: 1. ISD design, methodology and integrity of grout encapsulation; 2. Accidents and malfunctions	Canadian Nuclear Laboratories (CNL) appreciates the questions and concerns from the communities. The multiple community meetings/town halls has provided CNL the opportunity to hear the concerns first hand from community members and enabled CNL to address those questions and concerns face to face. CNL was able to talk in detail about the 10 topics listed in the comment at the community meetings. The	Proposed next steps from CNL – for discussion with the communities, referenced by number to the original comment: 3. End State Workshop through the Indigenous Advisory Committee. 5. Further discussions on how the communities would like to be involved in environmental monitoring. 8. Discuss desire to set up Relationship	1. ISD design, methodology and integrity of grout encapsulation. **Partially addressed** – We want to acknowledge that CNL has provided detailed scientific evidence related to the integrity of the grout encapsulation. However, we continue to have concerns related to radioactive materials entering the groundwater in the future. CNL's own scientific evidence, as provided to us on page 86 of our Traditional Knowledge and Land Use Study, entitled, "api migizik pii pa giiot – when eagles call" (as well as described in the project EIS), acknowledges that tritium, carbon-14, and other nuclides will be released into the environment through the groundwater – despite CNL's insistence in the integrity of the grout and multiple barriers used to contain the disposal facility. The health of the groundwater and the Winnipeg River are some of our primary concerns related to this	**1. ISD design, methodology, and integrity of grout encapsulation** **CNL recommends closing this item, pending completion of these next steps. By closing this comment, CNL acknowledges this is an on-going concern for Black River and Hollow Water.** CNL acknowledges Black River and Hollow Water First Nation's continued concern for the health of the groundwater and the Winnipeg River. CNL will continue to work on building strong relationships with Black River and Hollow Water First Nations. CNL has provided addition information regarding release of nuclides into the environment and addition information on how CNL will work with Black River and Hollow Water to address these concerns. Additional Information Although CNL does predict small amounts of nuclides will enter the environment outside of the disposal facility, the amount is very small compared to naturally occurring radiation. The average effective yearly dose rate from natural radiation (background) in this part of the province (reference site Winnipeg is **4.1 mSv/a** from CNSC Fact sheet – Natural background radiation). The estimated peak Total Dose rate to

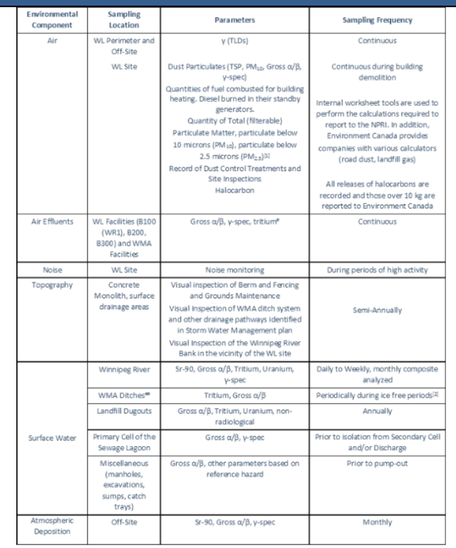
No.	Source	Comment Summary (All original submissions can be found on the Canadian Environmental Assessment Registry, Reference #80124)	Response from CNL	Next Steps (agreed to between CNL and the Community)	Community Acceptance (Addressed, Partially Addressed, Not Addressed)	Response from CNL
		(including previous spills and accidents); 3. Future land use and tenure; 4. Waste management and transportation of waste; 5. Current and long-term monitoring activities; 6. Duty to consult and accommodate (including past decisions relative to the WL site); 7. TK and impacts to traditional hunting, fishing and trapping in the area; 8. Capacity funding; 9. Economic opportunities; and, 10. Future engagement opportunities and involvement in the process.	following is a summary response to each topic. 1. There are many sound technical reasons why WR-1 is a suitable candidate for In Situ Disposal (ISD). • Small size of the facility. • The facility is already below grade and can contain the waste in a robust shielded underground structure. • The thick, reinforced concrete structure of the facility has been tested and verified to be in good shape (condition assessment discussed in Section 3.4.9.1.1 of the Environmental Impact Statement (EIS)). • When tested, the grout containing locally sourced materials (e.g., sand, fly ash, cement) met all performance expectations. • Over 30 years of storage with	Agreements with the communities. 9. Contract opportunities through Shawano Consulting Ltd. Discuss posting CNL vacancies with the communities. Indigenous Liaison position paid by CNL. 10. Continue seeking opportunities for engagement including: • Regular calls with communities and Canadian Nuclear Safety Commission (CNSC). • Supporting a traditional ceremony at Whiteshell Laboratories (WL) or other site as preferred by the First Nations. • Community meetings, site tours, meetings with Chief and Councils, other activities of interest.	project. While CNL's scientific models do not predict the levels of these nuclides to be dangerous to human health, as Anishinaabe Traditional Knowledge holders, we have seen that when we are predicting hundreds or thousands of years in the future, it is difficult to be confident in scientific predictions. In contrast, our traditional knowledge, which is based on thousands of years of cultural experience, focuses on the connections between the land, animals, fish, humans, and spiritual beings that surround us; it cannot be easily evaluated from a western or scientific understanding, because it is based on different - but equally valid - truths. Our traditional knowledge tells us that any potential contamination of the water may have long-term unforeseen consequences due to the interconnectedness of all beings. Our worldview teaches us to be humble as humans in how we act on or predict what will happen in the natural world. It guides us to be skeptical of these long-term technical predictions, and to be cautious in the decisions that we make for the future of our lands. 2. Accidents and malfunctions (including previous spills and accidents). **Partially addressed** - we appreciate CNL's willingness to form an Indigenous Advisory Committee and fund an Indigenous Liaison position. This position addresses one of the recommendations in our Traditional Knowledge & Land Use Study for the WR-1 decommissioning project, which requested the creation of "a funded position for a member of one of the First Nations to act as Community Engagement Coordinator, supporting ongoing information sharing and dialogue between CNL […] and the First Nations." We also acknowledge that CNL has made efforts to produce a basic fact sheet related to the leaks that occurred on the site (the "Whiteshell Reactor #1 Organic Coolant Leak Fact Sheet"). However, there is still an amount of distrust among community members regarding the leaks. When this information was provided to community members during the	humans for the WRDF is **0.005 mSv/a** (EIS Table 6.7.1-15: Summary of Total Dose during the Post-closure Phase Human Health Valued Components). Hence the change in average dose rate to humans in the normal evolution scenario would be from **4.1000 to 4.1005 mSv/a or 0.0012 %.** The amount contributed by the project is far below levels deemed acceptable by the regulator. CNL shares your perspective that the health of the groundwater and the Winnipeg River are of primary importance. To that end, CNL has put measures in place to monitor and test groundwater (see our response to #5 for more information), and test water quality in key locations on the Winnipeg River. These systems will serve as a means to alert CNL and the public if the very unlikely situation occurs where levels of contamination exceed accepted thresholds. It will also allow CNL to take the necessary immediate steps to remediate and address those issues before they reach a point where the environment or human health can be compromised. CNL has an Integrated Environmental Monitoring Program designed to track radiological and non-radiological contaminants throughout the different compartments of the geosphere, atmosphere, and biosphere and consists of three distinct programs: the Effluent Verification Monitoring Program (EVMP), the Environmental Monitoring Program (EMP) and the Groundwater Monitoring Program (GWMP). CNL recognizes the importance of listening to the knowledge keepers and learning about traditional knowledge, the community's worldviews, and teachings of Black River and Hollow Water First Nation. Your people are the original people of turtle island and have a deep understanding of this land and the interconnectedness of nature. CNL recognizes the value and benefit of merging different ways of knowing into its environmental protection program and understands that this is an area that requires further action to make sure CNL is taking a holistic approach to protecting the environment. <u>Recommendations to address concern</u> CNL understands Black River and Hollow Water First Nation's concern for the protection of the land and water will remain throughout the duration of the project, and we hope that our proposed next steps will help diminish these concerns: • Host an interactive workshop to discuss CNL's environmental protection program and inclusion of species of plants and fish of interest. • Host an interactive workshop to discuss how CNL can meaningfully include traditional knowledge, and different ways

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			surveillance has reduced the inventory of short lived isotopes. • Low permeability of the surrounding clay. • 99.9% of the radioactive material is trapped in the reactor vessel steels and zircalloy pipes and tanks, deep within the facility and underground, which will corrode very slowly, ensuring effective containment of the waste while natural radiation decay occurs. The ISD design consists of many overlapping safety barriers, including: • The waste form (slow corroding resists releases). • The Vault (thick heavy concrete designed to be water tight). • The grouted below grade structure (prevents collapse/subsidence, slows groundwater, and		traditional knowledge study, many community members expressed that this was the first time they had been informed about these leaks. The history of leaks at the site makes community members even more doubtful about the certainty of predictions related to potential groundwater and environmental contamination in the future. Without close engagement within the communities since 2019, it is unlikely that most community members are aware of the new materials about the leaks that CNL has produced. **Further work is needed to translate and share this information with our community members.** 3. Future land use and tenure. **Addressed** – HWFN and BRFN continue to request information and engagement on the future use of the Whiteshell Laboratories site. However, we recognize that the responsibility for engagement on this issue lies primarily with AECL. **The First Nations would like to receive and review information from the "characterization campaign" referenced in the Response from CNL.** 4. Waste management and transportation of waste. **Partially addressed** – BRFN and HWFN's Traditional Knowledge and Land Use Study highlighted the tension that many of our community members felt about wanting the waste removed from the Whiteshell Laboratories site, while recognizing that this would mean moving it to the lands of other First Nations (p. 68). One of our questions from the 2017 meeting was to **find out more about what, if anything, is being offered in compensation to other First Nations for storing nuclear waste material in their traditional territories.** One of the recommendations in the Traditional Knowledge and Land Use Study was to explore the potential for our communities to meet with representatives of First Nations associated with the Chalk River site and other decommissioning projects to learn more about how they have been affected (both negatively and perhaps positively) from nuclear waste storage.	of knowing into CNL's environmental protection programs with the goal to alleviate concerns about contamination. • Send a list of monitoring activities in advance to the communities and invite them to participate. • Send the communities the annual monitoring reports along with an easy-to-read summary page explaining the results and main conclusions. • Fund Black River and Hollow Water's proposed engagement plan to support greater engagement with their membership. We hope these provisions will support building trust in CNL's environmental protection program and that CNL is acting appropriately to make sure the land and water is safe. We look forward to discussing this initiative with you in greater detail. Reference to: https://nuclearsafety.gc.ca/eng/resources/fact-sheets/natural-background-radiation.cfm. **2. Accidents and malfunctions (including previous spills and accidents)** **CNL recommends closing this item pending Black River and Hollow Water's acceptance of CNL's proposed measure and the completion of the recommendation CNL has put toward to address concerns regarding community engagement.** We agree and support the need to meaningfully engage with transparent communication with both Black River and Hollow Water First Nation and to build trust with your communities. The steps we have taken, once implemented, such as the Indigenous Advisory Committee and having an Indigenous Liaison Officer in place representing your communities, will go a long way to ameliorate any ongoing concerns regarding communication. In addition, CNL is also proposing the following to address these concerns: • Support Black River First Nation and Hollow Water First Nations proposed engagement plan and the activities identified therein. ○ Take direction from the community on how they want to engage on the project and follow through on those engagements (e.g. site tours, webinars, workshop on specific areas of interests, support CNL's understanding of traditional teachings, lunch and learns, sponsored community event, etc.). ○ Respond to questions regarding historical release events in a forthright manner and support the sharing of information regarding the nuclear industry in Canada.

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			creates favourable chemical conditions to further slow corrosion). • Foundation walls (up to 4 feet thick and verified to be structurally sound, slows groundwater). • Cap and Cover (divert snow and rain, and resist human intrusion). The methodology for placement of the grout will be to pour it in "lifts" or small batches so grout can be properly placed where it needs to go. Strict quality control testing and inspection will be done on raw materials, and the mixed grout to ensure the highest quality final product. The requirements the grout must meet are given in the EIS Section 3.4.6.2 Table 3.4.6-1 Target Physical Properties of Grout. The target requirements are easily achieved by most cement based mixes, and the mix CNL has selected for WR-1		5. Current and long-term monitoring activities. **Not addressed** – In the 2017 meeting, our community members asked, "What say will our members have in the long term monitoring of this project?" CNL's response does provide details into the long-term monitoring plans that are already in place. We acknowledge that two community members were able to observe fish samples being processed at site in October 2020. This and further opportunities to observe and participate in technical monitoring undertaken by CNL are useful in that they provide some transparency and build community capacity to discuss and engage in monitoring. However, community members have expressed concern over the proponent monitoring its own activities, and over the federal government (CNSC) monitoring its own projects. As we stated in our Traditional Knowledge and Land Use Study, "There is a need for robust long-term legacy monitoring of the site, with results shared and understood by members of the First Nations. Communities will only trust monitoring if they understand it, and are confident that it is being carried out independently of the CNSC or CNL" (p. 70). **Our recommendation in the study was that our First Nations be funded to contract independent monitoring of the site, with results presented to CNSC and community representatives in a clear, understandable way**. This may include traditional knowledge monitoring in addition to conventional technical monitoring. All monitoring in place to date represents western technical/scientific approaches. Traditional knowledge-based monitoring should also be discussed. This may include visits and observations at site, sampling and harvesting, traditional activities, ceremonies, or other measures identified by traditional knowledge holders. While we are happy to see the comment that "CNL is interested in discussing environmental monitoring with the communities and learning about the communities' interests in this area," we would reiterate that no progress has been made in this area,	• Work with both communities to develop additional communication materials that is translated into their traditional language (e.g. brochures, info-graphs, one-pagers, etc.) to help inform their membership. **3. Future land use and tenure** **CNL recommends closing this item.** CNL acknowledges the request for additional information on the "characterization campaign" referenced in the response from CNL. The characterization campaign, which determined Affected vs Unaffected Lands was verified through a detailed airborne and ground radiological survey in 2000 and is described in the Comprehensive Study Report Sections 5.3.3 and 5.3.4. CNL also acknowledges Black River's and Hollow Water's request to engage on the future land use of the Whiteshell Laboratories Site and will be reaching out to engage with the communities on future land use in 2021. **4. Waste management and transportation of waste**. **CNL recommends closing this item pending follow-up from CNL.** Regarding of movement of waste, the relocation of waste from Whiteshell is to the Chalk River Laboratories (CRL) located northwest of Ottawa. CRL is an existing licenced facility that is capable of managing, and storing waste. In relation to compensation as this is an existing licensed facility and there are currently no impacts on Aboriginal and treaty rights, no compensation is currently being offered to Indigenous communities. The closest First Nation to CRL is the Algonquins of Pikwakanagan First Nation. The CRL area is in the traditional territory of First Nations represented by the Algonquins of Ontario. CNL has committed to ask Pikwakanagan about their interest in being contacted by Black River and Hollow Water First Nations to discuss their collective experience with the nuclear industry. CNL will share the results of their discussion with Pikwakanagan when it occurs. **5. Current and long-term monitoring activities** **CNL recommends closing this item, pending completion of these next steps. By closing this comment, CNL acknowledges this is an on-going concern for Black River and Hollow Water.** CNL acknowledges Black River and Hollow Water First Nation's continued concern for the health of the groundwater and the Winnipeg River. CNL has provided additional information about CNL's monitoring activities on site. CNL has also proposed next steps for how CNL will work with Black River and Hollow Water address these concerns.

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			is no exception. A detailed laboratory test program was performed to verify that the grout mix does meet or exceed all the target properties. The Whiteshell Reactor Disposal Facility (WRDF) will employ best available grout technology and quality assurance to extend it well beyond 300 years. This period of time was chosen for analytical purposes to evaluate worst-case potential dose to receptors, but the safety assessment was performed for a much longer duration, recognizing that the hazard exceeds thousands of years. CNL has created user friendly communications documents, including posters, documents and the WR-1 web page on WR-1 Decommissioning Homepage to help communicate the proposed ISD project. CNL heard the concerns of the communities and incorporated changes to the EIS to enhance		despite the concerns with long-term monitoring that we have been raising since 2017. There are a number of steps that CNL could take for immediate improvement: • Annual monitoring reports should be prepared in a format and language that is accessible to non-technical community audiences. We are open to discussing approaches to ensuring that these reports are useful to the First Nations. • We would like further discussion related to the rationale for conducting river sediment sampling at 20-year intervals. We believe that more frequent sampling is likely needed. • We would like further information and discussion about the vegetation, fish and wildlife sampling taking place at the site, and specifically with respect to the WR1 project. We are concerned that plants, fish, and wildlife would only be sampled if other parameters raise concern, and would like to discuss this further. We would also like to be invited to participate in future testing events on the site so that we can ask questions while the testing is in process. We hope that sincere discussions can take place on this matter in the coming months. 6. Duty to consult and accommodate (including past decisions relative to the WL site). **Partially addressed** – CNL's comments state, "Prior to the WR-1 project, CNL acknowledges that Indigenous peoples had not been extensively engaged in relation to the overall WL site and WL site closure. The Environmental Assessment currently in progress is specific to the WR-1 ISD Facility and is not meant to address historical issues." We recognize that this project is not meant to address historical issues and that the primary duty to consult on this project lies with the Crown (CNSC) and not CNL. However, CNSC and CNL must acknowledge the history of this site, whereby a colonial government was able to establish a nuclear research facility without the permission,	CNL sends the vast majority of the environmental samples to a third party lab for analysis. For samples completed by CNL Laboratories, we periodically do inter laboratory comparisons to certify our results and techniques. The CNSC also periodically conducts its own independent environmental monitoring program around all nuclear sites including the Whiteshell Laboratories Additional Information The monitoring program proposed for the Project are exclusive to the WR-1 project and do not include the monitoring that is planned for the remainder of the site. CNL has an Integrated Environmental Monitoring Program designed to track radiological and non-radiological contaminants throughout the different compartments of the geosphere, atmosphere, and biosphere and consists of three distinct programs: the Effluent Verification Monitoring Program (EVMP), the Environmental Monitoring Program (EMP) and the Groundwater Monitoring Program (GWMP). The current monitoring activities for the WL site and those proposed for WR-1 are described in Section 11 of the EIS and are summarized in Table 1 below. The Integrated Environmental Monitoring Program is dynamic in nature meaning that it is continually evolving based on various sources of information received. Should groundwater testing of wells in the vicinity of WR-1 indicate abnormal results an investigation would be initiated. This investigation would include sampling and analysis to determine/confirm the source of the contaminant and the extent of the contamination. This would include sampling at additional locations and for several matrices (water, soil, sediment). Groundwater monitoring is the most effective way of evaluating the performance of the WR-1 Disposal Facility. CNL has installed ground water monitoring well nests at 5 locations between WR-1 and the Winnipeg River. Upgradient well nests have also been installed at 3 locations east of Building 100. The wells have been installed at various depths to align with the site stratigraphy. Ground water sampling will provide timely and effective monitoring. The well nests are identified by red diamonds in the following image. Building 100 that houses WR-1 is highlighted in pink. Following site demolition of all structures, CNL plans to install a near-field well nest closer to the west side of Building 100. The below picture shows the locations of CNL's well nests.

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			the description of the design, methodology and integrity of grout encapsulation. CNL funded a trip to Hallam, Nebraska in 2018, providing an opportunity for representatives from Black River First Nation, Hollow Water First Nation and Brokenhead Ojibway Nation to see first-hand an in situ reactor site. CNL conducted a survey with the participants to evaluate the usefulness of the trip. The details are documented in the Indigenous Engagement Report. CNL also prepared a trip report with input from the trip participants that was distributed to community members. 2. CNL has proposed an Indigenous Advisory Committee that would support further discussions and is exploring an Indigenous Liaison position, which would facilitate further communications, including in the		engagement or knowledge of Indigenous communities – one which has created an environmental footprint and had unplanned releases to their traditional territories. While the environmental licensing process addresses one project at a time, the dialogue and relationship with First Nations must take a broader temporal scope. BRFN and HWFN appreciate the opportunities for discussion and information sharing that have been provided to date. While much of the dialogue since 2016 has been with individual community representatives, the 2018/2019 Traditional Knowledge study (funded by CNSC and supported by CNL) was a positive opportunity to engage a broader group of elders and knowledge holders in considering the proposed project. The outcomes of the TK study clearly show a need for further information sharing, engagement, dialogue and accommodation – as articulated in the study's 5 recommendations. There has been very little engagement between December 2019 and October 2020, but BRFN and HWFN and currently working with CNL and CNSC to establish a process funding mechanism to support meaningful engagement for the remainder of the planning, assessment and licensing process. We are optimistic that this will lead to deeper and more meaningful dialogue going forward. As we have shared in our Traditional Knowledge and Land Use Study (p. 62), we remain concerned that the initial plan to decommission the site and remove all materials is now being changed to a plan for permanent storage of nuclear waste adjacent to a critical waterway in the traditional lands of our Anishinaabe communities. We see CNL's proposal to permanently store nuclear waste in our traditional territory as a dramatically different project than just the continued decommissioning of an existing research facility. Indeed, this proposal should be treated as a new land use – the same as if there was a proposal to build a new permanent nuclear waste storage facility in a different location.	 **Summary of Effluent and Environmental Monitoring Activities at the Whiteshell Laboratories** In addition to the ground monitoring wells that will be installed for the WR-1 reactor, CNL also conducts additional environmental monitoring. The following table provides additional information on the monitoring activities at Whiteshell Laboratories.

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			Ojibway language. Analysis of potential accidents and malfunctions has been conducted as part of the EIS. This analysis includes events that could occur during the decommissioning work and following closure of the facility. None of the plausible events creates an unacceptable risk to people or the environment. WR-1 was used to research the use of organic coolants in reactors (replacing the water used in conventional CANDU reactors with an oil-based substance for cooling purposes). The type of coolant used in WR-1, called HB-40 or OS-84, has a toxicity that is comparable to gasoline or diesel fuel. There were three coolant leaks at WR-1 over its lifetime. Two reached the Winnipeg River. • The first leak was in 1967 where approximately 300 litres of coolant reached the river through the outfall (the discharge		Our communities continue to reflect on what is the most responsible and appropriate way to decommission the WR1 reactor. Full decommissioning, as originally planned, would introduce some additional costs and risks associated with transporting the reactor materials to a temporary storage site. It would mean moving more radioactive materials into the traditional territories of First Nations in Ontario, but would better remediate the lands and waters of the Whiteshell site. Full decommissioning would also allow Canada to eventually contain its nuclear waste in a single permanent storage facility. In-situ decommissioning, on the other hand, comes at a lower cost and limits further movement of dangerous materials onto lands in Ontario, but leaves a millennium-long legacy in the territories of Manitoba First Nations, and leaves Canada's nuclear waste scattered in multiple facilities across the country. Our communities will continue to reflect on the best course of action for this site. We hope to share the outcomes of our discussions on this topic as the CNSC proceeds with its environmental assessment. 7. TK and impacts to traditional hunting, fishing and trapping in the area. **Partially addressed** - In 2017, we had a number of questions about how the decommissioning activity would affect the environment, animals, and consequently hunting and trapping. These topics are important to us because harvesting from the land is central to our culture as Anishinaabeg. Harvesting keeps us connected to the land, provides food and medicines to nourish our bodies, helps to fulfill traditional family roles, and is protected among our Aboriginal and treaty rights. Since 2017, CNSC funded our communities to undertake the Traditional Knowledge and Land Use Study, "api migizik pii pa giiot – when eagles call." This study gave our communities a much better idea about the potential impacts to traditional hunting, fishing and trapping in the area and documented our current and historical use of the land. Over time, we have seen	 **Environmental Monitoring and Baseline Conditions Environmental Monitoring** The monitoring programs considered in the Alternative Assessments are exclusive to the WR-1 project and do not include the monitoring that is planned for the remainder of the site. The Comprehensive Study Report, which enables decommissioning of the WL site, includes an Environmental Assessment Follow-up Program (EAFP). This is a commitment made by Atomic Energy of Canada Limited (AECL) and executed by CNL that provides ongoing environmental monitoring. CNL currently analyzes, and has for decades, thousands of environmental samples per year. This program is committed to continue following site closure. Additional monitoring identified for the WR-1 project will be done over and above the current monitoring program. The proposed monitoring program for the WR-1 project includes the following: **Mammals** – The WL site's licensed area is comprised of ~4,375 hectares (10,810 acres) of mixed-use land ranging from agricultural, mixed and boreal forest, as well as the impacted lands that were developed or utilized in one way or another to support the research mission. Of the 4,375 hectares, approximately 3,000 hectares (69%) of the licenced area known as the Unaffected Lands, is classified as land that was not used or

Environmental Component	Sampling Location	Parameters	Sampling Frequency
Air	WL Perimeter and Off-Site	γ (TLDs)	Continuous
	WL Site	Dust Particulates (TSP, PM_{10}, Gross α/β, γ-spec) Quantities of fuel combusted for building heating, Diesel burned in their standby generators, Quantity of Total (filterable) Particulate Matter, particulate below 10 microns (PM_{10}), particulate below 2.5 microns ($PM_{2.5}$)[1] Record of Dust Control Treatments and Site Inspections Halocarbon	Continuous during building demolition Internal worksheet tools are used to perform the calculations required to report to the NPRI. In addition, Environment Canada provides companies with various calculators (road dust, landfill gas) All releases of halocarbons are recorded and those over 10 kg are reported to Environment Canada
Air Effluents	WL Facilities (B100 (WR1), B200, B300) and WMA Facilities	Gross α/β, γ-spec, tritium[a]	Continuous
Noise	WL Site	Noise monitoring	During periods of high activity
Topography	Concrete Monolith, surface drainage areas	Visual inspection of Berm and Fencing and Grounds Maintenance Visual inspection of WMA ditch system and other drainage pathways identified in Storm Water Management plan Visual inspection of the Winnipeg River Bank in the vicinity of the WL site	Semi-Annually
Surface Water	Winnipeg River	Sr-90, Gross α/β, Tritium, Uranium, γ-spec	Daily to Weekly, monthly composite analyzed
	WMA Ditches[a]	Tritium, Gross α/β	Periodically during ice free periods[2]
	Landfill Dugouts	Gross α/β, Tritium, Uranium, non-radiological	Annually
	Primary Cell of the Sewage Lagoon	Gross α/β, γ-spec	Prior to isolation from Secondary Cell and/or Discharge
	Miscellaneous (manholes, excavations, sumps, catch trays)	Gross α/β, other parameters based on reference hazard	Prior to pump-out
Atmospheric Deposition	Off-Site	Sr-90, Gross α/β, γ-spec	Monthly

[1] As the result of travel on gravel roads, sand blasting activities, use of gas powered vehicles, propane tanks, other CO_2 emissions, burn pile.
[2] Ditch locations are checked and, if water is flowing, are sampled after rain events greater than 5 millimetre of rain in a 24-hour period, preceded by at least 48 hours of no precipitation. Samples should also be taken during the spring (snow) melt and not more than weekly unless there is some operational concern that triggers additional sampling.

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			point of the liquid waste) as a result of a pin-hole leak in one of the tubes in the heat exchanger. Atomic Energy of Canada Limited (AECL) took action to fix the situation and prevent any more leaks by making design changes, such as using additional valves and installing additional notification systems. At the time, no environmental monitoring for organic material in the river sediments or river water was done. Routine monitoring of organic content in the outfall effluent (liquid waste) began in 1971. • The second leak took place in 1977. There was a slow, low-volume leak of coolant into the river, which settled into the riverbed up to 1 km downstream of		changes to the health of the animals that we harvest. We have also seen that hunting and trapping are getting harder for us to do, as many of our traditional areas have been converted to other land uses over time. The Whiteshell Laboratories development is one piece of the cumulative effects of development that have slowly taken away our traditional way of life. While it is too late to change the fact that the Whiteshell Laboratories were built on this site within our traditional territory, it is not too late to continue to work with CNL and other partners to discuss our communities' interests in this area as well as the future health of the water, land, fish, and animals. 8. Capacity funding. **Partially addressed** – We recognize that following the completion of our Traditional Knowledge and Land Use Study, CNL has made efforts to continue to move forward with our relationship and commit to funding the Indigenous Advisory Committee and Indigenous Liaison position. At this time, our communities are still working with CNL to set up a mechanism for funding other future activities. We expect an agreement will be reached shortly and look forward to continue building our local capacity for engaging in the Environmental Assessment process and for improving the communication process between CNL and our communities. 9. Economic opportunities. **Partially addressed** – In 2017, our members asked, "Where's all our members, why are they not working here—side by side with these people so that we job shadow them? Will our communities have any opportunities to work on the decommissioning?" While we acknowledge that CNL has made some effort to support economic development opportunities for our members, we still must ask why none of our members have found employment with CNL. This is our understanding of the opportunities that CNL has highlighted in the five bullet points in their response:	impacted during the more than 60 years of nuclear operations. The Unaffected Lands provide habitat to wildlife identified by WIN to be of high value. The impact of the proposed WR-1 project on wildlife is minimal as we will be remediating the Project site and leaving only the in situ Whiteshell Reactor Disposal Facility behind. This represents less than 0.1 hectares of the total land area of the 4,375 hectare WL site. Because of the large area of unaffected lands within the WL site, including boreal and mixed forest, wildlife have always been free to move on and off the WL site; therefore, there are no reasons to believe that the population of large mammals off-site would be different than the population on and around the site. It is not uncommon for employees to see large mammals while working on the site. Surveys for species likely to be impacted (i.e., local study area) were conducted. Due to the small footprint of the proposed project the only species identified with the potential to be impacted by the activities are the ones that may use man-made structures, i.e., bats and barn swallows. The only animal group that may be impacted from noise, dust, light, etc. during decommissioning could be songbirds. Data on forest songbirds was collected during the summer of 2018 in the periphery of the WR-1 local study area. The results of the study were included in the revised version of the Environmental Impact Statement. **Benthic Invertebrates** – The Environmental Risk Assessment (ERA) was completed following N288.6, which requires assessment of exposure in the areas where receptors will be exposed. We recognize that sessile organisms at the point of groundwater discharge, such as infauna benthic invertebrates, may be more directly exposed to groundwater. **Physical Monitoring** – Physical monitoring will include semi-annual visual inspection of the WR-1 areas for subsidence, erosion and animal or other intrusions, with decreasing (or increasing) inspection frequency as the performance of the engineered controls are demonstrated. Maintenance activities will be performed as needed to repair damaged areas. A storm water management plan is being prepared and maintained. **Groundwater Sampling** – Semi-annual water level measurements and water quality measurements will be included in the EAFP. The frequency of recurrence of water sampling will be reviewed based on performance data. The number and location of wells, and parameters measured, may change based on an annual review of the data. Testing will determine if any radiological or non-radiological contaminants are released from the in situ disposal facility, and confirm if the concentrations of released contaminants are within the range predicted in the environmental

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			the outfall. AECL tested drinking water, river water, and riverbed samples and found coolant only in the riverbed samples. The tests also found that there were no toxic effects on fish or bottom-dwelling invertebrates. River sediments will continue to be monitored in 2026, 2046 and 2066 in accordance with CNL's Environmental Assessment Follow-Up Program (EAFP). CNL continues to perform extensive site monitoring and reports the results annually to the CNSC. Summaries of these reports are posted on CNL's website. The reports show that the river and sediments are safe and that there is no contamination that would affect		• **CNL's First Nation and Metis Industry Day:** HWFN and BRFN were notified of these Industry Days, but could not attend. Note that it would have taken a 1.5 to 3 hour round trip to travel to these events from our communities. An Industry Day held in one of our communities would likely have been more well attended. • **First Nation and Metis Summer Student:** HWFN and BRFN's main contacts for this project, Furlon Barker and Oral Johnston do not recall hearing about this opportunity. • **South East Regional Development Corporation:** Our communities identified the SERDC as the appropriate body with which to present these opportunities and thank CNL for reaching out in this way. • **CNL's external vacancies:** BRFN and HWFN recall discussions about this but do not remember seeing anything come up after that. • **Ongoing discussions and opportunities:** We believe it is imperative that CNL work closely with our Chief and Council and, when hired, the new Indigenous Liaison, to ensure our members hear about job postings, to develop requirements for positions with our members in mind, and to remove other barriers they may face in applying for these positions or other positions that might be relevant to our First Nation members (e.g. a TK monitoring program, a joint venture contract awarded to the First Nations, etc.). It will take a concerted effort working closely with our communities to address these barriers. 10. Future engagement opportunities and involvement in the process. **Partially addressed** – As mentioned above, we recognize that CNL has committed to providing our communities with future engagement opportunities and involvement in the process, including the creation of the Indigenous Advisory Committee, the funding of the Indigenous Liaison Position, and other supports.	assessment (which are concentrations well below established benchmarks for the protection of humans and the environment). No changes to groundwater are predicted to occur for the first 25 years based on the predicted contaminant transport in the Decommissioning Safety Assessment Report. **Surface Water Sampling** – Surface water (Winnipeg River) and ditch system water will be sampled on a semi-annual basis at one upstream and two downstream locations as part of the EAFP. Frequency of recurrence will be assessed based on performance data. **River Sediment Sampling** – Sampling of the river sediments will be conducted. **Air Emissions Monitoring** – Passive tritium in air network monitoring (semi-annual change out) will be included as part of the EAFP. Monitoring locations (~4) will be selected to be within the main upriver and downriver wind rose sectors, at the site boundary and on-site mainly to monitor airborne tritium plumes potentially originating from the WR-1 entombed reactor. **Soil and Vegetation Sampling** – Should the surface and/or groundwater results reach Environmental Effects levels then CNL would undertake additional monitoring including, but not limited to, soil, vegetation, fish and wildlife. Remedial action plans will be prepared so that remedial action can be executed in a timely manner. The environmental monitoring results over the years demonstrate that CNL's (formerly AECL's) activities have been protective of people and the environment. CNL continues to perform extensive site monitoring and reports the results annually to the Canadian Nuclear Safety Commission. Summaries of these reports are posted on CNL's website. The reports show that the river and sediments are safe and that there is no contamination that would affect human health or the environment. It is important to note that 4,077 hectares (93%) of the WL site is classified as Agricultural land-use and will require no decommissioning or remedial work. The remainder of the site is being remediated and CNL commits to engage with Indigenous communities on the planned End State. <u>Next Steps</u> To help address this concern, CNL is proposing to: • CNL has agreed to fund Black River and Hollow Water First Nations' engagement proposal that will support further engagement and dialogue between CNL and the communities,

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			human health or the environment. • The third coolant leak occurred in 1978. The leaked coolant was cleaned up and stored on site. No coolant was released into the river. 3. Of the 4375 hectares that comprise the WL site, approximately 3,000 hectares (69%) of the licensed area, known as the Unaffected Lands, is classified as land that was not used or impacted during the more than 60 years of nuclear operations. This is supported by an extensive characterization campaign. The other areas that did see operational use is being remediated to Canadian clean-up standards. The total land remaining from the proposed WR-1 project will be under institutional control and represents less than 0.5% of the total WL site. The site will		However, at the time of this response, HWFN and BRFN are still working on a funding agreement with CNL and CNSC to establish ongoing community engagement processes.	including exploring the communities' preferred environmental monitoring program. • CNL is developing plain language material for the annual environmental monitoring reports. CNL will share with these with Black River and Hollow Water once they are complete. • Host a workshop to discuss CNL's environmental protection program and inclusion of species of plants and fish of interest and to discuss specific items related to WR-1 monitoring (i.e. 20-year sediment sampling frequency, and best practice models for Indigenous monitoring). • Host a workshop to discuss how CNL can meaningfully include traditional knowledge and different ways of knowing into CNL's environmental protection programs and how CNL can alleviate concerns about contamination. • Send a list of monitoring activities in advance to the communities and invite them to participate. **6. Duty to consult and accommodate (including past decisions relative to the WL site)** **CNL recommends closing this item pending completion of these discussions and subsequent follow-up actions.** CNL acknowledges your concern that the initial plan to decommission the site and remove all materials is now being modified. While the vast majority of waste will be removed, CNL is proposing to leave some waste in the WR-1 facility which will become permanent storage of nuclear waste. The purpose of this new application and supporting EIS and Indigenous Engagement Report is to reflect how the processes we propose to undertake for ISD are safe to both the environment and to people. We look forward to our continued engagement and to help clarify and address residual concerns you may have regarding our proposed approach. CNL has committed to funding Black River and Hollow Water First Nation's engagement proposal. While CNL is unable to change past decisions, we and AECL are interested in exploring future and long-term relationships with Black River and Hollow Water. **7. TK and impacts to traditional hunting, fishing and trapping in the area** **CNL recommends closing this item pending completion of these discussions and subsequent follow-up actions.** As noted, CNL has a robust long-term monitoring plan in place, in conjunction with proposed monitoring of the WR-1 site, to ensure fish

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			remain under the ownership and control of AECL and have a licence from the CNSC. It is anticipated that institutional controls will be in place for at least 100 years. Other site land will be available for future use, but the amount of land and the process to make it available has not been determined yet. There will be opportunities for First Nation communities to participate in discussions on this topic. The final land use decisions on the future disposition of the site will be made by AECL. 4. All waste from the Whiteshell site, with the exception of proposed trenches at the Waste Management Area, subject to CNSC approval, will be remediated, characterized, packaged and shipped to an appropriate waste handling facility. The majority of the waste will be shipped to Chalk River			species, species at risk and other terrestrial and aquatic species are not impacted by the decommissioning of the facility. CNL agrees with your statement *"While it is too late to change the fact that the Whiteshell Laboratories were built on this site within our traditional territory, it is not too late to continue to work with CNL and other partners to discuss our communities' interests in this area as well as the future health of the water, land, fish, and animals."* <u>Next Steps</u> To help address this concern, CNL is proposing to: • Support Black River First Nation and Hollow Water First Nations proposed engagement plan and the activities identified therein. • Host a workshop to discuss how CNL can meaningfully include traditional knowledge and different ways of knowing into CNL's environmental protection programs and how CNL can alleviate concerns about contamination. • Send a list of monitoring activities in advance to the communities and invite them to observe. • Send the communities the annual monitoring reports along with an easy-to-read summary page explaining the results and main conclusions. • Engage with Black River and Hollow Water First Nation on the End-State of the Whiteshell Laboratories Site. • Help facilitate a discussion on Future Land Use of the site. • Support a community liaison position. • Develop an Indigenous Advisory Committee for the Whiteshell Laboratories Site. **8. Capacity funding** **CNL recommends closing this item pending the receipt of the contribution agreement. By closing this item, CNL understanding that capacity funding in the future will still need to be discussed with Black River and Hollow Water First Nation.** CNL has committed to funding Black River and Hollow Water First Nations engagement proposal, which will support your engagement until the regulatory process has been concluded. In addition, we have offered Black River First Nation and Hollow Water First Nation representation on the Whiteshell Laboratories Indigenous Advisory Committee and a fully funded community liaison position by CNL that will help with addressing concerns, improving communication and increasing comfort and understanding of the project.

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			Laboratories (CRL). Significant amounts of waste have already been shipped to CRL and ongoing shipments are planned for the next 6 years. CNL-WL is registered with the Manitoba Government as a Waste Generator and as such is required to abide by Dangerous Goods Handling and Transportation Act (Manitoba), R.S.M. 1987, c.D12 and the regulations under the Act. This includes the management of hazardous non-radiological waste under the Hazardous Waste Regulation (195/2015). All waste generated by the proposed WR-1 project will also be characterized, packaged and shipped to an appropriate waste storage or disposal facility. This includes the above ground structure and the 2 stories below grade of the west, south and east wings of Building 100. Only the approximately			**9. Economic opportunities** **CNL recommends closing this item pending completion of these discussions and subsequent follow-up actions.** CNL appreciates your feedback on the matter of economic opportunities and employment related to this decommissioning project. We agree with your conclusion that "it is imperative that CNL work closely with our Chief and Council and, when hired, the new Indigenous Liaison, to ensure our members hear about job postings, to develop requirements for positions with our members in mind, and to remove other barriers they may face in applying for these positions or other positions that might be relevant to our First Nation members." We look forward to engaging in these discussions in an effort to address any ongoing concerns and to endeavour to remove any barriers to your economic participation in the project as possible. **10. Future engagement opportunities and involvement in the process** **CNL recommends closing this item pending the receipt of the contribution agreement. By closing this item, CNL acknowledges that further discussion and action that come from the communities' engagement proposal will be required.** CNL has committed to funding Black River and Hollow Water First Nations engagement proposal, community liaison, and the Indigenous Advisory Committee. While outside the scope of the EA, CNL will be requesting a discussion with the Black River and Hollow Water First Nations on the future end-state for the Whiteshell Laboratories site. We anticipate these discussions will begin in 2021.

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			30 m length x 30 m width x 20 m depth will remain as a permanent waste disposal facility. 5. The monitoring program proposed in the EIS is specific to the WR-1 project and does not include the monitoring that is currently conducted at the WL site and in the region around the site. The Comprehensive Study Report, which enables decommissioning of the WL site, includes an EAFP. This is a commitment made by AECL, and executed by CNL, that provides ongoing environmental monitoring. CNL currently analyzes thousands of environmental samples per year. This program is committed to continue following site closure. Additional monitoring identified for the WR-1 project will be done over and above the current monitoring program. The proposed monitoring program			

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			for the WR-1 project includes the following: Physical Monitoring – Physical monitoring will include semi-annual visual inspections of the WR-1 areas for subsidence, erosion and animal or other intrusions, with decreasing (or increasing) inspection frequency as the performance of the engineered controls are demonstrated. Maintenance activities will be performed as needed to repair damaged areas. A storm water management plan is being prepared and maintained. Groundwater Sampling – Semi-annual water level measurements and water quality measurements will be included in the EAFP. The frequency of recurrence of water sampling will be reviewed based on performance data. The number and location of wells, and parameters measured, may change based on			

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			an annual review of the data. Testing will determine if any radiological or non-radiological contaminants are released from the ISD facility, and confirm if the concentrations of released contaminants are within the range predicted in the Environmental Assessment (which are concentrations well below established benchmarks for the protection of humans and the environment). No changes to groundwater are predicted to occur for the first 25 years based on the predicted contaminant transport in the Decommissioning Safety Assessment Report. Surface Water sampling – Surface water (Winnipeg River) and ditch system water will be sampled on a semi-annual basis at one upstream and two downstream locations as part of the EAFP. Frequency of recurrence will be			

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			assessed based on performance data. River Sediment Sampling – Sampling of the river sediments will be conducted. Air Emissions Monitoring – Passive tritium in air network monitoring (semi-annual change out) will be included as part of the EAFP. Monitoring locations (~4) will be selected to be within the main upriver and downriver wind rose sectors, at the site boundary and on-site mainly to monitor airborne tritium plumes potentially originating from the WR-1 entombed reactor. Soil and Vegetation Sampling – Should the surface and/or groundwater results reach Environmental Effects levels, then CNL would undertake additional monitoring including, but not limited to, soil, vegetation, fish and wildlife. Remedial action plans will be prepared so that remedial action can be			

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			executed in a timely manner. Annual Safety Review and Environmental Monitoring Report – A Progress Report on the EAFP specific to the WR-1 Project will be prepared each year and will include a summary of the environmental monitoring results and the safety considerations of the waste left in situ. Cessation of a monitoring activity would occur once it can be shown that an effect has stabilized or has been reduced to a level where it is no longer considered significant by regulatory requirements or community concerns. Any proposals on modifications to the monitoring program will be communicated to the CNSC. CNL is interested in discussing environmental monitoring with the communities and learning about the			

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			communities interests in this area. 6. The duty to consult on the Environmental Assessment lies with the Crown and in this case is the CNSC. Prior to the WR-1 project, CNL acknowledges that Indigenous peoples had not been extensively engaged in relation to the overall WL site and WL site closure. The Environmental Assessment currently in progress is specific to the WR-1 ISD Facility and is not meant to address historical issues. The Environmental Assessment assesses safety of the proposed project relative to the current baseline conditions. The Environmental Assessment is being conducted under the *Canadian Environmental Assessment Act 2012 (CEAA 2012)*. CNL is fully committed to ensuring adequate engagement with Black River, Hollow Water and Brokenhead on this environmental			

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			assessment. As such, CNL approached engagement activities with the intent to provide sufficient background information and context, to establish relationships for future engagement efforts, and to support the overall Environmental Assessment process. This included providing overall background information about the WL site, the previously approved WL Decommissioning project, and the Project. The process was designed to reflect the interest, issues and concerns expressed by First Nations and Métis, and to be adaptive in nature. Engagement with Indigenous peoples was designed based on feedback from the communities and included the following types of mechanisms: • meetings with leadership; • community meetings; • the production of community			

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			specific newsletters; • a site benchmarking trip; • the production of easy to understand graphics and poster boards; • provision of funding by CNSC and CNL for Traditional Knowledge (TK) studies; • tours of the WL site; and • Industry days and workshops. The safety assessment predicts no impact to land, water, traditional foods or people. However, should impacts resulting from this project be identified, accommodations would be discussed with impacted communities. 7. CNL appreciates receiving the TK Study "api migizik pii pa giiot – when eagles call" from Hollow Water First Nation, Black River First Nation and Brokenhead Ojibway Nation and has updated the EIS to			

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			include references to and consideration of the TK Study in both Sections 4 Indigenous Engagement and 6.8 Land and Resource Use. CNL participated in two community meetings hosted by Brokenhead Ojibway Nation regarding the TK study where extensive dialogue with leadership and community members occurred on the topics listed in the Study. CNL has a robust long-term monitoring plan in place to ensure fish species, species at risk and other terrestrial and aquatic species are not impacted by the decommissioning of the facility. 8. CNL is committed to exploring Relationship agreements with the communities both to reaffirm CNL's commitment to continue to move forward with our relationship, as well as to set up a mechanism for funding future activities. Recently, CNL has offered all three First Nations			

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			representation on the WL Indigenous Advisory Committee and a community liaison position fully funded by CNL that will help with addressing concerns, improving communication and increasing comfort with the project. In response to discussions with Hollow Water and Black River, CNL has provided a draft Relationship Agreement to enable full participation in the Environmental Assessment process. 9. Activities to support economic development to date include: • CNL hosted a First Nation and Métis Industry day on the WL site and at Sagkeeng First Nation (focussed on all First Nations) to share information on employment and contracting opportunities. Black River, Hollow Water and Brokenhead were invited to			

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			participate in either workshop to learn more about employment and contracting opportunities related to the Project. CNL's Manager of Procurement reached out and engaged directly with interested First Nation communities. • CNL also created a First Nation and Métis affairs summer student position that was advertised in Indigenous communities interested in the Project. The position was not filled due to lack of applicants. • CNL met with a partnership of Golder Associates and the South East Regional Development Corporation's (SERDC) project management company Shawano, 2020 March 2, at the SERDC offices in			

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			Winnipeg and then again at WL, 2020 March 9, to discuss contracting opportunities. Following this, Shawano and Golder attended a Bidder's meeting, 2020 July 30, followed by a field walk-down to review a potential contract. • CNL has reached out to the communities inquiring whether they would like to receive copies of CNL's external vacancies and encourage their community members to identify that they are from Black River, Brokenhead or Hollow Water so that CNL can ensure appropriate consideration is given. • CNL remains committed to ongoing discussions with the First Nation communities			

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			regarding economic benefit programs and opportunities. 10. CNL is committed to engaging with Black River First Nation, Brokenhead Ojibway Nation and Hollow Water First Nation and will continue to reach out and attend meetings with Chief and Councils and other community meetings as well as offering onsite engagements and site tours. Arising from the TK Study, CNL heard the communities' interest in holding a traditional ceremony and CNL is eager to explore this further. Through the proposed Community Liaison position, community focussed engagement can occur. Through the proposed Relationship Agreement, CNL can ensure that the communities have the capacity to be involved to their desired level of interest.			

B.4 Wabaseemoong Independent Nations

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		EIS			
		Environmental Effects			
		Environmental Effects – Surface Water Environment			
141.	Wabaseemoong Independent Nations (WIN) (Jan 9, 2018)	WIN expresses the concern that baseline surface water quality and quantity conditions for areas within WIN's territory near the project have not been established and should be before any other actions take place. WIN indicates that there were no "Sites of Interest" (SOI) selected within the WIN Territory and that no information has been provided with respect to how the spill or nuclear waste assessments conducted at the site would be adequately extrapolated to apply to sites within WIN Territory. WIN notes that the assessments for the SOI were overly simplistic, relying on a mass balance-type approach and in the case of acute toxicity, inappropriately comparing acute thresholds to a mixed scenario. WIN also indicates that the locations of "Highly Sensitive Receptors" (HSRs) have not been made public, but the criteria with which these HSRs were selected followed a blanket approach, which did not take in to account the individual values of the historical transportation corridor. In the case of WIN, for example, this might include local drinking water intakes that are not of public record (i.e., Ministry of Environment and Climate Change water well records). The section through the WIN Territory is a notable issue with respect to spill detection and spill response of nuclear waste. The greater the length of time required to respond to and contain a spill, the greater the potential is for contaminating surface water or groundwater resources, regardless of the other factors acting on spill volume and migration. WIN explains that the effects and issues pertaining to surface and ground water described above have implications for numerous WIN rights and interests given that water is the foundation of life and community wellbeing. As such, risks to water resources trigger risks to numerous WIN rights and interests including: • Risks to water and watersheds; • Barriers to access to resources and livelihood;	**Baseline Water Quality** Canadian Nuclear Laboratories (CNL) conducts regular, ongoing water quality testing, both up- and down-stream of the Whiteshell (WL) site to ensure there are no impacts from the ongoing decommissioning operations. Baseline water quality data is well established, is published annually by CNL, and is independently verified by the Canadian Nuclear Safety Commission periodically to ensure CNL is compliant and transparent. The data is available on CNL's website and upon request. **Sites of Interest** "Sites of Interest" is not a term that is used in the Environmental Impact Statement (EIS). The EIS assesses potential cumulative effects from other sources of contamination on the Whiteshell Laboratories site. The proposed scope of the project is to partially dismantle the reactor building and convert a portion of the below-grade section to a permanent waste disposal facility. CNL has identified the areas of the local biosphere where impacts from the project may potentially occur, and has assessed the risks of those potential impacts. Areas within WIN territory that are outside of these potentially impacted areas were not assessed as there is no potential for impacts greater than those assessed in the vicinity of the project. There is therefore no justification for extrapolating impacts to a site other than those already identified in the assessment. **Highly Sensitive Receptors** The term "Highly Sensitive Receptors" is not used in the EIS. The EIS identified Valued Components (VCs), which include any aspect of the environment, biophysical or socioeconomic, that is of importance. Individual species of plant and animal are grouped into categories based on habitat and behaviours and a representative species is selected as the VC to be assessed on behalf of other similar biota. The consideration of which species to use as the VC includes a consideration of how sensitive a species is, or its status as a species at risk. The selection of VCs is reviewed periodically as engagement with Indigenous communities continues, to ensure that the selected VCs continue to be representative of any additional plants or animals that are identified as important.		

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		• Risks to economic opportunities; • Risks to clean water for cultural, ceremonial and spiritual purposes; • Risks to environmental integrity and compounding cumulative impacts; • Risks to health and community wellbeing; and • Barriers to stewardship and planning for seven generations.	The list of valued components for the latest draft EIS along with an explanation to support their selection is included in the accompanying document. **Response to Nuclear Spill** CNL has Emergency Preparedness, Radiation Protection, Environmental Protection and Occupational Health and Safety Programs and associated procedures in place to assist in the response to radiological and non-radiological incidents. Incident response and mitigation procedures and capabilities are maintained for all facilities, processes, and activities with identified environmental aspects. Response and mitigative actions to anticipated environmental incidents are addressed in emergency procedures. The WR-1 Facility has an emergency procedure (WL-508730-EP-002) that will be modified as the facility moves from the current storage with surveillance mode to decommissioning mode and activities change. The WL site has an Emergency Operations Centre Operating Procedure (WL-508730-PRO-559). This procedure conforms to the legislative and regulatory requirements as outlined by Canadian Nuclear Safety Commissioning REGDOC 2.10.1 and the Federal Nuclear Emergency Plan. In accordance with these requirements, this document, as part of WL's broader Emergency Management framework, serves to provide for the protection of life, property and the environment in the event of an abnormal condition or emergency situation impacting the WL site or surrounding area. CNL currently has of both on-site equipment and trained personnel, including any exercise regimes and 24/7 response times. As per the CNL standard on Environmental Incident Reporting, Investigation and Mitigation (900-509200-STD-005), an incident is investigated to determine corrective or preventive actions. Incident response and mitigation procedures and capabilities are maintained for all facilities, processes and activities with identified environmental aspects. **Risks to WIN Rights** The assessment documented within the EIS determines the level of potential risk to ground and surface water environments as it pertains to human and environmental health. The assessment addresses the concerns of WIN as follows: • Risks to water and watersheds; - Assessed in Sections 6.4 and 6.5 • Barriers to access to resources and livelihood; - Assessed in Section 6.8 • Risks to economic opportunities; - Assessed in Section 6.9 • Risks to clean water for cultural, ceremonial and spiritual purposes; - Assessed in Sections 6.4 and 6.5 • Risks to environmental integrity and compounding cumulative impacts; - Assessed in Section 8.0		

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			• Risks to health and community wellbeing; - Assessed in Section 6.7 and Summarized in Sections 9 and 12 • Barriers to stewardship and planning for seven generations; – Assessed in Section 4.0 and in Section 11.0 The assessment looks at impacts to ground and surface water where contamination may possibly spread (Section 6.3.2 and 6.4). It assesses the risks to water quality and the health impacts of that water quality on humans (Section 6.7) and the environment (Sections 6.5, and 6.6). The health effects of the water quality are directly related to water quality for ceremonial or spiritual purposes. The cumulative effects of the project are also examined as part of the assessment of impacts (Section 8.0). The assessment also looks at risks to health and community well-being (Sections 6.7 and 6.9). No specific barriers to stewardship have been identified to date. However, CNL has actively engaged with Indigenous communities to strengthen collaboration and build capabilities surrounding environmental monitoring and stewardship. CNL's proposed monitoring plan is presented in Section 11.0 of the EIS and meets the high standards for quality, accuracy and transparency that is expected. The assessment overall indicates that the risks are negligible through the combined effects of the performance of the facility, the low inventory of radioactive material, the slow potential releases, and monitoring to verify predictions. These potential impacts are also overestimated to ensure the actual risks are lower than assessed. CNL is committed first and foremost to protection of human health and the environment in all aspects of the work performed. If at any point the in situ disposal project poses an unacceptable risk to humans or the environment it will be stopped.		
		Environmental Effects - Aquatic Environment			
151.	WIN (Jan 9, 2018)	WIN members have rights and established interests in fish and fishing, access to fish, fishing resources and the quality/safety of the fish. As stewards of the land members of WIN have a responsibility to protect ecosystems and ensure ecosystem function including trophic impacts of contamination. WIN expresses the view that potential adverse impacts on fisheries from the project would negatively impact the ability of WIN members to collect these fisheries resources and damage their relationship with them. Moreover, changes to concentrations of contaminants (e.g. nuclear spills) in fish tissues could have negative consequences on human health. WIN indicates that the primary risks to fish and fish habitat from the project are related to impacts from:	CNL acknowledges that WIN has rights and established interests in fish, fishing, and access to fish. CNL further acknowledges WIN member interest in risks to fish, the quality and safety of fish, and fish habitat that may occur from the proposed decommissioning of the Whiteshell Reactor 1 (WR-1). Potential effects on the aquatic environment in the Winnipeg River are related to transport of site runoff, changes in drainage rates and flow patterns, air emissions, and seepage of contaminants from the Whiteshell Reactor Disposal Facility to the groundwater in the long-term. Mitigation and environmental design features implemented for the Project are well-understood and include existing practices at the WL site. Following completion of closure activities, the Project site and engineered cover will be graded to promote drainage of rain and snow melt run-off water to the Winnipeg River. Performance monitoring will be completed throughout the post-closure phase to confirm that the		

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		• The destruction or alteration of fish habitat from the decommissioning of the reactor; • Introduction of deleterious substances (e.g., spills, sediment), which can degrade water quality causing direct mortality and sub-lethal effects on fish; and • Modified ecosystem function and cumulative impacts on fish and fish habitat. WIN explains that the issues pertaining to fish, fish habitat and aquatics described above have inter-related implications for numerous WIN rights and interests including: • Barriers to access to resources and livelihood; • Risks to economic opportunities; • Risks to environmental integrity and compounding cumulative impacts; • Risks to health and community wellbeing; • Barriers to stewardship and planning for seven generations; and • Risks to water and watersheds.	concrete cap and engineered cover are functioning as intended. During the closure and post-closure phases, there are no predicted exceedances of the 9.6 mGy/d radiation benchmark for aquatic biota in the Winnipeg River. All predicted doses are well below these levels. Therefore, it is unlikely there would be significant adverse effects on either aquatic populations or communities as a result of radionuclide releases from closure activities or in the long-term during the post-closure phase. Consequently, changes to surface water quality and hydrology from the Project are predicted to have a negligible effect on the aquatic environment. As part of CNL's Environmental Protection Program, there are requirements and processes in place for the Management of Land, Habitat and Wildlife (900-509200-STD-006) and control of emissions (900-509200-STD-009, *Management and Monitoring of Emissions*). These procedures outline the mitigation strategies and actions that are to be employed to prevent and control contaminated run-off from the site to receiving waters. Monitoring of fish is part of both the current Environmental Monitoring program at WL and the Environmental Assessment Follow-up Program (EAFP) at WL. The data collected from this sampling is assessed and reported on each year in the Annual Environmental Monitoring report and Annual Progress Report on the EAFP. CNL will continue to monitor fish tissues annually during the closure phase. CNL will have adaptive management plans in place to include fish monitoring more frequently if water quality data indicates the need. CNL has provided details of the historic concentrations of Cesium-137 in fish. This data, from 1970 to 2017, has been included in the Environmental Impact Statement. More detailed information regarding fish monitoring as part of WL's Environmental Protection Program can be found in its series of annual reports that are publicly available and can be sent to the community if requested.		
		Environmental Effects – Terrestrial Environment			
159.	WIN (Jan 9, 2018)	WIN expresses the concern that no specific surveys were conducted for mammals within the WIN territory, and only desk-based information was relied on. Further, wildlife habitat features targeted during baseline surveys excluded features needed to support wildlife of high value to WIN such as beaver lodges, dams, mineral licks, deer/moose winter habitats, muskrat dens, river otter burrows, bear and wolf dens, and many more. WIN indicates that no baseline data was collected on benthic invertebrates, even though they are one of the most vulnerable groups to long-term effects of oil spills, and are valued by WIN due to their recognized importance at the base of food chains.	**Mammals** The WL site's licensed area is comprised of ~4,375 hectares (10,810 acres) of mixed-use land ranging from agricultural, mixed and boreal forest, as well as the impacted lands that were developed or utilized in one way or another to support the research mission. Of the 4,375 hectares, approximately 3,000 hectares (69%) of the licenced area known as the Unaffected Lands, is classified as land that was not used or impacted during the more than 60 years of nuclear operations. The Unaffected Lands provide habitat to wildlife identified by WIN to be of high value. The impact of the proposed WR-1 project on wildlife is minimal as we will be remediating the Project site and leaving only the in situ Whiteshell Reactor Disposal Facility behind. This		

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		Benthic invertebrates supply food to numerous fish, amphibians, small mammals, and birds; these species subsequently act as food items for terrestrial species at higher trophic levels (bear, herons, mink, etc.). WIN notes that it is also important to collect baseline information on benthic invertebrates as a reference point for determining when an area has been fully remediated following a nuclear mishap. For these reasons, WIN states that the wildlife and wildlife habitat baseline data are not currently adequate for use in properly informing an EA or as a reference point for remediation after a nuclear disaster within the WIN Territory. Also, WIN indicates it is clear that vegetation of traditional importance was not targeted during baseline surveys, assessed during the EA, or prioritized by mitigation methods. Further, there is a low level of information about the real-life success of various clean-up techniques within Manitoba and Ontario, particularly for nuclear waste. Depending on the severity of nuclear spill and age of the vegetation community lost, it may take many decades for the vegetation to be returned to similar conditions. Even if a nuclear spill occurs, however, remediating an area such that it can host vegetation used for traditional purposes (e.g., medicine, foods) is not currently a requirement for mitigation. Therefore, the current project – as proposed may pose a potential risk to WIN rights with regard to access to, use of, and management of traditional vegetation resources to maintain cultural practices, to sustain a livelihood and for economic well-being. WIN explains that the issues pertaining to wildlife and wildlife habitat described above have inter-related implications for numerous WIN rights and interests including: • Barriers to access to resources and livelihood; • Risks to economic opportunities; • Risks to environmental integrity and compounding cumulative impacts; • Risks to health and community wellbeing; and • Barriers to stewardship and planning for seven generations. WIN expresses the view that their members have the right to access and harvest wildlife for spiritual, cultural, health, or economic purposes. They have the right to sustain a livelihood from the lands and resources, which includes hunting, trapping, fishing, tourism, and employment from resource development. They have a right to healthy, interconnected habitat that	represents less than 0.1 hectares of the total land area of the 4,375 hectare WL site. Because of the large area of unaffected lands within the WL site, including boreal and mixed forest, wildlife have always been free to move on and off the WL site; therefore, there are no reasons to believe that the population of large mammals off-site would be different than the population on and around the site. It is not uncommon for employees to see large mammals while working on the site. Surveys for species likely to be impacted (i.e., local study area) were conducted. Due to the small footprint of the proposed project the only species identified with the potential to be impacted by the activities are the ones that may use man-made structures, i.e., bats and barn swallows. The only animal group that may be impacted from noise, dust, light, etc. during decommissioning could be songbirds. Data on forest songbirds was collected during the summer of 2018 in the periphery of the WR-1 local study area. The results of the study were included in the revised version of the Environmental Impact Statement. **Benthic Invertebrates** The Environmental Risk Assessment (ERA) was completed following N288.6, which requires assessment of exposure in the areas where receptors will be exposed. We recognize that sessile organisms at the point of groundwater discharge, such as infauna benthic invertebrates, may be more directly exposed to groundwater. The ERA has been adjusted to reflect this. **Environmental Monitoring and Baseline Conditions Environmental Monitoring** The monitoring programs considered in the Alternative Assessments are exclusive to the WR-1 project and do not include the monitoring that is planned for the remainder of the site. The Comprehensive Study Report, which enables decommissioning of the WL site, includes an Environmental Assessment Follow-up Program (EAFP). This is a commitment made by Atomic Energy of Canada Limited (AECL) and executed by CNL that provides ongoing environmental monitoring. CNL currently analyzes, and has for decades, thousands of environmental samples per year. This program is committed to continue following site closure. Additional monitoring identified for the WR-1 project will be done over and above the current monitoring program. The proposed monitoring program for the WR-1 project includes the following: **Physical Monitoring** – Physical monitoring will include semi-annual visual inspection of the WR-1 areas for subsidence, erosion and animal or other intrusions, with decreasing (or increasing) inspection frequency as the performance of the engineered controls are demonstrated. Maintenance activities will be performed as needed to repair damaged areas. A storm water management plan is being prepared and maintained.		

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		supports diverse and abundant species that are free of disease and migrate freely through their territory. Further, they have the right to manage the land and water according to their traditional teachings, which include a deep appreciation for ecosystem interactions and trophic relationships. WIN's review of the EA resulted in a failure to conclude that the project will have merely negligible impacts on the rights of WIN from impacts on wildlife and wildlife habitat.	**Groundwater Sampling** – Semi-annual water level measurements and water quality measurements will be included in the EAFP. The frequency of recurrence of water sampling will be reviewed based on performance data. The number and location of wells, and parameters measured, may change based on an annual review of the data. Testing will determine if any radiological or non-radiological contaminants are released from the in situ disposal facility, and confirm if the concentrations of released contaminants are within the range predicted in the environmental assessment (which are concentrations well below established benchmarks for the protection of humans and the environment). No changes to groundwater are predicted to occur for the first 25 years based on the predicted contaminant transport in the Decommissioning Safety Assessment Report. **Surface Water Sampling** – Surface water (Winnipeg River) and ditch system water will be sampled on a semi-annual basis at one upstream and two downstream locations as part of the EAFP. Frequency of recurrence will be assessed based on performance data. **River Sediment Sampling** – Sampling of the river sediments will be conducted. **Air Emissions Monitoring** – Passive tritium in air network monitoring (semi-annual change out) will be included as part of the EAFP. Monitoring locations (~4) will be selected to be within the main upriver and downriver wind rose sectors, at the site boundary and on-site mainly to monitor airborne tritium plumes potentially originating from the WR-1 entombed reactor. **Soil and Vegetation Sampling** – Should the surface and/or groundwater results reach Environmental Effects levels then CNL would undertake additional monitoring including, but not limited to, soil, vegetation, fish and wildlife. Remedial action plans will be prepared so that remedial action can be executed in a timely manner. The environmental monitoring results over the years demonstrate that CNL's (formerly AECL's) activities have been protective of people and the environment. CNL continues to perform extensive site monitoring and reports the results annually to the Canadian Nuclear Safety Commission. Summaries of these reports are posted on CNL's website. The reports show that the river and sediments are safe and that there is no contamination that would affect human health or the environment. It is important to note that 4,077 hectares (93%) of the WL site is classified as Agricultural land-use and will require no decommissioning or remedial work. The remainder of the site is being remediated and CNL commits to engage with Indigenous communities on the planned End State.		

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			Indigenous Knowledge and Commitment to Ongoing Engagement with WIN CNL welcomes the opportunity of collaborating and engaging with WIN and other interested Indigenous communities on environmental monitoring activities specific to the WR-1 project and the WL site more generally. CNL invites WIN to share their unique knowledge on plants and animals of traditional importance and to see first-hand how CNL is committed to ensuring the protection of these species through our existing, robust environmental protection program. CNL is open to enhancing this program with Indigenous knowledge provided by WIN.		

B.5 Brokenhead Ojibway Nation

Comment #	Source	Issue	Question/Recommendation
1	BON	The Proponent has indicated that they considered six alternatives but prefer the ISD alternative and indicated that the selection is "based on safety, environmental, technical and economic factors". They also suggest that the option lowers the liability associated with the site (EIS Revision 2 Executive Summary, page E-5). The Comprehensive Study Report (AECL, 2001) considered three options for remediating the site (20 years, 60 years and 100 years) and decided on the 60 year option because it would reduce the excessive cost of the 20 year option and would allow the radioactivity of WR-1 to decrease to acceptable levels before being dismantled. This should still be considered a viable option for the site to reduce the radioactivity to a safe level and further reduce the liability of the site by removing a major source of radioactivity, reduce the costs associated with long-term monitoring and maintenance, reduce the burden of future generations to manage the site, and lower the uncertainty of political and social changes that might impact the long-term management of the site.	The Proponent should re-evaluate the decommissioning of the whole site and consider the options to remove the radioactivity to another site, which would combine all similar wastes in one place. This would significantly reduce the costs of monitoring and site maintenance, and reduce uncertainty of contamination of the Winnipeg River well into the future.
2	BON	In the discussion of barriers (EIS Revision 2, Executive Summary, page ES-7), the Proponent relies on several barriers, including a concrete bioshield and the concrete walls and floor of the reactor building. That concrete is now roughly 50 years old. Also, the first barrier of reactor components underwent high radiation for a number of years. It is unclear what the status of the reactor material and the concrete barriers are now, and whether an assessment has been conducted of their properties in relation to when the reactor was constructed.	BON requests that the Proponent provide an assessment on the current condition of concrete barriers and reactor components, and whether they conform to specifications required to retain nuclides in the presence of groundwater. Radionuclide transport to the Winnipeg River and dose estimates to humans and the biotic community rely on the integrity of the materials in the barriers and their current condition should be assessed.
3	BON	In EIS Revision 2, Executive Summary, page ES-18, the Proponent mentions the Environmental Monitoring Program to verify radiation doses to the public, and sampling and analysis of ambient air, water, sediment, vegetation, game animals and fish. Details of the program are not discussed in terms of the number of samples, frequency of sampling, analysis of analytical error and uncertainty, and the statistical power of the proposed program. The Proponent indicates that sediments will be collected every 20 years which might not be sufficient to detect changes.	BON requests that the Proponent provide an outline of a proposed monitoring program, based on the results of monitoring and analysis over the last ten or more years to show what effort will be required to detect changes in the performance of the ISD during the institutional control period. Given that the concentrations of most nuclides in environment will be well below detection limits, the Proponent should provide an outline of the effort required to monitor environmental media and human exposure. The final design of the program will be provided by the CNSC but it is important for the evaluation of the ISD

Comment #	Source	Issue	Question/Recommendation
			option to consider what is involved with the monitoring program proposed by the Proponent.
4	BON	The Proponent uses the term “Ecological Health” to describe the process of radiation dose assessment, and hazard assessment for non-radiological substances, for the Valued Ecological Components (EIS Revision 2, Executive Summary, page ES-27). There is no attempt to assess the “health” status of the exposed wildlife, plant and fish populations and no site-specific surveys of even the most basic biological data on the species that were assessed. For example, fisheries data that includes distribution in the river, habitat, diet, age/sex structure of the population, etc. The process should be called an Ecological Risk Assessment as a purely desktop exercise, not “Ecosystem Health”.	BON requests that the Proponent consider renaming the Human and Ecosystem Health Sections to Human and Ecosystem Risk Assessment as there is no health assessment conducted.
5	BON	In the site description and approach recommended by the CSR (EIS Revision 2, Section 1.1, page 1-7), the Proponent refers to the WMA (Waste Management Area) with low-level waste that will remain on the site, but neglects to mention the contaminated sediments near the outfall in the Winnipeg River that the CSR assessment also discusses. This is significant in that the radioactivity in the sediments is substantial and will provide additional dose to benthic organisms in the portion of the river receiving radiation from the WL site.	In the section of Project Context, BON requests that the Proponent add information about the contaminated sediments remaining in place after as part of the plan to decommission the site. Sediments should also be referenced in EIS Revision 2 Section 6.1.1 under the Scope of the Assessment.
6	BON	As outlined in EIS Revision 2, Section 6.1.2, page 6-3, the selection of Valued Components (VC) is extensive but confusing (Climate Change is a VC, for example). Species are considered under Aquatic and Terrestrial environments, but a different set of species is considered under Human and Ecological Health. It is not clear why they are assessed separately. For the species considered under Human and Ecological Health, there are no historical or site-specific data on the populations. As discussed above, this is not an assessment of ecological health, but a risk assessment of radiation exposure and exposure to other contaminants. Also, there is no clear evaluation of species that might be used by someone fallowing a traditional lifestyle (moose, deer, hare, grouse, geese, ducks, whitefish, pike, walleye, etc.).	A) BON requests that the Proponent provide more details on the rationale behind the species chosen for assessment and the pathways of exposure. In particular, the Proponent should provide details of how the assessment will differentiate the “health” of the populations of the VCs for the Base Case and the Application Case. Is it solely based on the dose received when the Project is ongoing? The Proponent should provide estimates of the doses received on site with the Base Case. B) BON requests that the Proponent provide predictions on how far up the Winnipeg River nuclides will be transported, especially for the longer-lived nuclides that might accumulate in sediments and fish further north.
7	BON	The Description of the Environment (EIS Revision 2, Section 6.1.4, page 6.-19) makes it sound as if there are baseline field studies for the VCs that are considered in this section. In fact, there do not appear to be any site-specific data for any of the species considered, especially relative to the amount of data available for the site for the physical VCs. The analysis is not able to detect any “effects” on the VCs, but provides an estimate of absorbed dose based on the estimates of radionuclide concentrations. For this reason, this analysis should be not be considered a “health assessment” but a desktop risk analysis.	Much of this text infers that the analysis can predict adverse “effects” in exposed populations of species, particularly SARA listed species. Instead it estimates dose to species, but does not relate the exposure to site conditions. The monitoring program will not be able to detect any changes in the exposed populations given the lack of data. Again, the analysis should be clearly referred to as a desktop risk analysis.
8	BON	Reasonable Foreseeable Development Case considers the potential impact of other projects, but does not consider the changes predicted to occur under the influence of climate change (EIS Revision 2, Section 6.1.6.2, page 6-22). There may be huge changes to climate and the environment that should be factored into estimates of radiation exposure to VCs.	BON requests that the Proponent consider climate change in the same context as a major project adding to cumulative impacts on the site. The only project mentioned (Hydro’s Power Line) is not considered as a having a significant impact. Climate change is expected to change environmental conditions over the course of the institutional control period at the site.
9	BON	EIS Revision 2, Section 6.1.9, page 6-27 states that Follow Up Monitoring will include “programs designed to test the accuracy of effects predictions, reduce or address uncertainties, determine the effectiveness of mitigation, or provide appropriate feedback to operations for modifying or adopting new mitigation designs, policies and practices (e.g., monitoring of Winnipeg River for water quality effects). Results from these programs can be used to increase the certainty of effect predictions in future environmental assessments.” It is unclear what	BON requests that the Proponent provide specific guidance on the Integrated Monitoring Framework and Environmental Assessment Follow-up Program to support the statement that the program will be able to detect changes in nuclide concentrations

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		"effects" the proponent is referring to. This statement indicates that the Proponent is equipped to measure and detect "effects" in the environment, which is probably restricted to measuring environmental concentrations of certain nuclides and stable elements, and detecting changes in environmental media, such as surface waters. Most nuclides will be far too low in concentration to detect.	that could lead to mitigation and correction if the ISD is not performing to predictions.
10	BON	EIS Revision 2, Section Page 6-344 indicates that "With respect to non-radiological contaminants, some exceedances of applicable standards were predicted. Further refinement of the modelling and potential need for selective remediation to remove the hazard was recommended (AECL 2001)." This statement suggests that the exceedances by the non-radiological contaminants were due to the computer modelling process and changes in the data could "remove" the hazard. It is unclear whether these hazards remain in the WMA and if they impact the assessment for WR-1.	BON requests that the Proponent clarify if the hazards remain in the WMA or if they have been addressed in the WMA and are no longer a hazard.
11	BON	EIS Revision 2, Section 6.7, page 6-343 has a lot of repetition in the individual subsections but provides almost no detail on the exposure pathways to the "critical groups". For example, the characteristics of the "Harvester" and members of their family that includes a "child" harvester and an "infant" harvester. The details are likely available in the supporting document by EcoMetrix (2020), but the basic characteristics (age, ingestion rates, foods eaten, etc.) should be available here for review. The harvester consumes fish, waterfowl, hare, and deer but the amounts and from which areas (On site? Near the river?, etc.) is not given. This information is critical for determining if the exposure scenario is reasonable. The dose received by the harvester, the child and infant are low, and a fraction of the public dose limit, but the details of the exposure scenarios are not available. This also applies to the exposure of the Harvester and farmer to non-radiological hazards (cadmium and lead). It is unclear how the "Toddler" is defined – is it the same as in the radiological assessment?	BON requests that the Proponent provide enough details in the EIS to be able to evaluate the foods ingested, etc. which would give some idea of the potential sources of radiation exposure. Much of the extraneous and repetitive text can be removed to streamline the section.
12	BON	In EIS Revision 2, Section 6.7, page 6-352 the assessment uses the IAEA Reference Level for Disruptive Events (20 mSv/y) but doesn't explain the significance of the value. It is unclear whether this is presumed to be a short-term exposure, similar to a worker exposed under certain circumstances or suitable for long-term exposures (e.g., 70 years).	Please discuss the use of the higher dose limit from the IAEA and the possible implications for human health. The dose limit for the public in Canada is 1 mSv/y, so presumably 20 mSv/y for an extended period of time will result in a higher risk of cancers, for example.
13	BON	The text in EIS Revision 2, Section 6.7, page 6-353 indicates that the grout formulation is under development and the composition of the final product has not been determined. What is the impact on the transportation of nuclides from the ISD with the changes in the grout mix? Presumably, as the proportion of sand/cement varies, the hold-up time on release of nuclides and other contaminants will also change.	BON requests that the Proponent discuss the characteristics of the grout in terms of the retention of the radioactive elements and the objective of the development of the grout. Will the modelling of the release of nuclides need to be repeated?
14	BON	In EIS Revision 2, Section 6.7, pages 6-347 to 6-355 the estimated doses to the public from the releases of nuclides to the Winnipeg River are consistently low but are above zero for the farm resident and the children. The Proponent should provide error (uncertainty) estimates for the analysis and some indication of the most sensitive factors that are used in the analysis (e.g., transfer factor, ingestion rates, etc.). If error rates are ±100%, then doses are getting closer to the dose constraint, and worth further investigation. Also, the text on page 6-347 reads "the total dose peaks during the beginning portion of the modelling timeframe and is greatly reduced as time progresses." This is generally true, but the decline happens over a span of several thousand years, according to Figure 6.7.1-8 (which is very hard to read due to the similarity in colours). The uncertainty in the dose estimates will stretch over a long time period.	The developers of the computer models should be able to quantify the uncertainty to determine the range of doses for each of the critical groups. BON requests that the Proponent discuss what that range of doses will mean to human health outcomes.
15	BON	EIS Revision 2, Section 6.7, page 6-358 provides a reasonable scenario of a group inhabiting the site in 500 or 1000 years, farming the land, and possibly building a well for water, especially if the river drainage has changed significantly. The doses exceed the public dose limit by a considerable amount (the IAEA reference levels shouldn't apply under these conditions as it is a reasonable scenario). The analysis suggests that these conditions are "unlikely" but does not provide reasoning for that statement.	BON requests that the Proponent provide some idea of the uncertainty in these estimates, with a range of values to show the levels of exposure that a critical group inhabiting the site would experience. The exceedance of the dose limit suggests an increased risk of adverse health outcomes.
16	BON	Major terrestrial mammals (e.g., hare, deer) which would be part of a traditional diet are not included in the post-closure phase, even though the harvester diet apparently includes those species for several thousand years (EIS Revision 2, Section 6.7, page 6-369). Moose are also an important food source in a traditional diet, eat aquatic plants (part of the aquatic pathway of exposure) and have not been included in the	BON requests that the Proponent run simulations specifically testing the radiation exposure for species that are a significant part of a traditional diet. In addition to the MMF and Sagkeeng

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		ecological risk assessment. Similarly, there are few species of riparian birds (e.g., geese), land birds (e.g., grouse) and fish (e.g., whitefish, goldeye) that have been included.	First Nation diet studies there is a comprehensive dietary study by the First Nations Food, Nutrition and Environment Study (FNFNES) (Chan et al., 2012) that studied the species harvested by First Nations in Manitoba, the amounts consumed, and exposure to elements like mercury and arsenic. Data from the studies can be combined to provide a good basis for estimating impacts to important species and add relevance for First Nations that might be exposed to low levels of radioactivity in the future.
17	BON	The EIS Revision 2, Section 6.7, page 6-371 states that the "Viability of Populations is evaluated in the ERA by estimating VC exposures for the COPC and comparing those to benchmarks that are protective of growth, survival and reproduction." Given the importance of the protection of these species, it seems reasonable to use a more conservative dose limit than the UNSCEAR limit of 9.6 mGy/d. More conservative dose limits are presented in the literature. In the RFD Case (EIS Revision 2, Section 6.7, page 6-373), climate change should be considered as an additional stress on local populations over the long term. Changes in the levels of surface waters due to changing precipitation (plus or minus) could significantly impact doses to VCs.	BON requests that the proponent discuss the potential impacts of climate change on the status of VC populations and the implications for monitoring the populations in the future. (The climate change section in the EIS provides a very general discussion of potential changes in the environment but is not WL specific).
18	BON	Terrestrial plants in the area between the ISD and the River (with the uptake of contaminants through groundwater and soil) are not included in the exposure pathways outlined in EIS Revision 2, Section 6.7, pages 390-391).	BON requests that the Proponent provide a rationale for not including uptake by vegetation growing in the plume from the ISD as an exposure pathway for terrestrial animals.
19		EIS Revision 2, Section 6.7, page 6-398 indicates that the Proponent will monitor wild rice and berries. These data can be combined with fish and deer data from the AECL monitoring program to provide a good baseline for estimating doses from traditional food items on the WL site.	Communicate needs to occur between the Proponent and BON regarding the species of interest for consideration of inclusion in the program.
Hydrogeology			
20	BON	In EIS Revision 2, Section 3.2.2.4, page 3-15, CNL notes five drainage sumps located on site to collect water from various locations. It is unclear how water from the sumps is disposed of, and how the water in the sumps is tested. The Sub-surface Active Drainage sump is emptied directly into the storm drainage system, which suggests it is not monitored or sampled for possible chemical contamination. The lack of proper monitoring of these sumps is of concern to BON.	CNL must test all sump waters for chemicals of potential concern, including metals, hydrocarbons and radionuclides, on a minimum quarterly basis and provide the sampling results to BON.
21	BON	In EIS Revision 2, Section 3.5.4.1.5, page 3-47, CNL suggests that the local soil "chemically sorbs contaminants to further reduce their concentrations". CNL has provided no studies to validate the claim that this is the case. CNL has also not discussed whether the adsorption onto soil particles allows for the accumulation of contaminants in certain locations thereby providing potential for uptake into vegetation on site.	A) CNL must conduct studies verifying the ability of local soils to retain contaminants through adsorption and the potential for these accumulated to be taken up by overlying vegetation. B) CNL should include adsorption of contaminants in the various soil strata into their solute transport modelling.
22	BON	In EIS Revision 2, Section 3.5.4.1.6, page 3-47, CNL acknowledges the downward movement of groundwater in the area. BON residents have expressed concern about the bottom of the foundation of the WR-1 facility, in particular if the base of the foundation has been adequately studied for its structural integrity and whether it provides a preferential pathway for contaminant movement out of the facility. The structural integrity of the WR-1 foundation is a key assumption in the groundwater model.	A) CNL must provide results of studies of the structural integrity of the WR-1 foundation, with a focus on the base of the foundation, to ensure that there are no cracks or other conduits for groundwater movement. B) CNL should assess the outside of the WR-1 foundation to verify that sulphate attack or other forms of corrosion are not occurring at a rate greater than predicted on the foundation of the facility.
23	BON	In EIS Revision 2, Figure 6.3.1-2, page 6-88, CNL shows a figure of the nested groundwater monitoring wells on site. There are only 5 wells between the WR-1 site and the Winnipeg river, and none to the north and south of the facility. The groundwater monitoring network as it	CNL must install several more wells around the WR-1 site, including north and south of the facility. A minimum of 3 wells

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		exists is insufficient to properly characterize the risk to groundwater from the facility and be certain that any groundwater contamination is noticed prior to causing downstream effects.	should be installed north and south of well #5, which is closer to the Winnipeg River.
24	BON	In EIS Revision 2, Figure 6.3.1-2, page 6-88, CNL notes that the groundwater wells on site are nested wells. Nested wells are known to be difficult to construct and very difficult to verify whether they are hydraulically isolated from one another. Nested wells present concerns for contaminant hydrogeology studies, as the seals between wells can become compromised. It is unclear how CNL will ensure that the water quality data will be assured over time, and that the integrity of the seals between nested wells remains intact.	CNL must provide information on how they will ensure that the seals between nested wells remains intact over the 100 years of active institutional phase monitoring on site.
25	BON	In EIS Revision 2, Section 6.3.1.4.2.1, page 6-91, CNL discusses the structural geology of the bedrock around the WR-1 facility. Studies have noted that subvertical fractures are common, and frequently strike 110-130 degrees. Subvertical fractures were noted to be "partially or completely filled with chlorite, iron oxides, carbonates and clay minerals". Boreholes drilled by CNL also indicate that there are "heavily fractured zones" and it is unknown "if these represent splays of a larger fracture zone". Fracturing in the bedrock, especially subvertical fracturing, provides a preferential pathway for contaminant mobility on site, and the fact that there is substantial uncertainty around local structural geology calls the solute transport model into question, which considered the bedrock to be "a single hydrostatic unit with no discrete features" (Section 6.4.2.7). This is a significant concern to BON, as this poses an unknown risk to downstream water quality.	CNL must conduct a drilling program to increase confidence in the site-wide rock quality by identifying all significant fractures and zones of poor rock quality. All exploratory drill holes should be appropriately filled and sealed at the completion of the program. CNL must conduct packer testing at locations of poorer rock quality to verify the hydraulic conductivity in these zones and identify measures for controlling contaminant flow along major fractures.
26	BON	In Section EIS Revision 2, Section 6.3.2.4.2.3, page 6-146, CNL acknowledge the wide variation in hydraulic conductivity of the hydrostratigraphic units, with the basal sand unit having a notably higher hydraulic conductivity than the clay and clay till units. The WR-1 facility cuts through the basal sand unit, and it is unclear if there are any conduits in the foundation of the WR-1 facility that could provide a pathway for contaminants to enter the basal sand unit, providing a more direct pathway to the receiving environment. Any potential pathway for contaminated water to interact with fish and wildlife is a significant concern to BON.	CNL must compare the location of conduits in the WR-1 foundation against the soil stratigraphy on the outside of the conduit to assess future risks to groundwater quality that the conduit presents. CNL should provide specific monitoring to assess how conduits in the basal sand unit will have increased risk of contaminant mobility.
27	BON	In EIS Revision 2, Section 6.3.2.4.2.4, page 6-147, CNL acknowledges that HB-40, a toxic coolant which was used in relatively large volumes at the WR-1 site during operations, is occasionally detected in the groundwater on site. CNL has removed much of the HB-40 from the system during early phases of site decommissioning, but substantial volumes remain in the system. Considering the large volume of HB-40 reported to be present in the WR-1 facility (87,700 kg) BON is concerned with the presence of HB-40 in the WR-1 facility and its potential to contaminate groundwater into the future.	CNL must provide information specific to HB-40 to address its mobility in the grouted system and any adaptive management and contingency measures specific to HB-40 that they could undertake.
28	BON	In EIS Revision 2, Section 6.3.2.9, page 6-157, CNL states that "sealing of open conduits in the building foundation" will be necessary to "reduce residual effects on groundwater quality". Elsewhere, CNL has mentioned the used of an engineered plug to seal the open conduits. The specifications for these engineered plugs are not discussed. Improperly sealed conduits in the reactor structure provide preferential routes for groundwater flow out of the WR-1 facility, and improper sealing will be effectively impossible to monitor after final decommissioning. The fact that Manitoba soils are prone to causing sulphate attack, for example, is one example of the importance of the design of the plug in maintaining a sealed barrier.	CNL must provide BON details on the sealing of conduits in the WR-1 foundation to ensure that this is done properly and will remain properly sealed for the design life of the grouting.
29	BON	In EIS Revision 2, Table 6.3.2-11, page 6-158, CNL states that they will conduct "performance monitoring" of the grouted facility to "confirm that the cover and grout is functioning as intended". CNL states that the engineered cover will be monitored using geophysical methods as required but has provided no indication of how they will monitor the performance of the grouted structure and verify that it is operating as predicted. The performance could be compromised by chemical or physical means, which may require different monitoring techniques to verify performance.	CNL must provide details on the methods they will use to verify the performance of the grouted structure. CNL must report monitoring results to BON in a timely manner.
Surface Water Environment			
30	BON	In EIS Revision 2 Section 6.4.1.7, page 6-175, CNL notes that the "concrete cap and engineered cover will be graded to promote drainage from the site to the Winnipeg River". Effective operation of the engineered cap requires ongoing monitoring to ensure that no erosion of the structure is occurring, no vegetation establishes that compromises the integrity of the cover, and that the drainage away from the structure is	CNL must include a detailed monitoring plan for the engineered cover, and any mitigation plans for the establishment of unacceptable vegetation, excessive erosion and surface water infiltration around the margins of the engineered structure.

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		effective, in all directions, in minimizing infiltration around the grouted facility. The monitoring and maintenance of the engineered cover and concrete cap is important for ensuring that the facility is operating as predicted.	
31	BON	In EIS Revision 2 Section 6.4.2.6.2, page 6-221, CNL suggests that "the potential groundwater seep is predicted to have no effect on the Winnipeg River surface water quality". However, CNL is not intending to test the water in the groundwater seep as part of the ongoing and future water quality monitoring. BON is very concerned with the presumption of no effect with no water quality testing to validate the assessment.	CNL must test the groundwater seep at minimum quarterly and provide the water quality results to BON.
32	BON	In EIS Revision 2 Table 6.4.2-18, page 6-226, CNL states that "follow-up monitoring during the post-closure phase will be completed to verify effects, predictions and to provide information for use in adaptive management". CNL has not stated who will conduct the monitoring or if there will be any role for Indigenous monitors to safely and meaningfully participate in the water testing, should this be of interest.	As stewards of the land, BON requests that they are given the opportunity to meaningfully and safely participate in the post-closure follow-up monitoring and be provided the opportunity to give input into the adaptive management process during the active institutional phase.
Aquatic Environment			
33	BON	EIS Revision 2, Section 6.5.4 states that in 2000, elevated radionuclide concentrations were measured in sediments in the immediate vicinity of the outfall (in an area approximately 20 m wide by 80 m downstream). The total radionuclide inventory was considered low, approximately 1.3 GBq. This level of activity was also considered less than the annual releases of Cs-137 prior to 1985 when the reactor was operating. Measured concentrations of Cs-137 were as high as 1,345 Bq/kg in sediments collected near the outfall in 2008. Subsequently, concentrations measured during annual environmental monitoring completed between 2009 and 2015 have ranged from 14 to 473 Bq/kg. The EIS only states that these concentrations resulted in monitoring in subsequent years, but provides no information on associated environmental effects or the monitoring results from subsequent years.	The Proponent should revise the EIS to discuss what the environmental effects of these concentrations were on the fish and aquatic biota in the immediate vicinity for subsequent years. Further, the general statement provided in the EIS only compares concentrations to outdated data from 2008 and prior to operation. These concentrations and environmental effects should be discussed in the context of current provincial and federal guidelines and other regulated standards for the protection of aquatic life.
34	BON	The EIS Revision2, Section 6.5.4 indicates that sediment concentrations 150 m downstream of the outfall were measured at 118 Bq/kg in 2009 and subsequently ranged from 5.3 to 49 Bq/kg between 2010 to 2015. The EIS then states that variation of activity is not unexpected for all samples due to the highly localized and spotty nature of the contamination in the river sediments at the outfall and that sample collection is difficult as the sediment is largely impenetrable at the sampling locations due to the erosion created by the river current (Canadian Nuclear Laboratories, 2019). It is unclear how the Proponent is providing a range of values in sediment, but then goes on to discuss the issues in sampling.	The Proponent should revise the EIS to provide more detail on what data gaps exist due to the Proponent not being able to sample sediment. BON requests that the Proponent provide further information on what sediments were encountered at these monitoring locations that impeded the ability to sample and discuss how the monitoring stations were altered in order to retrieve a viable sample. The Proponent should also provide additional context around whether these issues in sampling have affected confidence in sediment data at the outflow.
35	BON	In EIS Revision 2, Section 6.5.4.3, fish consumption is stated as the principle exposure pathway of Cs-137 for people in the local area. CNL undertakes annual monitoring of radioactivity in fish flesh (muscle and tissue) collected from the Winnipeg River upstream and downstream of the WL site. Walleye, Northern Pike, Shorthead Redhorse, White Sucker and Lake Whitefish are usually captured and analyzed. Seven Sisters Generating Station, located approximately 7.5 km upstream from WL, acts as a barrier, separating fish populations downstream of WL from the upstream (control) populations. Table 6.5.4-1 provides a summary of the Cs-137, K-40 and gross beta activity found in fish flesh at three locations on the Winnipeg River, from 1992 to 2017. Average concentrations of all three radionuclides were slightly greater for Walleye at downstream locations compared to upstream (CNL 2018d). However, for the White Sucker, on average radionuclide levels were slightly lower downstream of the WL site compared to upstream. Although the data in Table 6.5.4-1 is useful, it only presents raw data, with no comparisons to provincial or federal guidelines or control stations. In addition, there is no indication of how far these individual samples were collected from the site.	Table 6.5.4-1 should include comparable guidelines to provincial and federal standards. In addition, to understand these concentrations in the context of the region, control samples from fish beyond the reach of influence from the site should be included and compared to exposure samples. Further, these tables should include location data to indicate how far these fish were captured from the site in order to give some indication of exposure probability.

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36	BON	EIS Revision 2, Section 6.5.5.2, Table 6.5.5-1 indicates that there is the potential for the transport of site runoff to the Winnipeg River. The mitigation provided indicates that the runoff will be collected and tested, and based on the results, is directed to the waste treatment center, domestic drain, processed drain, ditch systems or is sent for evaporation and/or solidification and disposal. After the runoff reaches the river, it is too late to mitigate impacts.	BON requests that the Proponent develop closure-specific runoff control measures, as well as sediment and erosion control measures, to minimize site surface water and sediment entering the river.
37	BON	EIS Revision 2, Section 6.5.5.2, Table 6.5.5-1 indicates that there will remain the potential for release of chemical and radiological contaminants in the long-term during the post closure phase from the Project. To mitigate, the Proponent states that, in accordance with their license, environmental monitoring will continue for the project during post closure phase. In addition, follow up monitoring will be completed to verify effects and predictions and to provide information for adaptive management to address potential unforeseen effects.	A) BON requests that the Proponent revise the EIS to include the specific monitoring plans that will be used, as well as an effects assessment of the mitigation measures in order to accurately predict the effectiveness of the monitoring activities. B) Considering the importance of fish to Indigenous communities, BON requests that a long-term fish monitoring program be implemented that includes a wide ranging annual fish sampling program in order to understand the ongoing effects of the project on fish through closure and post closure. C) As protectors of the lands and water, the proponent should work specifically with Indigenous communities, including BON, to develop and execute these long-term monitoring plans.
38	BON	EIS Revision 2, Section 6.5.5.2.2 predicts that re-suspension of contaminated sediments is not expected to lead to a decrease in water quality, without providing any context to support that prediction. High flow events and the variability of the Winnipeg River may have considerable impact on the sediments and erosion rates around the site into the future. Given climate change impacts, this is of significant concern.	A) BON requests that the Proponent revise the EIS to provide supporting evidence in the form of long-term modelling that would support the prediction that re-suspension or erosion will not occur at site into the closure and post-closure phases of the project. In addition, the EIS should propose specific mitigation measures that will ensure re-suspension of contaminated sediments will not occur. B) BON requests that the Proponent consider the construction of bank stabilization and other permanent erosion control measures to ensure the natural hydrological forces of the river will not impact the re-mobilization and exposure of buried contaminated sediments around the site.
39	BON	As part of CNL's licence with the CNSC, environmental monitoring around the WL site is required. As stated in EIS Revision 2, Section 6.5.5.2.2, the current program includes collecting fish flesh at one location upstream and two locations downstream of the WL site. Follow-up monitoring might include both C-14 and tritium in the radiochemical analyses of fish, to confirm that there is no measurable upstream-downstream difference, as expected. Monitoring of both surface water quality and fish flesh will continue into the post-closure period.	A) BON requests that the EIS include details of the proposed fish monitoring program. A monitoring program that only includes the collection of fish from one upstream location and two downstream locations may not be sufficient. Fish are mobile and this type of scoped monitoring may not provide accurate control or exposure values. BON recommends expanding the monitoring program to include a wider geographic scope to account for fish movement and fish community exposure. B) In addition, beyond sampling only adult tissue, the fish monitoring program should include sampling multiple life stages of fish species to understand the range of impacts radionuclides can have on various life stages of fish at the site and further into the Winnipeg River.

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			C) It is not clear how frequent this monitoring will occur. BON requests that the EIS include more detail on how often these samples will be collected and how often an analysis and report will be submitted for review. D) As stated, Indigenous communities should be included in the development and execution of the fish monitoring program. BON must be meaningfully and safely engaged, and supported, in the long-term monitoring of the site.
40	BON	EIS Revision 2, Section 6.5.5.2.2 indicates that historically, liquid effluent from the Active Liquid Waste Treatment Center was discharged to the Winnipeg River and elevated radionuclide concentrations were measured in sediments in the local outfall area. Exposure pathways to aquatic biota include radiation from nuclides in the water and sediment. A measurable increase in radionuclide concentrations in water and sediments is anticipated once groundwater from the WL site reaches the river (during the post-closure period). The EIS then states that the effect of exposure from radionuclides in sediments on aquatic biota was estimated in 2000 using clams. Acknowledging that clams represent a sessile species that would be exposed to contaminants continuously, the resulting effect on clams may, and will not likely be analogous to the effect on fish species that occur and feed in that area. Further, the EIS is relying on a comparison of data from 20 years ago.	The proponent must carry out an updated and applicable effects assessment of potential contaminants on the fish communities of the river at the site and into the regional area. This will be necessary in order to compare against the future proposed monitoring samples to understand the on-going effects of the project in closure.
Terrestrial Environment			
41	BON	The Proponent has not indicated if there will be opportunities for BON monitors to take part in the mitigation measures for wildlife, wildlife habitat and species at risk outlined in Table 6.6.5-1 (and in Table 11.0-1 that describes activities in the Environmental Assessment Follow-up Monitoring Program (e.g., effectiveness monitoring of nest structures and bat boxes, relocating wildlife structures, wildlife road surveys, and adaptive management practices). The Proponent has also not included opportunities for BON members to take on activities to restore habitat at the WR-1 site, such as preparation, planting, and follow-up maintenance.	The Proponent should commit to providing capacity funding and industry-standard job training for BON monitors to undertake, or at a minimum participate in, the pre-construction wildlife surveying and mitigation measures outlined in Table 6.6.5-1, follow up monitoring in Table 11.0-1, as well as restoration efforts.
42	BON	EIS Revision 2, Section 6.6.5.2, Table 6.6.5-1, page 6-288 indicates that the Proponent plans to establish turf grass over the reclaimed areas following decommissioning using locally appropriate grass seed mixtures that are certified weed-free. The Proponent will maintain the revegetated area over the concrete cap and engineered cover during the institutional control period to restrict weed establishment and prevent surface erosion and abrasion. The Proponent does not provide sufficient detail about the composition of the seed mix, maintenance of vegetation over time, or the measures they will put in place to mitigate the potential harmful impacts of herbicide application.	A) BON requests the Proponent provide additional detail about the seed mixture for the reclaimed areas. Since one of the Proponent's objectives is to prevent surface erosion and abrasion, we suggest the Proponent use deep-rooted prairie grass species that are regionally appropriate to hold the soil in place, in place of common turf species, assuming the deep roots would not compromise the integrity of the structures below. BON recommends the Proponent also use a diversity of native plants for restoration measures including flowering species that can provide valuable function for pollinators. B) The Proponent will maintain the vegetation on the concrete cap and engineered cover during the institutional control period by restricting weed establishment (using herbicide) and preventing soil erosion with silt fences and runoff management. BON requests additional information about vegetation maintenance, such as confirmation that the Proponent will maintain the vegetation for the length of the institutional control period (300 years). The long-term plan is not clear from the information in the EIS. For instance, does the Proponent anticipate the area will succeed into a forested habitat? If not,

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			how will the Proponent manage succession? And if so, seeding a ground cover more appropriate for a natural habitat would be more suitable (see Recommendation 42a:). C) EIS Revision 2, Section 6.6.5.2, Table 6.6.5-1, page 6-288 indicates that the Proponent intends to use herbicide to spot spray weeds in the areas that are being revegetated. The Proponent should develop a herbicide application protocol that should (at a minimum): require the use of low-toxicity sprays restrict application during high winds restrict application when prevailing winds could result in spray drifting into sensitive areas require the use of drift-reducing additives ensure personnel not involved in spray application are not in the vicinity
43	BON	In EIS Revision 2, Section 6.6.5.2, the Proponent has committed to follow up monitoring during the post-closure phase to verify their predictions for post-closure performance and to inform an adaptive management approach. The Proponent provides insufficient detail on the metrics they will use to evaluate the success of restoration efforts post-closure and to determine if adaptive management is necessary.	The Proponent must provide more details about what parameters will be measured to determine if revegetation is successful, such as, an assessment of the amount of vegetation cover and growth and proportion of non-native species in newly established vegetation. The Proponent should describe the adaptive measures to ensure restoration is successful and must monitor the restoration efforts until vegetation is established.
44	BON	In EIS Revision 2, Section 6.6.2, the Proponent has made predictions of the potential risks to waterfowl and white-tailed deer and determined that there would be no potential adverse effects on these animals. Large mammals and waterfowl were not selected as Valued Components for analysis of impacts on the terrestrial environment. The Proponent determined that the exposure of deer to radionuclides was minimal, and that exposure would be from drinking water from the Winnipeg River, since surface water runoff from the WL site flows into the Winnipeg River. The Proponent determined that it is unlikely that there would be significant adverse effects on terrestrial wildlife populations or communities as a result of chemical and radionuclide releases from the Project. BON members are concerned about how this project may have an impact on their ability to carry out traditional practices such as hunting, fishing, and gathering. Members are concerned that the animals and plants may be contaminated and not safe to eat or use in ceremony. Even though the Proponent has made predictions that adverse effects on wildlife are unlikely, the Proponent has not completed adequate field research to alleviate the BON members' concerns about the potential harmful effects of chemical and radionuclide exposure on large mammals or other animals of traditional importance to BON.	A) The Proponent should carry out research to test the level of chemical and radiological contamination in harvested species. To obtain samples of game animals for testing, we recommend the Proponent work with BON and other Indigenous Nations to identify coordinators in the communities to be trained on sample collection and work with hunters to collect samples from harvested animals. In a study done in the Dehcho, Northwest Territories, First Nation harvesters were provided training and biological sampling kits. Hunters were reimbursed for each kit they submitted. Samples from 43 harvested moose were collected (Larter and Kandola, 2010). B) The Proponent must make a commitment to notify the BON and other Indigenous communities if test results determine that animals in Southeastern Manitoba to be unsafe to consume, with specific commitments to timeframes and method of delivery.

Comment #	Source	Issue	Question/Recommendation
45	BON	In EIS Revision 2, Section 1.3, the Proponent has stated that no hunting or fishing is permitted on the WL site, but does not provide information about the duration of the restriction, how people are excluded from the area, for how long the restriction will be in place, and for what reason.	The Proponent should provide plain-language information to BON about the potential risks of hunting and fishing in the vicinity of the WL site.
46	BON	EIS Revision 2, Appendix 6.6-1 indicates that snapping turtles were observed crossing the road near the lagoon, by the east gate to the WMA and on Ara Mooradian Way. The Proponent proposed mitigation measures to avoid vehicle-wildlife collisions, with consideration of snapping turtles. The Proponent will post turtle crossing signs, install fencing at three potential crossing locations, and conduct annual wildlife surveys. Staff will report dead or wounded animals on roads to the Environmental Protection department. The Proponent reported that they will conduct 'routine' road surveys for turtles crossing the road following the Survey Protocol for Blanding's Turtle (*Emydoidea blandingii*) in Ontario (OMNRF 2015) but has not reported survey frequency. The Proponent will provide environmental and wildlife awareness training to staff yet has not reported specific details of what will be included in the training in the EIS.	A) BON recommends the Proponent conduct weekly routine road surveys for turtles. BON recommends the Proponent conduct more frequent surveys of the roads and the fencing that will be installed at critical times in the year (nesting and hatchling emergence) to mitigate turtle road mortality. The Proponent should conduct daily surveys to evaluate the effectiveness of the fences during nesting season (for the month of June) for the first three years after they have been erected. The Proponent should conduct road surveys twice a week in September for hatchlings. If the Proponent finds hatchlings, the hatchlings should be moved to the closest safe habitat. B) The wildlife awareness training provided to staff and workers that will be on site should include training on how to safely handle snapping turtles. C) The Proponent should develop a protocol for responding to the discovery of an injured or dead animal, focusing on species-at-risk (endangered, threatened, or special concern) in the area, and include the protocol in the Appendices of the EIS.
47	BON	The demolition of above-grade structures will result in the production of dust. The dust could carry potentially harmful substances (chemical and radiological contaminants) into the adjacent natural environment, such as wetlands that are proximal to the demolition site in the LSA.	To minimize dust fallout in the wetland areas, demolition activities should not occur during high wind events or when the wind direction would carry dust to the wetlands. To ensure that wetlands are not being affected by atmospheric transport of contaminated dust, wetlands closest to the LSA should be monitored. The analyses of these samples should include quantitative measurements of chemical and radiological contaminants.
Land and Resource Use			
48	BON	Within Table 4.3.2-4: Summary and Key Interests and Concerns for Black River First Nation, Brokenhead Ojibway Nation and Hollow Water First Nation, under the topic of Future Land Use and Tenure, BON is interested in "knowing if the land currently occupied by the WL Site would be available for other uses in the future". CNL's response is that "decisions on future uses of the land are not under the scope of CNL's contract. That is with AECL the owner of the WL site" (EIS Revision 2, Section 4.3.2.2, page 4-29). CNL further states that it has informed AECL of the communities' desire for future use.	A key facet of BON's rights and interests is to maintain a Seven Generations approach to stewardship of their lands and resources. As such, it is imperative that lands are available, healthy, and accessible to future generations. BON requests an engagement and consultation meeting with CNL and AECL to discuss future land use and tenure plans and agreements.
49	BON	Under section 4.4 Traditional Knowledge and Land Use Studies, CNL states that three Traditional Knowledge, Land Use and Occupancy (TKLUO) Studies were conducted for this Study and that these TKLUO Studies were conducted "to assist in better understanding modern and traditional land and resource use near the WL site". CNL further states that "it is committed to continue to incorporate Indigenous specific knowledge to improve our operations". Within Table 4.3.2-4: Summary and Key Interests and Concerns for Black River First Nation, Brokenhead Ojibway Nation and Hollow Water First Nation, under the topic of Traditional Knowledge, BON states the importance of fishing,	Please explicitly demonstrate the process and methods that were used to incorporate BON's Traditional Knowledge and their traditional land and resource use into this EIS and how CNL plans to apply BON's Traditional Knowledge into site specific planning such that BON's rights and interests will be protected. It is

Comment #	Source	Issue	Question/Recommendation
		harvesting and gathering medicinal plants from the Whiteshell area. Despite BON's traditional knowledge and assertion of current land use within the Study Area, there is no evidence of how BON and other Indigenous groups' Traditional Knowledge of traditional land and resource use is being meaningfully applied and incorporated into this EIS or how it is being considered into the Project design and the effects assessment process including plans for mitigation, management, monitoring and accommodation. Although engagement activities and issues/interests raised by Indigenous groups were present in the EIS, it does not seem as though Traditional Knowledge was incorporated into any discipline areas in the EIS including land and resource use, geological and hydrogeological, terrestrial and aquatic environments.	important that this process is communicated clearly and implemented in a meaningful and transparent manner.
50	BON	Within Table 4.3.2-4: Summary and Key Interests and Concerns for Black River First Nation, Brokenhead Ojibway Nation and Hollow Water First Nation, under the topic of Traditional Knowledge, CNL states that, "the fact that the WL has had restricted access over the last six decades, has also meant that no traditional land and resources have occurred within the boundaries of the WL site and not in proximity to the proposed Project". CNL's comment conflicts with BON's assertion of current land and resource use that occurs near the Whiteshell site. CNL even acknowledges that "they are aware that Indigenous organizations have indicated their concern about potential effects on wildlife, fish and plants and the resultant effect on traditional land and resource use that occurs in close proximity to the Whiteshell site". CNL's above statement about there being no traditional land and resource use occurring within the boundaries or in proximity of the WL site for the last six decades also fails to address the historic use of BON ancestors in the area. Within Table 4.3.2-4: Summary and Key Interests and Concerns for Black River First Nation, Brokenhead Ojibway Nation and Hollow Water First Nation, under the topic of Future Land Use and Tenure, BON participants noted "that the WL site occupies a large parcel of land that was removed from Treat 1 territory without adequate consultation".	A) BON requests that CNL clarify their statement that "no traditional land and resources have occurred within the boundaries of the WL site and not in proximity to the proposed Project" with supporting documentation that needs to be verified as this statement is in conflict with BON's assertion of continued land and resource use within proximity of the WL Study site. B) Discussions between CNL, the Federal Government and BON should take place to discuss accommodation measures for BON's loss of land and resource use access and use of the Project site.
51	BON	Within Table 4.3.2-4: Summary and Key Interests and Concerns for Black River First Nation, Brokenhead Ojibway Nation and Hollow Water First Nation, under the topic of Environmental Monitoring, the First Nations that were consulted for this Study request that environmental monitoring be continued for a minimum of 1,000 years. In response, CNL states that they are proposing 100 years of Environmental monitoring "based on international best practice and scientific basis". In addition to this, CNL is proposing an additional 200 years of institutional controls. BON operates according to their own Indigenous laws and principles and if CNL is committed to forming a genuine long-term relationship with BON (as stated in Section 4.5 CNL's Long-term Relationship with Indigenous Peoples), it is important for CNL to consider these unique laws and principles within their EIS.	A) CNL should consult with BON on their 1,000-year monitoring approach and come to an agreement on what this approach would look like and how they can achieve this objective together. B) As stated in the Land Use and Occupancy Study, BON is interested in environmental monitoring being conducted independently of the CNL/CNSC. As such, BON requests that an Indigenous environmental and cultural monitoring program be implemented. Furthermore, BON requests that CNL provide capacity funding for the First Nations with interests in the Project to conduct community led independent monitoring of the site, so that monitoring can be conducted in a manner that is consistent with the First Nations Indigenous laws and principles. An Indigenous/Traditional Knowledge approach to monitoring is needed to complement conventional technical monitoring. C) CNL needs to clarify what is meant by 200 years of institutional controls and what activities are included beyond the first 100 years of monitoring.
52	BON	Within Table 4.3.2-4: Summary and Key Interests and Concerns for Black River First Nation, Brokenhead Ojibway Nation and Hollow Water First Nation, under the topic of Environmental Monitoring, the First Nations that were consulted as part of this Study state that they "would like to know more about the future monitoring activities that will occur after the WL site is fully decommissioned". CNL provides a conflicting response to this comment. Within Section 4.0 (Indigenous Engagement) and Section 6.8 (Land and Resource Use) of the EIS, CNL mentions several times their commitment to involving the Indigenous communities in the environmental monitoring process, especially as a mitigation measure for impacts to the Winnipeg River. Specifically, in Section 6.8.6, CNL states, "CNL is aware that some of the Indigenous organizations have continuing concerns about the potential effects of the Project and more broadly the WL site and potential effect on traditional land and	A) CNL and AECL need to clearly state which party will be ultimately responsible for post-decommissioning environmental monitoring. B) CNL's commitment to involving Indigenous communities and their Traditional Knowledge into the environmental monitoring process is vague. CNL/AECL needs to explicitly state the process for Indigenous inclusion. For example, how many Indigenous

Comment #	Source	Issue	Question/Recommendation
		resource use and more specifically on the wildlife, fish and plants upon which such use is based. As such, CNL is committed to involving such organization in monitoring and to communicating with them over the long-term to address ongoing concerns". However, within Table 4.3.2-4: Summary and Key Interests and Concerns for Black River First Nation, Brokenhead Ojibway Nation and Hollow Water First Nation, under the topic of Environmental Monitoring, CNL states that "AECL (which is part of the Government of Canada) will ultimately be responsible for monitoring…".	monitors will be hired onto the project? What kind of training will be provided and where will the funding come from? Who will the environmental monitors report to? How will communities be informed about any issues that arise from the environmental monitoring process? CNL needs to clearly lay out a detailed environmental monitoring process and plan and communicate this plan clearly in the EIS. C) Traditional Knowledge should be central to the environmental monitoring process. CNL needs to explicitly explain the process for how Traditional Knowledge will be included in monitoring procedures.
53		In EIS Revision 2, Section 6.8 Land and Resource Use, CNL states that "the assessment of land and resource use includes considerations of both Indigenous land and resource use and non-Indigenous land and resource use activities in proximity to the Project". It is inappropriate to group Indigenous and non-Indigenous land and resource use under the same section within the EIS. Indigenous peoples have unique rights and interests that are protected under Section 35 of the *Constitution Act, 1982*. Any analysis of effects to Indigenous traditional land and resource use should be considered independently of non-Indigenous land and resource use. Also, in EIS Revision 2, Section 6.6.1, Table 6.6.1-1, page 6-256, CNL refers to concerns that were raised at engagement activities, such as impacts to migratory birds, impacts to wildlife, and long-term impacts on animals. However, CNL did not mention whether these concerns were raised in public engagement sessions or engagement with Indigenous Nations. It is important to distinguish the concerns raised in Indigenous and non-Indigenous engagement sessions as the impacts to both groups will be different.	CNL should separate the Land and Resource Use of Indigenous and non-Indigenous peoples into their own sections. This will provide more clarity on what the effects of the Project are on both land users. The Indigenous communities involved should have their own effects assessment that is separate from non-Indigenous land users.
Socio-Economic Environment			
54		EIS Revision 2, Section 6.9.4.2.3.2 and Section 6.9.4.2.3.3 provide an overview of employment rates, labour force characteristics and income levels in the region. EIS Revision 2, Section 6.9.4.2.6.2 provides an overview of community well-being. Two First Nations with respect to these baseline factors in the Project's RSA are described, however BON is not.	BON requests that the Proponent provide representation of BON's labour force, employment and income conditions as well as community well-being either quantitatively from Stats Canada if data exists, or qualitatively through relevant Key Person Interviews.
55		In Section 6.9.4.2.6.4, the EIS describes various health statistics and health determinants for the Indigenous population. There is no description or discussion however, of one of the most important and central components to Indigenous health and wellbeing: access to, connection to, and active participation in, land and resource use traditional activities. This section is not reflective of the inherent connections between Indigenous community wellbeing, cultural identity, pride, and ties to the land.	BON requests that the Proponent provide a supplementary filing that more accurately portrays the key tenants of Indigenous health and wellbeing so that this VC may be adequately assessed.
56		Although CNL is supporting the Community Regeneration Partnership and contributing to the region's socio-economic plan to sustain and revitalize the region's economy post site decommissioning, there is no indication of Indigenous socio-economic considerations and/or community wellbeing benefit enhancement plans besides a bulleted list of general aspirational efforts the CNL refers to in Section 6.9.5.2.2 Secondary Pathways of the EIS. More formal agreements and Indigenous community specific socio-economic plans are required that recognize the cumulative effects each Indigenous community has experienced by way of the WR-1's existence and associated activities in tandem with consideration and application of community specific traditional knowledge as it pertains to reclamation and land use planning.	BON requests that the Proponent provide clarification and confirmation of what plans will be developed and what measures will be taken to accommodate Indigenous communities for impacts they have experienced as a result of the site's activities and may continue to experience due to the issues related to the land surrounding the site post-reclamation.
57		There is no indication, within the EIS, of how Indigenous communities within the RSA will be involved in the site's decommissioning and reclamation phases in terms of decommissioning employment and more specifically, traditional knowledge incorporation into the Project's reclamation and restoration phases. What commitments and agreements will be put into place to ensure that Indigenous communities, including BON, will be represented in the (albeit small) new workforce of 50 people and in formal environmental and cultural monitoring positions during reclamation and restoration?	BON requests that the Proponent provide clarifying details regarding how Indigenous communities within the RSA will be involved in the site's decommissioning and reclamation phases in terms of decommissioning employment and more specifically, traditional knowledge incorporation into the Project's

Comment #	Source	Issue	Question/Recommendation
			reclamation and restoration phases. BON also requests confirmation as to whether and how commitments and agreements will be put into place to ensure that Indigenous communities, including BON, will be represented in the new workforce and in formal environmental and cultural monitoring positions during reclamation and restoration.
58		In EIS Revision 2, Section 6.9.71 Community Well-being (Residual Effects) there is a comprehensive discussion pertaining to CNL's efforts to fund and support the *Community Regeneration Partnership* program activities. These are centered around community and regional business and economic development. While BON acknowledges the importance of these initiatives, aspects of community wellbeing of importance to BON relate to the wellbeing of the lands and water bodies in and around the site during and post decommissioning. BON members have been impacted by loss of land and access to traditional grounds where their Aboriginal and treaty rights were practiced. Relevant to BON is the ability to reclaim and re-access their traditional territories so that their rights may be practiced, and lands and waters preserved and protected for future generations.	BON requests that socio-economic plans or community regeneration initiatives have an Indigenous component that reflects socio-economic values relevant to BON and other Indigenous groups in the RSA. This needs to be reflected in the form of accommodation measures within written agreements.
59		In EIS Revision 2, Section 6.9.9 Monitoring and Follow up, CNL refers to its environmental monitoring program and communicating these results to the Public Liaison Committee and the Partnership so that they in turn can market the area and its safety. BON agrees with the need for this approach however is concerned that there is no indication of Indigenous involvement in any aspect of environmental or cultural monitoring programs and communications.	BON requests that there be an Indigenous environmental and monitoring program established, with a formal way to apply community specific TK into decommissioning and reclamation activities; and in turn, to provide information about these activities and outcomes to each community that practices traditional activities - or wishes for future generation to – in the region.

Appendix C Background Information on Traditional Territories and Indigenous Communities and Organizations

IDENTIFIED FIRST NATION AND THE RED RIVER MÉTIS

The First Nations and the Red River Métis with a potential interest in the Project and included in CNL's Indigenous Engagement Program were identified in consultation with the CNSC and through information largely derived from available public sources. These include government sources (e.g., the Government of Canada's Aboriginal and Treaty Rights Information System (ATRIS) web portal [7], and First Nation community profile information from the Indigenous and Northern Affairs Canada (INAC) website [26] – [33] (which is updated semi-annually)), and Indigenous community and organization websites. Where possible, the information provided in this section generally includes reference to each First Nation's elected council, geographic location, population, and associations or memberships.

NUMBERED TREATIES

The communities described below are signatories to the "numbered treaties", a series of land cession treaties (1 to 11) negotiated between the Crown and First Nations (Anishinaabe, Anishininiwak, Ininiwak, and Denesuline) to address government interests in large tracts of land in the Northwest Territories, Northwestern Ontario and the Prairies, and to formalize the relationship between First Nations and the Crown. Government interests in treaty lands included agriculture, settlement, transportation links and resource development, and the numbered treaties meant to the government the cession of lands in exchange for specific First Nation rights such as: reserve lands for the sole use and benefit of First Nations, education, health, agricultural assistance, livestock, annuities, ammunition, clothing, taxation exemptions, and continued hunting, fishing, trapping and harvesting rights. Alternatively, First Nations sought to protect their culture, language, land base and livelihood. Treaties were not viewed by First Nations as a surrender of land but rather an agreement to share land.

The eleven numbered treaties were negotiated between 1871 and 1921 [32]; [34].

While the treaty agreements are generally similar in scope, unique clauses are present in individual treaties based on varying and/or competing interests. For example, Treaties No. 1 and No. 2, as the initial treaties negotiated, had fewer clauses than later treaties and according to [32] failed to specify that First Nation signatories maintain an ongoing right to hunt and fish within the treaty area. There were also differences in treaty annuities and the amount of reserve lands per band across the treaties [32].

Of the First Nations described below, Treaties 1, 3 and 5 are relevant and cover parts of Manitoba and Ontario. Figure 1 illustrates the proximity of these Treaty areas and community locations to the Project site. The Project is located on Treaty 3 land, while the overall WL site which extends west of the Winnipeg River falls on Treaty 1 land. Communities that form part of these Treaties and Treaty 5 also have historical and current land use ties with the area. Anishinaabe and Ojibway communities with historic traditional territories that have expressed some level of interest in the Project include the Sagkeeng and Brokenhead Ojibway Nation in

Treaty 1; Black River First Nation and Hollow Water First Nation in Treaty 5; and Wabaseemoong Independent Nations in Treaty 3 [34]; [35].

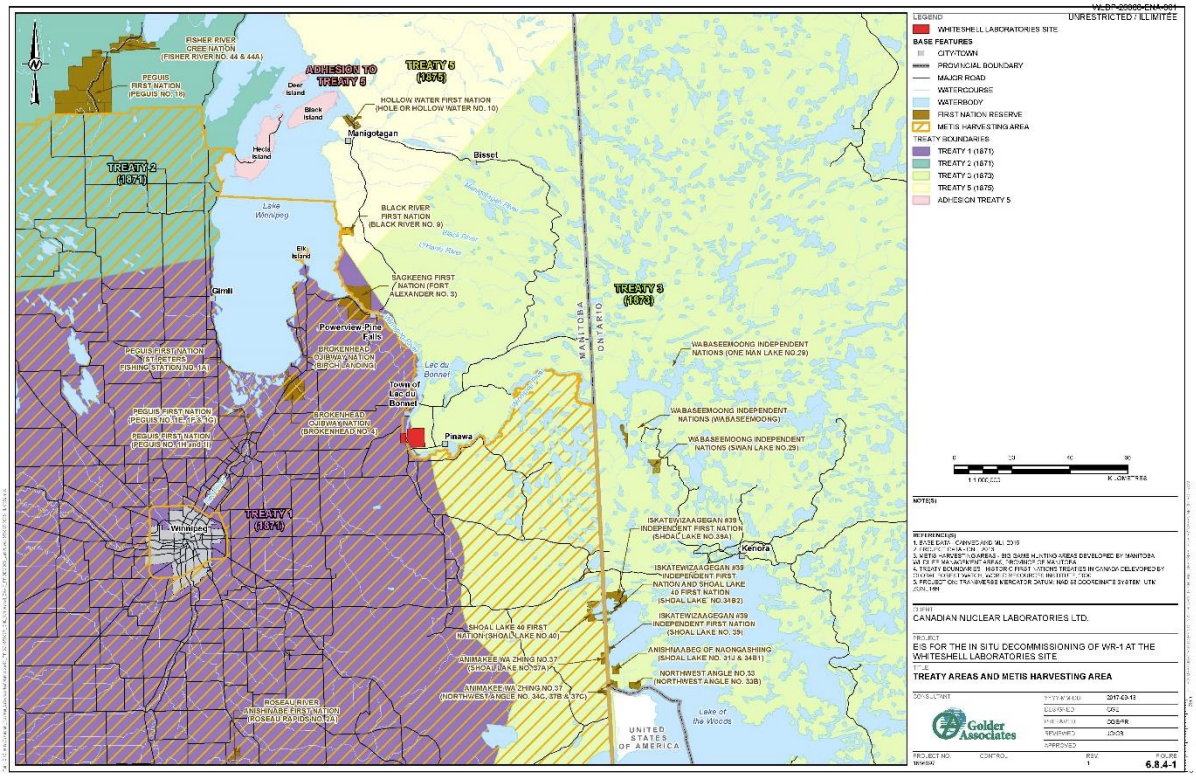


Figure 1: First Nations and Treaty Areas

TREATY NO. 1

Treaty No. 1 was the first post-Confederation treaty, covering Manitoba as it existed at the time, and was concluded at Lower Fort Garry on August 3, 1871. Seven communities are associated with this treaty: Brokenhead Ojibway Nation, Sagkeeng First Nation (Fort Alexander), Long Plain First Nation, Peguis First Nation, Roseau River Anishinaabe First Nation Government, Sandy Bay First Nation, and Swan Lake First Nation.

Figure 2 provides the land cessions established under Treaty No. 1 across all associated communities. Treaty historical boundaries identified in ATRIS are derived from a Natural Resources Canada Mapping project and may or may not have been officially surveyed. As such, the boundaries may not be precise but are included here to provide a general location with respect to the communities discussed below [7].



Source: Government of Canada, 2018a

Figure 2: Treaty No. 1 Settlement Boundary

TREATY NO. 3

Treaty No. 3 was entered into on October 3, 1873 at the North-West Angle of the Lake of the Woods between the Saulteaux Tribe of Ojibway Indians and the Dominion of Canada following three years of negotiations. Over 14 million ha of land were surrendered. Twenty-seven communities are associated with this treaty: Animakee Wa Zhing No. 37, Anishinaabe of Wauzhushk Onigum, Anishnaabeg of Naongashiing, Big Grassy, Buffalo Point First Nation, Couchiching First Nation, Eagle Lake, Grassy Narrows First Nation, Iskatewizaagegan No. 39 Independent First Nation, Lac Des Mille Lacs, Lac La Croix, Lac Seul, Mitaanjigamiing First Nation, Naicatchewenin, Naotkamegwanning, Nigigoonsiminikaaning First Nation, Northwest Angle No. 33 First Nation, Obashkaandagaang, Ochiichagwe'babigo'ining First Nation, Ojibway Nation of Saugeen, Ojibways of Onigaming First Nation, Rainy River First Nations, Seine River First Nation, Shoal Lake No. 40 First Nation, Wabaseemoong Independent Nations, Wabauskang First Nation, and Wabigoon Lake Ojibway Nation [7]. Four of these are discussed below: Shoal Lake No. 40 First Nation, Iskatewizaagegan No. 39 Independent First Nation, Northwest Angle No. 33 First Nation, and Wabaseemoong Independent Nations.

Figure 3 provides the land cessions established under the Treaty No. 3 across all associated First Nations. Treaty No. 3 territory includes parts of eastern Manitoba, including the WL site. Historical treaty boundaries identified in ATRIS may or may not have been officially surveyed and as such the Treaty No. 3 boundaries presented may not be precise [7].

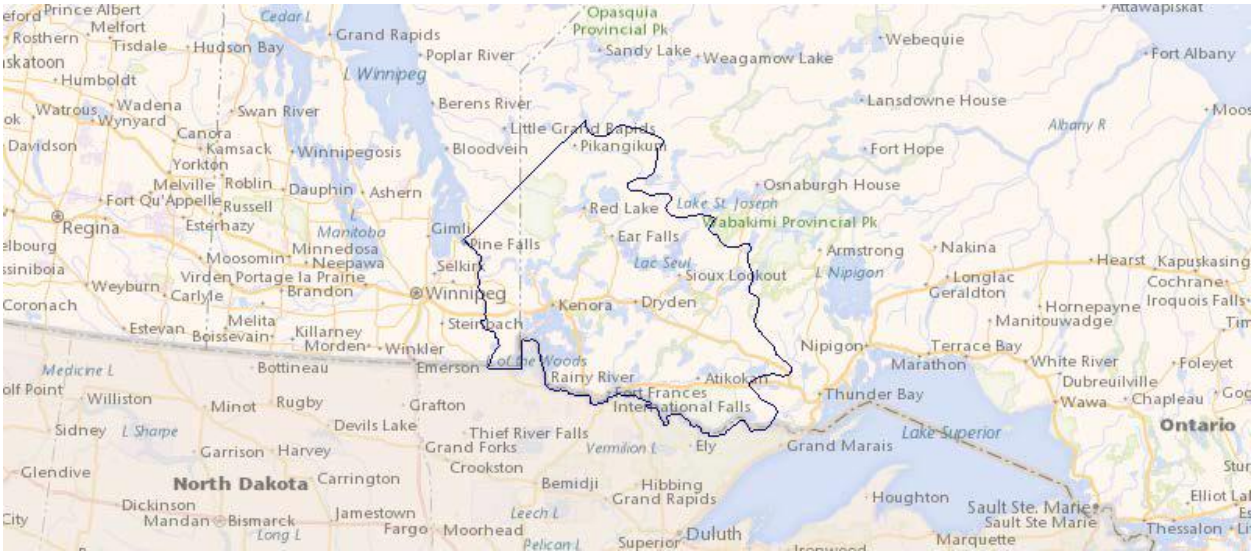


Figure 3: Treaty No. 3 Settlement Boundary

TREATY NO. 5

Thirty-nine First Nations are associated with this treaty which originated in two stages, with the southern and northern portions of the treaty negotiated in 1875 and 1908 respectively [7]. These Nations include: Berens River First Nation, Black River First Nation, Bloodvein First Nation, Bunibonibee Cree Nation, Chemawawin Cree Nation, Cross Lake Band of Indians, Cumberland House Cree Nation, Deer Lake First Nation, Fisher River Cree Nation, Fox Lake First Nation, Garden Hill First Nation, God's Lake First Nation, Hollow Water First Nation, Kee-Way-Win First Nation, Kinonjeoshtegon First Nation, Little Grand Rapids First Nation, Manto Sipi Cree Nation, Misipawistik Cree Nation, Mosakahiken Cree Nation, Nisichawayasihk Cree Nation, North Spirit Lake First Nation, Norway House Cree Nation, O-Pipon-Na-Piwin Cree Nation, Opaskwayak Cree Nation, Pauingassi First Nation, Pikangikum First Nation, Poplar Hill First Nation, Poplar River First Nation, Red Earth Cree Nation, Red Sucker Lake First Nation, Sandy Lake First Nation, Sayisi Dene First Nation, Shamattawa First Nation, Shoal Lake Cree Nation, St. Theresa Point First Nation, Tataskweyak Cree Nation, War Lake First Nation, Wasagamack First Nation, York Factory First Nation [7]. Two of these are discussed below: Black River First Nation and Hollow Water First Nation.

Figure 4 provides the land cessions established under Treaty No. 5 across all associated communities. As was the case with Treaty No. 1, historical treaty boundaries identified in ATRIS may or may not have been officially surveyed and as such boundaries presented may not be precise [7].



Source: Government of Canada, 2018a

Figure 4: Treaty No. 5 Settlement Boundary

SAGKEENG FIRST NATION

The Sagkeeng First Nation, formerly the Fort Alexander Band No. 262, are an Anicinabe First Nation, and signatory to Treaty No. 1, with land cessions within the settlement boundary identified in Figure 2 above. The Sagkeeng First Nation has potential, asserted and/or established Aboriginal and Treaty rights in the vicinity of the project (beyond Treaty No. 1), is within proximity to the WLsite, and has an existing relationship and expressed interest in the WL site. See Appendix D for a location map of this First Nation.

The following table provides an overview of the land base size and registered population both on and off reserve lands for the Sagkeeng First Nation.

Table 5: Sagkeeng First Nation Land Base and Population

First Nation	Land Base Description	Total Land Base Size (ha)	Registered Indigenous Population		Total Registered Population
			On Reserve Lands	Off Reserve Lands	On and Off Reserve Lands
Sagkeeng	Fort Alexander 3 (No. 06362)	8,771.3	3,566	4,516	8,037

Source: INAC, 2019c [8] (INAC as used in this Report generally refers to the former Indigenous and Northern Affairs Canada (INAC) Department. The functions of the former INAC have been recently separated and the official names of the Departments formerly referred to as INAC are now: “Crown-Indigenous Relations and Northern Affairs Canada” and “Indigenous Services Canada”. All the data and information referred to in this project would now be found on the Crown-Indigenous Relations and Northern Affairs Canada website.)

The Sagkeeng First Nation occupy one area of reserve lands: Fort Alexander 3 Reserve No. 06362 (Table 5). The Reserve is situated approximately 52 kilometres (km) north of the WL site, at the southeastern tip of Lake Winnipeg, and along the shores of the Winnipeg River. The reserve covers an area of 8771.3 ha. Sagkeeng First Nation has a total registered population of 8,037 (as of 2019 September). Roughly 56 percent of the registered population reside off reserve lands (4,471) [8].

The reserve is listed as Fort Alexander, although based on the community website, this area was named Sagkeeng ("mouth of the river") by the Ojibwe. According to the community website, the reserve was initiated over a kilometre upstream from the Hudson Bay Company occupied Fort Alexander trading post and based on INAC files later moved to the current location. Further, the community identifies its traditional territory to include land within Treaty No. 1 and land to the north and west of the Winnipeg River [36].

The Sagkeeng First Nation is in the process of developing its own Land Code, under the First Nations Land Management Regime pursuant to the federal *First Nations Lands Management Act* (1999). First Nations are enabled under the Regime to manage their own land, resources and environment based on community land codes, laws and policies [7].

The Sagkeeng First Nation is governed by an elected council comprised currently of a Chief and six councillors. The types of electoral systems undertaken by First Nations in selecting a chief and councillors falls under one of four processes: a custom system, the *Indian Act* election system, the First Nations Elections Act, or under the provisions of a self-governing agreement. According to the community and the ATRIS websites, this community uses the *Indian Act* electoral system with council election occurring every four years. This conflicts with the INAC site that lists a Custom Electoral System. The community website currently identifies one Chief and six councillors. Band Membership is under Section 11 of the *Indian Act.* Membership criteria under Section 11 requires registration as a status Indian [8]; [7].

As noted above the Sagkeeng First Nation is a signatory of Treaty No. 1. While not a signatory to Treaty #3, Sagkeeng is a member of the Grand Council Treaty #3 organization. The community is associated with four specific claims and assertions, one of which, based on information provided through ATRIS, is under assessment and the remaining three with a status of 'other'. Four court cases are also identified: two are currently listed as within a dormant phase (one discovery, one pleadings), and two within an active phase (one pleadings, one post trial). There may be additional active legal proceedings as ATRIS notes legal proceedings currently unavailable on the website [7]. The Sagkeeng First Nation website identifies the reserve as belonging to three treaty territories. The website identifies the First Nation's traditional territory as including land within Treaty No. 1 and land north and west of the Winnipeg River. It notes that Chief and Council filed a Statement of Claim in June of 2007 seeking court recognition of unextinguished Indigenous Title over traditional lands situated outside Treaty No. 1. Further, it states that a revised Treaty Land Entitlement claim was submitted by the Sagkeeng First Nation in September 2010, and which is currently before the Specific Claims Tribunal [36].

Sagkeeng is also a member of the Southern Chiefs Organization [37].

BROKENHEAD OJIBWAY NATION

The Brokenhead Ojibway Nation is an Anishinaabe (Saulteaux/Ojibwa) First Nation. The First Nation is a signatory to Treaty No. 1, with land cessions within the settlement boundary identified in Figure 2 above. The First Nation has potential, asserted and/or established Aboriginal and Treaty rights in the vicinity of the project, is within proximity to the WL site, and has expressed an interest in the project. See Appendix D for a location map of this First Nation.

The following table provides an overview of the land base size and registered population both on and off reserve lands for the Brokenhead Ojibway Nation.

Table 6: Brokenhead Ojibway Nation (Treaty No. 1) Land Base and Population

First Nation	Land Base Description	Total Land Base Size (ha)	Registered Indigenous Population		Total Registered Population
			On Reserve Lands	Off Reserve Lands	On and Off Reserve Lands
Brokenhead Ojibway Nation	Birch Landing (No. 09800)	272	787	1,325	2,112
	Brokenhead 4 (No. 06361)	5,412.8			
	Na-Sha-Ke-Penais (No. 09803)	3			

Source: INAC, 2019b [27]

The Brokenhead Ojibway Nation occupies three areas of reserve lands (Table 6). Brokenhead 4 Reserve No. 06361 is the largest and is situated approximately 44 km northwest of the WL site. This main reserve is largely surrounded by the Rural Municipality of St. Clements and contains the settlement of Scanterbury. The land base for this reserve is 5,412.8 ha. One of two additional smaller reserves is the Birch Landing Reserve No. 09800 (272 ha) to the north of Brokenhead 4 Reserve, and 55 km northwest of the WL site. This reserve is situated to the west of the Sagkeeng First Nation Fort Alexander 3 Reserve, on the shores of Lake Winnipeg and surrounded by the Rural Municipality of Alexander. The second smaller reserve is the Na-Sha-Ke-Penais Reserve No. 09803 (3 ha) to the south of Brokenhead 4 Reserve, 73 km southwest of the WL site, and surrounded by the Rural Municipality of East St. Paul.

The Brokenhead Ojibway Nation has a total registered population of 2,120 (as of 2019 September). Approximately 63 percent of this community (1,302) resides off reserve lands (Table 6). The economic base of the community is primarily agricultural produce. Commercial services and businesses include: a band office, health centre, school, entertainment and

recreational centres, daycare, historic village, treatment plant, training and employment program, bison ranch and restaurant [38].

The Brokenhead Ojibway Nation is governed by an elected council currently comprised of a Chief and four councillors. The electoral system occurs under the *Indian Act* and council elections occur every two years. A council quorum of a minimum of three members of Band Council are required to pass council decisions. Band Membership is under Section 10 of the *Indian Act*. Membership criteria under Section 10 means that the community determines its own membership code according to particular procedures set out as per Section 10 of the *Indian Act*. Further, rules of membership allow individuals with previously acquired rights to membership to remain. Individuals who do not have Indian status can be included in the community [7]. The Brokenhead Ojibway Nation is a member Nation of the Southeast Resource Development Council Corp Tribal Council, a formal unification of eight member First Nations in southeastern Manitoba which is governed by the Chiefs of its member communities [38]. Brokenhead is also a member of the Southern Chiefs Organization [37].

The Brokenhead Ojibway Nation is associated with five specific claims and assertions including: two settled, one in negotiations, one concluded, and one with a claim status of 'other'. Three active court cases are also identified as: two in pleadings phase and one in post-trial phase [7].

MANITOBA MÉTIS FEDERATION

Three Indigenous peoples are constitutionally recognized by the government in Canada, as per s.35(2) of the *Constitution Act*, 1982: First Nations, Inuit and Red River Métis. The term "Métis" is defined by the Metis National Council (MNC) as: *a person who self-identifies as Métis, is distinct from other Aboriginal peoples, is of historic Métis Nation Ancestry and who is accepted by the Métis Nation."* [39].

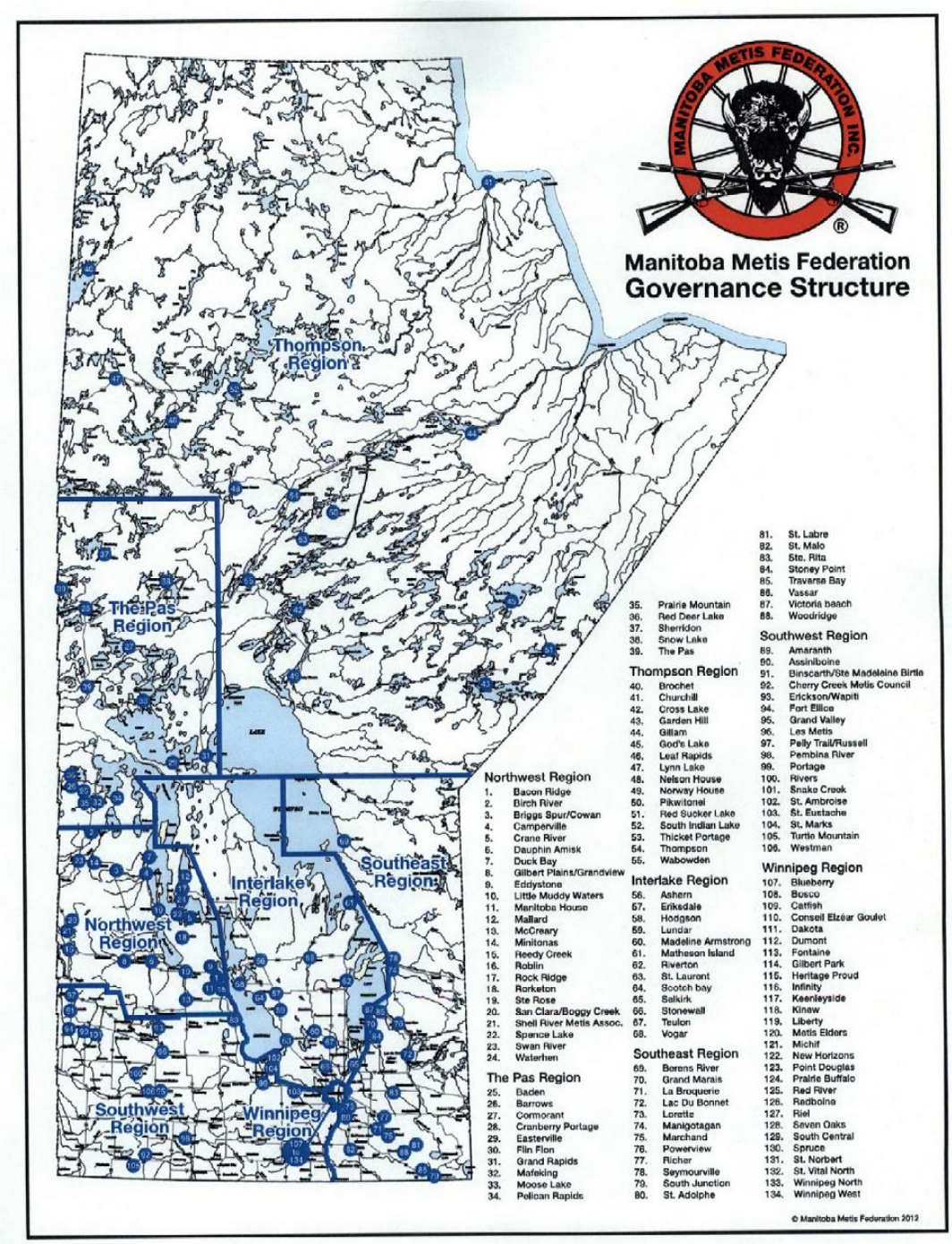
The Metis National Council is a federally recognized national administrative and representative body for the Métis both nationally and internationally since 1983. Five democratically elected provincial organizations exist within Canada and are comprised of regional councils, community councils, and Métis locals. The Manitoba Métis Federation is one of these provincial organizations, alongside the Métis Nation of Ontario, Métis Nation of Saskatchewan, Métis Nation of Alberta, and Métis Nation of British Columbia [7]. The Manitoba Métis Federation is the democratically elected self-government representative of the Manitoba Métis, also known as the Red River Métis, an "Aboriginal peoples" under Section 35 of the Constitution Act, 1982 and currently includes the Manitoba Métis Federation Inc., a non-share corporation incorporated pursuant to the laws of Manitoba.

The Manitoba Métis Federation represents and advances the interests of the Métis people of Manitoba and uses an electoral process where all formal positions are elected by Federation members in each designated Region or Local. Governance includes: a President, Board of Directors, regional associations or "Regions" and community-level "Locals".

The President functions as the Federation leader and spokesperson and Chief Executive Officer. This position oversees day-to-day Federation operations and is elected through a province-wide election every four years. A Board of Directors, comprised of 23 democratically elected

members, provides guidance, leadership and management toward Federation (and its subsidiaries) policies, objectives and strategic direction. Seven Regions across Manitoba are administered by a vice-president and two executive officers, who are also of the Federation's Board of Directors, and who administer programs and services independently to their specific geographic area. Each Region comprises various Locals. These are administered by a chairperson, a vice-chairperson and a secretary-treasurer, and have a minimum of nine members which meet at least four times a year. Each Manitoba Métis Federation member belongs to a Local. Specific Locals determine the timing of election of their respective Local representatives, while Regional officers are elected every four years [18].

The governance structure of the Manitoba Métis Federation is provided in Figure 5.

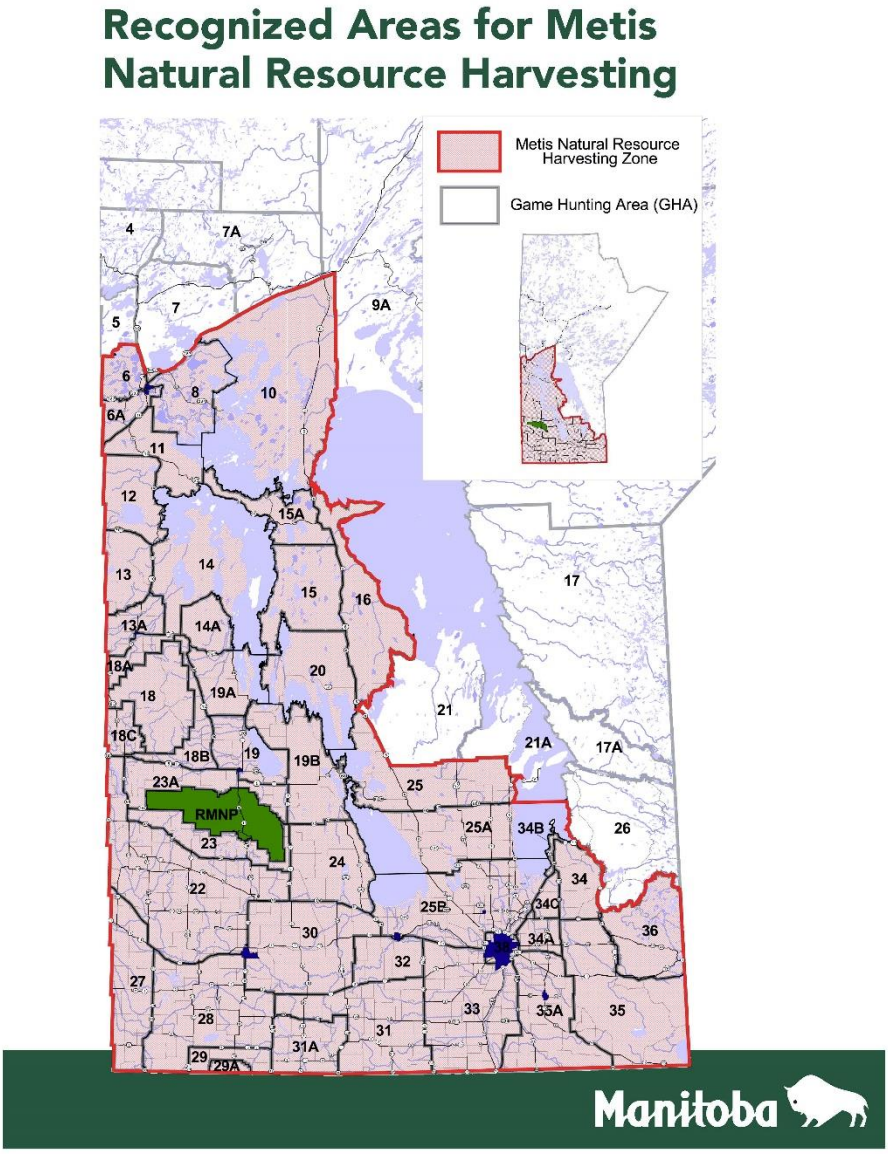


Source: Government of Canada, 2018b [40]

Figure 5: Manitoba Métis Federation Governance Structure

In 2012 the Government of Manitoba and the Manitoba Métis Federation signed an Agreement that provides for the recognition of Métis harvesting rights for food and domestic use in mutually agreed to regions of the province and which relies on the Manitoba Métis Federation's Métis Laws of the Harvest as the basis for the development of new provincial regulations to govern Métis harvesting [41]. The Agreement generally covered the southern

area of Manitoba but also committed the parties to a collaborative process for examining Métis harvesting rights in other regions of the Province. That map is shown below in Figure 6.



Source: Government of Manitoba and MMF 2012b [41]

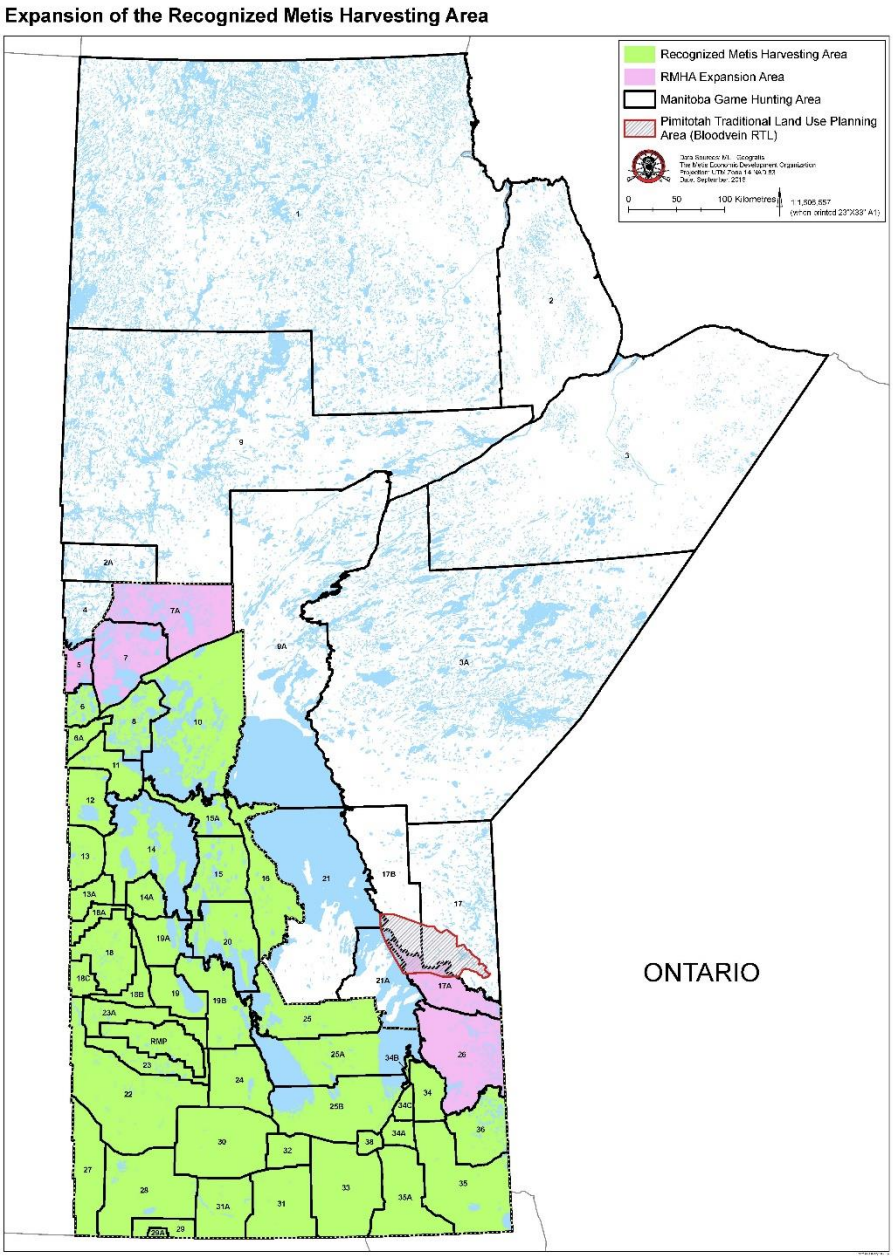
Figure 6: Recognized Areas for the Red River Métis Natural Resource Harvesting

It should be noted that the WL site on the east side of the Winnipeg River appears to be not in the Recognized Métis Harvesting Area but is rather in an area labelled as the "Recognized Metis Harvesting Area – Expansion Area" (see Figure 7 below), or provincial Game Hunting Area (GHA) #26 also known as Manigotagan. CNL has interpreted this to mean that the Province of Manitoba has not recognized the Manitoba Métis Federation assertion of potential Indigenous Métis harvesting rights in this area. In September 2018 [42] the Manitoba Métis Federation

issued a Notice with respect to defending Manitoba Métis harvesting and included mention of GHA #26 in that. This Notice stated:

> "On September 23rd, 2018 delegates to the Manitoba Métis Federation (MMF) Annual General Assembly voted unanimously in favour of a resolution to defend Métis harvesting rights in Manitoba. The resolution mandates the MMF to defend Métis Harvesters exercising Métis harvesting rights in expanded areas bordering the Recognized Métis Harvesting Area (RMHA) also referred to as the Métis Natural Resource Harvesting Zone. These include the following Game Hunting Areas (GHAs):
>
> - The Grass (Grassy) River Region: GHAs 5, 7 and 7A.
> - The Manigotagan Region: GHA 26 and that portion of GHA 17A outside of the Pimitotah Traditional Land Use Planning Area (also known as the Bloodvein Registered Trapline)."

Recognized Métis Harvesting Areas are located on the west (Area 34) and south sides of the Winnipeg River (35 and 36). Based on the Agreement, CNL is of the opinion that Red River Métis have existing, asserted and/or Red River Métis harvesting rights in the vicinity of the proposed project.



Source: MMF, 2018a [17]

Figure 7: Expansion of Recognized Red River Métis Harvesting Area

According to the Métis Law of the Harvesters, Métis harvesters may harvest throughout Recognized Métis Harvesting Area on all unoccupied provincial Crown Lands in Manitoba and occupied provincial Crown Lands, including provincial parks, wherever First Nation Members are allowed to harvest; and on any privately owned lands in Manitoba on which that Métis Harvester has been given permission by the owner or occupant, or Indian Reserve lands with permission of Band Council [43].

According to the Métis Law of the Harvest [43], harvest includes hunting, trapping, fishing and gathering for food and domestic use, including sharing, social and ceremonial purposes, of fish, big-game, small game, furbearers, game-bird (upland and migratory), berries, mushrooms, medicinal and other plants including wild rice, and firewood or timber.

BLACK RIVER FIRST NATION

The Black River First Nation is an Anishinaabe community, and signatory to Treaty No. 5 with land cessions within the settlement boundary identified in Figure 4 above.

Black River First Nation has potential, asserted and/or established Aboriginal and Treaty rights in the vicinity of the project, and is within proximity to the WL site. See Figure 1 for a location map of Black River First Nation.

Table 7 provides an overview of the land base size and registered population both on and off reserve lands for the Black River First Nation.

Table 7: Black River First Nation (Treaty No. 5) Land Base and Population

First Nation	Land Base Description	Total Land Base Size (ha)	Registered Indigenous Population		Total Registered Population
			On Reserve Lands	Off Reserve Lands	On and Off Reserve Lands
Black River	Black River 9 (No. 06360)	809.3	980	467	1,447

Source: INAC, 2019a [26]

The Black River First Nation primarily speak Ojibwe [44] and occupy one area of reserve lands: Black River 9 Reserve No. 06360 (Table 7). The Reserve is situated approximately 75 km north of the WL site, and along the eastern shore of Lake Winnipeg. The reserve covers an area of 809.3 ha. Band Membership is under Section 10 of the *Indian Act* [26].

The total registered population of this community is 1,447 (as of September 2019) (Table 7). Approximately thirty-two percent of the registered population reside off reserve lands (447). The economic base of the Black River First Nation includes trapping, commercial fishing, agricultural development, wild rice harvesting, and hunting. Features within the community include a band office, school, a water treatment facility, window and truss plants, health centre, Head Start Program, grader operation, school and general store/gas station [18]; [38].

Conflicting information is provided for the Black River First Nation electoral system. INAC identifies the community as being governed by an elected council under the *First Nations Elections Act,* whereas the ATRIS website identifies leadership selection every two years under the *Indian Act* [7]; [26]. According to the community website, current council is comprised of a Chief and three councillors with each position elected to a four year term and elections held

every four years [44]. The Black River First Nation is a member Nation of the Southeast Resource Development Council Corp. Black River First Nation is also a member of the Southern Chiefs Organization [37].

One concluded specific claim is associated with the Black River First Nation. One court case is also identified and listed as within discovery phase. The Black River First Nation is involved in the Treaty 5 and Adhesion to Treaty No. 5 First Nations discussions with the federal government, a process of recognition of Indigenous rights and self-determination [7].

HOLLOW WATER FIRST NATION

The Hollow Water First Nation is an Anishinaabe (Ojibwa) First Nation and signatory to Treaty No. 5, with land cessions within the settlement boundary identified in Figure 4 above. The Hollow Water First Nation has potential, asserted and/or established Aboriginal and Treaty rights in the vicinity of the project. See Appendix D for a location map of this First Nation.

Table 8 provides an overview of the land base size and registered population both on and off reserve lands for the Hollow Water First Nation.

Table 8: Hollow Water First Nation (Treaty No. 5) Land Base and Population

First Nation	Land Base Description	Total Land Base Size (ha)	Registered Indigenous Population		Total Registered Population
			On Reserve Lands	Off Reserve Lands	On and Off Reserve Lands
Hollow Water	Hole or Hollow Water 10 (No. 06363)	1,622.9	1058	978	2,036

Source: INAC, 2019d [28]

Hollow Water First Nation is located approximately 113 km north of the WL site, along the eastern shore of Lake Winnipeg. The single reserve includes 1,622.9 ha of land. The total registered population of this community is 2,036 (as of September 2019) with under half (964) residing off-reserve lands (Table 8). The population's economic base includes fishing, hunting, trapping and wild rice harvesting [38].

Selection of leadership is under the *Indian Act* with a council quorum of a minimum of three members of Band Council to pass council decisions. The current elected Council is comprised of a Chief and four councillors [28]. The Hollow Water First Nation is a member Nation of the Southeast Resource Development Council Corp Tribal Council. Band Membership is under Section 10 of the *Indian Act* [28].

The reserve includes commercial businesses and services such as a health centre, daycare, gas station, Indigenous Headstart Program, a campground, and water treatment plant [38].

A single specific claim is associated with the Hollow Water First Nation and is currently in a negotiations phase. One court case is also identified and listed as within discovery phase. Hollow Water First Nation is also involved in the Treaty 5 and Adhesion to Treaty No. 5 First Nations discussions with the federal government. There are no court cases associated with Hollow Water First Nation based on information from the ATRIS website [7].

Hollow Water First Nation is also a member of the Southern Chiefs Organization [37].

SHOAL LAKE NO. 40 FIRST NATION

The Shoal Lake No. 40 First Nation is a signatory to Treaty No. 3 with land cessions within the settlement boundary identified in Table 6 above. The First Nation has potential, asserted and/or established Aboriginal and Treaty rights in the vicinity of the project. See Appendix D for a location map of Shoal Lake No. 40 First Nation.

The following table provides an overview of the land base size and registered population both on and off reserve lands for the Shoal Lake No. 40 First Nation.

Table 9: Shoal Lake No. 40 (Treaty No. 3) Land Base and Population

First Nation	Land Base Description	Total Land Base Size (ha)	Registered Indigenous Population		Total Registered Population
			On Reserve Lands	Off Reserve Lands	On and Off Reserve Lands
Shoal Lake No. 40	Agency 30 (No. 06240)	379	292	363	655
	Shoal Lake 34B2 (No. 06285)	172.4			
	Shoal Lake 40 (No. 06288)	2,579			

Source: INAC, 2019g [31]

The Shoal Lake No. 40 First Nation occupies three areas of reserve lands (Table 9). Shoal Lake 40 Reserve No. 06288 is the largest with a land base of 2,579 ha. This reserve is situated on the southern end of the Manitoba/Ontario border, northwest of Lake of the Woods, and on the northwest shores of Shoal Lake. It is approximately 94 km southeast of the WL site. The Shoal Lake 34B2 Reserve No. 06285 is the smallest of the reserves (172.4 ha) and is located on a peninsula within Shoal Lake adjacent to Shoal Lake 40 Reserve, and approximately 110 km southeast of the WL site. The Shoal Lake No. 40 First Nation shares this reserve with the Iskatewizaagegan No. 39 Independent First Nation. The third reserve is the Agency 30 Reserve No. 06240 which is situated in Lake of the Woods, to the south east of Shoal Lake 40 Reserve, and approximately 140 km southeast of the WL site. This reserve covers an area of 379 ha. This reserve is shared with twelve other First Nations, including Iskatewizaagegan No. 39

Independent First Nation, Northwest Angle No. 33 First Nation, and Wabaseemoong Independent Nations.

The Shoal Lake No. 40 First Nation has a total registered population of 655 (as of September 2019). Slightly more than half of the community (350) resides off reserve lands (Table 9).

The Shoal Lake No. 40 First Nation is governed by an elected council currently comprised of a Chief and four councillors. The electoral system occurs under the *Indian Act* and council elections occur every two years. A council quorum of a minimum of three members of Band Council are required to pass council decisions. Band Membership is under Section 11 of the *Indian Act*.

Shoal Lake No. 40 First Nation is a member Nation of the Bimose Tribal Council, a federally incorporated council which formally unifies ten member First Nations. The Council provides advisory services in the areas of: First Nations governance, technical, community and capital planning services, financial management, economic development, education, and First Nation membership services (such as status/treaty cards) [45]; [31]. Shoal Lake No. 40 First Nation is also a member of the Grand Council of Treaty #3, a political organization that represents twenty-six communities across Treaty No. 3 areas in Ontario and Manitoba, and a member of the Chiefs of Ontario, a political coordinating body representing 133 communities in Ontario.

Shoal Lake No. 40 First Nation is associated with five specific claims and assertions including: one in negotiations, one concluded, and three with a claim status of ‘other’. One dormant court case is identified as in the pleadings phase. The First Nation is involved in the Grand Council Treaty #3 Recognition of Indigenous Rights and Self-Determination discussions with the federal government, a process of recognition of indigenous rights and self-determination. Twenty-six of the twenty-seven Treaty No. 3 communities are associated with this [7].

ISKATEWIZAAGEGAN NO. 39 INDEPENDENT FIRST NATION (SHOAL LAKE NO. 39 FIRST NATION)

The Iskatewizaagegan No. 39 Independent First Nation (also known as Shoal Lake No. 39) is a signatory to Treaty No. 3, with land cessions within the settlement boundary identified in Figure 3 above. The First Nation has potential, asserted and/or established Aboriginal and Treaty rights in the vicinity of the project. See Appendix D for a location map of Iskatewizaagegan No. 39 Independent First Nation.

Table 10 provides an overview of the land base size and registered population both on and off reserve lands for the Iskatewizaagegan No. 39 Independent First Nation.

Table 10: Iskatewizaagegan No. 39 Independent First Nation Land Base and Population

First Nation	Land Base Description	Total Land Base Size (ha)	Registered Indigenous Population		Total Registered Population
			On Reserve Lands	Off Reserve Lands	On and Off Reserve Lands
Iskatewizaagegan No. 39 Independent First Nation	Agency 30 (No. 06240)	379	328	341	669
	Shoal Lake 34B2 (No. 06285)	172.4			
	Shoal Lake 39 (No. 06286)	419.2			
	Shoal Lake 39a (No. 06287)	3,405.5			

Source: INAC, 2019e [29]

Four areas of reserve lands are occupied by the Iskatewizaagegan No. 39 Independent First Nation (Table 10). Shoal Lake 39a Reserve No. 06287 is the largest with a land base of 3,405.5 ha. This reserve is situated on the southern end of the Manitoba/Ontario border, northwest of Lake of the Woods, and on the northwest shores of Shoal Lake. It is located in the northeast portion of the Shoal Lake grouping of reserves and is approximately 93 km southeast of the WL site. The Shoal Lake 34B2 Reserve No. 06285 is the smallest of the reserves (172.4 ha) and is located on a peninsula within Shoal Lake, adjacent to Shoal Lake 40 Reserve, and approximately 110 km southeast of the WL site. The Iskatewizaagegan No. 39 Independent First Nation shares this reserve with the Shoal Lake No. 40 First Nation. The third reserve is the Agency 30 Reserve No. 06240 which is situated in Lake of the Woods, to the south east of Shoal Lake 40 Reserve, and approximately 140 km southeast of the WL site. This reserve covers an area of 379 ha. This reserve is shared with twelve other First Nations, including Shoal Lake No. 40 First Nation, Northwest Angle No. 33 First Nation, and Wabaseemoong Independent Nations. A fourth reserve is Shoal Lake 39 Reserve No. 06286 with an area of 419.2 ha. This reserve rests on the southwest portion of Shoal Lake, approximately 102 km southeast of the WL site.

The Iskatewizaagegan No. 39 Independent First Nation has a total registered population of 651 (as of September 2018). Approximately 49 percent of the community (291) resides off reserve lands (Table 10).

Iskatewizaagegan No. 39 Independent First Nation is governed by an elected council, comprised of a Chief and three councillors. The electoral system occurs under the *Indian Act* and council elections occur every two years. A council quorum of a minimum of three members of Band Council are required to pass council decisions. Band Membership is under Section 11 of the

Indian Act. Iskatewizaagegan No. 39 Independent First Nation is a member Nation of the Bimose Tribal Council, the Grand Council Treaty #3 and Chiefs of Ontario [29]; [7].

Iskatewizaagegan No. 39 Independent First Nation is associated with five specific claims and assertions including: two in negotiations, one concluded, and two with a claim status of 'other'. There are no specific court cases associated with Iskatewizaagegan No. 39 Indenpendent First Nation based on information from the ATRIS website, however it is noted on the website that Iskatewizaagegan No. 39 Independent First Nation is involved in legal proceedings but that information is currently unavailable on ATRIS. Iskatewizaagegan No. 39 Independent First Nation is involved in the Grand Council Treaty #3 Recognition of Indigenous Rights and Self-Determination discussions with the federal government [7].

NORTHWEST ANGLE NO. 33 FIRST NATION

Northwest Angle No. 33 First Nation is a signatory to Treaty No. 3, with land cessions within the settlement boundary identified in Figure 3 above. The First Nation has potential, asserted and/or established Aboriginal and Treaty rights in the vicinity of the project. See Appendix D for a location map of Northwest Angle No. 33 First Nation.

The following table provides an overview of the land base size and registered population both on and off reserve lands for Northwest Angle No. 33 First Nation.

Table 11: Northwest Angle No. 33 First Nation Land Base and Population

First Nation	Land Base Description	Total Land Base Size (ha)	Registered Indigenous Population		Total Registered Population
			On Reserve Lands	Off Reserve Lands	On and Off Reserve Lands
Northwest Angle No. 33	Agency 30 (No. 06240)	379	225	345	570
	Northwest Angle 33B (No. 06272)	1,335			
	Whitefish Bay 33A (No. 06273)	1,251			

Source: INAC, 2019f [30]

Three areas of reserve lands are occupied by Northwest Angle No. 33 First Nation, all within Northern Ontario (Table 11). The largest (1,335 ha) is Northwest Angle 33B Reserve No. 06272. This reserve is situated in Kenora District immediately north of the Canada/U.S. border and just east of the Manitoba/Ontario border. The reserve sits on the north shore of the Northwest Angle Inlet and is approximately 111 km southeast of the WL site. The smallest reserve is the Agency 30 Reserve No. 06240, which is situated in Lake of the Woods, to the east of Northwest

Angle 33B Reserve, and approximately 140 km southeast of the WL site. This reserve covers an area of 379 ha. This reserve is shared with twelve other First Nations, including Shoal Lake No. 40 First Nation, Iskatewizaagegan No. 39 Independent First Nation, and Wabaseemoong Independent Nations. Further east from Agency 30 Reserve is the Whitefish Bay 33A Reserve No. 06273, which covers an area of 1,251 ha. This reserve is located in Lake of the Woods, near Trans-Canada Highway 17, southeast of Kenora, and approximately 176 km southeast of the WL site.

Northwest Angle No. 33 First Nation has a total registered population of 570 (as of September 2019). Approximately 61 percent of the community (300) resides off reserve lands (Table 11).

Selection of leadership is under the *Indian Act* with a council quorum of a minimum of four members of Band Council to pass council decisions. The current elected Council is comprised of a Chief and five councillors. Band Membership is under Section 11 of the *Indian Act*. Northwest Angle No. 33 First Nation is a member Nation of the Anishinaabeg of Kabapikotawangag Resource Council [30]. The Resource Council provides technical and advisory services to eight member First Nations and is incorporated as a non-profit organization. The Council addresses issues of member First Nations, such and health, social, and education, as well as infrastructure and resource management. Governing Board members are all Chiefs of the five member First Nations and decision making is achieved through a process of consensus [46]; [7]. Northwest Angle No. 33 First Nation is also a member of the Grand Council Treaty #3 and Chiefs of Ontario.

Three specific claims and assertions are associated with Northwest Angle No. 33 First Nation including: one in negotiations, one concluded, and one with a claim status of ‘other’. Two dormant court cases are identified with both in the pleadings phase. Northwest Angle No. 33 First Nation is involved in the Grand Council Treaty #3 Recognition of Indigenous Rights and Self-Determination discussions with the federal government [7].

WABASEEMOONG INDEPENDENT NATIONS

Wabaseemoong Independent Nations (also known as Wabaseemoong Independent Nations of One Man Lake, Swan Lake and White Dog) are signatories to Treaty No. 3, with land cessions within the settlement boundary identified in Figure 3 above. Wabaseemoong Independent Nations have potential, asserted and/or established Aboriginal and Treaty rights in the vicinity of the project. See Appendix D for a location map of Wabaseemoong Independent Nations.

Table 12: Wabaseemoong Independent Nations Land Base and Population

First Nation	Land Base Description	Total Land Base Size (ha)	Registered Indigenous Population		Total Registered Population
			On Reserve Lands	Off Reserve Lands	On and Off Reserve Lands
Wabaseemoong Independent Nations	Agency 30 (No. 06240)	379	1,011	1,012	2,023
	One Man Lake 29 (No. 06269)	1,117.3			
	Swan Lake 29 (No. 06270)	2,237			
	Wabaseemoong (No. 06268)	8,480			

Source: INAC, 2018i [33]

Wabaseemoong Independent Nations has a total registered population of 1,989 (as of September 2018). Approximately half of the community (1,012) reside off reserve lands (Table 12).

Wabaseemoong Independent Nations occupy four areas of reserve lands, all within north-western Ontario (Table 12). Wabaseemoong Reserve No. 06268 has a land base of 8,480 ha. The largest of the four reserves, it is situated approximately 8 km east of the Manitoba/Ontario border and approximately 80 km east of the WL site. At its southern perimeter, the reserve encompasses the community of Whitedog. To the south is Swan Lake 29 Reserve No. 06270 with the second largest land area (2,237 ha), located on the east shore of Swan Lake and approximately 85 km east of the WL site. One Man Lake 29 Reserve No. 06269 is located to the northeast of Wabaseemoong Reserve, on the north shore of One Man Lake and 95 km east of the WL site. This reserve has a land base of 1,117.3 ha. Agency 30 Reserve No. 06240 is the fourth reserve (379 ha), well to the south of the other reserves, and situated in Lake of the Woods, approximately 140 km southeast of the WL site. This reserve is shared with twelve other First Nations, including Shoal Lake No. 40 First Nation, Northwest Angle No. 33 First Nation, and Iskatewizaagegan No. 39 Independent First Nation.

Based on information derived from the Wabaseemoong Independent Nations website, the traditional land use area (TLUA) of these nations occupies approximately 6,720 square km, extending north to Caribou Falls and west in to Manitoba, using the English River and Winnipeg River systems [47].

Wabaseemoong Independent Nations is a member of the Bimose Tribal Council, the Grand Council Treaty #3 and Chiefs of Ontario. Wabaseemoong Independent Nations is governed by an elected council, comprised of a Chief and four councillors. The electoral system occurs under

the *Indian Act* and council elections occur every two years. A council quorum of a minimum of three members of Band Council are required to pass council decisions. Band Membership is under Section 11 of the *Indian Act* [33]; [7].

There are no listed specific claims and assertions associated with Wabaseemoong Independent Nations. One dormant court case is identified as in the pleadings phase. There may be additional active legal proceedings as ATRIS notes legal proceedings currently unavailable on the website. Wabaseemoong Independent Nations is involved in the Grand Council Treaty #3 Recognition of Indigenous Rights and Self-Determination discussions with the federal government [7].

GRAND COUNCIL TREATY #3

Grand Council Treaty #3 is the historic government of the Anishinaabe Nation in Treaty No. 3. It is a political organization made up of 28 First Nation communities in northwestern Ontario and southeastern Manitoba, and comprising a total population of approximately 25,000 [48]; [7]. It functions as one of the four Provincial Territorial Organizations (PTOs) in Ontario which include: Grand Council Treaty #3, the Association of Iroquois and Allied Indians, Nishnawbe-Aski Nation, and the Union of Ontario Indians. The PTOs serve in various capacities as representative secretariat bodies to over 100 First Nation communities in Ontario, primarily through political leadership and advocacy, education, jurisdiction and negotiation, lands and resources, intergovernmental affairs, and health. PTO governance is comprised of an elected leadership which includes a Board of Directors, regional advisory councils, Elders, and youth [49].

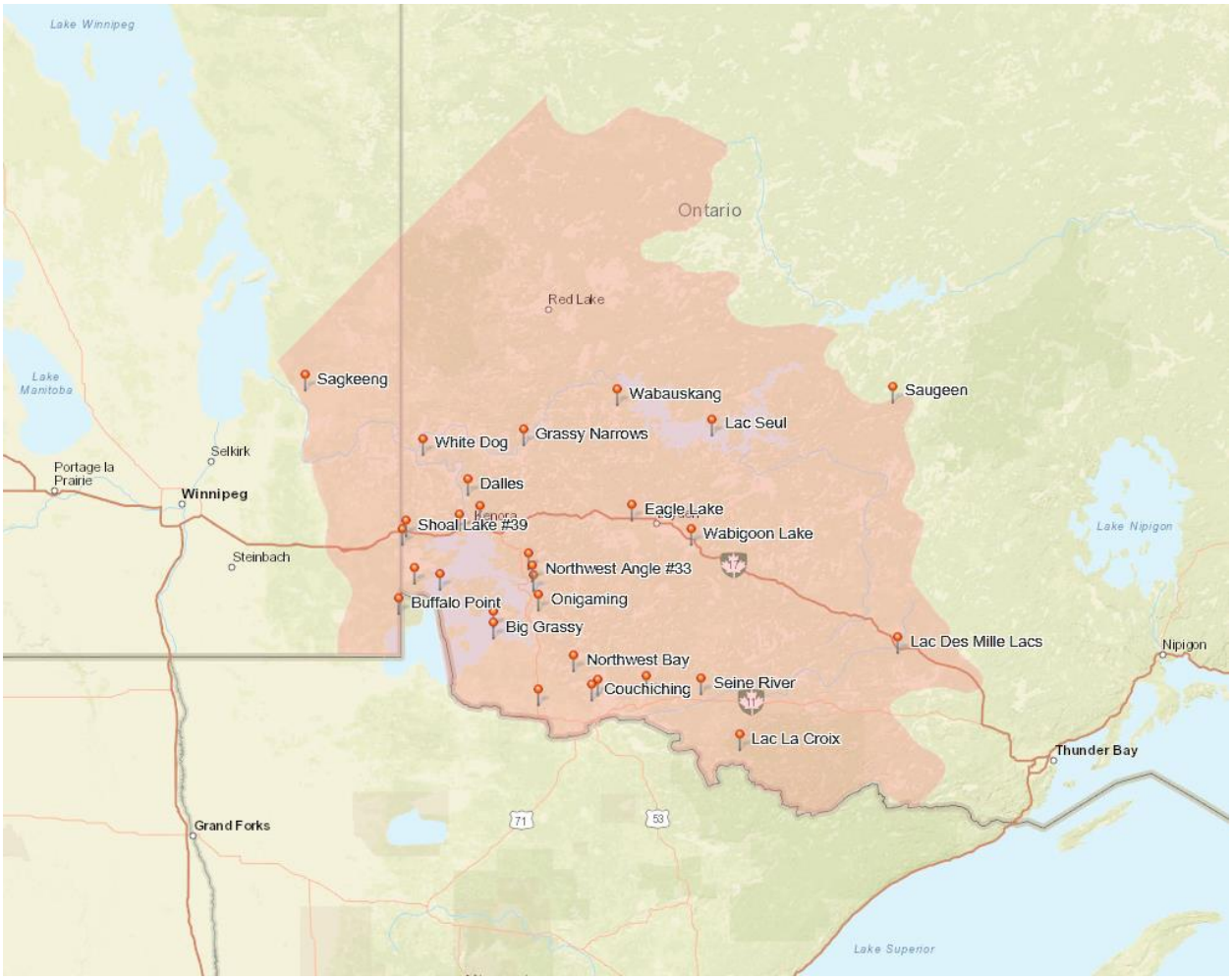
Grand Council Treaty #3 communities are listed in the table below.

Table 13: Grand Council Treaty #3 Communities

Community Names		
Animakee Wa Zhing 37	Mitaanjigamiing	Sagkeeng (Fort Alexander)*
Asubpeeschoseewagong (Grassy Narrows)	Naicatchewenin	Saugeen
Buffalo Point	Naongashiing (Big Island)	Seine River
Couchiching	Naotakamegwanning (Whitefish bay)	Shoal Lake No. 40*
Eagle Lake (Migisi Sahgaigan)	Nigigoonsiminikaaning	Wabaseemoong Independent Nations*
Iskatewizaagegan No. 39*	Northwest Angle No. 33*	Wabauskang
Lac des Mille Lacs	Obashkaandagaang	Wabigoon Lake
Lac La Croix	Ochiichagwe'Babigo'Ining	Wauzhushk Onigum
Lac Seul	Onigaming	
Mishkosiminiziibiing (Big Grassy)	Rainy River	

*Communities with a potential interest in the project

Based on the Grand Council Treaty #3 website, the territory associated with this organization spans from west of Thunder Bay to north of Sioux Lookout in Ontario, along the Canada/U.S. border, and to the province of Manitoba, covering approximately 55,000 sq. miles (see Figure 3 (above) and Figure 8 (below)). The WL site is included in this area. Of the First Nation communities associated with this organization, four have a potential interest in the project and are described in sections above: Northwest Angle No. 33 First Nation, Shoal Lake No. 40 First Nation, Iskatewizaagegan No. 39 Independent First Nation, and Wabaseemoong Independent Nations. While not a signatory to Treaty #3, Sagkeeng is a member of the Grand Council Treaty #3 organization.



Source: Adapted from Grand Council Treaty 3 website interactive mapping tool [48]

Figure 8: Treaty 3 Territory and Communities

The Grand Council Treaty #3 mandate is to protect, preserve and enhance Treaty and Aboriginal rights, to the benefit and protection of its community members, through the direction of its leadership. Further this is to be accomplished through activities that will enhance: Inherent jurisdiction, Sovereignty, Nation-building, and Traditional Governance. Through cooperation with communities, Tribal Councils, and organizations that provide programs to Anishinaabe citizens, and adopting treaty/territory wide approaches, the Grand Council Treaty #3 aims to achieve its mandate [48].

Governance and services identified by Grand Council Treaty #3 for its member communities include: administrative, governance of land, treaty and Indigenous rights research, advocacy, economic development, culture and citizenship, housing/infrastructure, territorial planning, monitoring and licensing for fishing, hunting and trapping, education, child care, health, and other social services [48].

The administrative office of Grand Council Treaty #3 provides support to various councils including the National Assembly and the Chiefs Assembly. This is achieved through contribution

to the following activities: policy analysis, strategic planning, policy design, governance revitalization, law making, historical research, issue identification, program development, and coordination of technical and political working groups [48].

CHIEFS OF ONTARIO

The Chiefs of Ontario, established in 1975, emerged from a joint Indian Associations Coordinating Committee, which constituted an unincorporated federation of the four First Nation PTOs in Ontario. The Committee had been formed to provide a single representative in Ontario to the Assembly of First Nations (a national First Nation advocacy organization). The Chiefs of Ontario office serves as a facilitation and coordinating body for 133 First Nation communities in Ontario and the four PTOs. It provides a political forum for advocacy and facilitates discussion, planning, implementation and evaluation of all local, regional and national matters affecting member communities [50]; [7].

Efforts toward self-determination of the Anishinaabek, Mushkegowuk, Onkwehonwe, and Lenape Peoples are mandated by the Chiefs-in-Assembly. The organization's activities are provided direction and guidance through the following:

- An elected Regional Chief;
- Resolutions passed by the Chiefs-in-Assembly of member First Nations; and
- Political Confederacy made up of the Grand Chiefs of the four PTOs, Independent First Nations representatives and the Ontario Regional Chief.

The office of the Chiefs of Ontario disseminates to the communities, Tribal Councils, and PTOs all information pertaining to matters that may affect and/or impact First Nations. Various committees and councils analyse issued which are subsequently brought forward to the Political Confederacy for action [50].

The Chiefs of Ontario provide the following 'priority' services to its member First Nations: economic development, education, environment, health, justice, social services, and youth. Detailed information, publications, guidance, recommendations and platforms for networking and information sharing are available to community members regarding these services [51]. Each individual service is the responsibility of a Chiefs of Ontario Coordinator, which in turn is assigned to a Political Confederacy member. The Political Confederacy provide guidance and direction to the Regional Chief and meet to ensure that the implementation of the various mandates are coordinated [50].

Of the First Nation communities associated with this organization, four are included in CNL's Indigenous Engagement Program: Shoal Lake No. 40 First Nation, Iskatewizaagegan No. 39 Independent First Nation, Northwest Angle No. 33, and Wabaseemoong Independent Nations.

INDIGENOUS COMMUNITIES ENGAGEMENT

The following identifies CNL's Indigenous communication objectives, the methods adopted to meet these objectives, the First Nation and Métis communities that CNL has identified and included in its Indigenous engagement for the Project, engagement activities that have been

undertaken to-date, feedback received to-date from communities, and further planned engagement activities. Please also note that Section 3.5 of this IER describes CNL's intentions with respect to the development of long-term relationships with Indigenous Peoples.

OBJECTIVES

As part of its corporate, environmental, and social responsibility, CNL recognizes and encourages the ongoing engagement of Indigenous communities through the course of its environmental assessment process for the Project. Through its engagement activities, CNL seeks to inform communities while building awareness and understanding of Project activities, to communicate the potential effects of these activities to members of communities and the environment, and to seek feedback from communities regarding traditional and current uses of the land surrounding the Project site.

Further, CNL seeks to undertake engagement activities in accordance with the REGDOC-3.2.2 [1].

CNL's Indigenous engagement objectives include:

- Initiating and maintaining two-way communication channels between CNL and First Nations and Red River Métis to determine the best methods for communicating project information and to solicit input at appropriate junctures in the Project schedule.
- Developing meaningful, user-friendly information and communication products geared for the public and First Nations and Red River Métis, and providing accessible and current information on Project activities.
- Demonstrating CNL's long-term commitment and approach to the reduction of Canada's nuclear legacy liabilities in a safe and cost effective manner.
- Informing and educating First Nations and Red River Métis about nuclear decommissioning, environmental remediation, and radioactive waste management.
- Meeting all regulatory-based communication and engagement requirements.

To meet these objectives, CNL has developed specific strategies to increase the effectiveness of the program so that Indigenous engagement requirements for the Project are met. These strategies include:

- Presenting information in a format that is easily understood through a variety of communications channels using targeted key messaging.
- Engaging technical experts to communicate information in various formats.
- Accomplishing all required activities in a timely manner.
- Providing various means for First Nations and Red River Métis to access information.

Regulatory requirements for Indigenous engagement are set out above in Section 2 of this IER. As noted earlier, CEAA (2012) [5] provides a clear description of the environmental effects on Indigenous peoples that are to be taken into account. REGDOC-3.2.2 [1] provides more detailed information on Indigenous engagement and sets out the "requirements and guidance for

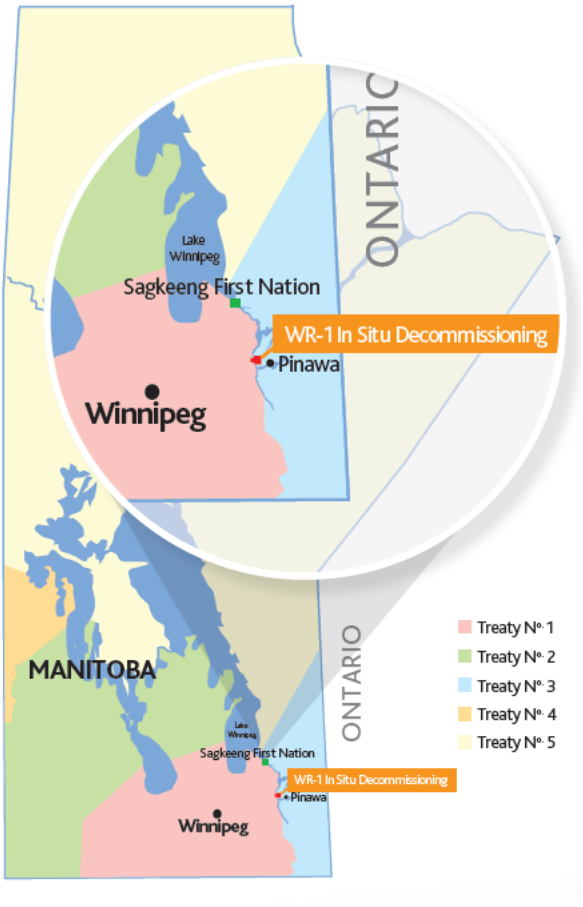
licensees" with respect to Indigenous engagement. It also provides procedural direction for licensees as noted above in Section 2 [1].

Additional CNSC requirements that are to be addressed or considered with respect to Indigenous Peoples are identified in Table 1 of this IER. Additional regulatory requirements for Indigenous engagement are also noted in Appendix A.3.8 of the CNSC's REGDOC 2.9.1 [4] as well as the CNSC's *Guidelines for the Preparation of an Environmental Impact Statement*, pursuant to CEAA, 2012, [3] which are all identified above in Table 1. Key requirements identified in that table associated with the various guiding documents generally relate to identifying Indigenous community perspectives and/or information associated with: Valued Components (VCs) identified for the Project; spatial and temporal boundaries used in the EIS; potential positive or negative effects of the Project on the natural environment, community socio-economic conditions/elements, community health and diet, traditional and current land and resource use (e.g., hunting, trapping, fishing and gathering), and physical and/or cultural heritage features; the mitigation measures suggested in the EIS with respect to potential effects; Indigenous treaties and litigation associated with the project area; traditional Indigenous knowledge associated with the project area; and the project Indigenous engagement process.

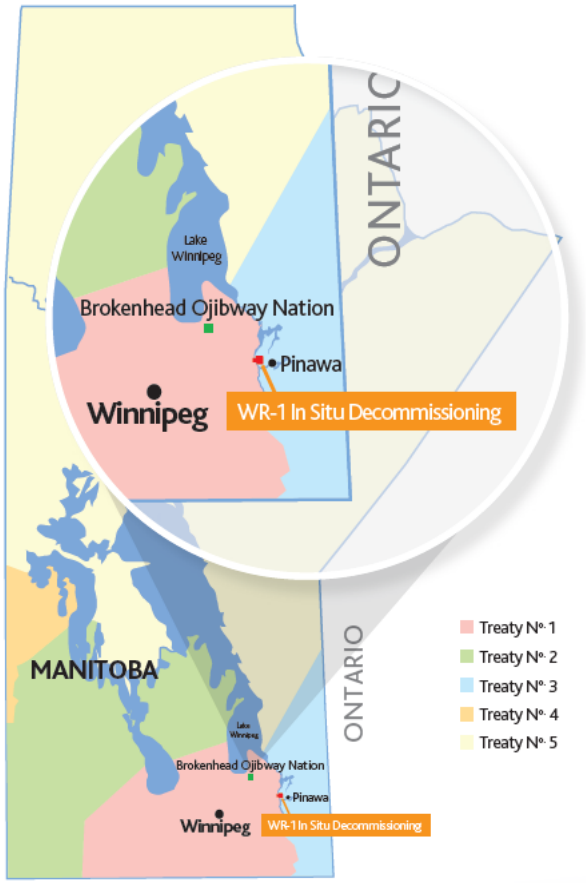
Further, on March 8, 2017, the CNSC released its Record of Decision [52] with respect to the scope of the factors to be assessed in the environmental assessments of three designated projects under CEAA 2012 [5], including the Project. The Record of Decision included statements regarding the CNSC's expectations and directions on Indigenous Engagement as well as total participant funding. Pursuant to section 19 of CEAA 2012, the CNSC determined the scope of factors for the environmental assessment for the Project to include the factors mandated in paragraphs 19(1)(a) to (h) of CEAA 2012, with no additional factors. As well, the Record of Decision set out that the environmental assessment must consider the Guidelines with respect to information and requirements on identifying VCs and spatial and temporal boundaries, and also engage Indigenous groups and the public on these.

Appendix D Maps

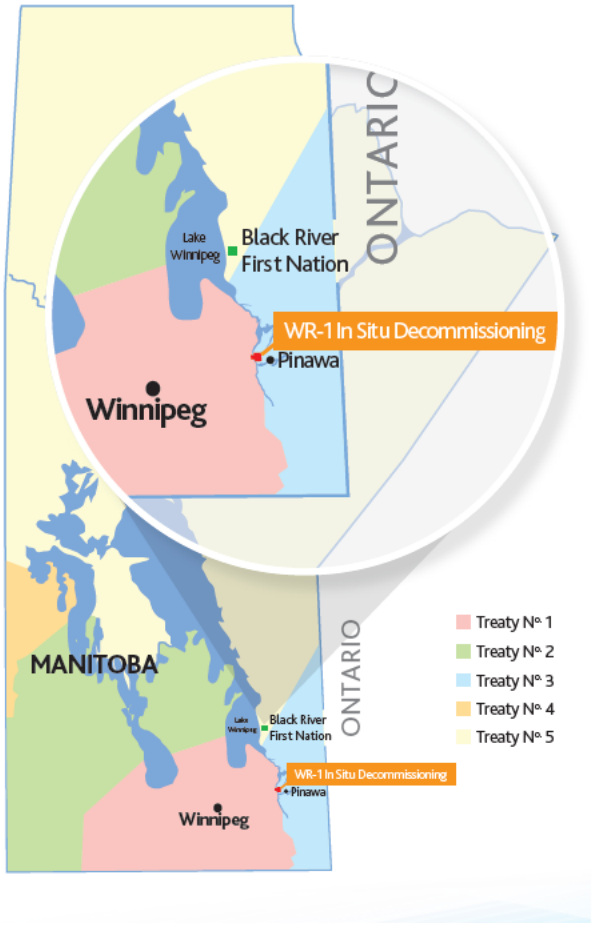
Sagkeeng First Nation



Brokenhead Ojibway Nation



Black River First Nation



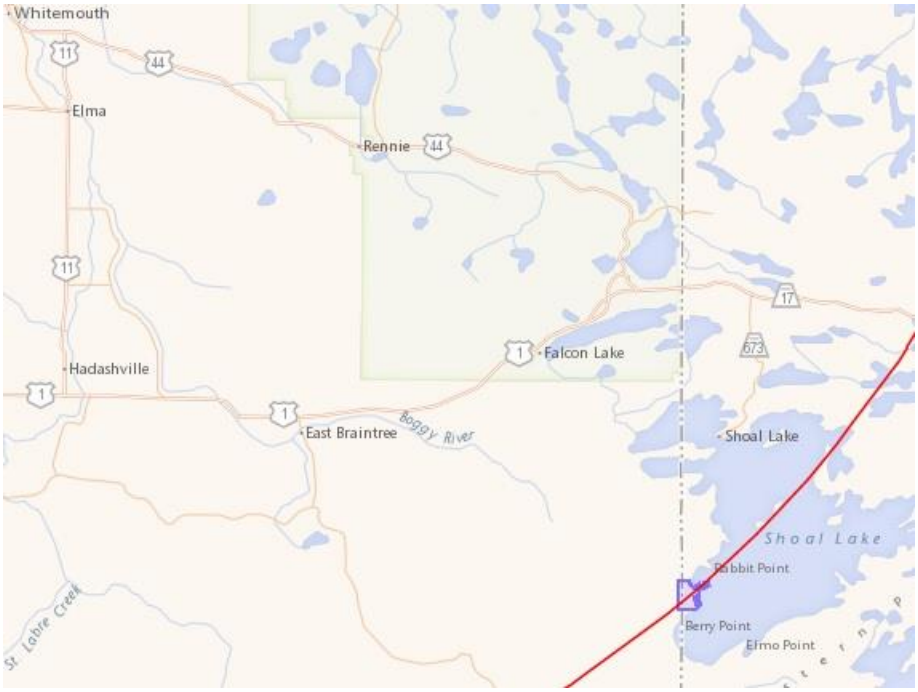
Hollow Water First Nation



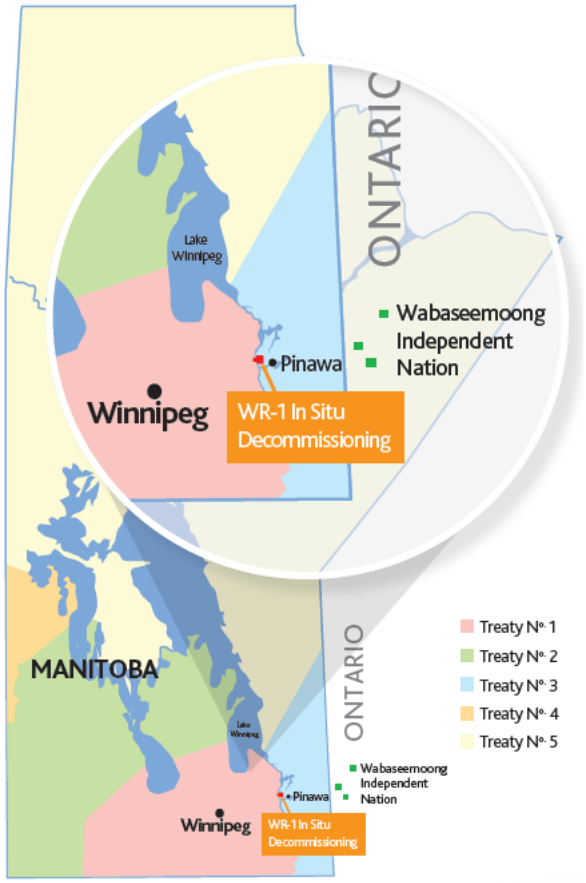
Shoal Lake #40 First Nation



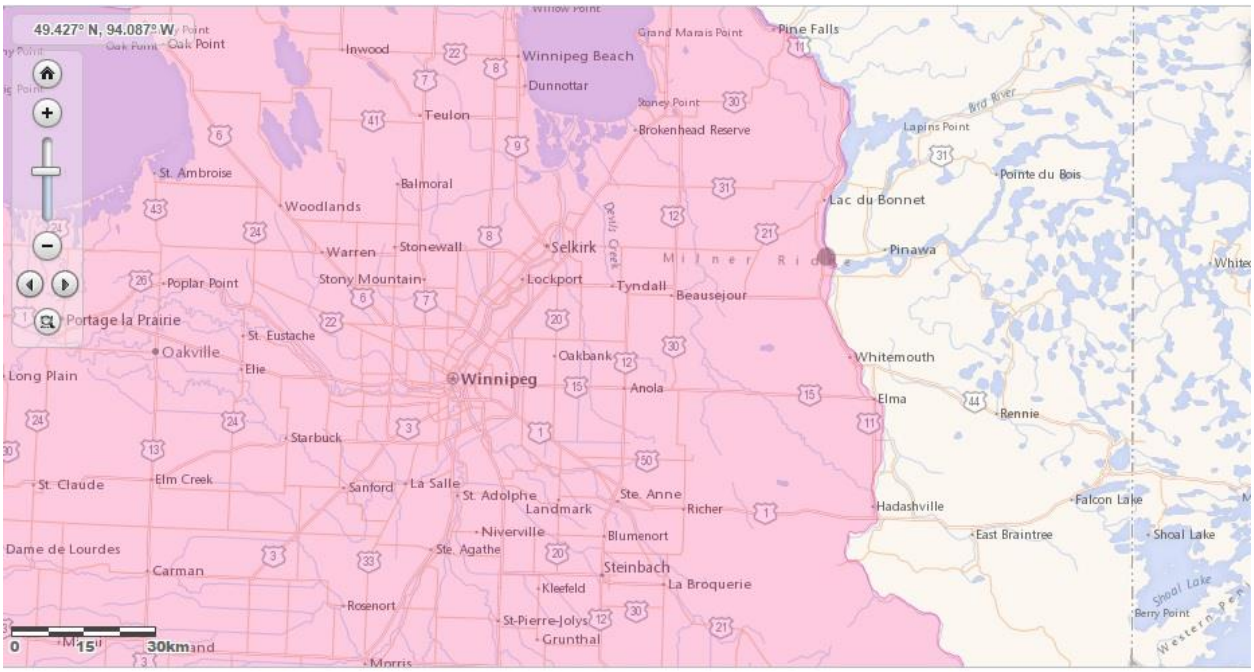
Iskatewizaagegan #39 Independent First Nation (Shoal Lake #39 First Nation)



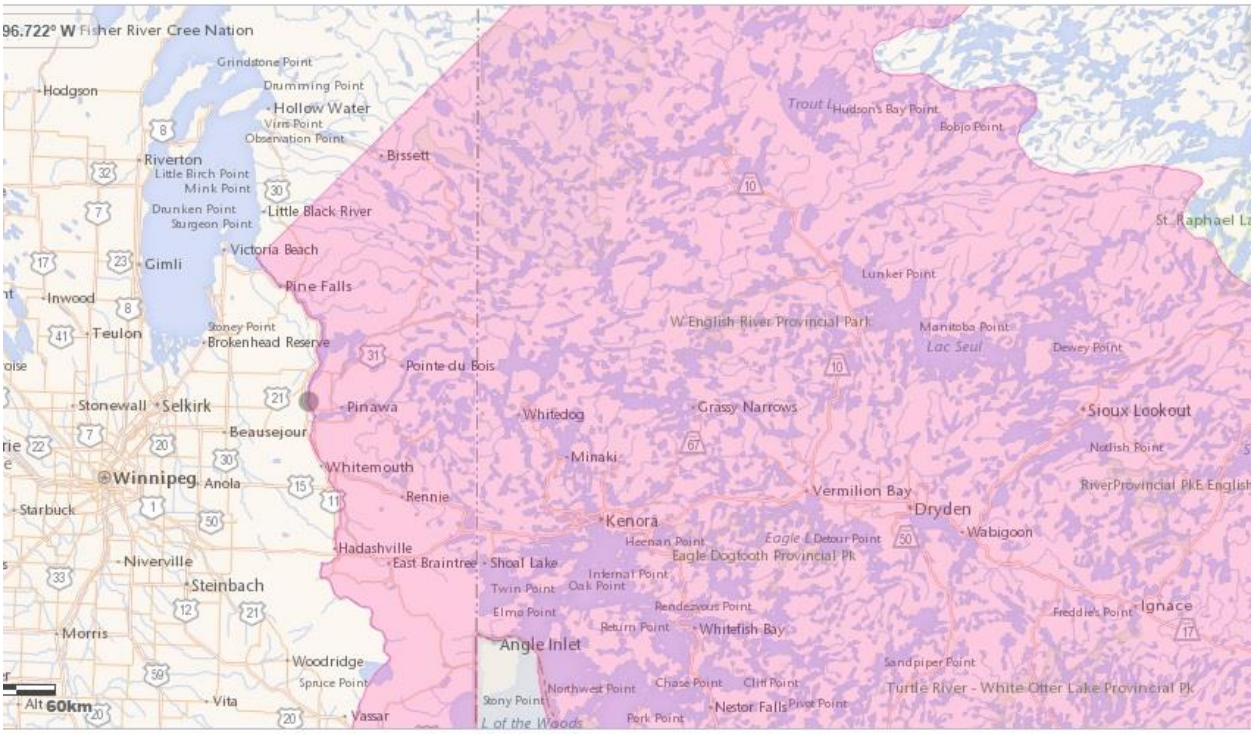
Wabaseemoong Independent Nations



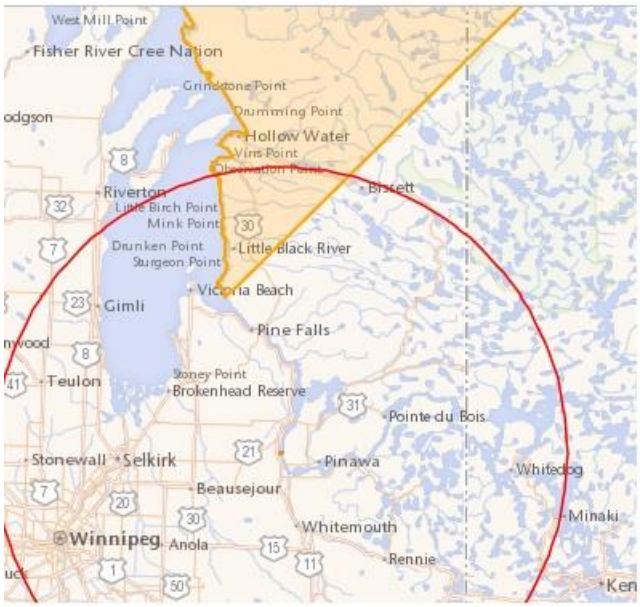
Treaty No. 1



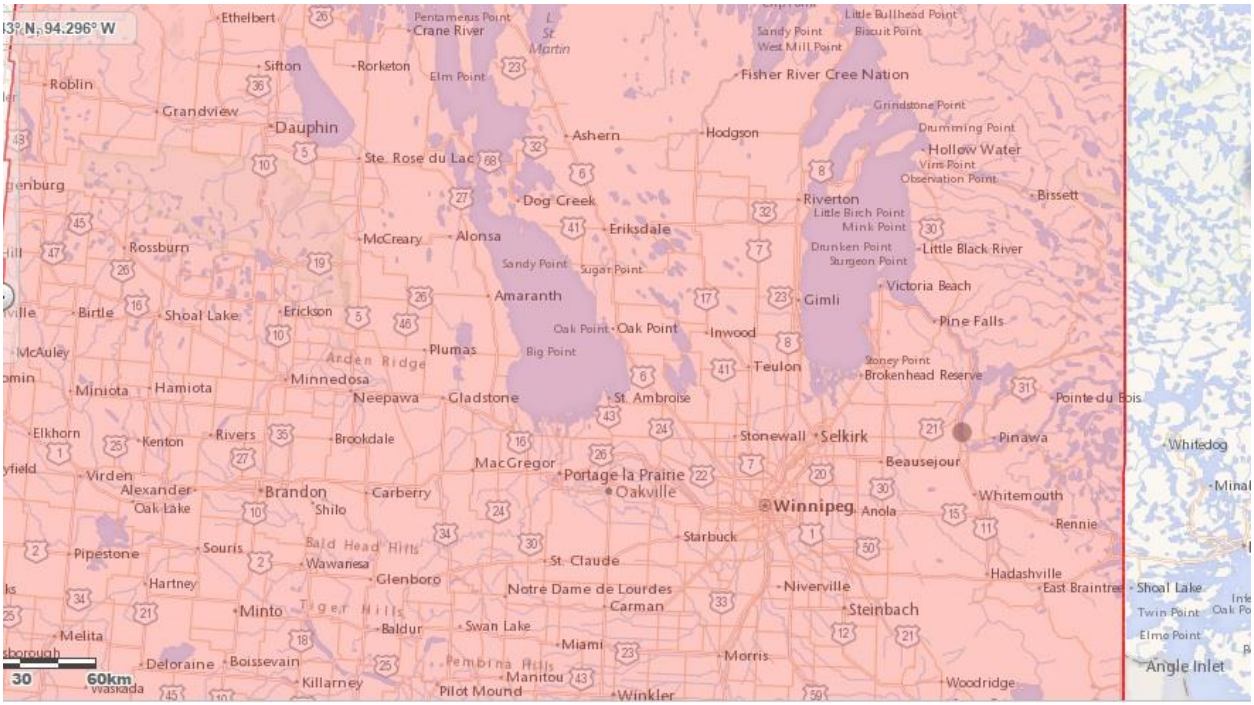
Treaty No. 3



Treaty No. 5



Red River Métis



Northwest Angle No. 33 First Nation



Appendix E Project Introductory Letter

August 03, 2016

File:

Attention: «Name»

«TITLE»
«ORGANIZATION»
«ADDRESS»

Reference: Federal Environmental Assessment, Canadian Nuclear Laboratories – In situ Decommissioning of the Whiteshell Reactor #1

Dear «Name»,

I am writing to invite discussions and determine your interest in engaging with Canadian Nuclear Laboratories (CNL) on an important CNL project. The project is the proposed in situ (leaving in place) decommissioning of the Whiteshell Reactor #1 (WR-1).

This is a key project in CNL's effort to safely decommission the WL site located near Pinawa, Manitoba. This CNL project may be of interest to you and your community.

The project includes a federal environmental assessments (EAs) under the Canadian Environmental Assessment Act (CEAA 2012), and is regulated under the authority of the Canadian Nuclear Safety Commission (CNSC).

As an objective of the EA under CEAA 2012, CNL is to identify, minimize or avoid adverse environmental effects before they occur, and incorporate environmental factors into decision-making.

We would like to ensure that representatives of your community are informed of our project and have the opportunity to provide meaningful feedback on the following:

- Whether the project may have environmental effect on any lands and/or resources currently used by First Nation and Métis peoples for traditional purposes;
- Whether the project may have any perceived impacts on First Nation and Métis and Treaty Rights;
- Whether local and traditional knowledge can assist in describing the existing environment; and
- The view of First Nation and Métis communities on proposed valued ecosystems components (environmental attributes) that have been identified for the assessment.

Information on the status of the ongoing EA's can be found online on the CNSC's website (www.nuclearsafety.gc.ca) and the Canadian Environmental Assessment Agency (CEA Agency) Public Registry (http://www.ceaa.gc.ca/050/index-eng.cfm). The CEA Agency also has a Glossary of terms which may be of assistance (http://www.ceaa.gc.ca/default.asp?lang=En&n=B7CA7139-1).

We are interested in hearing your views with respect to the project, and/or any potential adverse impacts that the project activities may have on your community. If you would like more information, please contact me directly at (613) 584-8500 or visit our project websites, www.cnl.ca/wl.

First Nation and Métis involvement in the EA process is important and appreciated. To ensure satisfactory engagement on these projects, if I do not hear from you, I will contact you in the coming weeks to discuss participation in the EA process.

Sincerely,

Patrick Quinn

Director, Corporate Communications

Comment Card

What do you value?
Canadian Nuclear Laboratories - WR-1 In Situ Decommissioning

We want your feedback

Valued components (VCs) refer to environmental features that may be affected by a project and that have been identified to be of concern by the proponent, government agencies, First Nations, Métis, and the public. The selection of appropriate VCs allows the assessment to be focused on those aspects of the natural and human environment that are of greatest importance to society.

We have identified a preliminary list of VCs based on our understanding of the overall Whiteshell Closure Project, regulatory expectations, and professional judgement. We also want to understand what is important to you. Please take a few moments to provide your input on VCs for the WR-1 In-Situ Decommissioning environmental assessment. We will use this to enhance our assessment of potential impacts of the project.

Valued Components

1. How important are each of the following Valued Component(s) to you as CNL designs the project?

Discipline	Proposed Valued components	Is this important to you?	Tell us why
Atmospheric Environment	Air quality		
	Green house gases		
Physical Environment	Geology		
	Hydrogeology		
Surface Water Environment	Surface water quality		
	Hydrology		
Aquatic Environment	Fish and fish habitat		
Terrestrial Environment	Barn swallow		
	Little brown myotis		
	Nothern myotis		
	Canada warbler		
	Snapping turtle		
Socio-economic Environment	Employment and income		
	Business opportunities		
	Government finances		
	Community infrastructure and services		
	Community well being		
	Public safety		

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What do you value?
Canadian Nuclear Laboratories - WR-1 In Situ Decommissioning

Discipline	Proposed Valued components	Is this important to you?	Tell us why
Land and Resource Use	Winnipeg River		
	Land tenure		
	Outdoor recreation and tourism		
	Traditional land and resource use by First Nation and Métis		
Human Health	Public health: Farming Resource havesters		
	Worker health		
Ecological Health	Terrestrial invertebrates (earthworm)		
	Terrestrial birds: American Robin Barn Swallow Loggerhead shrike		
	Terrestrial Plants: Grass and Shrubs Blueberries		
	Terrestrial Mammals: Meadow Vole Common Shrew Snowshoe Hare White-tailed Deer Red Fox Little Brown Myotis		
	Fish: Carmine Shiner Lake Sturgeon Walleye		
	Aquatic Plants		
	Benthic invertebrates		
	Riparian Birds: Horned Grebe Trumpeter Swan Mallard		
	Riparian Mammals (mink)		

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What do you value?
Canadian Nuclear Laboratories - WR-1 In Situ Decommissioning

Valued Components

2. Are there any Valued Component(s) not listed on the poster board that are important to you and why?

Valued Component	Importance (eg., environmental, recreational, social, etc.)

3. Are there any additional considerations that you would like to provide us as we develop the project?

Canadian Nuclear Laboratories | Laboratoires Nucléaires Canadiens

What do you value?
Canadian Nuclear Laboratories - WR-1 In Situ Decommissioning

Name: _____ Street Address: _____

City: _____ _____

Postal Code: _____ Phone: _____

Email: _____

Would you like to recieve a response from a team member about your questions, concerns or issues?

YES NO

Would you like to be added to the mailing list for information on future public open houses?

YES NO

If you have any future questions or comments about the WR-1 decommissioning project please contact:

CNL Corporate Communications
ATTN: Environmental Assessments
286 Plant Road
Chalk River, ON
K0J 1J0
communications@cnl.ca
www.cnl.ca/feedback

Canadian Nuclear Laboratories | Laboratoires Nucléaires Canadiens

Open House Comments

CNL WR-1 In-Situ Decommissioning Project

Public Information Poster Session
Sagkeeng First Nation
Sagkeeng Mino Pimatiziwin Family Treatment Centre Gym
Fort Alexander
Wednesday, January 25, 6:00-8:00pm

To begin the Public Information Poster Session an Elder from Sagkeeng Frist Nation received a tobacco offering and said a prayer. Chief Henderson then introduced the project team to the community members in attendance. Brian Wilcox, from the project team, then provided a presentation regarding the WR-1 In-Situ Decommissioning Project. Upon completion of the presentation, the floor was opened to questions and answers. Table 1 summarizes the questions that were asked, and responses given by CNL representatives.

Table 1: Question and Answer Summary – Sagkeeng First Nation

Question/Comment	CNL Response
Does a third party verify the case studies on entombing reactors?	All information including case studies are considered in the thorough evaluation by the independent regulator.
What does in situ mean?	Essentially, in situ means leaving in place. In the case of WR-1, this means leaving the part of the reactor building that is below ground level in place instead of removing it. This approach reduces the risk to workers, both of exposure to radiation, and other industrial hazards, and reduces the risk of releases to the public and the environment during decommissioning by not disturbing, handling, or transporting the radioactive materials. The monolith that is left underground will isolate the radioactivity that remains in WR-1, allowing it to continue to decay away.
Is there a project schedule that's includes First Nation inputs?	The poster board titled Regulatory 'Oversight Canadian Nuclear Laboratories' has a project timeline that includes First Nation touch points.
Is twenty years a standard operating time for a nuclear reactor?	CNL explained that most reactors are operational for a longer time period. The WR-1 was a research reactor and was only used for the time period required to test new nuclear technology.
Was it understood at the outset that WR-1 would only be a temporary reactor?	CNL indicated that WR-1 Laboratory team did not consider the lifespan of the reactor. They were likely only thinking of the immediate testing capabilities of the WR-1 reactor.
What decommissioning plans were considered when WR-1 was built?	CNL indicated that decommissioning plans were not considered when WR-1 was built. Discussion followed on how standards around this have changed and now projects are required to have approved decommissioning plans prior to being built.
Did the WR-1 reactor achieve testing success?	CNL mentioned that the WR-1 reactor did provide valuable testing results however Canadian nuclear

Question/Comment	CNL Response
	technology went in a different direction regarding reactor operating technology. Testing was also completed at the WR-1 site regarding material and nuclear safety research.
Does AECL fund the decommissioning?	CNL indicated that yes, AECL funds the WR-1 decommissioning.
Do various options for decommissioning have differing costs?	CNL noted that cost is one of the factors considered in the selection of decommissioning plans and yes, there is a significant cost difference between options. Rough estimates put in situ decommissioning at about one quarter of the cost to fully dismantle WR-1.
How does the grout decay?	CNL explained that at some point the grout will begin to decay. The grout will be formulated so it will flow into every pocket and fill all the voids in the reactor. The grout will prevent collapse of the reactor and delay corrosion over time. The grout will also be bleed-free. Over time, 1,000 – 1,200 years the grout will being to breakdown, turning to gravel then ultimately soil. This timeline will match the decay of the waste material within the WR-1 reactor. By the time these components are detectable in the environment they will not have an negative impact.
Will climate change impact the decommissioning process?	CNL indicated that climate change may have an impact on the site and that potential effects are being considered. CNL also mentioned that extreme events are also being considered including flooding.
Has this type of in-situ decommissioning been undertaken anywhere else in Canada? If so, what are the results of these projects?	CNL explained that this type of decommissioning has not yet been undertaken in Canada, however there are six reactors that have been decommissioned in a similar in-situ process in the United States. Currently there is a reactor undergoing in-situ decommissioning in Rolphton Ontario, Canada.
Has the dismantling decommissioning process been undertaken in Canada?	CNL indicated that if the WR-1 was dismantled it would be the first time this process was used in Canada. Technically, it is possible to dismantle the reactor, however there are significant risks involved with this decommissioning process. Risks with dismantling include mechanical risks to crew and exposure to hazardous material.
Have there been injuries sustained at the reactors dismantled throughout the United States?	CNL noted that mechanical and industrial injuries have been reported at other projects where reactors were dismantled in the United States. Risks associated with this dismantling technique also include injury, exposure during dismantling, and exposure through shipping and packaging processes. Lessons learned regarding decommissioning techniques are shared worldwide.

Question/Comment	CNL Response
If the WR-1 reactor was dismantled where would the hazardous waste be stored?	CNL indicated that the hazardous material from WR-1 would be separated and then stored on site. Neither Canada nor the United States has a permanent disposal site for intermediate or high level waste. A disposal site for this type of waste is likely 50 years away from being established.
Overall, is the in-situ decommissioning the most environmentally safe plan?	CNL noted that this is difficult to judge as each decommissioning situation is different. The risks associated with each case must be considered. Dismantling has the potential to create contamination while in-situ may be safer for the transportation and dismantling crews. WR-1 is a relatively small reactor located in clay-based soil. These parameters make it an ideal candidate for in-situ decommissioning. In-situ decommissioning may not be suitable for other larger reactors.
What are the potential risks to people from this decommissioning process?	CNL indicated that safety is a priority for this project. Factors considered include worker safety, public safety, environmental protection, feasibility and cost.
We need to be able to trust in the decommissioning process you are selecting. People may not trust in the concrete to do its job.	CNL stated that it is their job to ensure they select a responsible way to decommission the project.
A suggestion was put forth for future CNL engagement efforts to be promoted and endorsed by Chief and Council. Chief and Council have a template they use to post notifications in the community, if the next CNL event was promoted in this manner community members would know that the event was relevant to them. The CNL feedback survey and presentation can be put up on the community website along with the link to the in-situ decommissioning video.	CNL was appreciative of this offer and agreed that working together to promote any upcoming CNL events would be helpful.
What are the next steps in the decommissioning process?	CNL indicated that the Environmental Impact Assessment will be completed, which will be available for review and comment by the public during the regulatory review.
An Elder mentioned that traditional medicine and wild rice are harvested in the Whiteshell area. The worry is that other communities may not be aware of this decommissioning process and where the site is located.	CNL mentioned that the WR-1 site has been an area of restricted access for a long time. Chief Henderson indicated that he will notify Treaty 3 Chiefs of this decommissioning process.
It was suggested the CNL speak with Sagkeeng First Nation Elders to understand what types of traditional medicines are collected in the Whiteshell area. Examples included: • Wild Rice • Calamus Root – known as Weekay Root • Labrador tea • Wild ginger – used as heart medicine	CNL thanked the Elder for sharing this information.

Question/Comment	CNL Response
• Waterlily root, found in creeks and ditches – used to treat gangrene and diabetes	
Primary concern is that there is the temptation to select the cheapest option (penny pinching) for decommissioning at the expense of the environment.	CNL agreed and mentioned that the regulator reviewing the environmental assessment will take this into consideration. Cost is one of the factors that was considered in selecting the approach to in-situ decommissioning.

Appendix F Student Job Description Example

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STUDENT POSITION DESCRIPTION FORM

Number of Students Required 1

Length of Work Term Required ☒ 4 month ☐ 8 month ☐ 12 month ☐ 16 month

For which Term(s) ☐ Jan – Apr ☒ May - Aug ☐ Sept – Dec ☐ Other (please specify)

Do you require a general or academic position:

☐ General (Administrative or clerical position that is NOT related to students academic training),
OR
☒ Academic (a specific level and type of education that is REQUIRED to perform the job)

If an Academic position is required, please complete the following areas:

☒ College ☒ University

Screening (please select one of the following):

☐ Submit all resumes
☒ Submit all resumes that meet security requirements
☐ Only submit resumes that meet the minimum requirements
☐ Other (please specify): _____

JOB TITLE
- First Nations and Métis Affairs Coordinator, Student

INTRO
– Describe work environment/facility/operations
The First Nations and Métis Affairs Coordinator, Student will play a support role in developing and implementing communication and engagement strategies focused on supporting CNL's First Nations and Métis relationships. Reporting to the Manager, Whiteshell Closure Project Stakeholder Relations, the First Nations and Métis Affairs Coordinator, Student will work with the communications team, to develop materials and create opportunities for First Nations and Métis communities to better understand the Whiteshell Closure Project. Activities will include working with First Nations and Métis communities to develop/maintain and implement an engagement and information sharing program. The First Nations and Métis Coordinator, Student will also support the development of programming aimed at helping, staff, to more fully understand and appreciate the rich and vibrant histories and cultures of Canada's native peoples.



RESPONSIBILITIES

– List a minimum of five key duties/responsibilities/project work the student would be involved in

- *Assist in the implementation of the Company's First Nations and Métis Relations report.*
- *Assist in the engagement process related to the Whiteshell Laboratories Closure Project.*
- *Assist in the development of formal and informal briefings for internal stakeholders.*
- *Assist in coordinating and working with representatives of First Nations and Métis communities, provincial and federal government organizations, and agencies relevant to projects/programs.*
- *Assist in coordinating outreach meetings with First Nations and Métis communities and other related events.*
- *Perform other duties as required.*

REQUIREMENTS

- Interpersonal or technical skills, knowledge or abilities required

Interpersonal, verbal, and written communications skills.
Organization and planning skills.
Some experience working with First Nation and Métis communities, including the preparation of material for activities.

MAJORS

– Education requirements that would best suit this position

Examples: Corporate Communications, Professional Communications, Public Relations, Native Studies

Year of Study:

Completed Level of Education Required to Perform the Job:

☐ 1st year ☒ 2nd year ☒ 3rd year ☒ 4th year or higher

Candidates for this position can be found at {specify the school and program }

Additional Comments:

Please save completed forms to your M Drive shared folder and notify your Talent Solutions Advisor by email.

Appendix G Poster Board Examples

Canadian Nuclear Laboratories | Laboratoires Nucléaires Canadiens

In-Situ Decommissioning of the WR-1 Reactor

PROJECT BACKGROUND

The WR-1 reactor was a research reactor that played an important role in building Canada's scientific and industrial capacity. When operating more than 31 years ago, WR-1 reached a maximum of 60 megawatt thermal (MWt), which is significantly less than power reactors, which operate at values greater than 1,500 MWt. The safe shutdown of WR-1 was done in a planned and controlled manner. Shutdown in 1985 and de-fuelled thereafter, WR-1 has been safely maintained in a state of "storage with surveillance."

As part of its work to manage Canada's decommissioning and waste-management responsibilities on behalf of Atomic Energy of Canada Limited, CNL is proposing to decommission and leave in-situ the research reactor (WR-1) at the Whiteshell Laboratories site. The proposed approach will provide a safe, secure and effective disposal solution for the existing contaminated below-grade building. This approach minimizes the risks to the health, safety and security of the public, workers and the environment.



STATUS OF WR-1 DECOMMISSIONING

At the time of the WR-1 shutdown in 1985, deferred decommissioning was the preferred strategy for management of the main reactor building. The deferment period has allowed a significant reduction of radiation fields within the facility and the associated systems. This reduction has helped to reduce the risks to staff preparing to complete the decommissioning project.

PROJECT GOAL

To safely decommission the WR-1 reactor thereby reducing long-term nuclear liabilities.

Canadian Nuclear Laboratories | Laboratoires Nucléaires Canadiens

For more information on this project contact: Email: communications@cnl.ca
Canadian Nuclear Laboratories 1-866-886-2325 or visit: www.cnl.ca





THE PLAN

The technique CNL is proposing involves pouring a specially-engineered grout into the reactor to lock contaminants in place, essentially making a giant, underground, block of concrete.

A protective cover will then be added on the surface which will also serve to channel water away from the site and protect it from the elements.

Long-term care, maintenance activities and decommissioning site environmental monitoring will continue to ensure that the site remains safe and the decommissioning approach performs to expectation.

The proposed end state leaves approximately 10,800 acres of land unaffected, and only a small portion, approximately 0.5 per cent of the former laboratories site, would be maintained under institutional control.

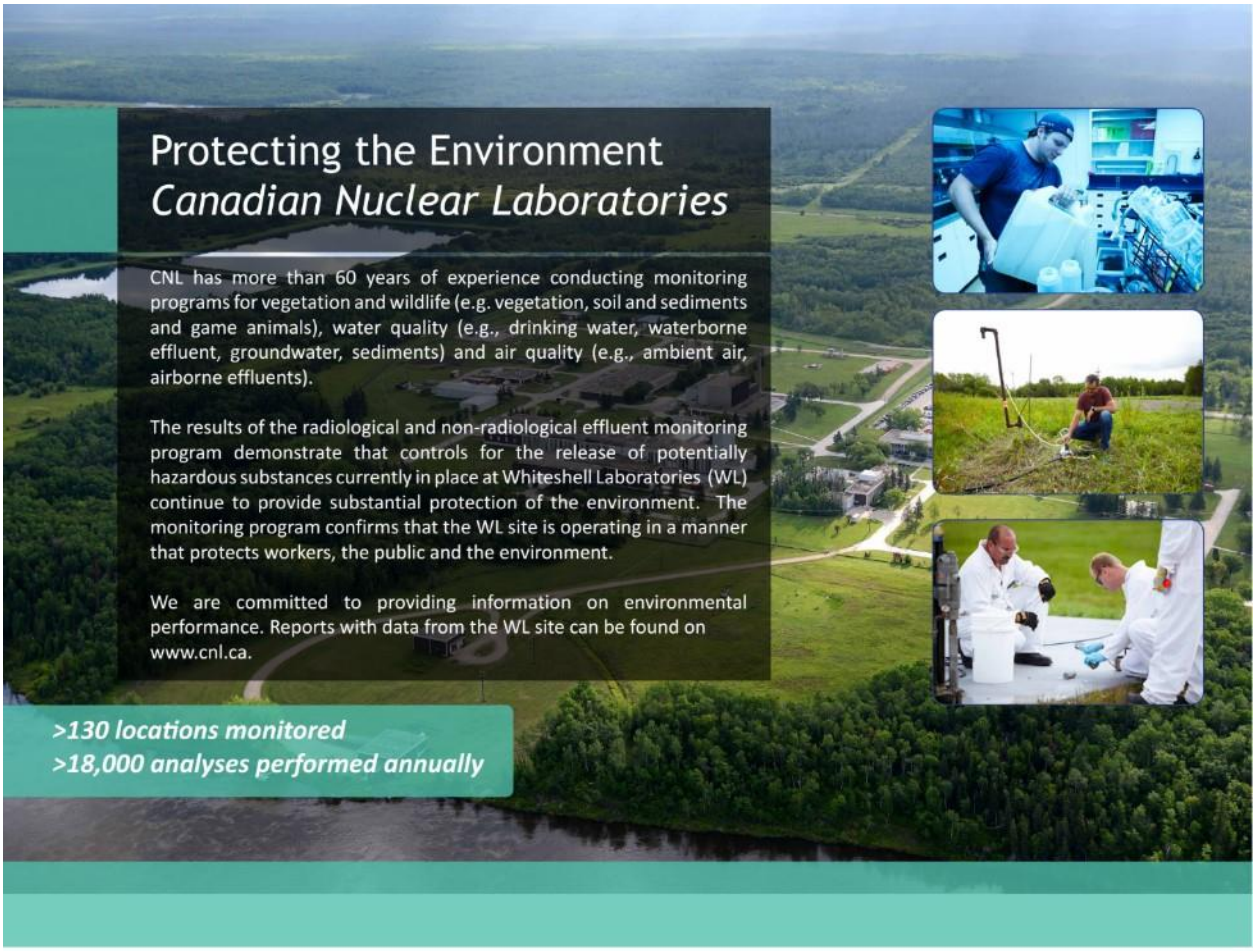
DECOMMISSIONING ACTIVITIES

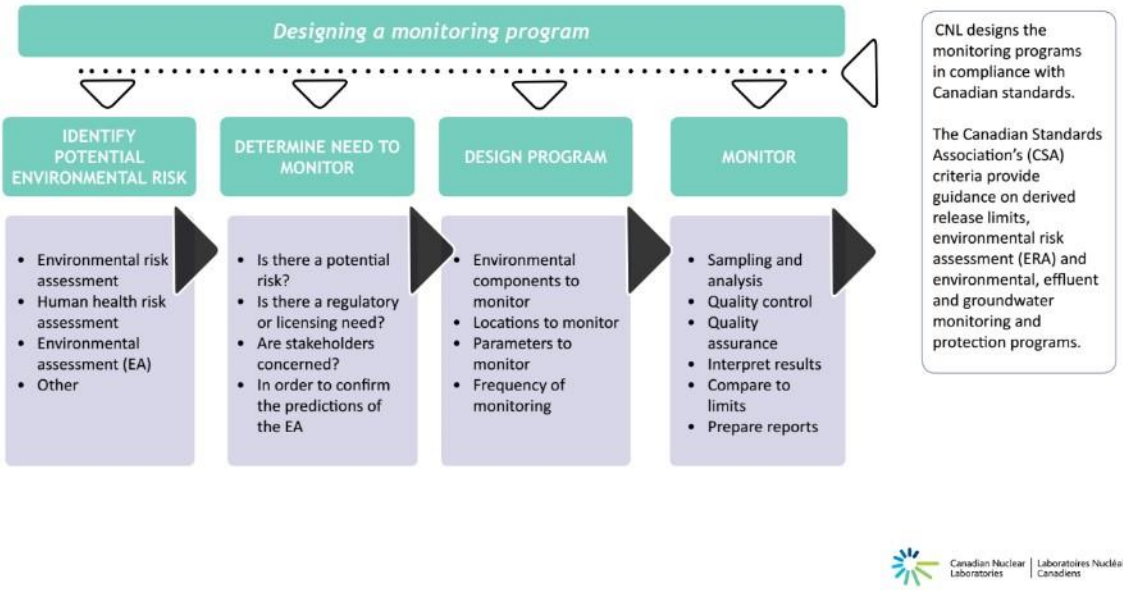
- Environmental Assessment process
- Regulator decision on proposed technique
- Grouting of below grade structures
- Removal of above grade structures
- Installation of concrete cap and engineered barrier over the grouted area
- Final site restoration and preparation for long-term care and maintenance activities

Date of Issue: June 2016

Canadian Nuclear Laboratories | Laboratoires Nucléaires Canadiens

For more information on this project contact: Email: communications@cnl.ca
Canadian Nuclear Laboratories 1-866-886-2325 or visit: www.cnl.ca





Canadian Nuclear Laboratories | Laboratoires Nucléaires Canadiens



Regulatory Approvals

For the project to go forward, two main regulatory approvals are required:

1) An Environmental Impact Statement (EIS) will be submitted under the *Canadian Environmental Assessment Act* (CEAA) 2012. The EIS will assess the potential environmental effects of the project and will include stakeholder engagement and Aboriginal engagement.

2) A licence amendment (in conjunction with licence renewal) under the *Nuclear Safety Control Act* (NSCA) is required. The amendment application will include the following component:

- Request for a licence amendment for the change to the decommissioning plan for WR-1 Reactor Building

A decision of approval under CEAA 2012 is required before a decision can be made under the NSCA

WR-1 In Situ Decommissioning

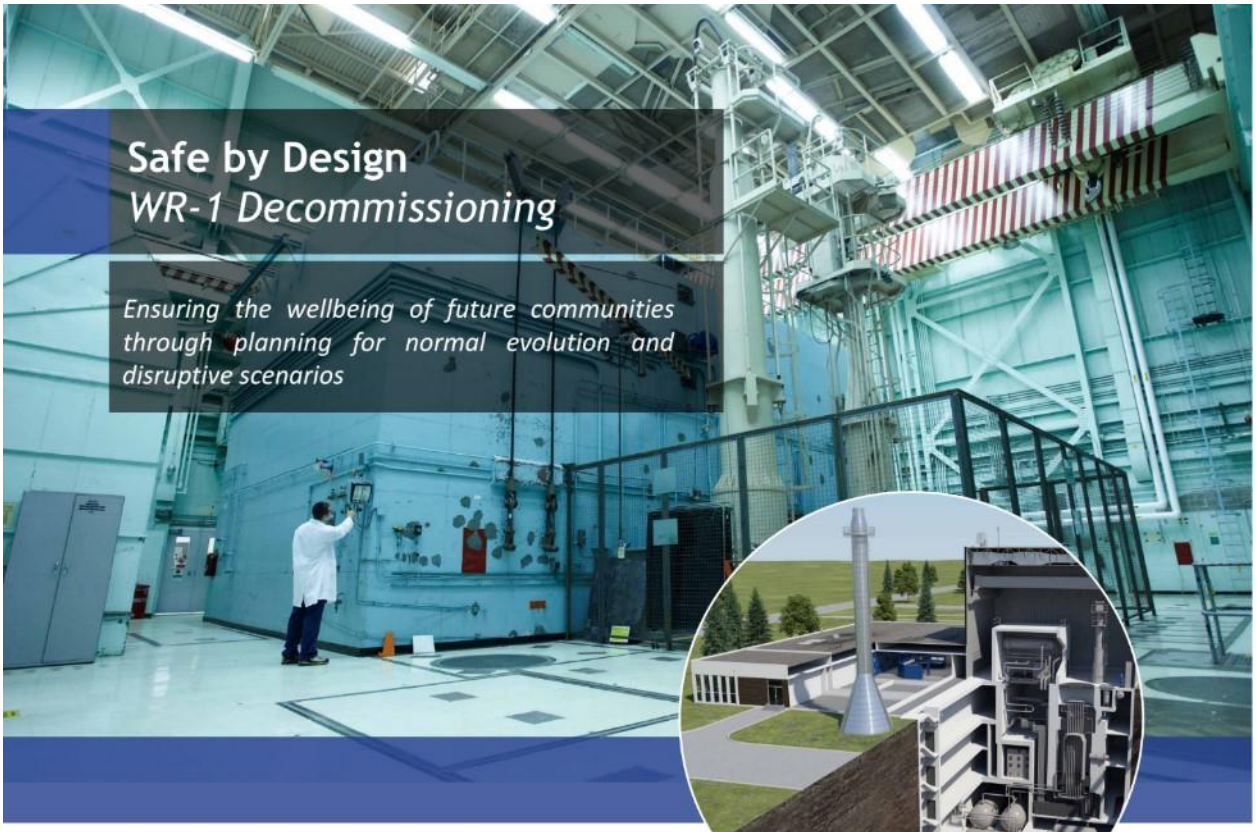
CEAA 2012 Requirements*	NSCA Requirements*
• Environmental Assessment (includes, Environmental Impact Statement, Stakeholder Engagement and Aboriginal Engagement) • WR-1 in situ decommissioning safety assessment report	• Request for licence amendment to perform in situ decommissioning of WR-1 • Revised Whiteshell Overview Detailed Decommissioning Plan

* There are also other requirements beyond those listed.

Environmental Assessment Process

CANADIAN NUCLEAR LABORATORIES: Project Description	CANADIAN NUCLEAR SAFETY COMMISSION: Decision on Project Scope	CNL: Environmental Impact Statement (EIS) September 2017	CNSC STAFF: Environmental Assessment Report (EA)	CNSC COMMISSION: Decision: Can the project proceed? Fall 2018
• Overview of project and surrounding environment	• CNSC reviews the Project Description • CNSC provides EIS guidelines • Project Description posted for public review • CNSC (Commission) considers public and Aboriginal comments and makes a decision on scope of EA	• Prepares EIS in accordance with regulations • Evaluates environmental impact of project • Determines mitigation measures to minimize environmental impacts • EIS review by CNSC, federal authorities and public and Aboriginal stakeholders • Informs the public, First Nation and Métis groups and collects their feedback	• CNSC (staff) summarize EIS into an Environmental Assessment report • First Nation and Métis groups review • Public review period	• CNSC (Commission) reviews EA report • CNSC (Commission) makes a decision on whether the project may proceed • Follow-up monitoring and reporting requirements

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What is a Post-Closure Safety Assessment?

A Post-Closure Safety Assessment is an assessment to demonstrate understanding of the waste management system through a well-structured, transparent and traceable methodology.

A Post-Closure Safety Assessment will provide a quantitative assessment of the post closure radiological and non-radiological safety of the in situ decommissioning of WR-1.

It will also identify the uncertainties or potential events that have the greatest potential impact on the long-term performance of the in situ decommissioning.

Normal evolution

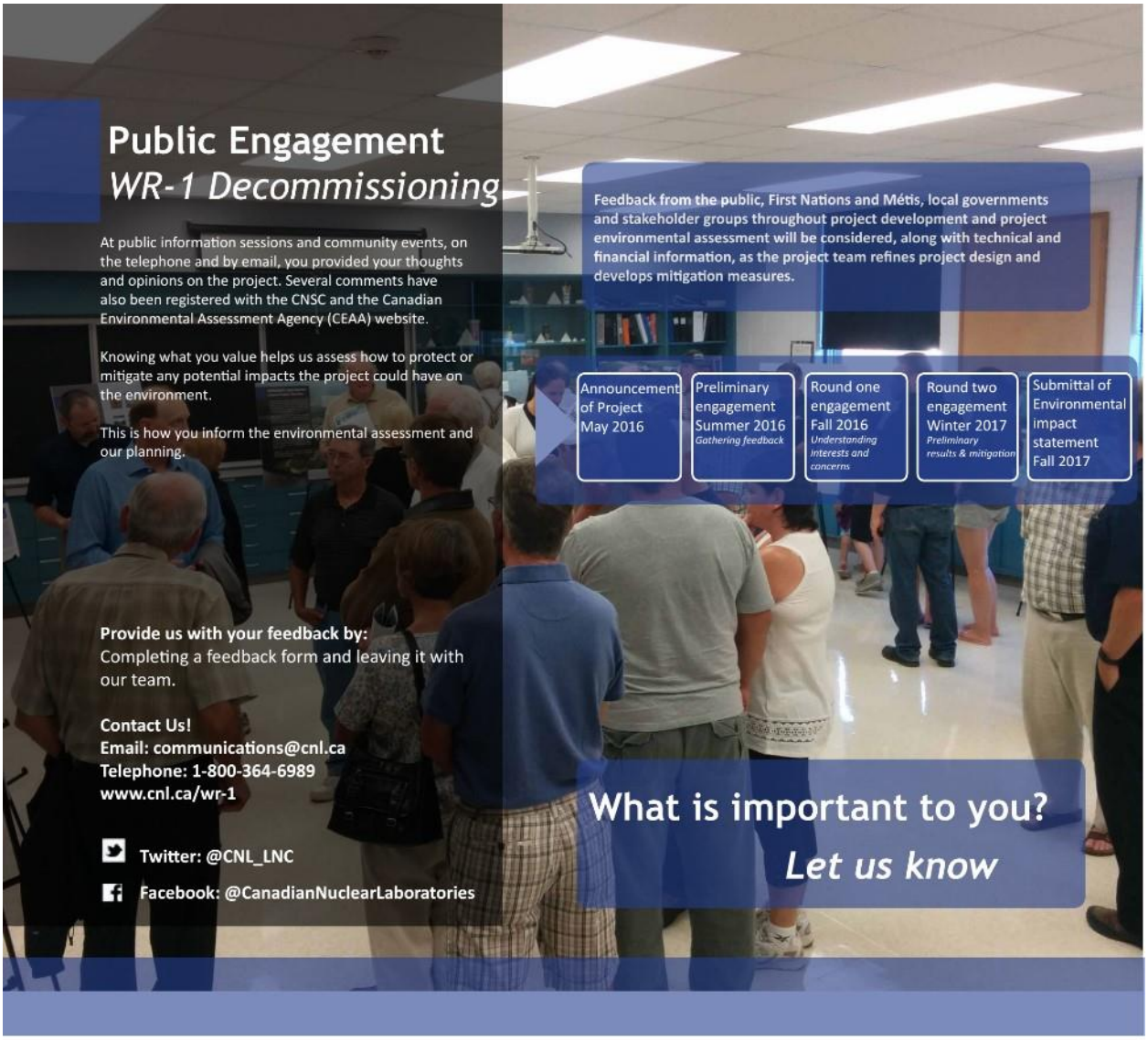
Normal evolution is the expected long-term evolution of the WR-1 site following closure. It is the scenario that is predicted based on reasonable extrapolations of present-day site features and receptors' lifestyles. This includes the site's expected degradation with time.

Disruptive scenarios

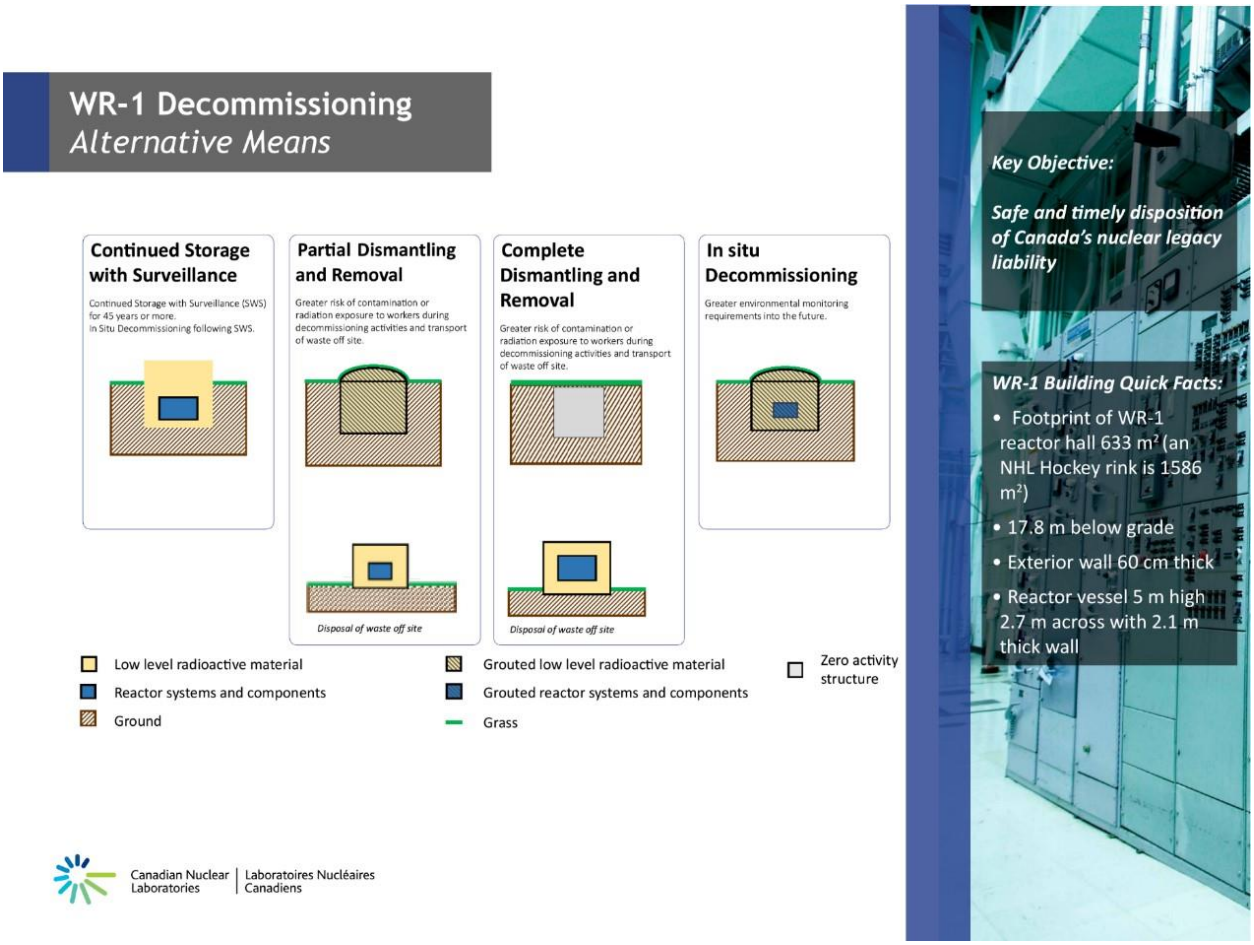
Disruptive scenarios refer to events or situations unlikely to occur but which lead to the possible penetration of barriers and abnormal loss of containment. The following are being assessed:

- Early degradation of grout
- Early glaciation
- Digging a well
- Human intrusion
- Site investigation

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Public Engagement
WR-1 Decommissioning
At public information sessions and community events, on the telephone and by email, you provided your thoughts and opinions on the project. Several comments have also been registered with the CNSC and the Canadian Environmental Assessment Agency (CEAA) website.
Knowing what you value helps us assess how to protect or mitigate any potential impacts the project could have on the environment.
This is how you inform the environmental assessment and our planning.
Provide us with your feedback by:
Completing a feedback form and leaving it with our team.
Contact Us!
Email: communications@cnl.ca
Telephone: 1-800-364-6989
www.cnl.ca/wr-1
Twitter: @CNL_LNC
Facebook: @CanadianNuclearLaboratories
Feedback from the public, First Nations and Métis, local governments and stakeholder groups throughout project development and project environmental assessment will be considered, along with technical and financial information, as the project team refines project design and develops mitigation measures.
Announcement of Project May 2016
Preliminary engagement Summer 2016
Gathering feedback
Round one engagement Fall 2016
Understanding interests and concerns
Round two engagement Winter 2017
Preliminary results & mitigation
Submittal of Environmental impact statement Fall 2017
What is important to you?
Let us know


What we heard...
Land and Resources Use
• Land and resource use tenures
• Focal areas for public recreation and tourism activity
Land and Resources Use for Traditional Purposes
• Tradional land use activity
• Cultural site
Aquatic
• Fish
• Fish habitat
Sediment Quality
Socioeconomics
• Employment and income
• Business and economic development
• Government finance
• Housing, services and infrastructure
• Community wellbeing
• Public safety
Terrestrial Biodiversity
• Migratory birds
Air Quality
Public Safety
Surface Water Quality and Quantity
Groundwater Quality and Quantity
Canadian Nuclear Laboratories | Laboratoires Nucléaires Canadiens


WR-1 Decommissioning
Alternative Means
Continued Storage with Surveillance
Continued Storage with Surveillance (SWS) for 45 years or more.
In Situ Decommissioning following SWS.
Partial Dismantling and Removal
Greater risk of contamination or radiation exposure to workers during decommissioning activities and transport of waste off site.
Disposal of waste off site
Complete Dismantling and Removal
Greater risk of contamination or radiation exposure to workers during decommissioning activities and transport of waste off site.
Disposal of waste off site
In situ Decommissioning
Greater environmental monitoring requirements into the future.
Low level radioactive material
Reactor systems and components
Ground
Grouted low level radioactive material
Grouted reactor systems and components
Grass
Zero activity structure
Canadian Nuclear Laboratories | Laboratoires Nucléaires Canadiens
Key Objective:
Safe and timely disposition of Canada's nuclear legacy liability
WR-1 Building Quick Facts:
• Footprint of WR-1 reactor hall 633 m² (an NHL Hockey rink is 1586 m²)
• 17.8 m below grade
• Exterior wall 60 cm thick
• Reactor vessel 5 m high 2.7 m across with 2.1 m thick wall

What do you think?
WR-1 Decommissioning

Valued components (VCs) are environmental features that may be affected by a project and that have been identified to be of concern by:

- the proponent
- government agencies
- First Nation and Métis groups
- the public

The value of a component not only relates to its role in the ecosystem, but also to the value people place on it. For example, it may have been identified as having scientific, social, cultural, economic, historical, archaeological or aesthetic importance.

VC selection is based on the potential project-environment interactions in various environmental components.

What do you value?
Let us know

- Grab a comment card and fill it out.
- Use the marker attached to this poster and mark an X next to what is important to you on this poster.
- Or write down what's missing in the bottom of this poster.

Contact us!
For more information or to share your thoughts on the Valued Components, related to this project, contact us:
Email: communications@cnl.ca
Telephone: 1-800-364-6989
www.cnl.ca/WR-1
Twitter: @CNL_LNC
Facebook: @CanadianNuclearLaboratories

What's missing? Write it down.

Valued Components Identified for the WR-1 in situ decommissioning

Land and Resource Use
- Winnipeg River
- Land Tenure
- Outdoor Recreation
- Tourism
- Cultural sites
- Traditional land

Ecological Health
- American Robin
- Barn Swallow
- Loggerhead Shrike
- Grass and shrubs
- Blueberries
- Meadow Vole
- Common shrew
- Snowshoe Hare
- White-tailed Deer
- Red Fox
- Little Brown Myotis
- Northern Myotis
- Canada Warbler
- Snapping Turtle
- Invertebrates
- Horned Grebe
- Trumpeter Swan
- Mallard
- Mink



Socio-economic
- Employment
- Income
- Business opportunities
- Government finances
- Community infrastructure
- Community services
- Community well-being
- Public safety

Human Health
- Worker health
- Public health

Aquatic
- Carmine Shiner
- Lake Sturgeon
- Walleye
- Aquatic plants
- Invertebrates
- Fish & Fish Habitat



Atomspheric Environment
- Air quality
- Greenhouse gases



Physical Environment
- Geology
- Hydrogeology

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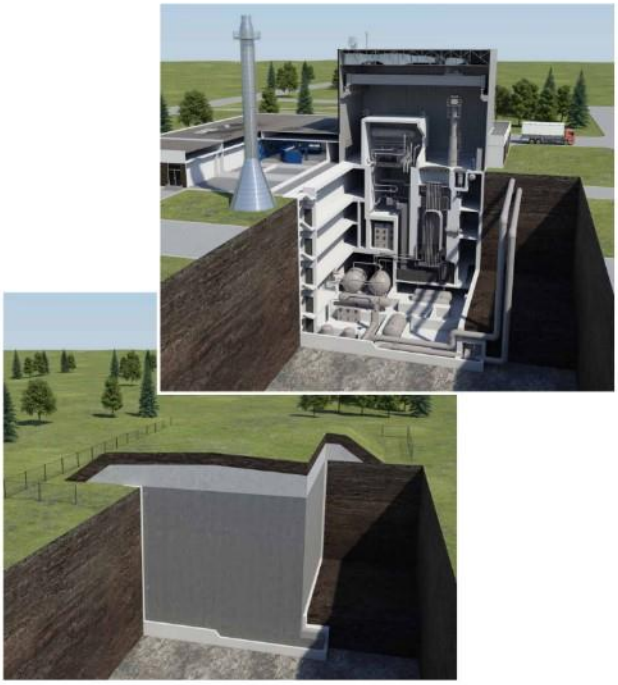


Why in situ decommissioning?

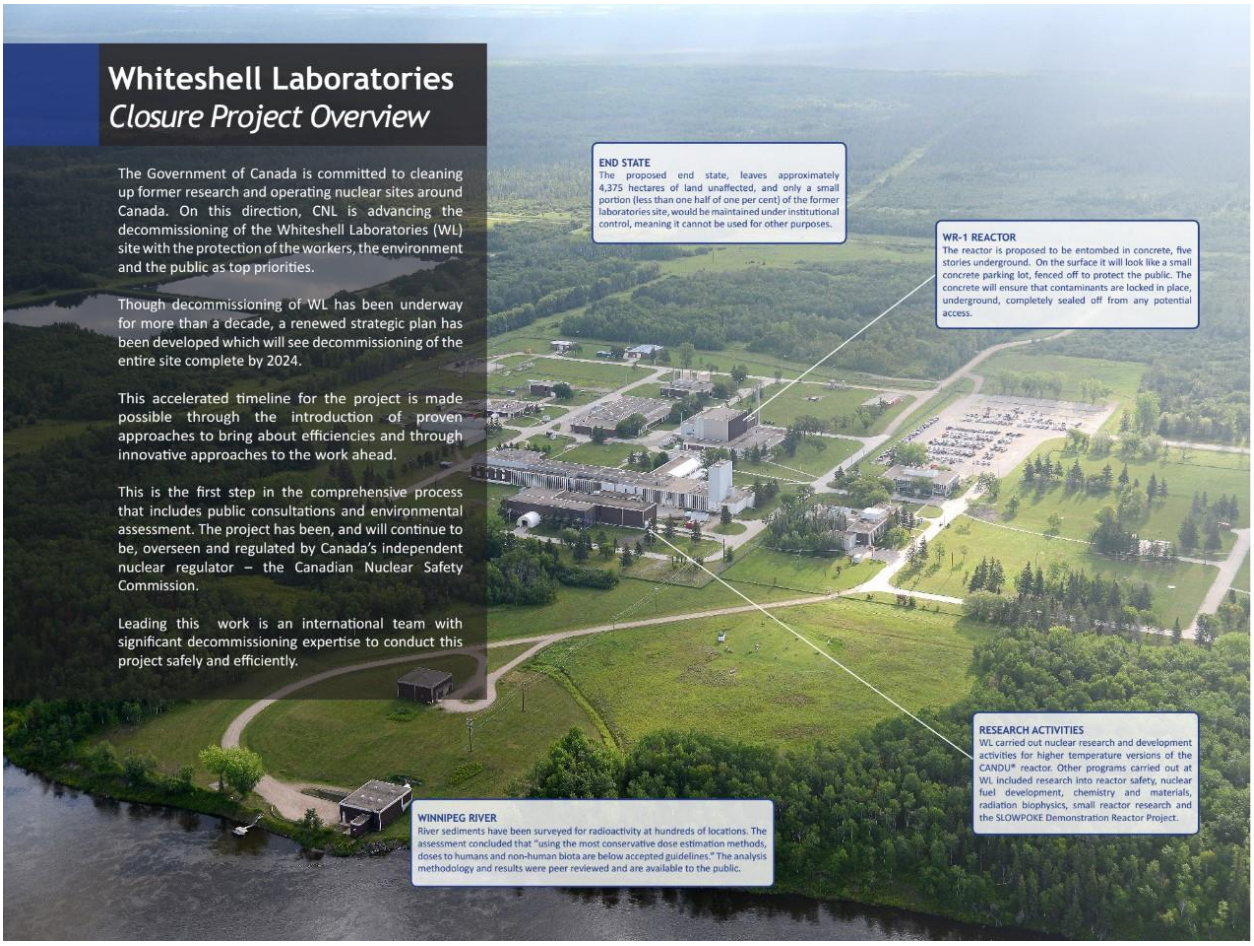
In situ decommissioning has been selected as the proposed decommissioning technique as it provides the following advantages:

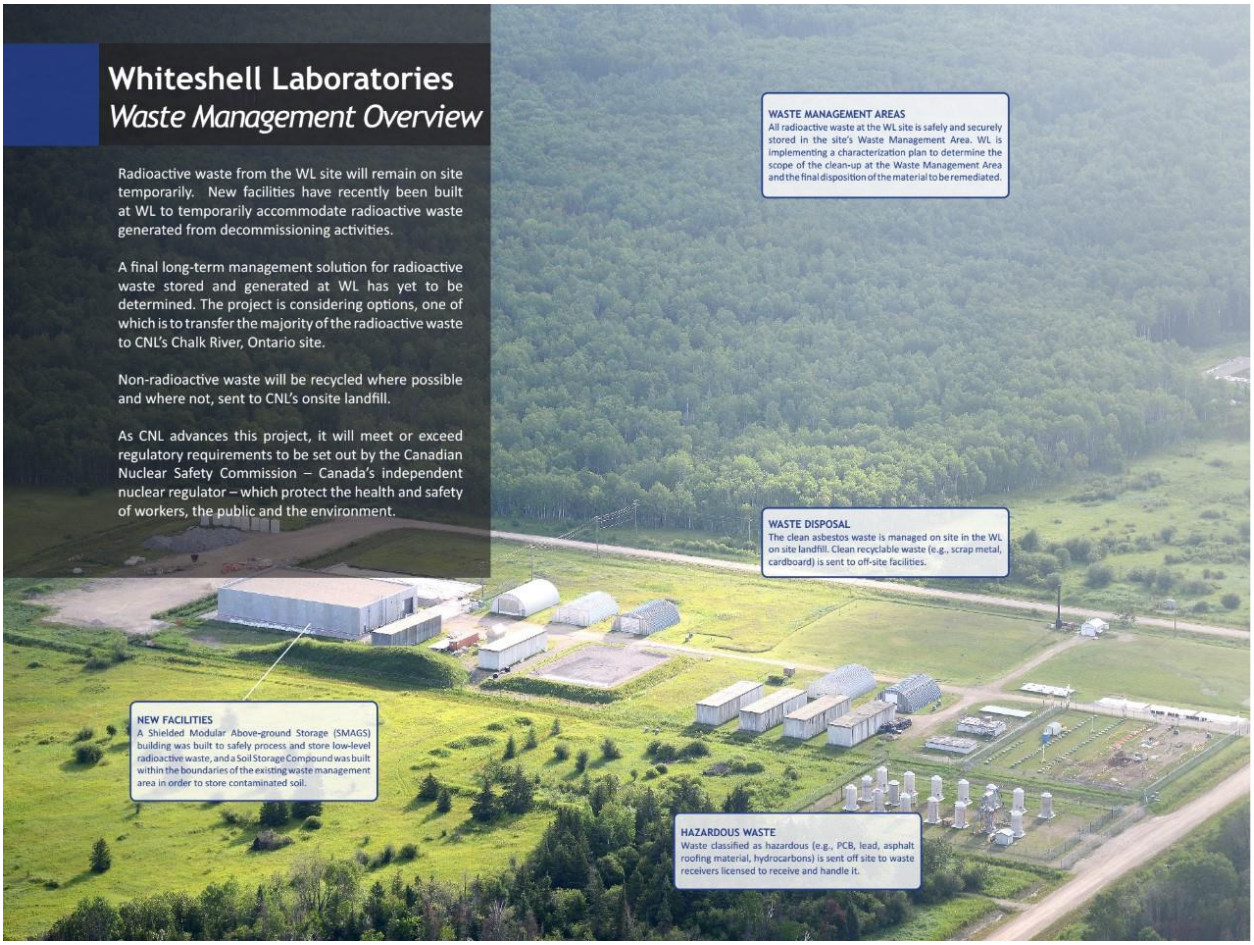
- Reduced risk for radiological and industrial hazards exposure to workers
- Reduced transport/waste handling risks to the public and environment
- Effective reduction of the nuclear liability and eliminating interim waste storage
- Eliminates the risk associated with multiple handling of waste packages to and from interim storage and final disposal
- Allows for early release of non-impacted WR-1 property
- Reduced cost to Canadian tax payers

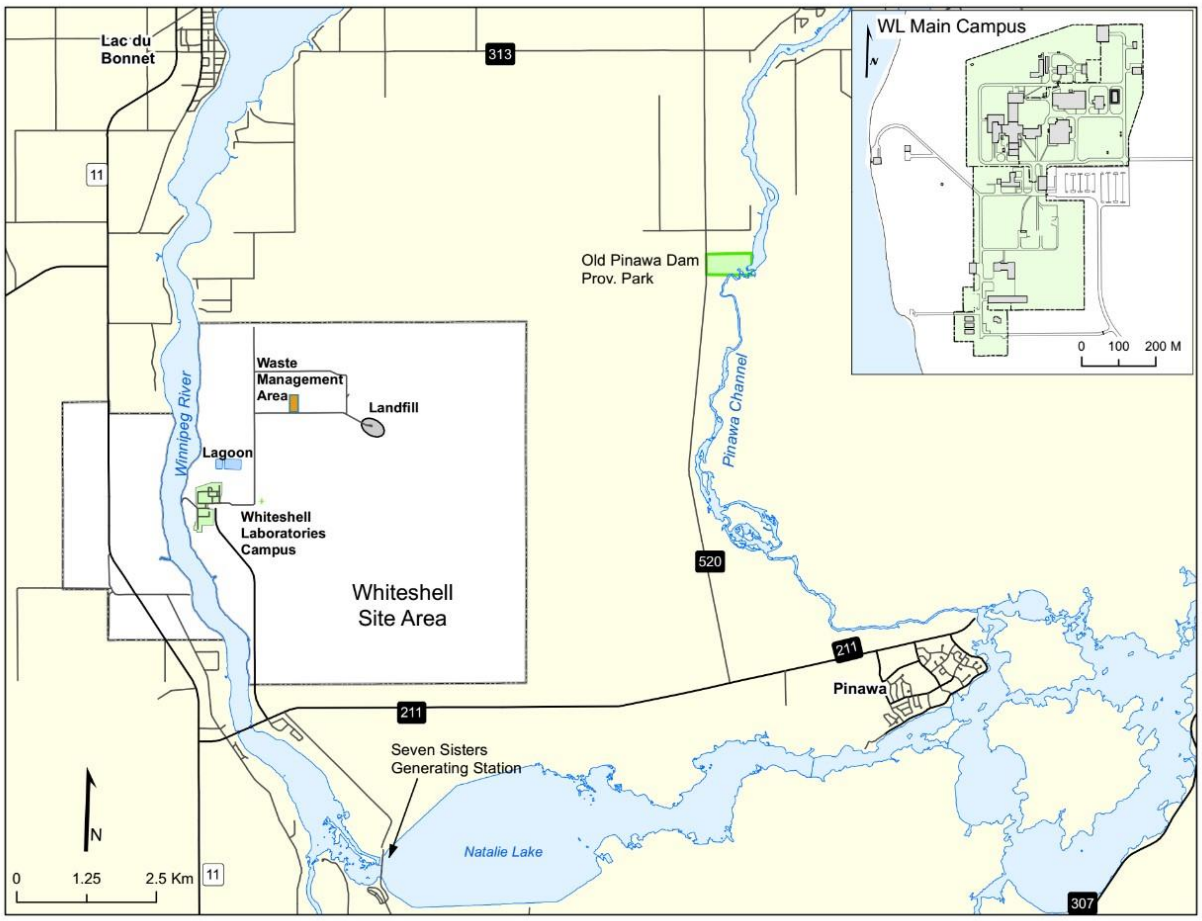
In situ decommissioning requires additional long-term monitoring of the impacted area.



Canadian Nuclear Laboratories | Laboratoires Nucléaires Canadiens


Whiteshell Laboratories
Closure Project Overview
The Government of Canada is committed to cleaning up former research and operating nuclear sites around Canada. On this direction, CNL is advancing the decommissioning of the Whiteshell Laboratories (WL) site with the protection of the workers, the environment and the public as top priorities.
Though decommissioning of WL has been underway for more than a decade, a renewed strategic plan has been developed which will see decommissioning of the entire site complete by 2024.
This accelerated timeline for the project is made possible through the introduction of proven approaches to bring about efficiencies and through innovative approaches to the work ahead.
This is the first step in the comprehensive process that includes public consultations and environmental assessment. The project has been, and will continue to be, overseen and regulated by Canada's independent nuclear regulator – the Canadian Nuclear Safety Commission.
Leading this work is an international team with significant decommissioning expertise to conduct this project safely and efficiently.
END STATE
The proposed end state, leaves approximately 4,375 hectares of land unaffected, and only a small portion (less than one half of one per cent) of the former laboratories site, would be maintained under institutional control, meaning it cannot be used for other purposes.
WR-1 REACTOR
The reactor is proposed to be entombed in concrete, five stories underground. On the surface it will look like a small concrete parking lot, fenced off to protect the public. The concrete will ensure that contaminants are locked in place, underground, completely sealed off from any potential access.
RESEARCH ACTIVITIES
WL carried out nuclear research and development activities for higher temperature versions of the CANDU® reactor. Other programs carried out at WL included research into reactor safety, nuclear fuel development, chemistry and materials, radiation biophysics, small reactor research and the SLOWPOKE Demonstration Reactor Project.
WINNIPEG RIVER
River sediments have been surveyed for radioactivity at hundreds of locations. The assessment concluded that "using the most conservative dose estimation methods, doses to humans and non-human biota are below accepted guidelines." The analysis methodology and results were peer reviewed and are available to the public.


Whiteshell Laboratories
Waste Management Overview
Radioactive waste from the WL site will remain on site temporarily. New facilities have recently been built at WL to temporarily accommodate radioactive waste generated from decommissioning activities.
A final long-term management solution for radioactive waste stored and generated at WL has yet to be determined. The project is considering options, one of which is to transfer the majority of the radioactive waste to CNL's Chalk River, Ontario site.
Non-radioactive waste will be recycled where possible and where not, sent to CNL's onsite landfill.
As CNL advances this project, it will meet or exceed regulatory requirements to be set out by the Canadian Nuclear Safety Commission – Canada's independent nuclear regulator – which protect the health and safety of workers, the public and the environment.
WASTE MANAGEMENT AREAS
All radioactive waste at the WL site is safely and securely stored in the site's Waste Management Area. WL is implementing a characterization plan to determine the scope of the clean-up at the Waste Management Area and the final disposition of the material to be remediated.
WASTE DISPOSAL
The clean asbestos waste is managed on site in the WL on site landfill. Clean recyclable waste (e.g., scrap metal, cardboard) is sent to off-site facilities.
NEW FACILITIES
A Shielded Modular Above-ground Storage (SMAGS) building was built to safely process and store low-level radioactive waste, and a Soil Storage Compound was built within the boundaries of the existing waste management area in order to store contaminated soil.
HAZARDOUS WASTE
Waste classified as hazardous (e.g., PCB, lead, asphalt roofing material, hydrocarbons) is sent off site to waste receivers licensed to receive and handle it.


Lac du Bonnet
313
11
Old Pinawa Dam Prov. Park
WL Main Campus
0 100 200 M
Waste Management Area
Landfill
Lagoon
Winnipeg River
Pinawa Channel
Whiteshell Laboratories Campus
Whiteshell Site Area
520
211
Pinawa
211
Seven Sisters Generating Station
N
0 1.25 2.5 Km
11
Natalie Lake
307

Appendix H Sample Presentation



Canadian Nuclear Laboratories (CNL)

Presentation for Black River, Brokenhead and Hollow Water First Nations

2017 February 21 – South Beach Hotel

CNL Representatives

Dan Coyne	General Manager and Site Head
Brian Wilcox	Director Project Delivery
Jeff Thompson	Director Environment, Health Safety and Quality Assurance
Mitch MacKay	Manager Community Relations

Presentation Outline

- Introduction and Overview
- Canadian Nuclear Laboratories and the Whiteshell Laboratories Closure Project
- Overview of the In Situ Decommissioning of Whiteshell Reactor 1

About Canadian Nuclear Laboratories



- On behalf of the Government of Canada, CNL manages nuclear liabilities at sites across Canada.
- CNL transitioned to a Government Owned – Contractor Operated model in September 2015; with a mandate to complete decommissioning of the Whiteshell Laboratories site.
- CNL is advancing its waste and decommissioning effort for effective and efficient elimination of nuclear liabilities.

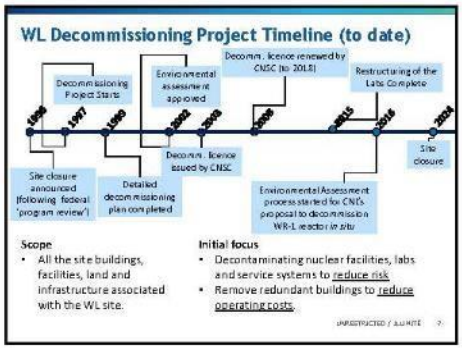


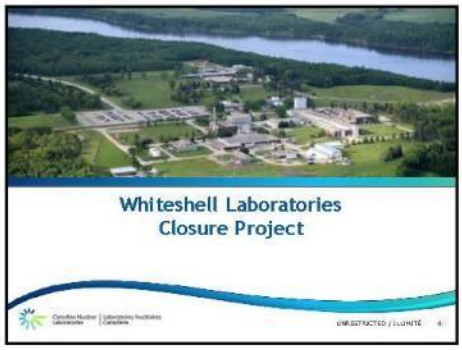
Whiteshell Laboratories

Background



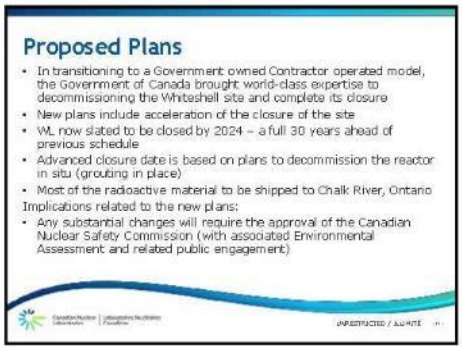
- LGD of Pinawa formed in 1960 (Agreement between AECL & Gov of Manitoba)
- WL site commissioned 1964
- 60 MW organic liquid-cooled research reactor (1965-1985)
- Various nuclear facilities (hot cells, accelerators, radiochemical labs, etc..)
- Reactor safety research, small reactor development, fuel development, biophysics and radiation applications
- Canadian Nuclear Fuel Waste Management Program

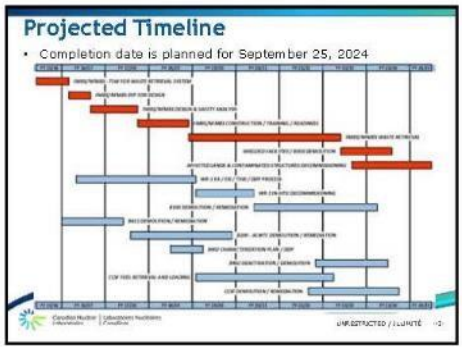

WL Decommissioning Project Timeline (to date)
Decommissioning Project Starts
Environmental assessment approved
Decomm. licence renewed by CNSC (to 2018)
Restructuring of the Labs Complete
Site closure announced (following federal 'program review')
Detailed decommissioning plan completed
Decomm. licence issued by CNSC
Environmental Assessment process started for CNSC proposal to decommission a WR-1 reactor in situ
Site closure
Scope
All the site buildings, facilities, land and infrastructure associated with the WL site.
Initial focus
Decontaminating nuclear facilities, labs and service systems to reduce risk
Remove redundant buildings to reduce operating costs.


Whiteshell Laboratories
Closure Project


Presentation Overview
Decommissioning Project Progress
Proposed Plans
Environmental Monitoring
Look Ahead


Whiteshell Site


Proposed Plans
In transitioning to a Government owned Contractor operated model, the Government of Canada brought world-class expertise to decommissioning the Whiteshell site and complete its closure
New plans include acceleration of the closure of the site
WL now slated to be closed by 2024 – a full 30 years ahead of previous schedule
Advanced closure date is based on plans to decommission the reactor in situ (grouting in place)
Most of the radioactive material to be shipped to Chalk River, Ontario
Implications related to the new plans:
Any substantial changes will require the approval of the Canadian Nuclear Safety Commission (with associated Environmental Assessment and related public engagement)


Projected Timeline
Completion date is planned for September 25, 2024

Decommissioning

Safely and responsibly removing infrastructure from the site



- Building 300 Whiteshell's Largest Nuclear Radiochemical Laboratory
- 8600 m2 portion safely demolished and remediated



Demolition in Progress



Waste Management

Preparing Waste for Removal

- Repackaging historic waste packages
- Characterizing historic waste storage facilities



Environmental Remediation

Protecting the environment and reducing our ecological footprint

- Original power house demolition & hydrocarbon remediation
- 197 truckloads (approximately 2760 m3) of contaminated soil have been sent to an off-site disposal facility.



Environmental Performance

- ISO 14001 certified this year
- Collect ~18,000 samples at 130 locations each year
- Very low impact on the environment - zero environmental reportable events in 2015 & 2016
- Environmental Report for 2015 issued to the regulator, local stakeholders, and available online
- Hard copies available here





Whiteshell Laboratories Closure Project
Whiteshell Reactor - 1 (WR-1)
In Situ Decommissioning

Outline

- Project Background and Scope
- Project Timeline
- Environmental Assessment Approach
- What Will Be Assessed?
- What Matters Most to You?

Background
2003 Comprehensive Study Report (CSR) and WR-1

CSR proposed 2 types of decommissioning
- dismantling/packaging/interim storage
- in situ decommissioning

At the time (~16 years ago), decommissioning was in its infancy

CSR recognized the occupational health and safety risks and high costs associated with reactor dismantling and waste handling

Background - CSR and WR-1

CSR said various strategies, approaches and technologies would be considered to optimize the approach for each facility, based on:
- Nature and level of contamination
- Exposure pathways
- Potential environmental effects
- Technical feasibility of remediation
- Economic feasibility of remediation
- Public input

WR-1 Approach in CSR

Preliminary decommissioning 1989 – 1995
- Addressed easily mobilized radioactivity (fluids, fuel)
- Reduced hazards and monitoring/surveillance requirements

Final decommissioning around 2038
- Remove and package all contaminated/activated components
- Decontaminate the facility structure
- Demolish the building

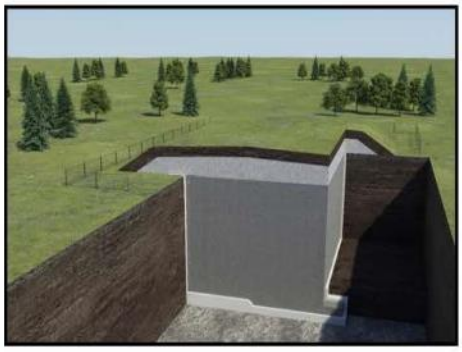
New Approach

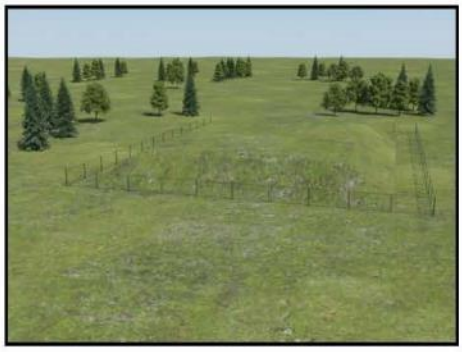
- Perform an environmental impact study
- Encapsulate the below grade contaminated systems in a concrete monolith
- Demolish the above grade structures/building

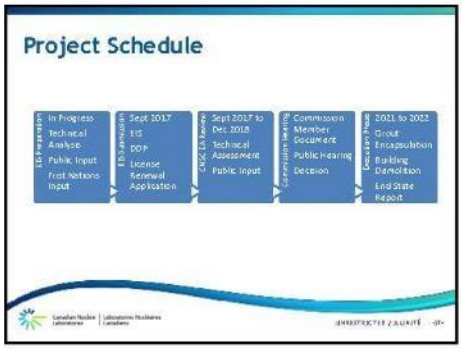
- Reduce the occupational health and safety risks here and at CRL
- Reduce the transportation risk
- Reduce the cost and timeframe of the project



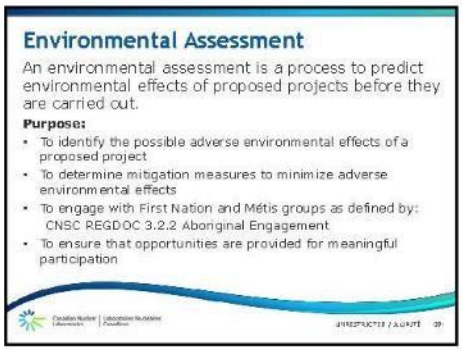














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EA - Alternatives Considered

Assessment of Project Alternatives and Selection of the Preferred Mean

- Presented in three steps:
  - Identification of technical and economically feasible alternative means
  - Identification of effects on valued components
  - Apply criteria and complete a comparative evaluation to identify the preferred mean
- Each alternative is assessed and the most preferable option is selected after systematic consideration of technical feasibility, safety, economic feasibility, and environmental effects
- Public engagement feedback considered in the decision-making process

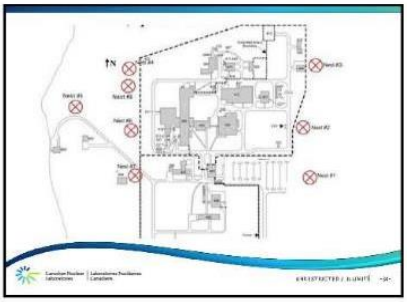
Project Alternatives

- Maintain storage with surveillance and defer dismantling to 2060
- Immediate dismantling, waste packaging and interim storage
- In situ disposal via grout encapsulation
- In situ disposal via grout encapsulation with source term reduction through removal of the fuel channels
- In situ disposal via grout encapsulation with source term reduction through removal and interim storage of the core

EIS Contents

EIS Contents follow CNSC Generic Guidelines for the Preparation of an Environmental Impact Statement, May 2016

- Project Description
- Public and First Nation and Métis Engagement
- Description of Baseline Environment (biophysical, socio-economic, Valued Components)
- Assessment of Effects
  - Normal operations, accidents & mal-functions, extreme environmental conditions
  - Complete Project Life cycle
  - Radiological and non-radiological substances
- Mitigation Measures
- Conclusions on Significance
- Monitoring & Follow-up



Borehole Network





Valued Ecosystem Components

An element of an ecosystem that is identified as having scientific, social, cultural, economic, historical, archeological or aesthetic importance

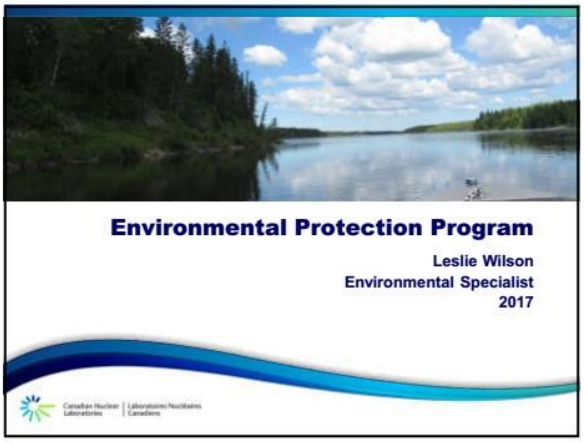
- Traditional Land Use
- Winnipeg River and its shorelines
- Water quality (river, ditches, discharges)
- Fish (sturgeon, walleye, mooneye, etc) and Fish Habitat
- Wetlands
- Forested lands
- White Tail Deer
- Migratory Birds and Waterfowl

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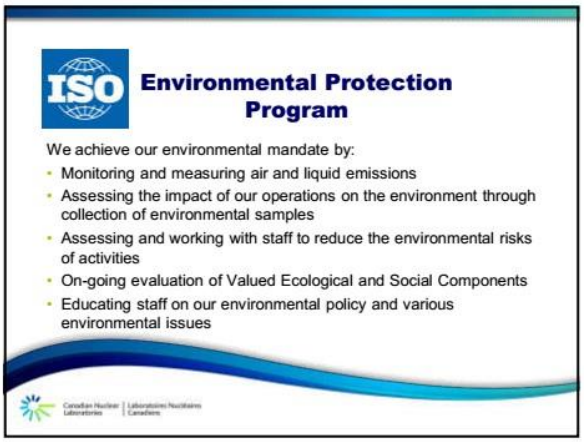
Valued Ecosystem Components

- Air quality and Green House Gas
- Geology and Hydrogeology (ground water)
- Outdoor Recreation and Tourism
- Employment and Business Opportunities
- Farming and Resource Harvesters
- Snapping Turtle
- Little Brown Myotis Bat
- Barn Swallow
- Canada Warbler

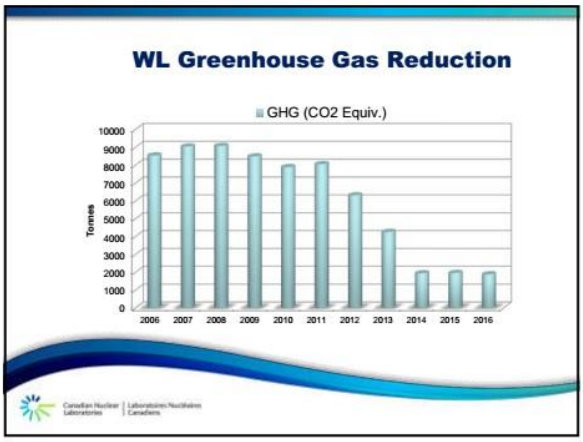
Appendix I Environmental Protection Program Presentation

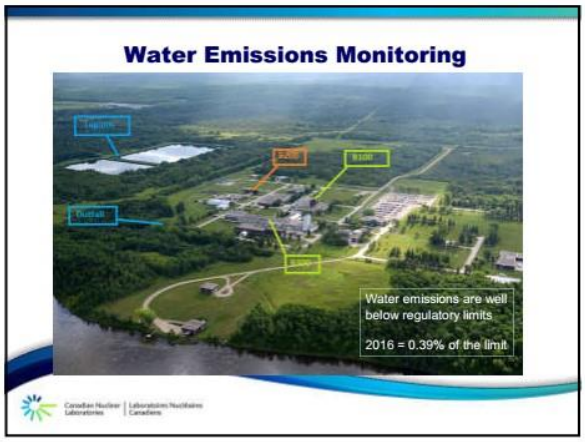










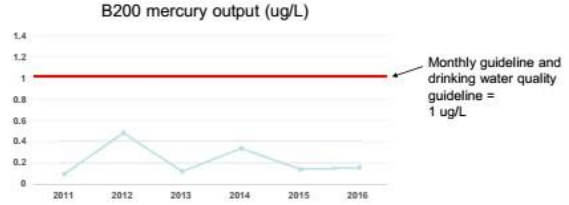


Non-radiological Monitoring Program

We routinely measure and report on:

- pH, Conductivity
- Total Suspended Solids, Oil & Grease
- Phosphorus, Phenolics
- Metals (chromium, copper, iron, lead, mercury, nickel, zinc)
- Biological Oxygen Demand, Fecal Coliforms, Un-ionized Ammonia and Total Residual Chlorine (lagoon only)

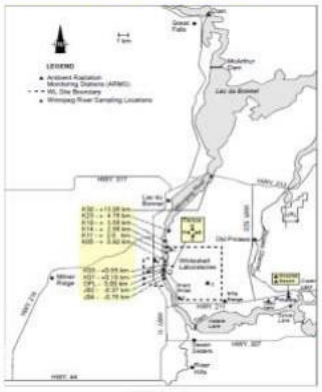
Non-radiological Monitoring Program



Environmental Monitoring Program

Collect routine environmental samples from:

- Winnipeg River water
- Sediments
- Soil
- Fish
- Natural vegetation
- Garden crops
- Game animals



Environmental Monitoring Program

Types of Fish	Types of Garden Crops (leaf, root and fruit type crops)	Types of natural vegetation
White sucker	Tomatoes	Mixed grasses
Walleye	Carrots	Weeds
Northern pike	Beets	Clover
Whitefish	Potatoes	
Redhorse sucker	Chard	

WL1

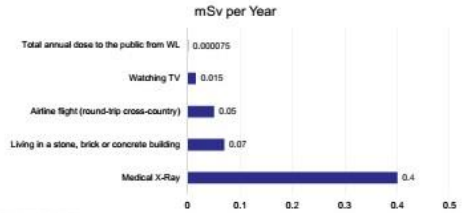
Environmental Monitoring Results (mSv per year)

	2016
Water Ingestion	0.0000078
Fish Ingestion	0.000067
Game Meat Ingestion	Nil
Vegetable Ingestion	Nil
Total	0.000075

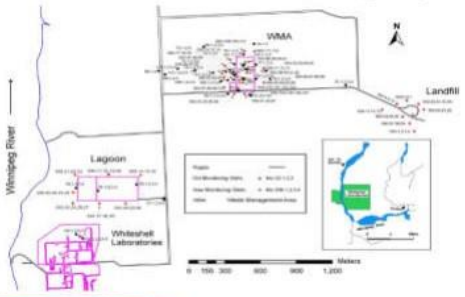
The annual dose allowed to the public is 1 mSv/year

WL1

Environmental Monitoring Results Comparison



On-site Groundwater Monitoring Program



Sampling and Analysis

- More than 130 sampling locations.
- Majority of samples are collected by the environmental field crew.
- Over 18,000 analyses are performed either on-site or through contract laboratories.
- Over 50 years of environmental data.





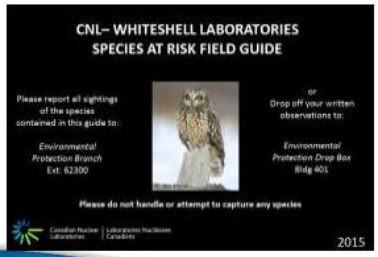
Environmental Considerations for Operations and Projects

- Migratory Birds and Species at Risk
- Valued Ecosystem Components
- Archaeological artifacts and cultural significance
- Consumption of Natural Resources
- Contain Spills
- Use of chemicals
- Sediment/Erosion Control
- Remediation of impacted areas
- Waste Segregation (recycling and waste minimization)
- Dust control
- Air quality
- Manage Emissions

Legal Requirements

- Canadian Environmental Protection Act
- Fisheries Act
- Canadian Environmental Assessment Act
- Migratory Bird Regulations
- Species at Risk Act
- Transportation of Dangerous Goods Regulation
- Wastewater Systems Effluent Regulations
- Nuclear Safety and Control Act
  - Radiation Protection Regulations
  - Packaging and Transport of Nuclear Substances Regulations

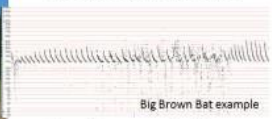
Species at Risk Program



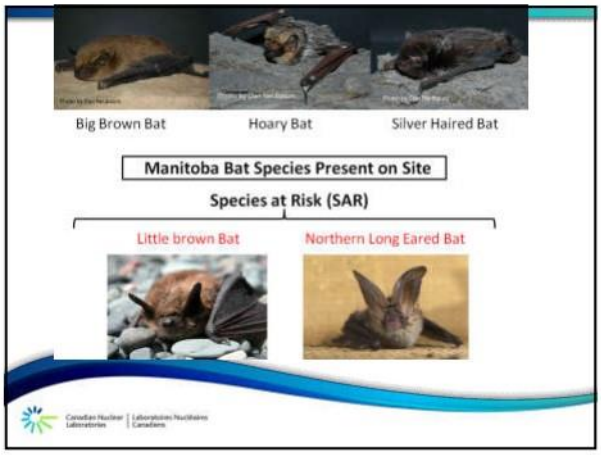
Summer 2015 Bat Monitoring Project



- Passive acoustic bat survey
- Bat Call Software Identification recorded ultrasonic calls



- Locations recorded for a minimum of 6 nights to a max of 12
- Recorded at 22 locations across site


Big Brown Bat
Hoary Bat
Silver Haired Bat
Manitoba Bat Species Present on Site
Species at Risk (SAR)
Little brown Bat
Northern Long Eared Bat


Learning Community
• September Learning Community
• Indigenous Peoples in the region and environmental protection staff
• Together we can share ideas and learn from eachother


Environmental Questions or Concerns?
Please call me if you have any questions about the Environmental Protection Program
Leslie Wilson, Environmental Specialist
(204) 753-2311


Thank you for coming today

Appendix J Industry Day Poster

Canadian Nuclear Laboratories | Laboratoires Nucléaires Canadiens

Whiteshell Laboratories Closure Project

Will be hosting

First Nation

Industry Day

July 6, 2017 10:00 am – 12:00 pm
Sagkeeng Arena Lobby

Join us to learn about opportunities around the project to decommission and remediate the former nuclear research site located near Pinawa, Manitoba.

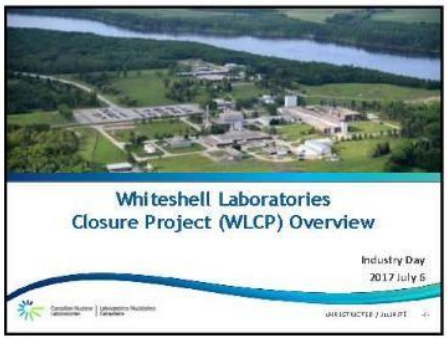
For more information:
visit www.cnl.ca/idwl
email wlcommunications@cnl.ca





Appendix K Industry Day Presentation

2017/08/04













Unrestricted 1

2017/08/04













Unrestricted 2

2017/08/04













Unrestricted 3

2017/08/04

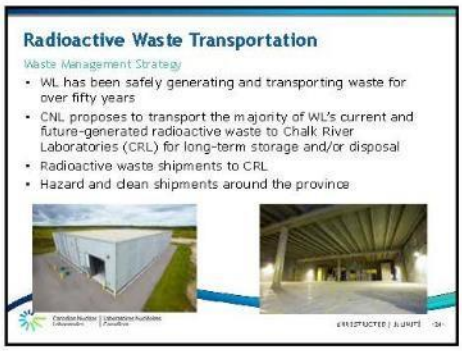












Unrestricted 4

2017/08/04

Environmental Remediation

Protecting the environment and caring for public resources responsibly

- Characterization
- Remediation
- Long-term monitoring





Scope of Work & Contract Opportunities

D&WM Contract Opportunities



Nuclear Decommissioning



- Development of Work Plans
- Characterization
- Deactivation of services
- Large scale building demolition
- Waste packaging
- Transportation of waste

Non-Nuclear Decommissioning



- Characterization
- Deactivation of services
- Building demolition
- Waste packaging
- Transportation of waste

Affected Lands & Site Services



- Safety Assessments
- Engineering Services
- Characterization
- Deactivation of Services
- Dewatering
- Water Treatment
- Soil Remediation

2017/08/04

Concrete Canisters



- Cranes
- Demolition
- Waste handling
- Transportation

Waste Management Area



- Safety Assessments
- Waste Recovery
- Waste Handling
- Characterization
- Demolition
- Soil Remediation
- Water Treatment

Contract Opportunities Summary

- Consulting
  - Safety Assessments
  - Staff Augmentation – Specialists
  - Decommissioning Engineering
  - Characterization Planning
  - Project Management
- Building Demolition/Land Excavation

Contract Opportunities - Summary

- Engineering
  - Deactivation and Demolition Designs/Field Support
  - Electrical Distribution/Reconfiguration
  - Water Management
- Design/Build
  - WR-1 Grout Emplacement
  - Engineered Cover

Contract Opportunities - Summary

- Heavy Equipment
  - Cranes/Excavators/Soft Digging/Etc
- Characterization
  - Geoprobe/Boreholes
  - ArcGIS
- Staff Augmentation – Trades
- Waste Packages and Transportation



Environment, Safety, Security, Health & Quality (ESSH&Q)

2017/08/04

Environment, Safety, Security, Health and Quality

- ESSH&Q requirements are more stringent on nuclear sites than other work sites
- Performance is expected to meet regulatory and CNL requirements at all times
- Must comply with all applicable Federal, Provincial and/or Municipal legislation and associated regulations.



Examples of Regulatory Requirements

- Canadian Nuclear Safety Commission (CNSC)
- Occupational Health and Safety
- Manitoba's Workplace Safety & Health Act
- Transportation of Dangerous Goods Act (TDGA, 1992), National Fire Code of Canada, National Building and Plumbing Codes, Canadian Electrical Code and be in compliance with WHMIS 2015.
- Government of Canada security guidelines

ESSH&Q Contractor Safety Responsibilities

- Evidence of an established Safety Policy and Program
- Registered and in good standing with WCB
- Provision of all PPE&C (radiation protective clothing and equipment provided by CNL)
- Appropriately trained and qualified workers
- Report any and all accidents/incidents

ESSH&Q Contractor Security Responsibilities

- Working on site requires a security clearance
- Depending on level of security required, clearance may take a number of weeks to obtain
- Criminal record checks are done via fingerprinting
- For any questions, contact WL Emergency Services Operations at 204-753-2311, ext. 62224

CNL Requirements

- All contractors are assigned a sponsor
- CNL has a Work Permit System which is a tool to identify workplace hazards
- CNL sponsor will ensure that work permits are initiated and authorized when required
- CNL sponsor provides guidance



Summary

- All work conducted on CNL property must be carried out in compliance with applicable federal and provincial safety legislation, CNSC and WL site licenses and policies.
- Safe completion of contracted work is the utmost importance to CNL.



2017/08/04



Supply Chain Engagement
Doing Business at Whiteshell Laboratories

Gina Barnett - WL Procurement Manager

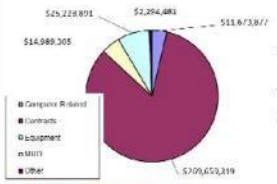
Briefing Points



- Context
- GoCo
- Conflict of Interest
- Supply Chain Transition
- Supply Chain Portal
- Procurement Process
- WL Procurement Branch
- Supply Chain Policy

Context for Procurement

2016-17 External Commitments

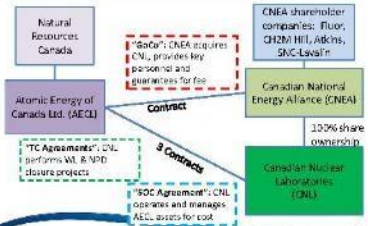


CNL - $ 324 M

WL - $ 9.5 M
~150M to 2024

Change in CNL's Ownership

Government Owned-Contractor Operated (Go-Co) Model



AECL Oversight

- AECL's contracts with CNEA and CNL require:
  - Limitations, oversight and approvals of procurement activities
  - Implementation of new procurement policies and strategy
  - Procurement policies that are fair, accessible, open and competitive

Objective: deliver best value by optimizing: cost, quality, competition, transparency, sustainability, long-term costs and benefits, and the development of a capable nuclear supply chain in Canada.

AECL Oversight - CNL Procurement

- CNEA's shareholder companies and their affiliates can perform and compete for other subcontracted work, for profit;
  - Terms cannot be any less favorable than could be obtained otherwise– level playing field
- Oversight includes the management of conflicts of interest
  - CNL conflict of interest policy
  - Supplier code of conduct
  - Provide notice to AECL in advance of initiating a procurement process if it believes one of its affiliates intends to participate
  - Accommodate AECL additional oversight including, if appropriate, the engagement of an independent fairness monitor

2017/08/04

Fairness and Integrity



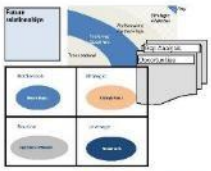
Means for managing conflicts of interest (COI) and ensuring best value

- Work cannot commence without purchase contract in place
- Only Procurement staff are authorized to set up purchase contracts and request pricing information (other than budgetary pricing)
- Suppliers should confirm with their CNL contact that they are authorized to make such a transaction
  - Non-binding and/or unfair advantage

Plan - 5 Key Areas of transformation



Supply Chain Engagement & Relationships



- Public procurement to commercial industry
- Transactional procurement to strategic sourcing
  - More complex, higher-value opportunities
  - Strategic collaboration
  - Earlier contractor engagement
  - Fewer and longer term relationships
- New contract models
- Best value to CNL, AECL and the Canadian taxpayer

Visibility of doing business with CNL



CNL' Supplier Portal on CNL.ca website

Doing business with CNL

Procurement opportunities and awards

Registering as a potential supplier
- Prequalification
- Capabilities
- Financial standing
- HSSE&Q

Useful information
- Supply Chain Policy
- Standard TECs
- Forms
- Contacts

Quality



- Desktop audits
- Qualified to bid
- Site audit
- Qualified to award
  valid for three years

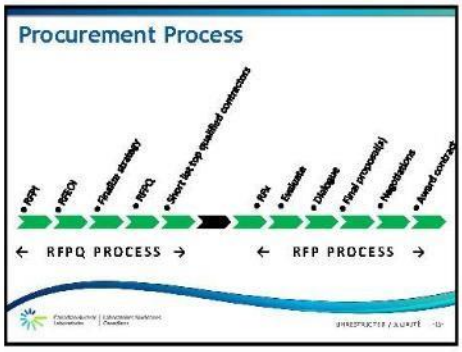
ISO 9001
CSA N285
CSA N286
CSA Z299
CSA B51
ASME

Health & Safety



- Prequal (ISN)
- WCB
- Insurance

2017/08/04


Procurement Process
RFPI
RFPQ
Finalize strategy
RFPQ
Short list top qualified contractors
RFP
Evaluate
Dialogue
Final proposal(s)
Negotiations
Award contract
← RFPQ PROCESS →
← RFP PROCESS →


Typical Major Construction Procurement
RFPQ Evaluation Criteria
Contemplated Criteria Themes:
1. Acceptable financial capability
2. Acceptance of Nuclear Liability provisions & other terms
3. Health & safety program and records
4. Quality management system
5. Acceptable insurance provisions
6. Technical competence, capacity and experience


WL Procurement Branch
Gina Barnett, Manager
gina.barnett@cnl.ca
ext 62209
Grant Hlady, Supervisor
grant.hlady@cnl.ca
ext 62218
Shawn Giesbrecht, Senior Contract Officer
Connie Grand, Senior Contract Officer
Dawn Milhausen, Contract Officer
Angela Redmond, Contract Officer
Angela Taylor, Purchasing Assistant
Pat Pargeter, Administrative Assistant


Supply Chain Policy - Key Messages
Fair, accessible, open and competitive
Agile, flexible, & best value SC
Graded approach to risk
Develop, maintain, integrate & optimize the supply chain
Seek diversity of supply, including small, local and aboriginal businesses
Work collaboratively with suppliers
Visibility and transparency of opportunities

Appendix L Community Specific Reports Example

Chief Jim Bear
Brokenhead Ojibway Nation
1 Anishinabe Way P.O. Box 180
Scanterbury, MB R0E 1W0

Reference: Federal Environmental Assessment, Canadian Nuclear Laboratories – Proposed Near Surface Disposal Facility Draft Environmental Impact Statement

Further to my email of Thursday, October 5th, 2017, I am writing to advise you that Canadian Nuclear Laboratories (CNL) submitted the draft Environmental Impact Statement for the proposed in situ decommissioning of the Whiteshell Reactor #1 (WR-1) at CNL's WL site located near Pinawa, Manitoba to the Canadian Nuclear Safety Commission (CNSC). The proposed in situ technique is a permanent, passive decommissioning end state for the WR-1 reactor that was safely brought out of operation in 1985. It uses multiple barriers to contain the radiological and non-radiological waste in the reactor, and provides time for the radioactive materials to decay to safe levels.

If approved, the plan is to remove all of the structures above ground using traditional decommissioning methods, while encasing everything below ground (i.e., the reactor itself) in grout. An engineered cover will then be constructed over the below-ground structure to prevent future intrusion. Ongoing site environmental monitoring will continue to ensure that the site remains safe and the decommissioning approach performs to expectation.

Please find enclosed both a hard copy of the Executive Summary of the draft Environmental Impact Statement and a community specific newsletter.

The submission of the draft Environmental Impact Statement to the Canadian Nuclear Safety Commission is a requirement of the Environmental Assessment process for the in situ decommissioning of the WR-1 facility.

In order for the project to move forward, the Environmental Assessment, which is carried out under the Canadian Environmental Assessment Act, 2012, and regulated under the authority of the Canadian Nuclear Safety Commission, must be completed by the CNSC to affirm that the proposed activities will not cause significant adverse environmental effects.

With our submission of the in situ decommissioning of the WR-1 project Environmental Impact Statement, the Canadian Nuclear Safety Commission will be accepting comments from the public and Indigenous groups.

CNL encourages participation from members of the public and Indigenous groups in the Environmental Assessment process. Links to the following documents associated with the in situ decommissioning of the Whiteshell Reactor #1 draft Environmental Assessment are located on our website at www.cnl.ca/wr-1:

- Public Notice from the Canadian Nuclear Safety Commission
- Environmental Impact Statement Executive Summary
- Environmental Impact Statement

Recognizing the value of Indigenous involvement in the Environmental Assessment process, CNL would like to encourage your participation. If you would like more information, please contact me directly at Mitch.MacKay@cnl.ca or by phone at 204-753-2311 ext. 63006.

Yours truly,

Mitch MacKay
Manager, Communications

Encl.

Engagement Report

Update

for the Brokenhead Ojibway Nation

Fall 2017



Canadian Nuclear Laboratories WR-1 In Situ Decommissioning Project Near Pinawa

Canadian Nuclear Laboratories (CNL) WR-1 In Situ Decommissioning Project near Pinawa, Manitoba, is proceeding through an environmental assessment process with the Canadian Nuclear Safety Commission (CNSC). CNL has been engaged with the Brokenhead Ojibway Nation about the Project since December 2015, and is committed to ongoing communication and engagement with the community as the environmental assessment of the Project and overall closure of the Whiteshell Laboratory Site proceeds. At the request of the community, much of this engagement has occurred in parallel with engagement with the communities of Black River First Nation and Hollow Water First Nation. This report summarizes some of the key findings from the environmental assessment, and provides information about how the feedback provided by Brokenhead Ojibway Nation has been considered to date. It is CNL's intention and purpose to use this document to spark continued engagement and discussion on the Project as the environmental assessment process continues.

This report summarizes some of the key findings from the environmental assessment, and provides information about the feedback provided by Brokenhead First Nation



ABOUT THE WHITESHELL LABORATORIES

Whiteshell Laboratories (WL) was established in the early 1960s to carry out nuclear research for peaceful purposes such as energy waste management and use in health applications. The WL site is

(Continued on page 2)

Canadian Nuclear Laboratories | Laboratoires Nucléaires Canadiens

1

Engagement Report
Update

Canadian Nuclear Laboratories – WR-1 In Situ Decommissioning Project

Continued from page 1

located approximately 79 kilometres southeast of Brokenhead Ojibway Nation, on the shore of the Winnipeg River, in the Local Government district of Pinawa. The WL site operated for approximately 40 years as a nuclear research and test operation facility. The WR-1 Reactor was the research and development centerpiece of the site and was safely brought out of operation and permanently shut down and defueled in 1985. All of the fuel was removed at this time, so the reactor is now comprised of empty pipes and tanks, and most of the contaminants are inside the metal of these remaining structures.

The WR-1 structure has since been partially decommissioned and continues to be maintained and monitored, awaiting final decommissioning. In 1998, Atomic Energy of Canada Limited made a decision to decommission the overall WL site. A Comprehensive Study Report under the Canadian Environmental Assessment Act (1992) was completed for the decommissioning of the WL site, which was approved by the federal Minister of the Environment in March 2002. The overall decommissioning of the site has been occurring since this time.

Understanding the The WR-1 In Situ Decommissioning Project

Canadian Nuclear Laboratories is proposing a decommissioning approach for WR-1, which is a change from the previously approved 2002 decommissioning plan. The new approach will allow for the decommissioning and disposal of the WR-1 Building in a safe manner, protective of people and the environment.

The previously approved decommissioning plan involved, after an extended period of time, the dismantling and removal of the entire WR-1 structure, and did not provide a clear path for the storage of the removed structure. Since a long term storage facility for radioactive materials has still not been created in Canada, the proposed plan is to now remove all of the structures above ground using traditional demolition methods, while encasing everything below ground (i.e., the reactor itself) in a protective grout.

An engineered cover will then be constructed over the below-ground structure for additional protection and to prevent future human intrusion. The in-situ approach reduces potential risk to people and the environment by providing a robust seal that will allow for safe, continued natural decay of the waste material. Ongoing site environmental monitoring will continue to ensure that the site remains safe and the decommissioning approach performs to expectation.

> Ongoing site environmental monitoring will continue to ensure that the site remains safe

In situ decommissioning is a permanent, passive decommissioning end state. It uses multiple barriers to contain the radiological and non-radiological waste in the reactor, and provides time for the radioactive materials to decay to safe levels.

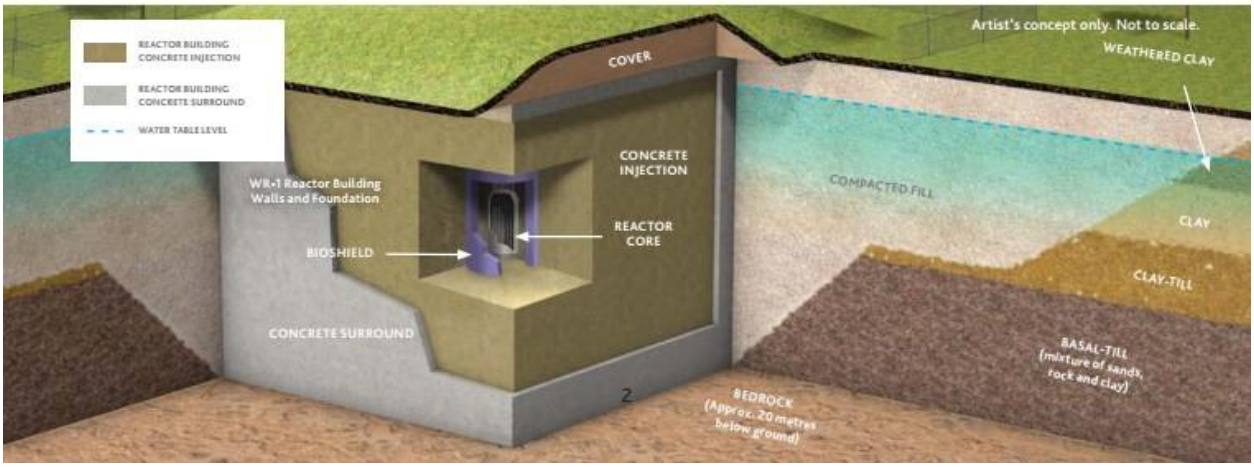
The first barrier is the metals in the reactor itself. The vast majority of remaining radioactive waste is contained within the metal components of the reactor core. These metals will corrode very slowly inhibiting release of contaminants.

The second barrier is the thick (approximately 2 metres), concrete reactor bioshield. This heavy concrete barrier surrounds the reactor core, further restricting accessibility to the reactor and inhibiting material transport.

The third barrier is the concrete grout that will fill all major void spaces in the reactor facility surrounding the core. Approximately 10,000 cubic metres (about the size of 3 indoor hockey rinks) of grout will fill all rooms, providing structural prevention of degradation and further limiting releases to the environment.

The fourth barrier is the reactor building foundation, which is reinforced concrete and sits directly on the bedrock. This will be reinforced by a cover made of a concrete cap to prevent access, minimize water entering, and further prevent intrusion by plants and animals.

The final barrier is a natural barrier, consisting of the geology of the region which is rich in clays, creating a slow pace for groundwater and material movement.



The Environmental Assessment Process

REGULATORY APPROVALS

The overall closure of the WL site continues under the approved environmental assessment from 2002, sometimes referred to as the Comprehensive Study Report (CSR). The proposed change from the previously approved decommissioning plan to in situ decommissioning of the reactor has triggered an environmental assessment for just that aspect of the previous plan. For the in situ project to go forward, regulatory approvals are required. This will include:

- An Environmental Impact Statement (EIS) to be submitted under the Canadian Environmental Assessment Act (CEAA) 2012. The EIS assesses the potential environmental effects of the Project.
- A license amendment under the Nuclear Safety Control Act to perform in situ decommissioning of WR-1.

A decision under CEAA 2012 is required before a decision can be made under the Nuclear Safety Control Act.

There are many steps in the environmental assessment process, including getting feedback from the First Nations, the public, Métis groups, local governments and stakeholder groups. The steps in the process include:

CANADIAN NUCLEAR LABORATORIES: Project Description
- Overview of project and surrounding environment

CANADIAN NUCLEAR SAFETY COMMISSION: Decision on Project Scope
- CNSC reviews the Project Description
- CNSC provides EIS guidelines
- Project Description posted for public review
- CNSC (Commission) considers public, First Nations and Métis groups comments and makes a decision on scope of EA

CNL: Environmental Impact Statement (EIS) September 2017
- Prepares EIS in accordance with regulations
- Evaluates environmental impact of project
- Determines mitigation measures to minimize environmental impacts
- EIS review by CNSC, federal authorities and public, First Nations and Métis groups
- Informs the public, First Nations and Métis groups and collects their feedback

CNSC STAFF: Environmental Assessment Report (EA)
- CNSC (staff) summarizes EIS into an Environmental Assessment report
- First Nation and Métis groups review
- Public review period

CNSC COMMISSION: Decision: Can the project proceed? Fall 2018
- CNSC (Commission) reviews EA report
- CNSC (Commission) makes a decision on whether the project may proceed
- Follow-up monitoring and reporting requirements

Understanding Effects in the Long-Term

When assessing potential effects of the Project – two general phases of activity were considered:

- **The Closure Phase**, or when the actual decommissioning work will be performed from 2019-2023 that includes:
  - All perforations are sealed;
  - Grouting of the below grade structures of the WR-1 building;
  - Removal of the above grade WR-1 structures;
  - Installation of an engineered cover over the grouted WR-1 building area;
  - Final site restoration.
- **The Post Closure Phase**, or when monitoring of the site will occur from 2023 until approximately 300 years in the future:
  - Preparation for institutional control, which will include things like access restrictions (e.g., physical barriers/fencing, signage, and land title instruments/deed restrictions); and
  - Institutional control (the extended period for monitoring).

Disruptive scenarios were also assessed, which included consideration of events or situations that were unlikely to occur, but which could lead to the possible penetration of the barriers and grout. The scenarios that were evaluated included the early degradation of grout, seismic damage (i.e., earthquake), early glaciation, groundwater discharge to the shore of the Winnipeg River, and human intrusion.

WR-1 In Situ Decommissioning Project Phases

Post Closure Monitoring of the site will occur from 2023 until approximately 300 years in the future.



CURRENT PHASE ▶ CLOSURE PHASE (2019 - 2023) ▶ POST CLOSURE AND INSTITUTIONAL CONTROL PHASE (2023 - 2323)

3

Engagement Report
Update

Canadian Nuclear Laboratories – WR-1 In Situ Decommissioning Project

What is Assessed?

First Nations and Métis groups have influence on the Valued Components

One of the important steps in the environmental assessment process is identifying Valued Components (VCs). Valued Components refer to environmental features that may be affected by a project that have been identified to be of concern by CNL, scientists, government agencies, First Nations and Métis groups, and the public. These components are ultimately what get evaluated during the environmental assessment process.

When selecting VCs, many things are considered, including:

- Presence, abundance and distribution within, or relevance to the area associated with Project;
- Potential interaction with the Project and potential vulnerability to the effects of the Project;
- Species conservation status or concern (e.g., rarity, uniqueness);
- Ecological and socio-economic value to communities, government agencies and the public (including the outcomes of public engagement activities);
- Traditional, cultural and heritage importance to First Nations and Métis groups;
- Legally recognized and afforded special protection by law, regulation, or policy; and
- Experience with similar projects.

Valued Components



Physical Environment

Geology
Groundwater quality and flow

Aquatic Environment

Fish and fish habitat



Land and Resource Use

Winnipeg River
Land tenure
Outdoor recreation and tourism
Cultural and archaeological sites
Traditional land and resource use by Indigenous people

Atmospheric Environment

Air quality
Climate change

Human Health

Public health
Worker health

Ecological Health

Terrestrial Invertebrates (i.e., earthworm)
Terrestrial Birds: American Robin, Barn Swallow, Loggerhead Shrike
Terrestrial Plants: grass and shrubs, blueberries
Terrestrial Mammals: Meadow Vole, Common Shrew, Snowshoe Hare, White-tailed Deer, Red Fox, Little Brown Bat
Fish: Carmine Shiner, Lake Sturgeon, Walleye
Benthic Invertebrates (i.e., snails)
Riparian Birds: Horned Grebe, Trumpeter Swan, Mallard
Riparian Mammals (i.e., mink)
Aquatic plants (submerged and emergent macrophytes)

Socioeconomic Environment

Employment and Income
Government finances
Community well-being
Public safety
Business opportunities
Community infrastructure and services



Surface Water Environment

Surface water quality and flow



Terrestrial Environment

Barn Swallow; Little Brown Bat; Northern Bat
Golden-winged Warbler; Snapping Turtle

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Site Tour of WR-1 with Black River First Nation, Brokenhead Ojibway Nation, and Hollow Water First Nation

Engagement with Brokenhead Ojibway Nation

To date, CNL has met with the Brokenhead Ojibway Nation on 3 occasions in relation to the Project, including discussions with the CNSC, meetings with leadership, and a community meeting and site tour. A summary of those meetings is provided in the table below.

SUMMARY OF PROJECT ENGAGEMENT WITH BROKENHEAD OJIBWAY NATION

ACTIVITY	LOCATION	DATE AND TIME	ATTENDANCE	PURPOSE OF THE MEETING
Meeting with Leadership	Swan Lake Office, Headingley, MB	December 15, 2016 10:00 a.m. – 3:00 p.m.	■ 7 representatives from the First Nations (Brokenhead Ojibway Nation, Black River First Nation, and Hollow Water First Nation) ■ 4 representatives from CNL ■ 1 representative from CNL contractor	■ To introduce the WR-1 Decommissioning Project, and to understand what was important to the community when undertaking the environmental assessment.
Community Meeting & Site Tour	South Beach Casino, Scanterbury, MB Tour of WL site	February 21, 2017 9:00 a.m. – 3:00 p.m. February 22, 2017	■ 13 members of Brokenhead Ojibway Nation ■ 11 members of Black River First Nation ■ 13 members of Hollow Water First Nation ■ 6 representatives from CNL ■ 1 representative from CNL contractor	■ To introduce the WR-1 Decommissioning Project to the community. ■ To provide a better understanding of the WL site itself, the overall closure of the project, the current environmental monitoring programs in place, and an opportunity to view the WR-1 Reactor itself. ■ To hear feedback from Brokenhead Ojibway Nation citizens regarding the project and learn about their traditional land use.
CNSC-led meeting with Brokenhead Ojibway Nation	Brokenhead Ojibway Nation Band office, Scanterbury, MB	June 27, 2017 10:30 a.m. – 12:00 p.m.	■ 5 representatives from Brokenhead Ojibway Nation ■ 2 representatives from CNSC ■ 1 representative from AECL ■ 1 representative from CNL	■ To provide an overview of the Project, and to allow for each of CNSC, CNL and AECL to explain their role in the process. ■ To gain an understanding of the community's concerns in relation to the Project.

Canadian Nuclear Laboratories also engaged with other communities, such as the Local Government District of Pinawa, and the Town of Lac du Bonnet. Other First Nations (Sagkeeng First Nation, Little Black River First Nation, Hollow Water First Nation, and Wabaseemoong Independent Nations) and the Manitoba Metis Federation were also engaged.

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What We Heard

Throughout the engagement process, CNL has tried to inform the community about the Project, while building awareness and understanding of the Project and its potential effects on the environment, including consideration of potential traditional and current uses in proximity to the site. During these engagements, Brokenhead Ojibway Nation identified several interests and concerns, which are summarized in the table below.

INTERESTS AND CONCERNS IDENTIFIED DURING PROJECT ENGAGEMENT

TOPIC	KEY INTERESTS AND CONCERNS
BUSINESS AND EMPLOYMENT OPPORTUNITIES	■ Brokenhead Ojibway Nation wanted to know if there are any Indigenous procurement requirements associated with the Project. ■ Brokenhead Ojibway Nation raised the possibility of CNL using direct negotiated contracts with First Nations in decommissioning and overall closure processes. ■ Brokenhead Ojibway Nation suggested other employment opportunities for community members related to the environmental assessment process. ■ Brokenhead Ojibway Nation expressed concern that they would not be competitive with larger businesses in the tender process. ■ Brokenhead Ojibway Nation were curious about the employment opportunities that are currently available on the WL site.
FUTURE LAND USE AND TENURE	■ Brokenhead Ojibway Nation was interested in knowing if the land currently occupied by the WL site would be available for other uses in the future. ■ Participants noted that the site occupies a large parcel of land that was removed from Treaty 1 territory without adequate consultation. There will need to be discussions with the Federal Government about the future of the WL site and potentially accommodation. ■ There has been talk about using the WL site to build small modular reactors and the First Nations wanted to know more about small modular reactors and if there will be any First Nation and Métis engagement as part of the process.
ACCIDENTS AND MALFUNCTIONS	■ There was discussion about past releases and the potential for future releases of hazardous and radioactive material into the Winnipeg River. ■ Brokenhead Ojibway Nation was interested in how releases could be contained in the soil. They were also interested in how CNL detects spills.
WASTE MANAGEMENT	■ Brokenhead Ojibway Nation asked about which material will be sent to Chalk River for disposal and how it will be transported.
FUTURE COMMUNICATION	■ Brokenhead Ojibway Nation was interested in CNL's planned engagement activities.
MONITORING	■ Brokenhead Ojibway Nation requested more information about CNL's current monitoring activities, including activities related to the contamination in the river bed of Winnipeg River. ■ Brokenhead Ojibway Nation would like to know more about future monitoring activities that will occur after the WL site is fully decommissioned.
PROJECT DESCRIPTION	■ There was interest in understanding the decommissioning method better, including how long radioactive materials will require to decay, what precisely will happen to the Whiteshell Reactor 1 (WR-1), and how safe In Situ Decommissioning (ISD) is. ■ Brokenhead Ojibway Nation expressed interest in understanding how ISD was chosen as the preferred decommissioning methods for the WR-1 and wanted to know if nearby communities would have an opportunity to provide input on the chosen decommissioning method. ■ There was discussion about whether climate change or natural disasters could affect the integrity of the grouted encapsulation and how it would be constructed to ensure that it is safe.

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TOPIC	KEY INTERESTS AND CONCERNS
REGULATORY PROCESS	■ Questions were raised about why communities had not been previously consulted on the WL site. ■ Questions were raised about the duty to consult. ■ The First Nations expressed concern regarding the level of capacity support provided to them to date for their participation in the regulatory review process, including the amount awarded to them through the CNSC's Participant Funding Program. ■ Brokenhead Ojibway Nation was curious about the Canadian Environmental Assessment Act 2012 and its requirements for soliciting information from nearby communities. ■ Brokenhead Ojibway Nation wanted to understand how the regulator works, and how the independent commission is selected.
TRADITIONAL KNOWLEDGE	■ There are petroforms in the Whiteshell area. ■ Brokenhead Ojibway Nation noted the importance of traditional and cultural perspectives with regards to the Project.



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Representatives of Black River First Nation, Brokenhead Ojibway Nation, and Hollow Water First Nation participated in an informational tour of the WR-1 site.

You Spoke. We Listened.

Throughout the environmental assessment process, CNL has considered the feedback the community has provided, and shared it with the technical experts conducting the environmental assessment. A few examples of how Brokenhead Ojibway Nations' interests and concerns were considered included the following:

- Considered how the grout would degrade over time as an important consideration in understanding potential long-term effects to the environment;
- Considered the potential effects of climate change and natural disasters in the assessment process;
- Developed presentation materials that addressed community concerns about the handling and transportation of waste materials, including demonstrations of the monitoring equipment used on site;
- Discussed how future monitoring on the site could better incorporate First Nation interests, such as locations where the community fishes or harvests in proximity to the site;
- Arranging a site tour so that representatives of the community could get a better understanding of the Project and the site and its activities (held February 22, 2017); and
- Creating a First Nation and Métis affairs summer student position that was advertised in Indigenous communities interested in the Project.

Canadian Nuclear Laboratories has also committed to hosting a First Nations and Métis communities environmental protection workshop to better understand how traditional knowledge could contribute to CNL's current and future environmental protection program.

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Effects To Traditional Land And Resources Use

ASSESSING EFFECTS TO TRADITIONAL LAND AND RESOURCES USE

One of the things that CNL heard, was that traditional land and resources uses, including consideration of the species harvested by the community, is very important. Because of this, traditional land and resources use was identified as a Valued Component (VC) for the effects assessment. Traditional land and resources use is important for maintaining meaningful connections with cultural identity and community history. Traditional land and resources use can also promote intergenerational connections within communities as knowledge is passed down from elders to community members, including youth. Potential changes to traditional land and resources use by Indigenous people can have an adverse effect on Indigenous people by preventing them from fully expressing their cultural identity and exerting Treaty rights.

Brokenhead Ojibway Nation is located near the southern basin of Lake Winnipeg, 73 km from the WL site. Brokenhead resource harvesters currently use traditional areas as far north of the Manigotogan River and as far south as the RM of Brokenhead (Brokenhead Ojibway Nation 2015). This traditional use area spans Treaties 1, 3 and 5 (TRCM n.d.). Brokenhead Ojibway Nation resource harvesting activities occur within wildlife management areas, parks and within reserve boundaries. Resource harvesting sites within this area include locations along the Winnipeg and Brokenhead Rivers (Brokenhead Ojibway Nation 2015). Current resource harvesting activities include, but are not limited to, moose hunting and trapping for muskrat and beaver (Brokenhead Ojibway Nation 2015). Brokenhead continues to address outstanding Treaty Land Entitlement specific claims discussions with the Province of Manitoba and Government of Canada. Included in these discussions is the selection of land within the Whiteshell Provincial Park Petroform area located east and south of Pinawa (Brokenhead Ojibway Nation 2015).

(Continued on page 10)

REFERENCES:

Brokenhead Ojibway Nation. (2015). Brokenhead Ojibway Nation Community Newsletter – Spring 2015. Available from http://www.brokenheadojibwaynation.net/wp-content/uploads/2015/05/BON-Newsletter-Spring-2015-Master.pdf [accessed December 2, 2016]..pdf [accessed November 18, 2016].



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(Continued from page 9)

The assessment of effects to traditional land and resources use evaluated whether the Project would result in any changes to the continued opportunity for traditional activities such as hunting, fishing, trapping, gathering and other cultural pursuits on the land. Public access to the WL site has generally been excluded for such activities for safety and security reasons. As such, there have been no traditional land and resources use directly on the site since the 1960s, although activities in proximity to the site, including use of the Winnipeg River have persisted.

The first part of the analysis identified whether there were any pathways from the Project that could cause a potential effect to traditional land and resources use. Each potential pathway was initially considered to have a potential effect, be it through normal or routine activities, or in the event of an accident or malfunction. For an effect to occur there has to be a Project component or activity that results in a detectable change to the continued opportunity for traditional activities such as hunting, fishing, trapping, and plant and berry gathering. For example, preparing the WR-1 reactor building for demolishing and grouting was not considered as a potential pathway from the Project to traditional land and resources use, as no traditional land and resources use activities are permitted on the WL site.

Several potential pathways to traditional land and resources use were considered in the assessment, included potential Project-related changes to:

- Ground or surface water quality;
- Relative abundance and distribution of fish species;
- Relative abundance and distribution of plant species;
- Relative abundance and distribution of wildlife species;
- Continued opportunities for traditional land use; and
- Perceived changes to the area's suitability for land use and/or quality of harvested resources.

Consideration of potential risks to ecological and human health were also evaluated including the assessment of radiological and non-radiological contaminants of concern.



Results

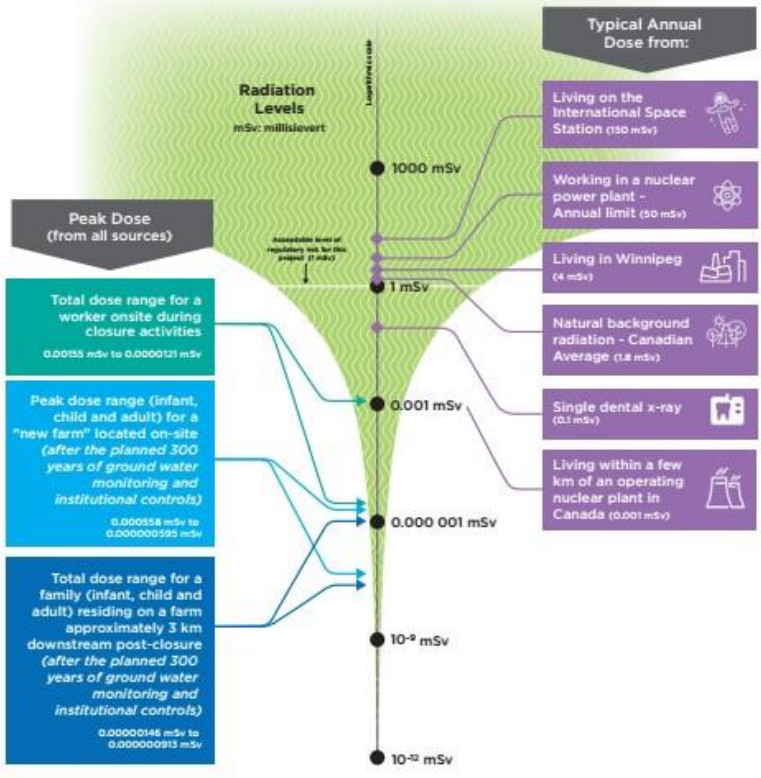
In order to understand potential effects to traditional land and resources use, consideration was given as to whether there would be effects to other components of the environment. Each of these potential pathways from the Project to traditional land and resources use was considered.

Effects to ground water and surface water quality were identified as very important to people. The assessment evaluated changes to groundwater quality from the release of solutes as the grout and reactor components gradually deteriorate over time. A groundwater flow and transport model was also completed, the results indicated it will take approximately 100 years for groundwater to travel from the Project to the Winnipeg River. Although in and of itself, the flow of groundwater to the Winnipeg River was unlikely to affect land and resources use directly, it could result in risk to ecological or human health. As such, the groundwater results were incorporated into the Ecological Risk Assessment to evaluate potential effects to human and ecological health.

Effects to human health were also identified as important, and people expressed concern about past potential future releases of hazardous and radioactive material into the Winnipeg River. The ecological risk assessment considered potential effects to numerous species including people (see diagram, page 10) along with incorporating the results of the studies of air quality, groundwater quality, and surface water quality (each of which were separately studied). Potential effects of the Project were modelled for various species, including several fictional human receptors that were created to simulate future users of the area. This included farms and a traditional resource harvester downstream of the Project, along with a farm and a traditional resource harvester using the WL site itself at some point beyond the institutional control period (i.e., 300 years or more). The results of the studies found that the radiological dose assessment for the closure and post-closure phases were below their respective benchmark values, or in other words, would not exceed the Canadian Nuclear Safety Commission public dose limit for radiation of 1 millisievert per year.

(Continued on page 12)

Radiation Peak Dose Ranges from Project



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This means that the Project will not result in any increased risk of radiation exposure. Similarly, the results also showed that there were no exposures to non-radiological contaminants that would exceed benchmarks to protect human health.

Effects to fish and wildlife were also identified as important as it relates to traditional land and resources use. The assessment considered whether the Project would be likely to result in any changes to things such as fish habitat and fish, and to terrestrial habitat and wildlife (with particular focus on wildlife listed in the Species at Risk Act, or the Committee on the Status of Endangered Wildlife in Canada ranking). This included potential changes associated with ecological health (i.e., radiation or other contaminants), and for other potential project activities such as changes to drainage, air emissions, nuisance factors such as noise, and traffic. In all instances, there were no project activities or outcomes that would result in a residual effect to fish and wildlife, so species of importance to traditional land and resources use will not be affected.

Canadian Nuclear Laboratories also heard that wild rice is an important species for the community. Because of the access restrictions on site, none of these species are harvested in proximity to the Project, although CNL will consider this information as it undertakes monitoring into the future. Berries were included as part of the ecological and human health risk assessment, and their consumption, even when combined with other activities such as harvesting, did not result in any adverse effects to health.

When all of the potential pathways from the Project to traditional land and resources use were considered, such as changes to water quality, to fish, to wildlife, to vegetation, or to human health, there were no potential measurable effects identified. The fact that the WL has had restricted access over the last six decades, has also meant that no traditional land and resources have occurred in proximity to the Project, although it is evident that activities have persisted in the Whiteshell area, the Winnipeg River and downstream to Lake Winnipeg. It is anticipated that the Project will not prevent continued use of these areas to continue well into the future.

The Site's Long-Term Future

The Project itself will remain under institutional control as many as 300 years or more. CNL is currently developing appropriate criteria for site remediation and clean-up activities on the WL site. The Project will result in a small area of safe, but restricted use. The majority of the site is not impacted and will be safe and appropriate for other uses. It is expected that all activities and land uses, including traditional land uses, adjacent to the site will be able to continue into the future, as the Project will have no effect on land tenure or usage beyond the site boundaries. The future uses/zoning of the site itself have not been determined, and some long term institutional controls (e.g., signage, fencing, restrictions on land title) for a small portion of the WL site will be required.

Process Forward and Opportunities for Continued Involvement

Canadian Nuclear Laboratories has filed the Environmental Impact Statement with the CNSC, which is now available for public review and available at www.cnl.ca/wr-1-eis. Brokenhead Ojibway Nation has received participant funding to review the environmental impact statement. Canadian Nuclear Laboratories is committed to ongoing engagement with the public, First Nations, and the Manitoba Metis Federation, and would welcome the opportunity to share more information with the community directly.

For more information, please contact:

Mitch MacKay

email: Mitch.Mackay@CNL.ca

Phone: 204-753-2311 ext. 63006

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Appendix M Benchmarking Trip to Hallam, Nebraska

Trip Report



Canadian Nuclear Laboratories WR-1 In Situ Decommissioning Project Near Pinawa

Community Benchmarking Trip Seeks Input for Proposed Plans

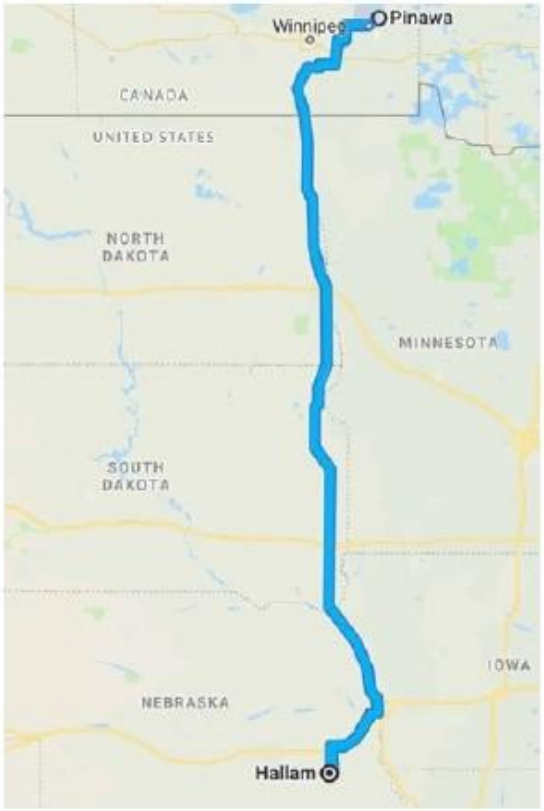
Canadian Nuclear Laboratories (CNL) is proposing a new approach to decommission the WR-1 reactor at the Whiteshell site. This new approach is subject to a federal environmental assessment. As part of this CNL is engaging with Indigenous communities and public stakeholders. In this regard CNL approached several stakeholder and Indigenous communities to join them on a benchmarking tour to Hallam, Nebraska where a reactor underwent "in situ decommissioning", similar to what is proposed for WR-1. The group was to learn what a decommissioned in situ reactor looked like, how it was performing and the effect on the surrounding communities.

The group was led by members of CNL's leadership team. It had representatives from the Manitoba Metis Federation, Sagkeeng First Nation, Black River First Nation, Brokenhead First Nation, Wabaseemoong First Nation, the Whiteshell Closure project Public Liaison Committee, the Whiteshell Laboratories Economic Regeneration Partnership, the Canadian Nuclear Safety Commission (CNSC), Atomic Energy Canada Limited (AECL), and Golder Associates.

The group met several key representatives of the United States Department of Energy (US DOE), the State of Nebraska, Nebraska Public Power District and the local host community.

The group learned several important lessons during the visit, key among them that the entombment is working as designed and has had zero significant detectable effects to the surrounding community.

CNL believes that the trip was valuable and will help to strengthen the knowledge and relationships necessary to help understand the proposed in situ method and demonstrate CNL's transparency in developing a plan that the region has the capacity to understand and provide meaningful input into.



Location of sites

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Trip Report

Canadian Nuclear Laboratories – WR-1 In Situ Decommissioning Project

Background to visit

CNL is proposing a decommissioning approach for WR-1 that is a change from the previously approved 2002 decommissioning plan. Nuclear in situ decommissioning is new to Canada but has been used numerous times in the United States and Europe.

Throughout the environmental assessment process CNL has considered the feedback communities have provided and has tried to enhance the way information is shared and respond where possible and reasonable. Feedback from some communities has been related to a greater understanding of what the in situ method looks like, how it is monitored, will it perform, and anxiety about having it in the community. CNL sought to respond to this feedback and concerns by coordinating a benchmarking trip to a facility that went through a similar process. The visit was timed around an annual inspection to see how that works and to interact with key stakeholders.

It was therefore suggested that CNL look at potential sites where this benchmarking might occur. Hallam, Nebraska was considered a good case because of several factors, including geographical location, one of the oldest in situ examples, similar hazards present, size of the reactor, and ease of access to the site. See chart below for a cross comparison.

	HALLAM	WR-1 (PROPOSED)
Entombed portion	Area 1 (reactor vessel and vessel containment structures), Area 2 (Fuel Storage Pit 3 thimbles), and Area 3 (moderator element storage cells).	Below-grade building and reactor systems. Calandria and fuel channels.
Size	240MWT	60MWT
Purpose	Power generation	Prototype and research
Total Activity Entombed	300,000 Curies	~31,000 Curies
Grout type	Expanding grout	Zero bleed, low shrinkage grout
Prior decommissioning	All irradiated fuel and all bulk sodium removed. Residual sodium rendered inert.	All irradiated fuel removed. All bulk heavy water and organics removed.
Cap	Sealed with sand, waterproof polyvinyl membrane and covering of earth.	Concrete cover and an engineered cap with grading to manage surface water.
Depth of Facility	20.5 metres	20 metres
Closest body of water	Large regional aquifer @ 46 metres below ground level	Winnipeg River@ 500 metres from the facility

CNL is proposing a decommissioning approach for WR-1 that is a change from the previously approved 2002 decommissioning plan. Nuclear in situ decommissioning is new to Canada but has been used numerous times.

Objectives

- To learn and appreciate the performance of the in situ method.
- To learn and appreciate the site inspection and environmental monitoring process associated with an in situ facility.
- To provide opportunities to interact, engage and connect with those who have a stake or whose communities are effected by the in situ structure at the Hallam site.
- To better inform communities on the in situ approach and allow them to comment and provide feedback with a deeper understanding and using an existing example.
- To understand what the final entombment looks like.
- To observe the effects on the surrounding environment and communities.

Findings and Observations–Day One

The first day consisted of an opening meeting where introductions were made and a discussion was facilitated on what participants' expectations were for the benchmarking trip and what they wanted to get out of the trip. All expressed a desire to see the Hallam site and the opportunity to bring information back to their communities. Other themes included safety and economic impacts as a result of the Hallam entombed reactor, expectations of the regulator on the site, and understanding lessons learned. Individuals were also interested in the health effects of the site, whether the land will be lost forever, when the monitoring of the site will stop and who is responsible for cleanup if something doesn't go as planned.

An introductory presentation was made on the Hallam site and a comparision with the Whiteshell site along with the comparison of the WR-1 reactor and the Hallam reactor. A representative from Nebraska Public Power District was on hand to answer questions about the site and give an overview of the next day's proceedings. The representative also talked about new economic development at the site, including a partnership with Monolith Materials. The company is setting up near the Sheldon Station site to make carbon black. The Sheldon Station plant will use the by-product – hydrogen as a fuel for generating electricity. The Hallam reactor entombment is not a concern for the company.



Participants discuss the similarities and differences between the Hallam in situ reactor and the proposed WR-1 plan during day one of the benchmarking trip.

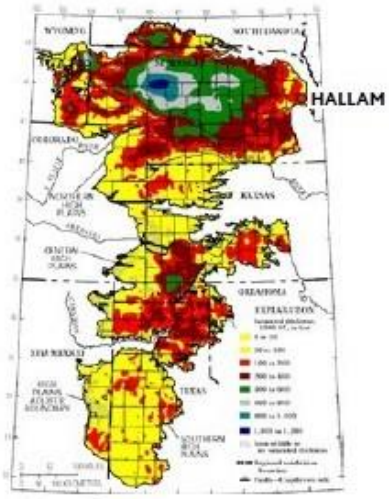
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Trip Report

Canadian Nuclear Laboratories – WR-1 In Situ Decommissioning Project

Findings and Observations–Day Two

- All participants boarded a bus and made their way to the Hallam site, it is approximately a 40 kilometre drive from Lincoln, Nebraska to the Sheldon Power Station home of the Hallam reactor in situ site.
- The group heard opening remarks from the Sheldon station general manager, including a safety brief. The participants were introduced and given opportunity to provide some background on why they were there. First Nation communities pointed out that there was a lack of consultation when the WL site was built and that one of the reasons they were on this trip was to now become informed and have input into the future of the WL site.
- Alan, Director of Research (NPPD) and Bob, Electrical Engineer for NPPD provided comments, including a presentation. Alan gave the history and Bob provided perspective on the reactor and in situ decommissioning technique from someone who was there.
- Construction of the reactor started in 1959. It was the world's first sodium-graphite commercial nuclear power plant. Connected to the grid in 1963 and provided 75 MWe. After 14 months of operation, it was decided to shut down the plant. Sodium was leaking into the graphite moderator cans. There was a technology race going on in the United States at the time with different reactor technologies. Light water reactors won the race, setting the standard for future power reactors. NPPD decided to build one other light water plant in Nebraska, Cooper Station. This is an 800 MWe Boiling Water Reactor plant built in 1974 and currently licensed until 2034.
- Used Fuel from the Hallam reactor was sent to Hanford.
- Bob pointed out that not all space in the below grade facility was filled with concrete. The annulus space around the reactor core was not filled with concrete. A concrete cover was installed, then covered with sand, a water proof membrane, soil and grass. The cover is approximately 7 feet high.
- A lot of discussion occurred about the Ogallala aquifer which the reactor sits above by approximately 100 feet. The Sheldon Station coal plant draws cooling water from it from a 300 foot well. The site also draws drinking water at 200 feet. The Ogallala aquifer is approximately 450,000 km², spans eight states and is an important source of drinking and irrigation water for the State of Nebraska and other states.



Ogallala aquifer

- Gordon Bluesky asked what the surrounding lands are used for and what was there before the site was built. The answer by NPPD was that the site is surrounded by agricultural land, primarily corn. They speculated the lands were probably prairie grassland prior to construction.

Michelle Miller (US DOE) explains the inspection process of a ground water monitoring station.





Day two participants received presentations on the Hallam site and the monitoring and follow-up program before departing on a tour.

- Someone asked how environmental monitoring is done. NPPD said ground water is a very important resource in Nebraska. Wells are located around the facility to provide monitoring.
- Comments were made that earthquakes occur occasionally. Mostly small and no damage has been noted. In 2004 the second largest tornado in US record (peaking at 4 KM wide) destroyed the community of Hallam. The in situ reactor suffered no damage or environmental effects.
- Michelle Miller a contractor to the United States Department of Energy (US DOE) from Navarro began a presentation. She was supported by a representative from the US DOE and a representative of the Nebraska State Environmental branch.
- Michelle inspects and monitors a number of entombed reactor facilities including BONUS in Puerto Rico and Piqua in Ohio. She notes BONUS has been directly hit by two hurricanes in the last few years. The last caused major island damage, but no effects to the reactor.
- The Hallam site has been monitored since 1970. Most data is available on the DOE legacy management website (www.doe.lm.gov). Monitoring has found "nothing". One single detection of NI-63, but no other detections ever. Michelle said there is no impact to the perched ground water which sits between 4 and 20 feet.
- The US DOE has switched recently to a 5 year ground water monitoring cycle. They do visual inspections annually. The next ground water collection is 2021.
- There is a proposed exit strategy for the monitoring. In 2071 there will no longer be any radioisotopes of concern and the monitoring is planned to cease.
- The US DOE does not monitor for any non-radioactive materials (for example lead). They determined leaching would not be a concern. DOE only monitors ground water to a depth of 20'. They are primarily concerned with the perched water. They have no concerns about anything leaching out to a deeper level.
- The total footprint of the entombed site is 1.4 acres.
- A question was asked about engagement with local First Nations. The DOE and NPPD said they have not been asked for any engagement. They are willing to do so, but no requests.
- As an example at another site in Nebraska, an NPPD representative mentioned that during the relicensing of the Cooper Nuclear Plant, NPPD reached out to local Tribal Councils but there was no response back.
- Michelle discussed the details of the inspection today. It is not a ground water monitoring year, so no samples would be collected. There are 19 wells on the site. They spend about $20,000 USD/ year on monitoring.

Trip Report

Canadian Nuclear Laboratories – WR-1 In Situ Decommissioning Project

Survey Results

Immediately following the tour the group congregated at the hotel conference room for debrief and survey to gauge immediate thoughts, questions, comments and sentiments. Below is a summary of each answer.

What did you like about the trip to Hallam?

- It was a great opportunity to meet others, hear other concerns, helpful to get a firsthand view of a similar site.
- The group was a great cross section of people.
- The trip was well organized making it a very valuable and focused experience.
- The inspection was very interesting and it was good to see the final product.
- It was very useful to bring different perspectives, the trip reinforced that this is not a new technology.
- Hosts presentations were very informative.

What would have made the trip to Hallam better?

- More time with the local mayor and the mayor should have addressed the whole delegation.
- A bit more rigour from the local regulator, at times they seemed very relaxed.
- It was too bad not all communities were able to attend the trip, to give an even better cross section.
- Visuals of the geology and cap system at the site would have been helpful.
- Needed additional information of the design basis of the Hallam site.
- Needed more on interest from community and indigenous groups.
- Availability of more technical experts during the Hallam site engagement.

Was this useful in helping you understand what in situ decommissioning (entombment) is and how it applies to Whiteshell? If not, please identify the reasons why you don't think it relevant.

- It brought to life what CNL is proposing.
- The facts are very important to understand, not every site will be the same and the Whiteshell site can build on this learning to be better.
- There needs to be a discussion on legacy management and what monitoring post project will look like.
- The Hallam employees were not familiar with design concepts.
- Better understanding, but where do we go from here, how do First Nations benefit.
- The monitoring well depth was a disappointment.

Was there anything that you viewed or heard on the trip that concerned you? Would this concern also be applicable at Whiteshell? (Please be as explicit and detailed as possible so we might be able to better answer your questions and address your concerns).

- Better signage on the site.
- Timing of monitoring ceasing seems to be too soon.
- There needs to be an agreed to fact sheet of the trip for everyone to share.
- The WR-1 in situ is expected to be better, communities will insist.
- Further understanding of the aquifer.
- Lack of public comment on Hallam.
- Management expectation is very long, multigenerational care of the site.
- Visible wear on aspects of the site that were above grade.
- Future land use of the site, new opportunities.
- Not a walk away site, absence of monitoring below 20 feet was a real concern.
- A monitoring plan needs to be developed with First Nations.
- The calculated measure of radionuclides is concerning especially if monitoring is to end in 2071.

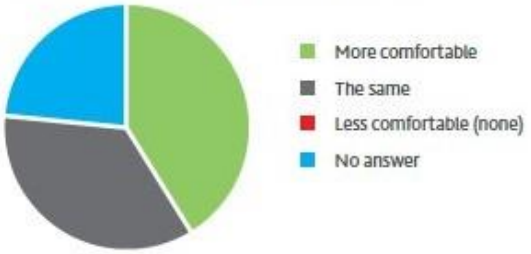
Is there any follow-up information we can provide you with on Hallam or its applicability to the decommissioning of WR-1 at Whiteshell Laboratories?

- Geology of the site from the US DOE.
- NPPD slide deck with names and emails.
- The Hallam decommissioning process and how public concerns were taken in.
- The Hallam safety case and the monitoring plan and schedule.
- The grout specifications.
- Are US allowable levels comparable to that in Canada?
- Lessons learned from Hallam and other projects should be explicitly considered.
- Need a benchmarking trip to CNL's Chalk River Laboratories now.
- Explain how the facility prevents flux of groundwater through the decommissioned reactor building.

After having visited Hallam, what questions would you or your community pose to Canadian Nuclear Laboratories with respect to the decommissioning of WR-1 at Whiteshell Laboratories? (Please list as many as you wish)

- Ensure record retention and involve communities in monitoring.
- Show examples of tools and technologies used to monitor.
- What can be done for adaptive management?
- Will you follow the Hallam site as a template for CNL?
- Procurement with First Nations and involvement in long term monitoring, when do those discussions take place?
- Are there any lessons CNL could learn from Hallam?
- What has changed in the technology since 1969?
- Hallam benefits from ongoing operations, WL needs to involve stakeholders in long term management.
- Phased monitoring was a good way of explaining the process.
- The NPPD is publically owned and the board is voted on, not appointed.
- WL should follow Hallam, handled the right way.
- The time capsule was a good idea.
- CNL should conduct a rigorous lessons learned and apply.
- Not a good example of indigenous engagement.

Considering in situ decommissioning as an approach for WR-1 do you feel more comfortable, the same or less comfortable following this visit? (Please circle your answer)



Do you have any other comments or questions about the trip to Hallam?

- This was a positive trip in building bridges.
- Important to note that CNSC, AECL and MLA Ewasko covered their own costs for the trip.
- Indigenous angle was not there.
- There is no measurable release from the site.
- Interested in visiting another site.
- Contracting opportunities for locals during decommissioning.
- Community presentation about this trip to the community.
- A more recent example of an in situ reactor would be more helpful.

Conclusion

All attendees are now better informed on what CNL's proposal for WR-1 represents and are in a position to better inform their communities and the process moving forward. The visit was well organized and professional. Conditions at the Hallam site are not exact to that of the WR-1 site and this contributes to the relevancy of some aspects of the trip. For instance a more technical perspective was not available on the trip that included a more thorough discussion around the design basis and environmental performance of the Hallam facility. CNL has clearly heard that communities want to be involved and a part of the long term monitoring of the site, they want monitoring wells that reach depths lower than the facility and they want the monitoring to be looking for more than just radionuclides. Feedback also indicates that CNL should be incorporating all lessons learned from the Hallam in situ site and that that ongoing operations at the site (similar to Hallam) would go a long way to alleviate management fears.

Next steps

CNL has asked for feedback on this report from all participants and has incorporated. CNL has formalized this report and provided, digital and printed copies for ease of sharing with communities and interested stakeholders. CNL has also offered to come to each community to co-present and engage on the trip and the WR-1 project. Finally several supporting documents including presentations and requested materials have been provided in addition to this report.

7

Engagement Report

Trip Report

Canadian Nuclear Laboratories – WR-1 In Situ Decommissioning Project

Attendees

Organization	Names
Black River First Nation	Patricia Mitchell (community coordinator) Oral Johnston (councillor)
Brokenhead First Nation	Gordon Bluesky Buddy Prince (councillor)
Sagkeeng First Nation	Tony Brown (consultant)
Wabaseemoong First Nation	Marvin Lee McDonald Georgina McDonald
Manitoba Metis Federation	Stephen Howatt Jade Dewar
Mayor of Pinawa, Manitoba (host community to the site)	Blair Skinner (PLC)
WL Economic Regeneration Partnership	Denis Sabourin
Local Member of the Legislative Assembly of Manitoba	Wayne Ewasko
Golder (consultants on the project)	Alyson Beal
	Marci Mehl
Canadian Nuclear Safety Commission (CNL's Federal Regulator)	Siobhan Arnott John Thelen Candida Cianci
Atomic Energy Canada Limited (Federal corporation that owns the site)	Maude Page Janet Stefaniuk
Canadian Nuclear Laboratories (operators of the site)	Dan Coyne Mitch MacKay Brian Wilcox Lou Riccoboni
Nebraska Public Power District	Mark Becker (Communications) Chris Cerveny (Plant Manager) Todd Chinn (Environmental) Bob Wilbur (Engineer) Alan Dostal (Research)
United States Department of Energy, Legacy Management	Michelle Miller (Navarro) Andrew Kelm, Senior Environmental Protection Manager, DOE office of Legacy Management
State of Nebraska	Bryan Miller, Health Physicist Department of Health and Human Services, Radiological Health Division
Mayor of Hallam	Gary Vocasek

WR-1 Reactor projected decommissioning

Cutaway of facility

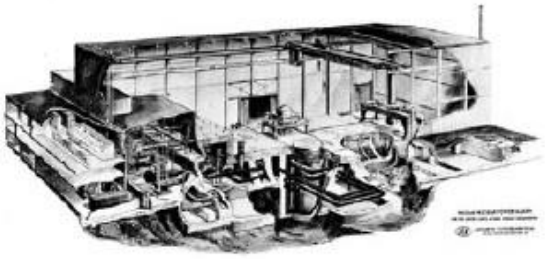


Capped mound of WR-1 facility



Hallam Facility

Cutaway of facility



Capped mound of Hallam facility



9

Trip Report

Canadian Nuclear Laboratories – WR-1 In Situ Decommissioning Project

Trip Agenda

Agenda (2018 April 3-5)

Day 1 - 2018 April 3 (Travel)

Time	Activity	Lead
06:30 Delta 2829	Flight – Winnipeg to Lincoln Connecting flight in Minneapolis	CNL
10:21 Delta 4697	Arrive in Lincoln, NE	
10:30 am	Check-in The Lincoln Marriott Cornhusker Hotel 33 S 13th St, Lincoln	CNL
1:00 pm	Lunch, introductions and overview of site visit @ Yankee hill 2 conference room Marriott Cornhusker Hotel	CNL
6:30 pm	Dinner Miller Time Pub & Grill, Marriott Cornhusker Hotel	CNL

Day 2 - 2018 April 4

Time	Activity	Lead
6:00 am	Breakfast	CNL
7:00 am	Board bus Travel to Hallam via bus	CNL
7:30 am	Begin check in with NPPD security staff	NPPD
8:00 am	Welcome from Chris Cerveny; Sheldon Station, plant manager; safety orientation; hard hats and safety glasses required (supplied) ; introductions	NPPD
8:15 am – 9 am	Alan Dostal, NPPD Director of Research, origination of the Hallam Nuclear Plant Bob Wilbur, Engineer (semi-retired), D & D of the Hallam Nuclear Plant	NPPD
9:00 am – 9:30 am	Michelle Miller and DOE, State inspection staff message and what will be done on the tour	NPPD
9:30 – 11:30 am	Inspection Tour	NPPD
11:30 – 12 noon	Close out and questions	NPPD
12 noon-1:30 pm	Lunch at the Hallam Steakhouse; joined by Gary Vocasek, Hallam Village Chairman; additional questions and discussion	NPPD
1:30 – 2:00 pm	Board bus return to hotel	CNL
2:15 – 4:00 pm	Site visit debrief, discussion and survey @ Yankee hill 2 conference room Marriott Cornhusker Hotel	CNL
6:00 – 8:00 pm	Dinner Rodizio Grill, 737 P Street Lincoln, NE – Hotel shuttle	CNL

Day 3 - 2018 April 5 (Travel)

Time	Activity	Lead
9:00 am	Hotel check out, hotel shuttle to depart for airport	CNL
10:49 am Delta 4697	Flight – Lincoln to Winnipeg Connecting flight in Minneapolis	CNL
16:52 am Delta 4801	Arrive in Winnipeg	CNL



The benchmarking group stands on the Hallam permanently encased reactor. The Sheldon Station coal power generating plant is located in the background.





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WR-1 In Situ Decommissioning Project

For more information, please contact:

Mitch MacKay

email: Mitch.Mackay@CNL.ca

Phone: 204-753-2311 ext. 63006

WWW.CNL.CA

Appendix N Sagkeeng Consumption Survey Results

Canadian Nuclear Laboratories | Laboratoires Nucléaires Canadiens

MEMO / NOTE

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ABORIGINAL FOOD INTAKE SURVEY
REFERENCE # : 900-511300-STD-001

File No.:	WLDP	26000	021	000
	Doc. Collection ID	Subject Index	Doc. Code	Serial No.

WL Project Delivery
WR-1 D&D

Non-Standard ID: **WLP-18-008**
Date: 2018/09/24

To: Brian Wilcox
From: Jesse Gordon
Cc:
Subject: Aboriginal Food Intake Survey

1. INTRODUCTION

CNL is preparing an Environmental Impact Statement (EIS) that assesses the potential environmental effects of the WR-1 decommissioning and disposal project. As required by RegDoc 2.9.1, the EIS must assess any potential change to the environment that my cause adverse health effects to Aboriginal people. CNL has prepared a human health risk assessment that considers effects to people that interact with or near the proposed disposal site in the future. One of the models is an Aboriginal Harvester. To validate the consumption assumptions, CNL requested members of the Sagkeeng First Nation to complete a survey on food intake.

An example of the survey is in Appendix A. The survey asked participants to report the types and quantities of local food consumed on a weekly basis. The survey defined serving sizes for various local foods to ensure consistency and was completed by 35 individuals. In addition to foods eaten, survey respondents were asked to identify any traditional or medicinal items that are also collected and used. The area of interest for the survey was restricted to harvesting within 10 kilometres (6.2 miles) of the Whiteshell WR-1 Complex. CNL provided a stipend of $50 per completed survey. The findings are described and illustrated in this document.

2. RESULTS

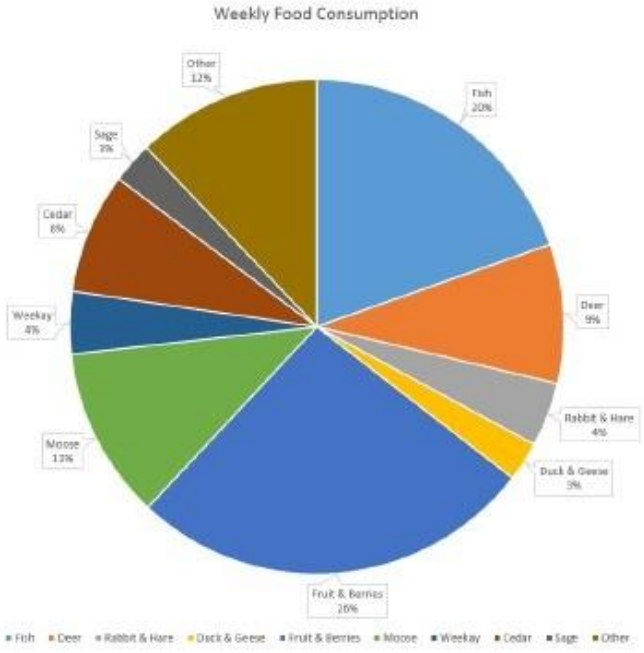
Though the survey was completed by 35 people, the data sets used for the charts located in this document range from 21 to 29 entries due to ambiguous survey answers. Additionally, other local foods determined by the survey that had less than 4 individuals consuming them were included in the Weekly Food Consumption Pie Chart, seen below, under the heading of 'Other' and not included in the histograms of Appendix B. Looking first at the pie chart, it can be seen that fruit, berries and fish make up just under 50% of the local food consumed, with fruit & berries at 26% and fish at 20%. Next is the 'Other' category at 12% followed by moose at 11%, deer at 9%, and cedar at 8%. Cedar branches are used to make tea as well as used when smudging (ceremony of burning sacred plants for spiritual purposes [1]), however smudging uses were not included in the making of the charts. Lastly, rabbit & hare and weekay come in at 4% with duck & geese and sage at 3%. Weekay (also known as American Sweet Flag) has many uses in Aboriginal culture. The roots are chewed for

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relief from pain and to help get over a cold as well as used in smudging and tea making. Sage is one of four plants considered sacred by Aboriginal people [2]. It is also used for smudging and tea making. 'Other' local foods identified on the survey responses that are not incorporated into the pie chart because of low responses are:

- Beaver
- Elk
- Labrador Tea – leaves used to make tea
- Wild Mint – used to make tea
- Juniper – berries ate when sick, berries and plant used for tea
- Frog Leaf (Common Plantain) – used to treat cuts
- Bear Root (Osha Root) – used for smudging and tea
- Chamomile - leaves
- Wild Rice
- Muskrat
- Mushrooms
- Porcupine
- Rat
- Lynx

Table 1: Weekly Food Consumption Pie Chart



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Continuing on to the various histograms of Appendix B, it is seen that, out of the data set, most respondents eat fish, consuming on average 2.98 servings per week. However, it is of note that 2 people identified that they eat over 12 servings per week. Deer consumption follows a similar but smaller trend. Less people consume deer and the average person eats 1.38 servings per week. A majority of the people surveyed do not eat rabbits, hares, ducks or geese, hence the low average weekly consumptions of 0.64 (rabbits & hares) and 0.39 (ducks & geese). Moose, which was not preindicated on the survey, is consumed by a majority of the data set and has an average of 1.71 servings per week. Fruit & berries are eaten by most people surveyed and has the highest average of 4.03 servings per week. Finally, weekay (calamus root), cedar, and sage are not consumed by most people and have averages of 0.62, 1.20, and 0.41, respectively.

3. DISCUSSION

From the survey responses it became apparent that participants did not only consider the local area (within 10 kilometres of the Whiteshell WR-1 Complex). Moose, the second most specified meat eaten by respondents, are rarely seen in the area around Pinawa and Lac du Bonnet and are typically found further north. However, some conclusions can still be drawn on the data received. Comparing the individual food consumption averages to the values of the Harvester Model in Appendix C [3], after converting to kilogram per day units (kg/day), percent differences of 51%, 86%, 82% and 142% were calculated for deer, waterfowl (duck & geese), wild game (deer, rabbit & hare, moose and 50% of 'Other') and fish, respectively.

As indicated by the high percentages, the values differ significantly. Everything, besides fish, is consumed far less than expected, by at least half. Fish, on the other hand, is consumed at a much greater rate, over double. It is important to remember that the data sets only consisted of a maximum of 29 people and thus might not provide the full picture. However, it might be useful to create a subset Harvester Model who eats primarily fish to account for these findings.

Without larger data sets it is difficult to draw any further conclusions. If more surveys were to be sent out, it could be beneficial to provide an example survey showing how to properly fill it out and defining what medicinal plants are as some responses were unclear to the point where they were not included and at least one participant did not know what medicinal plants are.

4. REFERENCES

1. https://www.ictinc.ca/blog/a-definition-of-smudging
2. https://www.ictinc.ca/blog/aboriginal-sacred-plants-sage
3. WLDP-26000-REPT-006, WR-1 at the Whiteshell Laboratories Site Environmental Risk Assessment, 2017 August
4. https://survivalsofjewels.wordpress.com/2013/03/25/raw-vs-cooked-weights/

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APPENDIX A FOOD INTAKE SURVEY EXAMPLE

Please fax to 204 387 4315 or hand deliver to the Sagkeeng Government Office to the Attention: Chief Executive Officer

Aboriginal Local Country Food Intake Survey

(a) **Purpose**
We are interested in finding out how much local country food is eaten by local resident First Nation and Metis Nation community members.

(b) **Definition of Local Area and Locally Sourced**
The local area is defined as being within 10 kilometres (6.2 miles) of the Whiteshell WR-1 Complex (see map provided).



If you have harvested/hunted the food within this area yourself or if you have purchased/were gifted food from someone else who harvested/hunted the food within this area the food would be considered locally sourced.

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(c) Definition of Serving Size

We are interested in finding out how many servings a week a person eats, for each of the locally sourced food items. To make sure we are all thinking about the same serving sizes the following have been defined (https://www.eatrightontario.ca/getmedia/255dbbe6-23cd-4adf-9abe-f18310f09e3d/Handy-Servings-Guide-English-for-web-FINAL-October-2015.aspx).

Serving of fish	= 1/3 cup or palm of hand	(78 ml, 75g, 2 ½ oz)
Serving of Deer	= 1 ½ cups or palm of hand	(78 ml, 75g, 2 ½ oz)
Serving of Rabbit / Hare	= 1 ½ cups or palm of hand	(78 ml, 75g, 2 ½ oz)
Serving of Duck	= 1 ½ cups or palm of hand	(78 ml, 75g, 2 ½ oz)
Serving of Fruit / Berries	= ½ cup or half a fist	(125 ml, 90g, 3.5 oz)
Medicinal Plants	= ¼ cup or cupped hand	(63 ml, 56 g, 2 oz)



(1) Using the above definition, please estimate how many servings each week you eat of the following food items that have been harvested them from the local area, either by yourself or someone else.

Food Item	Per Week 1	2	3	4	5	6	7	Other	Specify
Fish	☐	☑	☐	☐	☐	☐	☐	☐	
Deer	☑	☐	☐	☐	☐	☐	☐	☐	
Rabbit / Hare	☐	☑	☐	☐	☐	☐	☐	☐	
Duck / Geese	☐	☑	☐	☐	☐	☐	☐	☐	
Other Animal[1]	☐	☐	☐	☐	☐	☐	☐	☐	_____

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Food Item	Per Week 1	2	3	4	5	6	7	Other			Specify
Other Animal[2]	☐	☐	☐	☐	☐	☐	☐	☐			
Fruit / Berries	☐	☐	☐	☑	☐	☐	☐	☐	☐	☐	
Medicinal Plants[1]	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	/
Medicinal Plants[2]	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	/
Medicinal Plants[3]	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	/
Medicinal Plants[4]	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	/
Medicinal Plants[5]	☐	☐	☐	☐	☐	☐	☐	☐	☐	☐	/

(2) Do you eat any of the locally sourced meat raw (not cooked or dried)? If yes, what portion of the meat you eat in a year is raw (1/4, 1/3, ½, or 2/3)? This gives us an idea of if we are underestimating the weight of the meat you eat/ NO

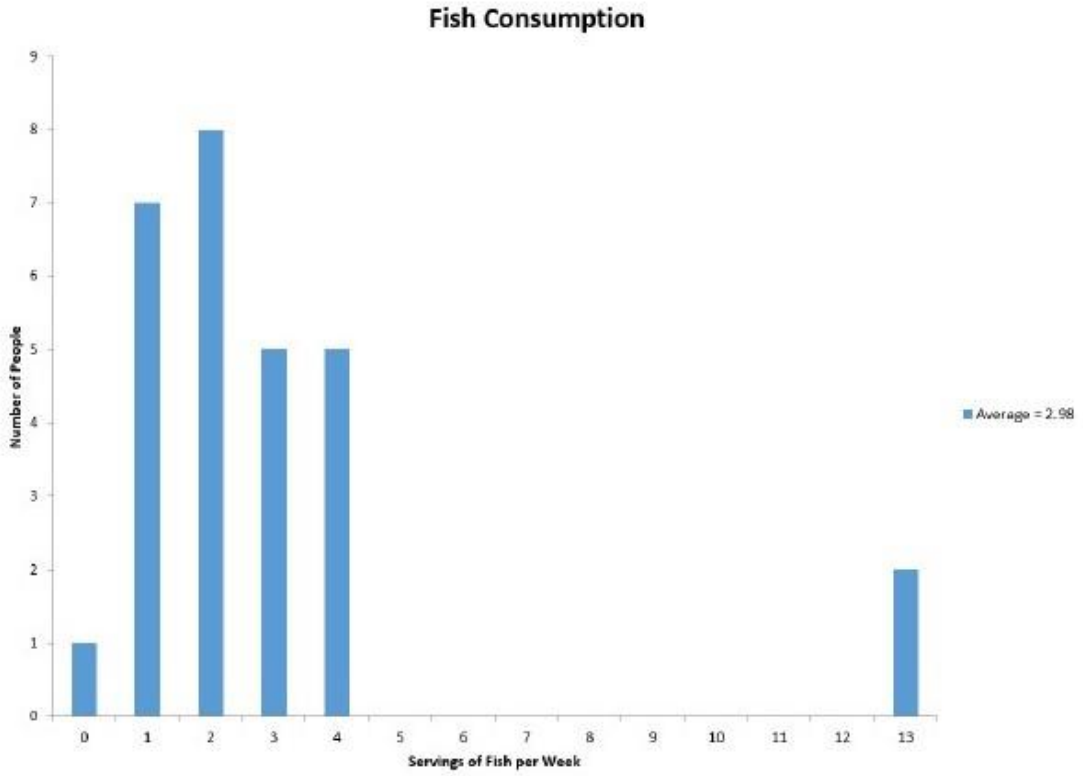
Fish
Deer
Rabbit / Hare None
Duck
Other Animal[1]
Other Animal[2]

(3) Please identify what part of the medicinal plant are consumed. This gives us an idea of how to represent these plants as part of your diet.

Medicinal Plant[1]
Medicinal Plant[2]
Medicinal Plant[3] None
Medicinal Plant[4]
Medicinal Plant[5]

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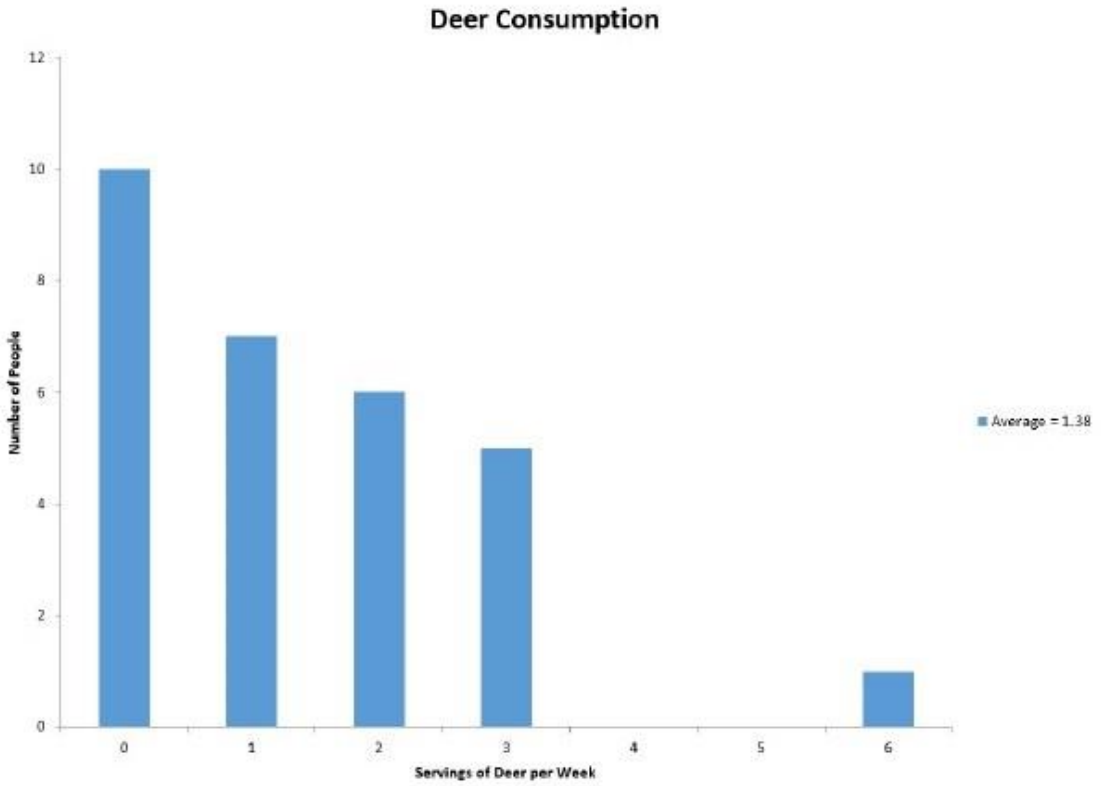
APPENDIX B INDIVIDUAL FOOD HISTOGRAMS



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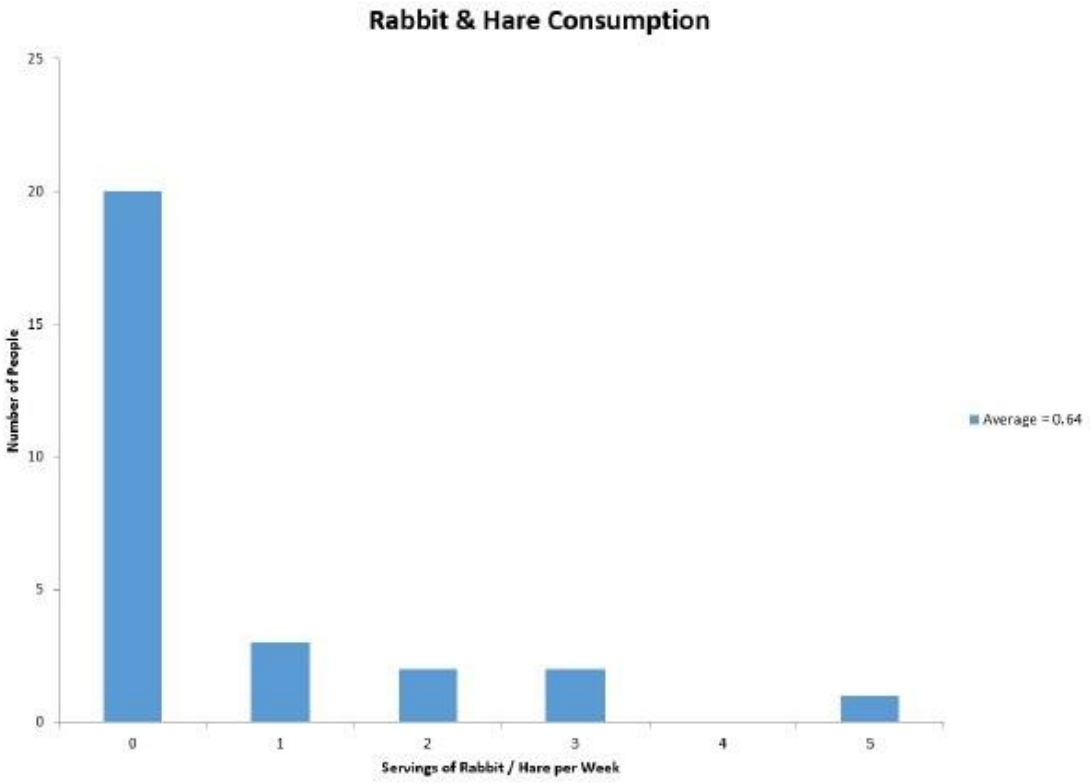
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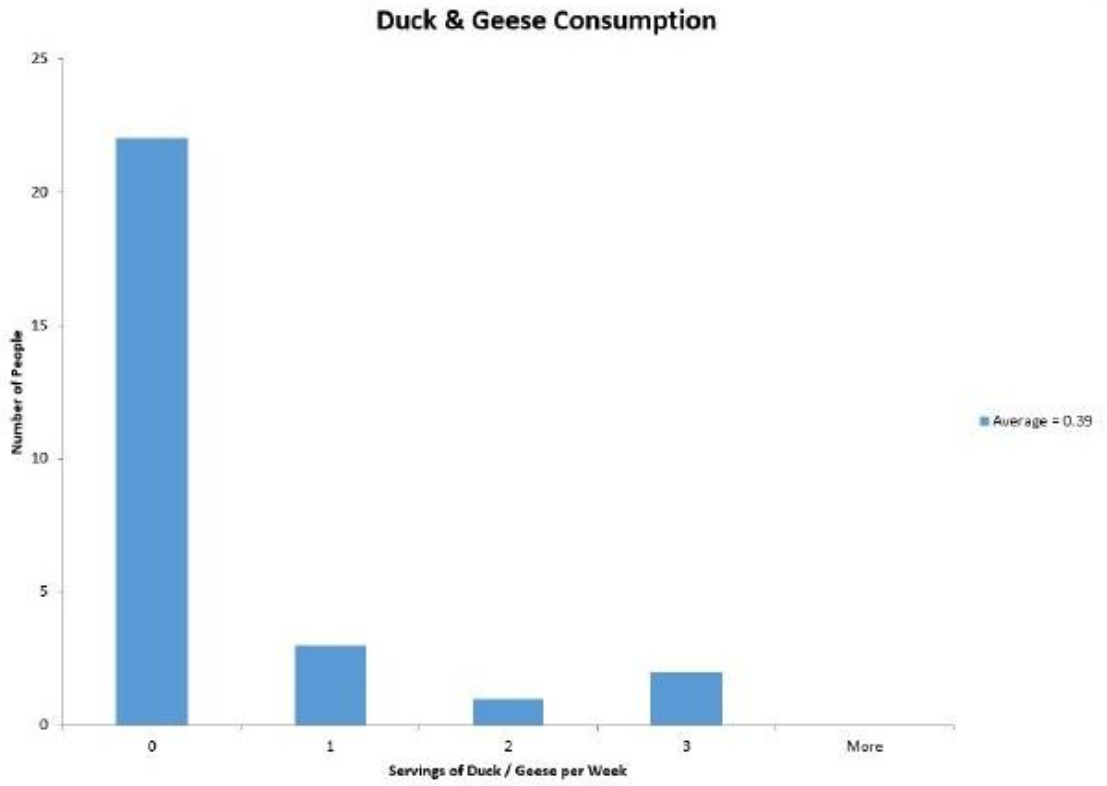
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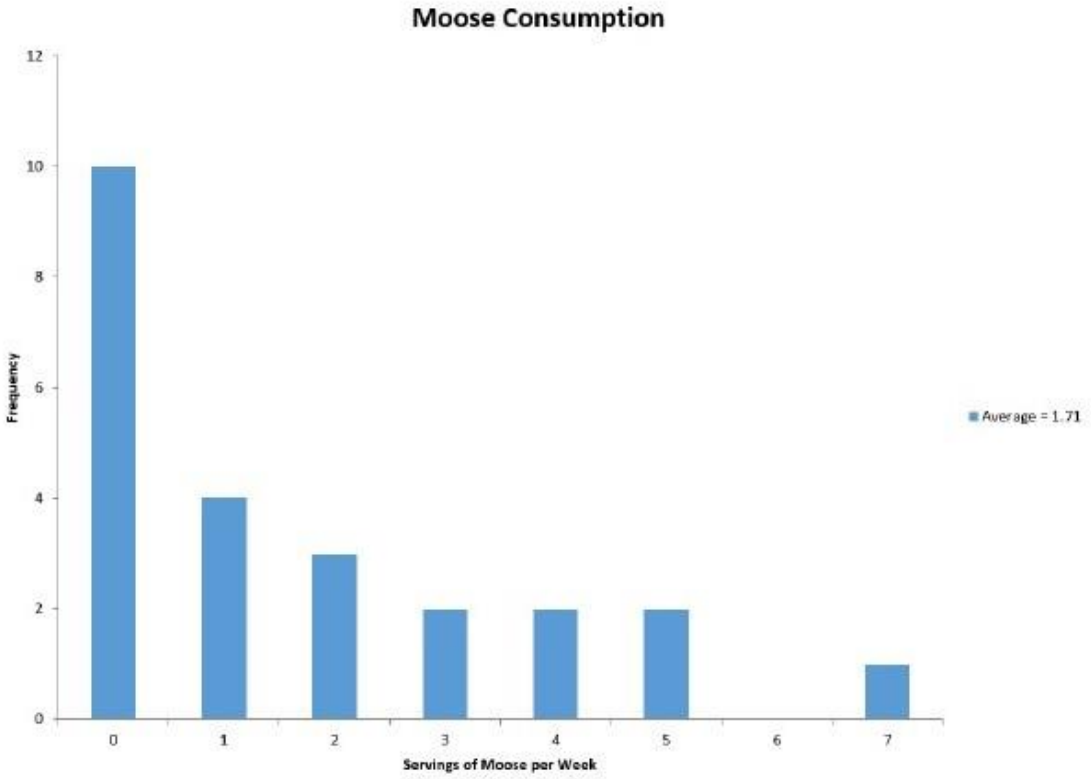
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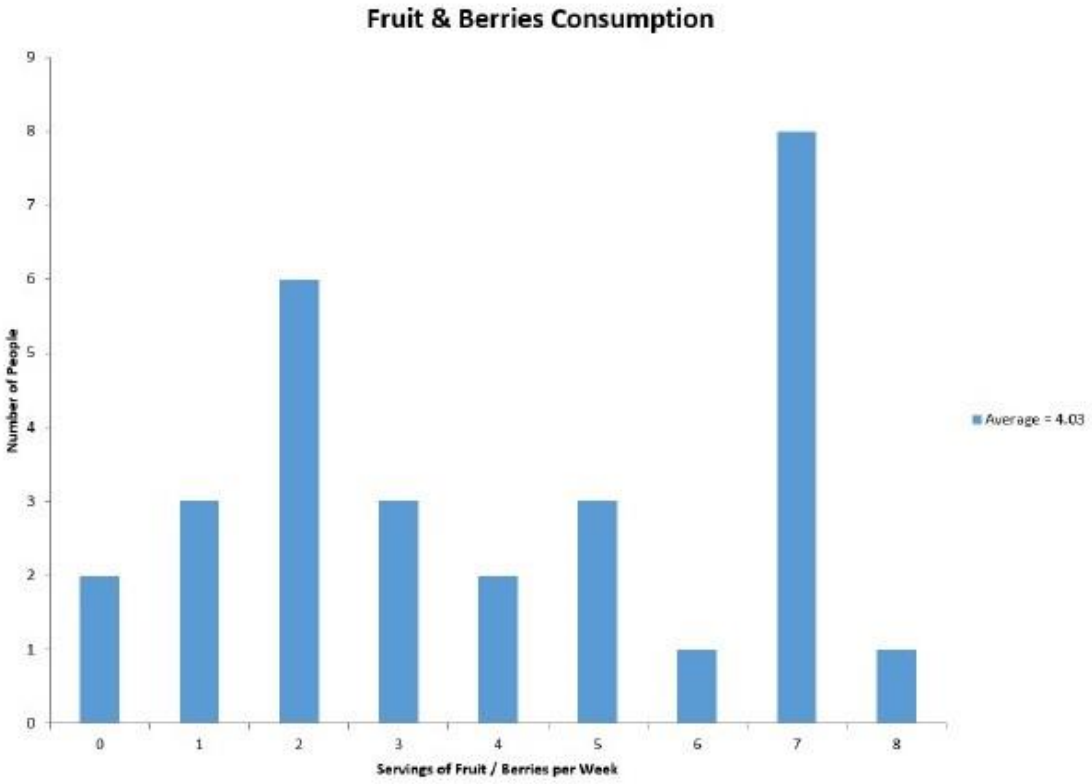
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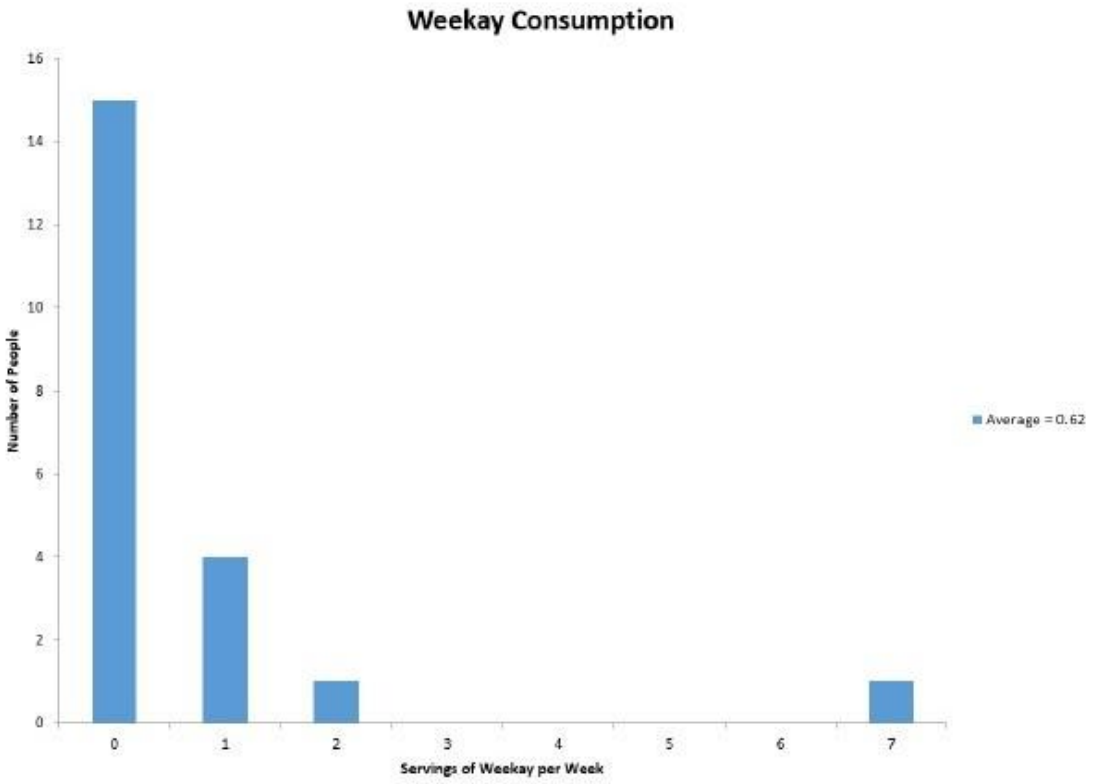
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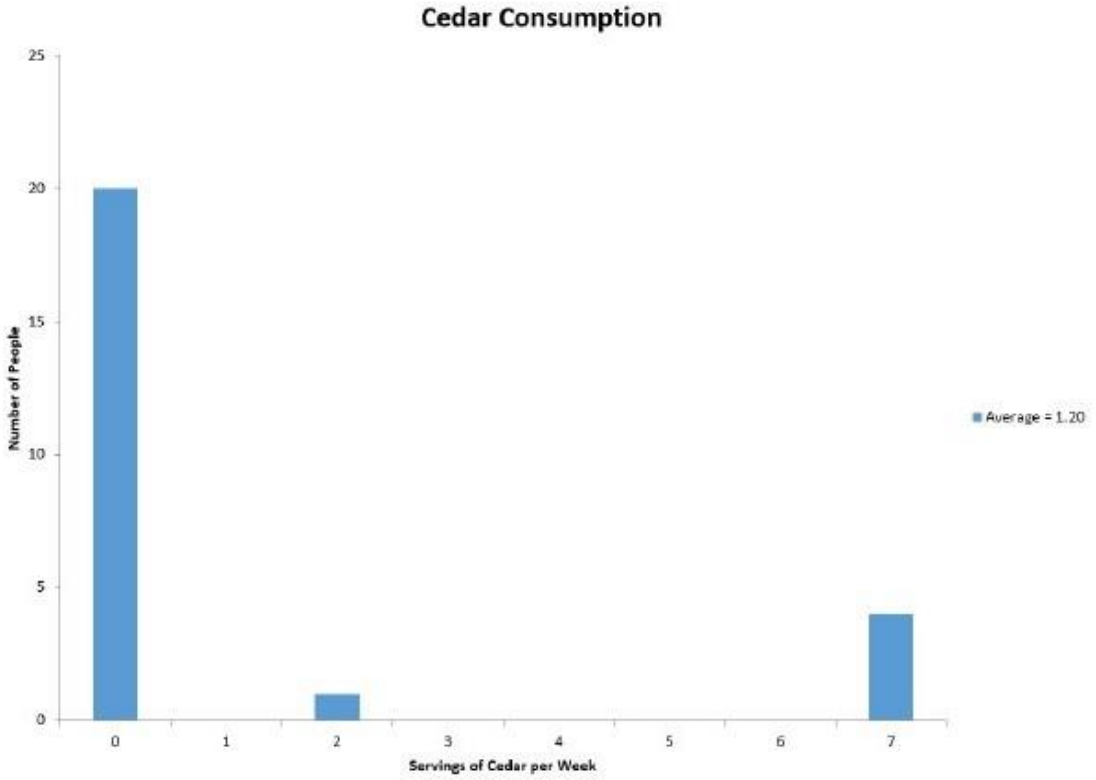
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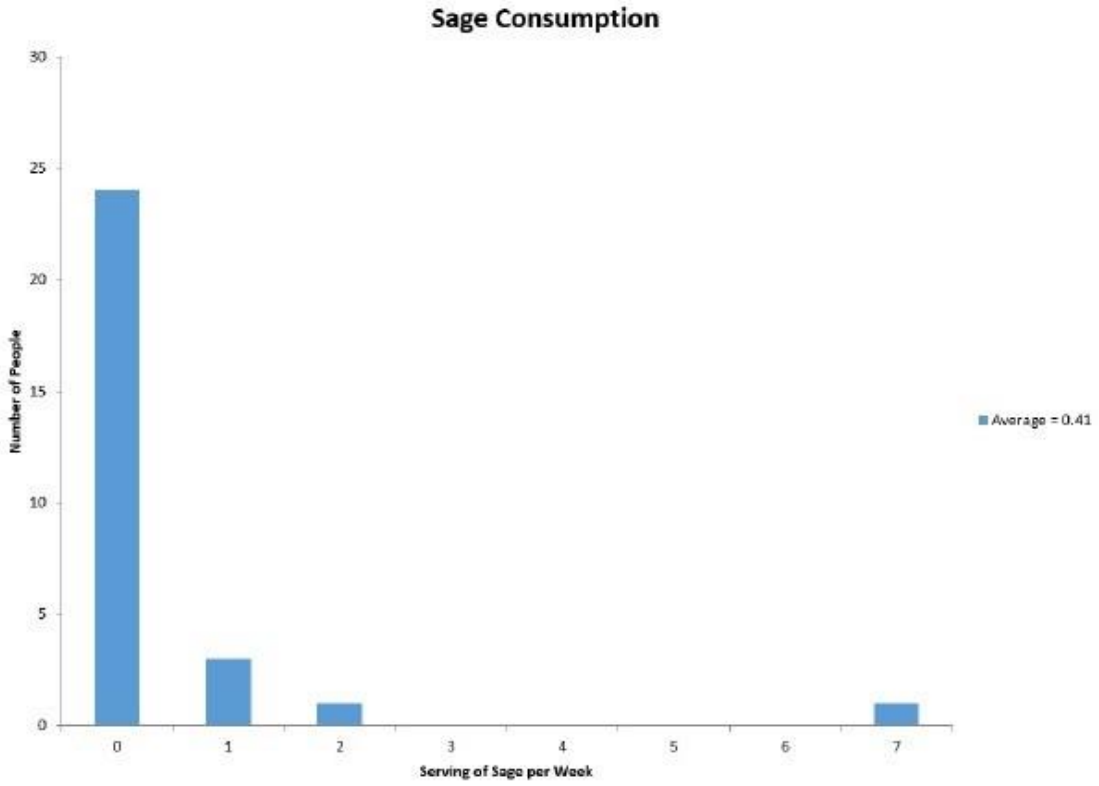
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APPENDIX C HARVESTER EXPOSURE FACTORS FOR NON-RADIOLOGICAL DOSE CALCULATIONS

Receptor Characteristic	Toddler	Child	Adult (Male)	Source
Age (years)	7 months to 4 years	5 to 11	20+	Health Canada 1994 (as cited in HC 2010a)
Body weight (kg)	16.5	32.9	70.7	Richardson 1997 (as cited in HC 2010a)
Food Ingestion Rate of Wild Game (kg/day)	0.085	0.125	0.27	Richardson 1997 (as cited in HC 2010a)
Food Ingestion Rate of Fish (kg/day) (IR_{Fi})	0.0066	0.01089	0.0132	Health Canada 2007 (http://www.hc-sc.gc.ca/fn-an/alt_formats/hpfb-dgpsa/pdf/nutrition/merc_fish_poisson-eng.pdf) and 0.33%
Food Ingestion Rate of Wild Waterfowl (kg/day) (IR_{Fi})	0.011	0.015	0.03	Fraction of 12.38%, 11.88%, and 11.81% for the toddler, child, adult, respectively.
Food Ingestion Rate of Deer (kg/day)	0.001	0.012	0.03	Fraction of 8.25%, 9.24%, and 9.38% for the toddler, child, adult, respectively.
Days per year for food ingestion (D_i)	122	122	122	Assumed

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Appendix O MMF Observation of CNL's Environmental Monitoring Program

300-150 Henry Ave,
Winnipeg MB, R3B 0J7
PH: (204)-586-8474

DAILY FIELD REPORT

DATE: August 1, 2019
PROPONENT: Canadian Nuclear Laboratories
LOCATION: Pinawa

PROJECT: CNL WR1
MONITOR: Jade Dewar

Weather & Ground Conditions:

Weather Conditions	Hot, Sunny
Ground Conditions	Dry
Other	N/A

Community	Topics Discussed
Manitoba Metis Federation	The Manitoba Metis Federation conducted interviews with a number of Metis Citizens to produce a Traditional Land Use Study for the WR1 Decommissioning Project. This information was used in the development of the monitoring component and in consideration of the type of monitoring being conducted.

300-150 Henry Ave,
Winnipeg MB, R3B 0J7
PH: (204)-586-8474

DAILY FIELD REPORT

DATE: August 1, 2019
PROPONENT: Canadian Nuclear Laboratories
LOCATION: Pinawa

PROJECT: CNL WR1
MONITOR: Jade Dewar

Daily Activity	Comments
Sample Collection	The CNL environmental team collects samples from surrounding water treatment centers that draw water from up and downstream of the WR1 site. Lac du Bonnet, Great Falls, Pinnawa and a precipitation collection area near the local lagoon (Pinawa). After collection, samples are catalogued and sent out for testing for radiological and other contaminates.
Sample Collection/River Run	We went downstream to K11 to collect a sample. K11 is an area where one of the main drainage ditches from the site. They collect these samples each week to produce a compiled monthly report.
Remediated site	There was a contaminated site. Remediated and now is a wetland. Groundwater monitoring is ongoing through collection wells.

General Comments: The Environmental Team at CNL does a number of environmental activities at their site. Water monitoring is a large component of their activities. Samples are taken from various points in the Winnipeg River System and sent to a lab for tests. PH, Conductivity and radioactive and non-radioactive contaminates are some the tests. The Citizens and Harvesters of the Manitoba Metis Community can be assured that there is still a significant amount of monitoring of the effluent systems although there is limited activity onsite. All results are available to the public.

300-150 Henry Ave,
Winnipeg MB, R3B 0J7
PH: (204)-586-8474

DAILY FIELD REPORT

DATE: August 1, 2019
PROPONENT: Canadian Nuclear Laboratories
LOCATION: Pinawa

PROJECT: CNL WR1
MONITOR: Jade Dewar









Appendix P MMF Observation of CNL's Environmental Monitoring Program

300-150 Henry Ave,
Winnipeg MB, R3B 0J7
PH: (204)-586-8474

DAILY FIELD REPORT

DATE: August 13, 2019
PROPONENT: Canadian Nuclear Laboratories
LOCATION: Pinawa

PROJECT: CNL WR1
MONITOR: Jade Dewar

Weather & Ground Conditions:

Weather Conditions	Hot, Sunny
Ground Conditions	Dry
Other	N/A

Community	Topics Discussed
Manitoba Metis Federation	The Manitoba Metis Federation conducted interviews with a number of Metis Citizens to produce a Traditional Land Use Study for the WR1 Decommissioning Project. This information was used in the development of the monitoring component and in consideration of the type of monitoring being conducted.

Daily Activity	Comments
CNL Team Member	Met with Environmental team to discuss their promotional and safety materials. Discussed what appropriate language should be used while incorporating Metis Specific information. We also took a tour of the site. Observed the former lunchroom site fully remediated. Also had the opportunity to see the structures they built for nesting Barn Swallows and predator guarding. They are located in the green space.
Lagoon discharge ditch sampling.	The CNL team takes soil samples from the lagoon discharge ditch. Every 16' throughout. Samples are sent to a lab for testing.
Site tour	Toured the site. Located some of the wells that would be monitored in a future visit.

General Comments: It was a good opportunity to see some different aspects of their environmental work. The Environmental team at CNL is not only committed to a strict environmental program they have displayed a commitment to working with the MMF. All results from their monitoring practices can be found publically online at (www.cnl.ca).

MANITOBA METIS FEDERATION INC.

DAILY FIELD REPORT

300-150 Henry Ave,
Winnipeg MB, R3B 0J7
PH: (204)-586-8474

DATE: August 13, 2019
PROPONENT: Canadian Nuclear Laboratories
LOCATION: Pinawa

PROJECT: CNL WR1
MONITOR: Jade Dewar



L: Remediated lunch room site



R: Lagoon Discharge Ditch



L: Soil Sample from Lagoon Discharge ditch



R: Bird nest structure