



# ልጋራ

ገጽ-ቤተሰብ ጠቅላይ ጥያቄዎች	3
ለጥያቄዎች	5
ጥያቄ አይነቶች	6
ጥያቄዎች አይነቶች	7
ጥያቄዎች አይነቶች 1 - ለጥያቄ ስልጠና	10
ጥያቄዎች አይነቶች 2 - ለጥያቄ ስልጠና ለተሳተፊው አደጋ	10
ጥያቄዎች አይነቶች 3 - ወይን ስልጠና	10
ጥያቄዎች አይነቶች 4 - ጥያቄ ስልጠና	11
ጥያቄዎች አይነቶች 5 - ለጥያቄ ስልጠና አደጋ	11
ጥያቄዎች አይነቶች 6 - ወይን ስልጠና ለጥያቄ ስልጠና ለጥያቄ ስልጠና	11
ጥያቄዎች አይነቶች 7 - ለጥያቄ ስልጠና	11
ጥያቄዎች አይነቶች 8 - ለጥያቄ ስልጠና	11
ጥያቄዎች አይነቶች 9 - ለጥያቄ ስልጠና ለጥያቄ ስልጠና	12
ጥያቄዎች አይነቶች 10 - ለጥያቄ ስልጠና	12
<b>ጥያቄ ስልጠና ወይን ስልጠና ለጥያቄ ስልጠና ለጥያቄ ስልጠና - ጥያቄ ስልጠና</b>	<b>122</b>
ጥያቄ ስልጠና ለጥያቄ ስልጠና ለጥያቄ ስልጠና	15
<b>ጥያቄ ስልጠና</b>	<b>20</b>
ጥያቄ ስልጠና A - ለጥያቄ ስልጠና ለጥያቄ ስልጠና ለጥያቄ ስልጠና ለጥያቄ ስልጠና ጥያቄ ስልጠና 04, 2021	20
ጥያቄ ስልጠና B - ለጥያቄ ስልጠና ለጥያቄ ስልጠና ለጥያቄ ስልጠና ለጥያቄ ስልጠና ጥያቄ ስልጠና ጥያቄ ስልጠና 21, 2021	215
ጥያቄ ስልጠና C - ለጥያቄ ስልጠና ለጥያቄ ስልጠና ለጥያቄ ስልጠና ለጥያቄ ስልጠና ጥያቄ ስልጠና 10, 2021	288
ጥያቄ ስልጠና D - ለጥያቄ ስልጠና ለጥያቄ ስልጠና ለጥያቄ ስልጠና ለጥያቄ ስልጠና ጥያቄ ስልጠና ጥያቄ ስልጠና 30, 2021	30
ጥያቄ ስልጠና E - ወይን ስልጠና ለጥያቄ ስልጠና ለጥያቄ ስልጠና ለጥያቄ ስልጠና ጥያቄ ስልጠና ጥያቄ ስልጠና 11, 2022 (ጥያቄ ስልጠና ለጥያቄ ስልጠና 26, 2022)	455
ጥያቄ ስልጠና F - ለጥያቄ ስልጠና ለጥያቄ ስልጠና ለጥያቄ ስልጠና ለጥያቄ ስልጠና ጥያቄ ስልጠና ጥያቄ ስልጠና 25, 2022 (ጥያቄ ስልጠና ለጥያቄ ስልጠና ጥያቄ ስልጠና 31, 2022)	566
ጥያቄ ስልጠና G - ለጥያቄ ስልጠና ለጥያቄ ስልጠና ለጥያቄ ስልጠና ለጥያቄ ስልጠና ጥያቄ ስልጠና ጥያቄ ስልጠና 28, 2022	63
ጥያቄ ስልጠና H - ለጥያቄ ስልጠና ለጥያቄ ስልጠና ለጥያቄ ስልጠና ለጥያቄ ስልጠና ጥያቄ ስልጠና ጥያቄ ስልጠና 02, 2023	766
ጥያቄ ስልጠና I - ለጥያቄ ስልጠና ለጥያቄ ስልጠና ለጥያቄ ስልጠና ለጥያቄ ስልጠና ጥያቄ ስልጠና ጥያቄ ስልጠና ጥያቄ ስልጠና 20, 2023	81
ጥያቄ ስልጠና J - ለጥያቄ ስልጠና ለጥያቄ ስልጠና ለጥያቄ ስልጠና ለጥያቄ ስልጠና ጥያቄ ስልጠና ጥያቄ ስልጠና (ጥያቄ ስልጠና ለጥያቄ ስልጠና)	877
	<b>899</b>











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- ግብርና ለጭብጫ ለጭብጫ; ብሔራዊ ግብርና ለጭብጫ ለጭብጫ ለጭብጫ, NIO
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- ግብርና ለጭብጫ ለጭብጫ ለጭብጫ 3, ON
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  - በበጎረቤት ጋራ ጋራ, ጋራ 28, 2022
  - በበጎረቤት ጋራ ጋራ, ለጭብጫ 02, 2023
- ለጭብጫ ግብርና ለጭብጫ
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  - በበጎረቤት ጋራ ጋራ, በጋራ 10, 2021
- ለጭብጫ ለጭብጫ ለጭብጫ ለጭብጫ
  - ለጭብጫ ለጭብጫ ለጭብጫ
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  - ለጭብጫ ለጭብጫ ለጭብጫ 1-3
  - ለጭብጫ ለጭብጫ ለጭብጫ 1-3
  - ለጭብጫ ለጭብጫ ለጭብጫ 1-3
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  - ለጭብጫ ለጭብጫ (ጭብጫ ለጭብጫ)
  - ለጭብጫ ለጭብጫ (ጭብጫ ለጭብጫ)
  - ለጭብጫ ለጭብጫ ለጭብጫ ለጭብጫ
  - ለጭብጫ ለጭብጫ (ጭብጫ ለጭብጫ)
  - ለጭብጫ ለጭብጫ ለጭብጫ (ጭብጫ)
  - ለጭብጫ ለጭብጫ (ጭብጫ ለጭብጫ)
  - ለጭብጫ ለጭብጫ (ጭብጫ ለጭብጫ)
  - ለጭብጫ ለጭብጫ ለጭብጫ (ጭብጫ ለጭብጫ)
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- ለጭብጫ ለጭብጫ ለጭብጫ, ለጭብጫ ለጭብጫ





Δረገጥና ድንበራዎችን ለየተጠቀሙ ለደረጃ ማረጋገጫና ለሌሎችም ለማድረግ ማዘጋጀት ማስፈጸም ለሚችሉ ሰዎች ለማስገደድ ማድረግ የሚችሉ ሁኔታዎችን ማቆም ለሚችሉ ሰዎች ለማስገደድ ማድረግ ይቻላል።

የሰው ልማት ደረጃ ለማረጋገጥ ለሚችሉ ሰዎች ለማስገደድ ማድረግ ለሚችሉ ሰዎች ለማስገደድ ማድረግ ይቻላል። ለሌሎችም ለማድረግ ማዘጋጀት ማስፈጸም ለሚችሉ ሰዎች ለማስገደድ ማድረግ ይቻላል።

የሰው ልማት ደረጃ ለማረጋገጥ ለሚችሉ ሰዎች ለማስገደድ ማድረግ ለሚችሉ ሰዎች ለማስገደድ ማድረግ ይቻላል። ለሌሎችም ለማድረግ ማዘጋጀት ማስፈጸም ለሚችሉ ሰዎች ለማስገደድ ማድረግ ይቻላል።

### የደንበኞች አገልግሎት 1 - የሰው ልማት

የሰው ልማት ደረጃ ለማረጋገጥ ለሚችሉ ሰዎች ለማስገደድ ማድረግ ለሚችሉ ሰዎች ለማስገደድ ማድረግ ይቻላል። ለሌሎችም ለማድረግ ማዘጋጀት ማስፈጸም ለሚችሉ ሰዎች ለማስገደድ ማድረግ ይቻላል።

### የደንበኞች አገልግሎት 2 - የሰው ልማት ለተጨማሪ ተግባር

የሰው ልማት ደረጃ ለማረጋገጥ ለሚችሉ ሰዎች ለማስገደድ ማድረግ ለሚችሉ ሰዎች ለማስገደድ ማድረግ ይቻላል። ለሌሎችም ለማድረግ ማዘጋጀት ማስፈጸም ለሚችሉ ሰዎች ለማስገደድ ማድረግ ይቻላል።

### የደንበኞች አገልግሎት 3 - ማዘጋጀት ማስፈጸም

የሰው ልማት ደረጃ ለማረጋገጥ ለሚችሉ ሰዎች ለማስገደድ ማድረግ ለሚችሉ ሰዎች ለማስገደድ ማድረግ ይቻላል። ለሌሎችም ለማድረግ ማዘጋጀት ማስፈጸም ለሚችሉ ሰዎች ለማስገደድ ማድረግ ይቻላል።

















ከርዕሰ ጉዳዮች አንዱ ሆኖ፣ ለአዲስ የግብርና ስርዓት ጥናት ምክርቤት ማቅረብ ተገቢ ሆኖ ሊቀረፅ ይችላል።

**በሌሎች ዓይነት አገልግሎት ለማስፈጸም ለሚገቡ ገንዘቦች ለማቀጠል ማብራሪያ ማድረግ፡** ይህም የብድር አጠቃቀም ለማቀጠል ይረዳል። ለደብዳቤ ማላካት ይቻላል። የደብዳቤ ማላካት ለብድር አጠቃቀም ማቀጠል ይረዳል። ለደብዳቤ ማላካት ይቻላል። የደብዳቤ ማላካት ለብድር አጠቃቀም ማቀጠል ይረዳል።

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## Algonquins of Pikwakanagan First Nation

<p><i>Recommendation #5: Regulatory instruments and financial incentives be considered in the ISRW to minimize radioactive waste be integrated when developing the ISRW.</i></p>	<p>P. 7</p>
<p><i>Recommendation #6: Canada integrate requirements into the ISRW for proponents to seek explicit permissions of impacted Indigenous groups prior to transporting and storing radioactive wastes through or in their traditional territories.</i></p>	<p>P. 8</p>
<p><i>Recommendation #7: The ISRW include concrete measures to accelerate the creation of permanent waste disposal facilities, in a manner that does not infringe on the rights of potentially impacted parties and communities.</i></p>	<p>P. 8</p>
<p><i>Recommendation #8: Decommissioning decision-making processes must be based on clearly defined end-state objectives established in a joint forum between Canada, proponents and impacted Indigenous groups, prior to the development of decommissioning proposals (in all but emergency situations). In particular, those objectives should be aligned with likely long-term land-uses that will exist after decommissioning. Further, and consistent with the precautionary principle, it should be assumed that future land uses may include scenarios that include: a) extensive human use (including residency) in the vicinity of residual radionuclides; b) that physical containment and institutional controls may not perform as intended; and c) that land users are unaware of any associated risks.</i></p>	<p>P. 9</p>
<p>Recommendation #9: The following critically important policy considerations should be incorporated into the ISRW:</p> <ul style="list-style-type: none"> <li>● <u>Intergenerational Impacts</u> – Consistent with IAEA and other environmental guidance, decommissioning strategies should not result in undue environmental, health and safety financial and other impacts to future generations.</li> <li>● <u>Institutional Care</u> – Decommissioning strategies should rely on long-term institutional care only in situations where approaches that have more passive long-term care requirements are not technically viable and effective.</li> <li>● <u>Consolidation</u> – To the greatest degree possible, radioactive wastes should be disposed in a small number of centralized, permanent and purpose-built facilities.</li> </ul>	<p>P. 9</p>



## Algonquins of Pikwakanagan First Nation

<ul style="list-style-type: none"> <li>• <i><u>Willing Hosts</u> – Decommissioning strategies must be acceptable to local communities, as confirmed through plebiscites, referenda or other similar mechanisms.</i></li>   <li>• <i><u>Compensation</u> – Impacted communities should be adequately compensated.</i></li>   <li>• <i><u>Indigenous Interests</u> – The modernized policy framework must fully conform with Canada’s international commitments as they relate to Indigenous interests. This includes UNDRIP which requires that Canada “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”.</i></li>   <li>• <i><u>In-Situ Decommissioning</u> – In-situ decommissioning needs to be recognized as a poor to unacceptable choice for ultimate disposal of nuclear reactors, including “legacy” reactors, in keeping with IAEA’s guidance on this topic, and the reality that this is the creation of a permanent, unplanned, near surface, radioactive waste disposal facility that is by definition more risky than deep geological deposition.</i></li> </ul>	
<p><i>Recommendation #10: The ISRW should address the following gaps in waste disposal:</i></p> <ul style="list-style-type: none"> <li>• <i><u>Precautionary Principle</u>: The selection of preferred waste disposal approaches must give due consideration to uncertainty related to future land use and the performance of waste disposal facilities. To mitigate the risks associated with this uncertainty, the policy must be grounded in the precautionary principle.</i></li>   <li>• <i><u>Temporal Scope</u>: The design of radioactive waste disposal facilities should be based on an explicitly defined temporal scope. That temporal scope should correspond to the predicted duration of the radioactive waste hazard. Selected radioactive waste disposal approaches must be proven to perform effectively throughout the entire temporal scope, without active care and maintenance.</i></li>   <li>• <i><u>Resiliency</u>: Selected radioactive waste disposal approaches must be proven to be resilient under the full range of potential environmental conditions that could</i></li> </ul>	P. 9



## Algonquins of Pikwakanagan First Nation

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## *Algonquins of Pikwakanagan First Nation*

*credibly occur during the temporal scope. These include but are not limited to geomorphic change (e.g., through glaciation or hydrology) and climate change.*

- ***Passive Management:** To the greatest degree possible, radioactive waste disposal approaches should not require active care and maintenance and/or institutional controls to limit radioactivity exposures to humans or other biota.*
  
- ***Funding:** The policy must ensure that adequate funding is provided by the proponent or owner to manage the long-term hazards of radioactive wastes. This includes both the initial capital costs of constructing disposal facilities and any long-term investments that may be necessary to ensure wastes remain appropriately contained in the future. All required funds should be deposited in a form (e.g., financial trust) that prevents it from being re-appropriated for other purposes. This requirement should also apply to government-funded waste-disposal projects; government priorities change over time and there needs to be assurances that sufficient funds are secured for long-term management of radioactive wastes. Funding should include compensation for potential impacts to Nations. Compensation should be provided for both bio-physical impacts and psycho-social impacts experienced by the communities. Government and regulators should only authorize projects to proceed in instances where adequate compensation has been provided.*











4. KFN does not support the nuclear industry unilaterally developing an "integrated radioactive waste strategy". Our understanding is this exercise began some years ago and is described in the Canadian 7th National Report for the Joint Convention on Spent Fuel Management which states that "The first output of this industry-led exercise on preparing an integrated radioactive waste strategy is expected in 2020". Kebaowek First Nation supports environmental non-governmental organizations and other civil society groups in not engaging with the Nuclear Waste Management Organization and this process as it is a primarily industry-led exercise has been underway for years without meaningful participation of Indigenous Nations.

In conclusion, we support Nuclear Waste Watch correspondence to your organization and can not be persuaded that the NWMO is sincere in your efforts to engage Indigenous Nations. It is the duty of the Federal Crown to be accountable to our Section 35 and inherent rights and title to our territories as it relates to radioactive waste and further reconciliation of our values, interests and needs in radioactive waste policy. While we have been disappointed in the timing aspects of the Natural Resources Canada radioactive waste policy review process, Kebaowek First Nation is participating, and we will continue to do so.

Meegwetch



Councillor Justin Roy  
Kebaowek First Nation  
Lands and Resources Department

Cc/ Jim Delaney, Natural Resources Canada

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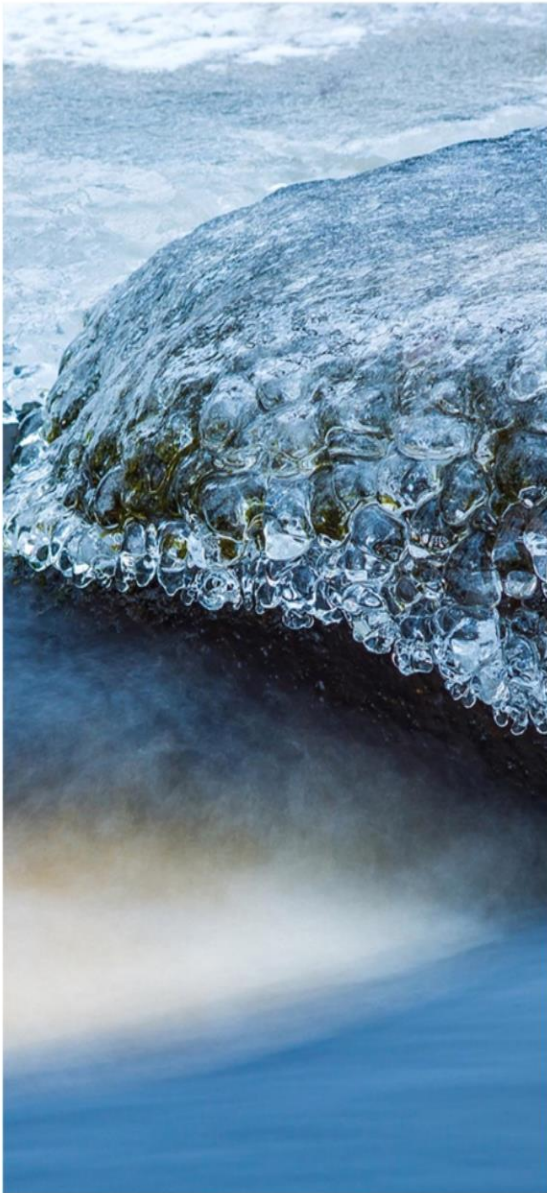


GRAND COUNCIL TREATY #3



# GRAND COUNCIL TREATY #3 INTEGRATED RADIOACTIVE WASTE STRATEGY COMMENTS

DECEMBER 30TH, 2021  
PREPARED BY THE TERRITORIAL PLANNING UNIT



## TABLE OF CONTENTS

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THE ANISHINAABE NATION IN TREATY #3 .....	3
BACKGROUND .....	4
FEEDBACK .....	5
A. CONSIDERATIONS	
B. CONCERNS	
C. RECCOMENDATIONS	
MANITO AKI INAKONIGAAWIN .....	8
THE NIBI DECLARATION .....	12
NEXT STEPS .....	13
CONCLUSION .....	14

# THE ANISHINAABE NATION IN TREATY #3

Grand Council Treaty #3 (GCT#3) is the traditional government of the Anishinaabe Nation in Treaty #3. Grand Council encompasses 28 communities across the Territory. Grand Council's mandate is to protect the future of the Anishinaabe people by ensuring the protection, preservation and enhancement of inherent and treaty rights. The Territorial Planning Unit (TPU) is the department within Grand Council that works with the Treaty #3 Leadership to protect the lands, water and resources within the 55,000 square miles that make up Treaty #3 Territory. The TPU is guided by Anishinaabe Inakonigaawin (Anishinaabe Law), including Manito Aki Inakonigaawin (Great Earth Law) and the Treaty #3 Nibi (Water) Declaration.

Treaty #3 Territory is governed by Anishinaabe law, including Manito Aki Inakonigaawin and the Nibi Declaration. Manito Aki Inakonigaawin represents respect, reciprocity and responsibilities with all relations of Mother Earth. The law signifies the duty to respect and protect lands that may be effected from over-usages, degradation, unethical and unsustainable processes. The law is unique to Treaty #3 Territory and passed on through our Elders and Knowledge Keepers.

The Nibi Declaration represents respect, love, and the sacred relationship with nibi (water) and the life that it brings. It is based on teachings about water, lands, other elements such as air and wind, and all of creation. The Declaration is meant to preserve and share knowledge with youth and future generations. The Declaration guides us in our relationship with nibi so we can take action individually, in our communities and as a Nation to help ensure healthy, living nibi for all of creation.

Read more about Manito Aki Inakonigaawin and the Nibi Declaration on page 8.



# BACKGROUND

The Anishinaabe Nation in Treaty #3 brings unique Anishinaabe Knowledge to the Integrated Strategy on Radioactive Waste discussion, including the understanding of how Manito Aki Inakonigaawin (Great Earth Law) applies in Treaty #3 Territory. The law is unique to Treaty #3 Territory and passed on through Elders; meaning no other Nation is able to incorporate the same knowledge into a process that is guided by Manito Aki Inakonigaawin. Understanding how Anishinaabe Knowledge is properly incorporated into advice-seeking (regulatory) processes and Treaty #3 Leadership decision-making, requires the Crown and proponents to abandon the hope of creating a pan-Indigenous strategies. This report is intended to provide feedback to the Nuclear Waste Management Organization in regards to Treaty #3 values for the Integrated Radioactive Waste strategy.

Treaty #3 Communities have a right to meaningful consultation and engagement. During the COVID-19 pandemic there has been ongoing restrictions hindering the ability to have in-person engagement with Treaty #3 Communities. Treaty #3 looks forward to moving ahead with meaningful in-person engagement, however, Treaty #3 does not support the notion that this engagement and report fulfils the duty to consult.

The Nation is extremely rich with Anishinaabe Knowledge, which is completely unique to the region. This knowledge in our area is mostly unwritten and can only be learned through discussions with Elders and Knowledge Keepers.

One application of the traditional laws is Manito Aki Inakonigaawin, which is a guiding framework in the decision making process of the Anishinaabe Nation as it relates to activities impacting the Treaty #3 Territory. In this Anishinaabe framework, there is a both a community decision making process and a Nation based decision making process that is outlined which are: application, engagement/consultation, authorization, and compliance and monitoring. This significantly increases the value-added to the Integrated Radioactive Waste discussion to continue to support and invest into Anishinaabe law in Treaty #3.

**B. Engagement Concerns**

- Individual community engagements to develop the strategy were not held
- Inadequate levels of in-person meaningful engagement with Treaty #3 were had
- Elders, Knowledge Keepers and Youth were not adequately engaged

**C. Recommendations**

- Manito Aki Inakonigaawin and the Nibi Declaration must guide future discussions in regards to the strategy
- NWMO must learn and respect Manito Aki Inakonigaawin and the Nibi Declaration
- Treaty #3 laws and rights must be upheld and respected first and foremost
- There must be inclusions of Anishinaabe and Treaty rights and laws through further engagement with Treaty #3
- Further engagement with Treaty #3 communities need to be held to develop next steps
- Conduct meaningful, in person and consistent engagement with Treaty #3 through follow-up sessions
- Elders and Knowledge Keepers guiding ceremony are necessary to this process
- Anishinaabe Knowledge and Western Science must be considered and respected on equal footing
- Cumulative impacts must be incorporated



# FEEDBACK

## A. Concerns

- The current methods of dealing with radioactive waste in Canada do not harmonize with Treaty #3 Anishinaabe Inakonigaawin processes and principles
- Treaty #3 values are not incorporated
- As agreed upon in the signing of Treaty #3, Treaty #3 Communities jurisdictional issues are discussed internally, approved and proceeded with under Manito Aki Inakonigaawin, not through government or proponent processes
- The strategy must not conflict with Treaty #3 governance laws, which are guided by Treaty #3 Communities and Elders in Treaty #3
- The Integrated Radioactive Waste Strategy must decolonize the way Anishinaabe Knowledge is utilized in regulatory reviews and dialogue.
- Anishinaabe Knowledge from Treaty #3 Elders and Knowledge Keepers is not incorporated into processes, which can only be gathered under traditional protocols set out by the Elders in the Nation of Treaty #3
- Unethical terminology is used such as: "considerations to Indigenous Knowledge". Indigenous Knowledge is pan-Indigenous and not respectful of the uniqueness of Indigenous peoples- Indigenous Knowledge must be respected and acknowledged.



# WHAT IS MANITO AKI INAKONIGAAWIN?

At the beginning of time, Saagima Manito gave the Anishinaabe duties and responsibilities to protect, care for and respect the land. These duties were to last forever, in spirit, in breath and in all of life, for all of eternity. The spirit and intent of Manito Aki Inakonigaawin signifies the duty to respect and protect lands that may be effected from over-usage, degradation and un-ethical processes. Saagima Manito explained the Great Earth Law as a manner of thought, a way of feeling and a way of living. As a teaching, the law is difficult to translate to English, as it is engraved into Anishinaabe ways of life.

Manito Aki Inakonigaawin was officially written and ratified by Elders of the Anishinaabe Nation in Treaty #3 in 1997. On April 22 and 23, and July 31, 1997, an Elders gathering was held in Kay-Nah-Chi-Wah-Nung at Manito Ochi-waan. The Elders brought the written law through ceremony, where the spirits approved this law and respectfully petitioned the National Assembly to adopt it as a temporal law of the Nation. In the spring of 1997, a traditional validation process was held through a shake-tent ceremony.

Although it is now written in English, the authoritative version of Manito Aki Inakonigaawin lives in ceremony. No human decision is greater than spirit, therefore ceremony is an integral process to following Manito Aki Inakonigaawin.

The Anishinaabe Nation in Treaty #3 has pre-existing jurisdiction that continues to be exercised by the Nation, Grand Council and Treaty #3 Communities. Treaty #3 established a shared control over some matters between the British and the Anishinaabe, therefore it is imperative to reconcile the pre-existing sovereignty of the Anishinaabe with the asserted sovereignty of the Queen and her divisional governments.

The Anishinaabe Nation in Treaty #3 exercises pre-existing jurisdiction which includes our powers and authority as proper stewards of the land.

Since time immemorial, Creator entrusted the Anishinaabe to care for lands and resources on Turtle Island. The Anishinaabe maintain a spiritual connection to the land and Mother Earth. The 28 communities in Treaty #3 support and guide Grand Council's



efforts to facilitate collective engagement respecting the land and waters, as guided by the principles set out by Manito Aki Inakonigaawin.

Manito Aki Inakonigaawin has been an inherent law to Anishinaabe in Treaty #3 Territory since time immemorial. The law governs relationships with the land and its inhabitants throughout daily life. This includes:

- Respecting the lands and waters
- Giving offerings to spirits and Creator when you benefit from Mother Earth’s gifts such as hunting, fishing or transportation
- Knowing your inherent rights that Treaty #3 members are born with
- Understanding the responsibility as a steward of the land

Since the law was formally written in 1997, it has helped uphold inherent and Treaty rights, and create a Nation based law-making process in the territory.

Manito Aki Inakonigaawin is written within and throughout nature- its spirit is within all living things on earth- from you, to the animals, to the trees, and to the air that we breathe. It is the natural law that governs the natural cycles of life. Manito Aki Inakonigaawin has its own spirit, as it itself is also living.

The law is eco-centric, which means the law considers and acknowledges that it’s not only human beings that live on this land, but ALL things on Earth possess spirit and life. Manito Aki Inakonigaawin is based not only on rights- but also on the responsibilities we have as a collective to care for Mother Earth. The law is guided by Treaty #3 Communities in Treaty #3 Territory and supports the collective rights of the Nation as a whole, while affirming jurisdiction of Anishinaabe laws and respecting the jurisdictions held by Treaty #3 Communities. Manito Aki Inakonigaawin helps to provide a law-making (regulatory decisions/approvals/certificates/permits) process and is centered on the inherent relationship to Mother Earth.

Although the law was given to the Anishinaabe at the beginning of time- it’s important to understand that the responsibility to protect and respect Mother Earth doesn’t solely depend on Anishinaabe people- the law represents the collective duty of us all to protect Mother Earth.



Manito Aki Inakonigaawin states that there is the right to meaningful engagements and respect for inherent and Treaty rights. It is therefore considered to be unlawful to proceed with developments within Treaty #3 Territory without the proper consent of the Anishinaabe Nation in Treaty #3. Any Crown or proponent development/activity that occurs, which may affect natural resources must abide by these rights and roles of the duty to engage with the Anishinaabe Nation in Treaty #3. The obligation lies on all stakeholders who wish to develop or manage resources within Treaty #3 Territory to abide by Manito Aki Inakonigaawin. As such, MAI is considered a foundational process of mutual respect. Following a process that is guided by Manito Aki Inakonigaawin, it is possible for development to occur with the least amount of uncertainty and conflict. It also allows for the Anishinaabe Nation in Treaty #3 to weigh the burdens and benefits of any proposed major developments in order to provide rigorous recommendations to Treaty #3 Leadership on whether or not to approve/authorize major developments in Treaty #3 Territory.

By treaty with Her Majesty in 1873, the Nation shared its duties, responsibilities and protected its rights respecting 55,000 square miles of territory. The Anishinaabe Nation in Treaty #3 did not surrender any inherent rights of self-government by signing of the Treaty, instead believed the signing to be a mutual respect and sharing of the lands and resources. The Government of the Anishinaabe Nation in Treaty #3 continue to exercise its powers and authority throughout Treaty #3 Territory.

Treaty #3 was not a valid surrender instrument and notwithstanding the language of Treaty #3, which was written by the Crown in English, it would be unconstitutional for Anishinaabe to "surrender" the 55,000 square miles of territory. The Anishinaabe Nation in Treaty # 3 maintains rights and title to all lands and water in the Treaty # 3 Territory commonly referred to Northwestern Ontario and south-eastern Manitoba. Accordingly, any development in the Treaty # 3 Territory such as, but not limited to, forestry, mining, nuclear waste storage, hydro, highways and pipeline systems that operate in the Treaty # 3 Territory require the consent, agreement and participation of the Anishinaabe Nation in Treaty # 3.

In exercising its authority, the Grand Council expresses concern with proponents (corporations, developers etc.) who carry out business activities that may result in destruction to the environment or interfere with the rights-based activities of individual or collective members of the Anishinaabe Nation in Treaty # 3.



Manito Aki Inakonigaawin states that all resource developments should be done in honor with Anishinaabe rights and in respect to the natural resources. Therefore, Grand Council recognizes the potential for adverse effects in regards to exercising inherent and treaty rights that may be impacted through certain business activities. In order to eliminate, minimize, mitigate or otherwise accommodate these adverse effects, the Grand Council is prepared to hold discussions, engagements and potential negotiations with proponents, governments and other industry.

In accordance with Manito Aki Inakonigaawin process, proponents in Treaty #3 are required to contact Grand Council to seek specific Treaty # 3 authorizations, which will provide clear authority to conduct their business ventures and create legal certainty to legitimize these developments in Treaty # 3 Territory. These processes do not infringe on the rights of individual communities and it is recognized they have their own authorization and engagement protocols. It is the goal of the Grand Council to establish strong working relationships with any proponent who respects Anishinaabe laws, values and principles on the environment.





# WHAT IS THE NIBI DECLARATION?

The Nibi Declaration is a way for Treaty #3 to explain the Anishinaabe relationship to water. The Declaration can be a reflection of the sacred teachings of water held by Treaty #3 knowledge keepers/Gitiizii m-inaanik to be shared with communities and those outside of the Treaty #3 Nation. It can speak to the sacred relationship and responsibilities that the Anishinaabe have to water, water beings and the lakes and rivers around them.



**NIBI (WATER) IS ALIVE AND HAS A SPIRIT. IT IS THE LIFE BLOOD OF OUR MOTHER (AKI) AND CONNECTS EVERYTHING. IT CAN GIVE, SUSTAIN AND TAKE LIFE.**

**NIBI CAN TAKE MANY FORMS INCLUDING SNOW, ICE, SPRING WATER, SALT WATER, RAIN, FRESH WATER, SWAMP WATER, AQUIFERS AND BIRTH WATER. EACH TYPE OF WATER HAS A ROLE TO PLAY IN OUR WELLNESS AND HEALING. NIBI IS CONNECTED TO OUR GRANDMOTHER, THE MOON.**

**EVEN THOUGH IT HAS SUFFERED, NIBI CONTINUES TO BRING FORWARD LIFE AND WE MUST WORK TO HEAL THE WATER AND OURSELVES.**

**NIBI HAS A SPIRIT AND SHARES ITS GIFT OF LIFE WITH ALL OF CREATION**  
 Nibi has its own spirit. It cannot be owned or controlled. Nibi is shared across lands and territories, between people, with other nations and all other beings that are part of creation. Spirits and other beings in creation look after nibi and its wellbeing. Nibi and all beings and spirits that look after nibi must be feasted. All creation expresses love and respect for nibi through gestures of gratitude.

**WE ALL HAVE A SACRED RELATIONSHIP WITH NIBI**  
 Anishinaabe have been responsible for the care of the aki (land) and nibi since time immemorial. Women have a sacred relationship with nibi and a special responsibility to look after nibi because they carry birth water and have the ability to bring life into this world. Men have a role to play to protect the land and support the wellbeing of nibi and ikwewag. Our relationship with nibi is preserved through ceremony, teachings, education and knowledge shared through generations.

**WE NEED NIBI IN ORDER TO LIVE A GOOD LIFE**  
 All beings, including Anishinaabe, are born of nibi. We depend on nibi to live and our bodies are made of it. Nibi is the source of our wellbeing. It nourishes us, spiritually, physically, mentally and emotionally and provides cleansing and healing. Clean nibi for drinking is important to our health. We must respect our sacred relationship with nibi and all beings in creation to help protect nibi for our children and future generations.

**NIBI UNITES US**  
 Through its flow and movement, nibi cleanses itself and connects us all. It brings us together as families, communities and as a nation. Traditional governance and law, including the Manito Aki Inokongwaawin and Treaty #3 confirm our collective responsibility to take action, give back and protect nibi and the environment for our children and future generations.

**NIBI**  
 DECLARATION OF TREATY #3

**NIBI HAS A SPIRIT • NIBI IS LIFE • NIBI IS SACRED • WE HONOUR RESPECT AND LOVE NIBI**









# GRAND COUNCIL TREATY #3

THE GOVERNMENT OF THE ANISHINAABE NATION IN TREATY #3



For more information or questions, please contact:

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**Contents**

<b>Executive Summary</b>	<b>3</b>
Agenda Overview	3
Breakout Sessions	3
<b>1.0 Workshop Preparation</b>	<b>4</b>
1.1 Recruitment Focus of Workshop Participants	4
<b>2.0 Advertising</b>	<b>4</b>
<b>3.0 First Nation Communities Participation</b>	<b>4</b>
3.1 Breakdown by First Nation Community	5
<b>4.0 Organizations and Companies Participation</b>	<b>5</b>
4.1 Breakdown by Organization and Companies	5
<b>5.0 Key Themes</b>	<b>6</b>
5.1 Questions Sorted into Key Themes	6
<b>6.0 Concerns and Sensitivities</b>	<b>8</b>
<b>7.0 Recommendations</b>	<b>8</b>
<b>8.0 Appendix</b>	<b>9</b>
8.1 Agenda and Advertisement	9
8.2 FNPA Email Template of Invitation to First Nation Communities	9
8.3 FNPA Email Template to Organizations and Companies	9
8.4 NWMO Presentations	11







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### 3.1 Breakdown by First Nation Community

First Nation participants came from the following communities:

- The Key First Nation
- Kinistin Sauteaux Nation
- Eel Ground First Nation
- Pasqua First Nation #79
- White Bear First Nations Lands & Resources
- Lake Manitoba First Nation
- Opaskwayak
- Little Black Bear
- Moosomin First Nation
- Woodland Cree First Nation
- Lac La Ronge Indian Band
- Flying Dust
- George Gordon First Nation
- Curve Lake First Nation
- Mosquito, Grizzly Bear's Head, Lean Man
- Cowessess First Nation
- Driftpile Cree Nation
- Flying Dust First Nation
- Fort McKay First Nation
- Peter Ballantyne Cree Nation
- Red Earth Cree Nation
- Carry The Kettle
- Muskoday First Nation

### 4.0 Organizations and Companies Participation

Several organizations and companies participated in the meeting. In total, there 15 various representatives from organizations and companies participating in the engagement session and workshop.

#### 4.1 Breakdown by Organization and Companies

- Saskatchewan Aboriginal Land Technicians (SALT)

- 
- University of Manitoba
  - enTrust Engagement Inc,
  - Corporate Finance Institute (CFI)
  - Kawe Consulting
  - Atim Ka-Mikosit/ONEC group
  - Indigenous Working group on SMR (Small Modular Reactors)
  - Government of Saskatchewan
  - X-Energy
  - DB2 Consulting
  - Wild Matriarch
  - Meadow Lake Tribal Council Industrial Investment
  - Ontario Power Generation (OPG)
  - Attunda Inc.
  - North Shore Mi'kmaq District Council (NSMDC)

## 5.0 Key Themes

Throughout the meeting, several themes were raised during presentations. Several questions gave rise to key themes.

- Transportation
- Nuclear Fuel Bundle
- Nuclear Fuel Waste
- Nuclear Fuel Waste Storage
- Nuclear Fuel Waste Policy
- Indigenous Relations
- Federal Contaminated Sites
- Technology Distribution

### 5.1 Questions Sorted into Key Themes

Key themes came to form through questions asked by meeting participants.

#### Transportation:

- Are the waste containers crash-proof during transport? What transport accident scenarios do the containers need to withstand?
- Can we export the waste outside of the country? To the US?
- How often is the waste currently going through our communities?



- 
- How can we ensure good relationships with Indigenous peoples and the industry?
  - What is the biggest surprise for you Jessica in the conversation about Indigenous knowledge and science?
  - Are there any Indigenous companies that NWMO works with?
  - Can we get a copy of your indigenous policies?
  - Is opposition from Treaty First Nations available to review?

Federal Contaminated Sites

- I guess the Federal Contaminated Sites is not involved or no one knows about it?  
This question is in relation to abandoned railroads in First Nation communities

Common Misconceptions

- What are some of the common misconceptions about Nuclear Waste?

Technology Distribution

- How long before this technology can be distributed to the general population?

## 6.0 Concerns and Sensitivities

There was reluctance expressed to participate due to the concern of the Duty to Consult. They wanted to validate that FNPA was not consulting on behalf of the Federal Government's fiduciary responsibility on the Duty to Consult.

## 7.0 Recommendations

**Recommendation #1: More information on Severe Accident Consequence Analysis work.**

FNPA CEO requested this information document and the NMWO shared the recently released [Transportation Planning Framework](#)

**Recommendation #2: More information on the transportation of nuclear waste**

**Recommendation #3: More NWMO workshops on key themes arising from the January 26th, 2022 session, and workshop.**

**Recommendation #4: Continuing the conversation on the Key Theme areas**

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## 8.0 Appendix

### 8.1 Agenda and Advertisement

[Nuclear Waste In Canada: Information Session and Workshop January 26, 2022](#)

### 8.2 FNPA Email Template of Invitation to First Nation Communities

Good afternoon [Insert Name],

On behalf of the First Nations Power Authority,

FNPA and the Nuclear Waste Management Organization (NWMO) have developed an informational session and workshop regarding nuclear waste management.

This information session ensures knowledge transfer between communities and government takes place to assist in making informed decisions. NWMO staff will be available for engagement. We believe having meaningful engagement and dialogue with Indigenous communities, industry, and the government is a crucial step toward reconciliation.

The virtual event will take place on January 26, 2022, from 10:00 AM to 3:00 PM (CST) via Pheedloop.

An honorarium of \$300.00 will be available to one representative from each Indigenous community; Others are welcome to attend.

Registration can take place via Pheedloop [HERE](#) or by emailing Joshua Thomas at [jthomas@fnpa.ca](mailto:jthomas@fnpa.ca).

Please refer to the attached agenda and invitation letter for more information.

Please distribute to First Nation communities and their Chiefs

### 8.3 FNPA Email Template to Organizations and Companies

#### **Nuclear Waste Engagement Virtual Sessions**

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First Nations Power Authority (FNPA) was established in 2011 as a not-for-profit organization to facilitate the development of First Nations-led power projects and promote Indigenous participation in power procurement opportunities.

FNPA is supportive of a range of power options including Small Modular Reactors (SMRs) that establish and implement plans for climate action and a clean energy future. FNPA is committed to working with Natural Resources Canada to deliver sound public policy for Indigenous Engagement and Economic Reconciliation, as outlined in our commitment to the SMR Roadmap Statement of Principles.

All of Canada's low- and intermediate-level radioactive waste is safely managed today in interim storage. An integrated strategy will ensure the material continues to be managed in accordance with international best practices over the longer term. Building on previous work, this strategy represents a next step to identify and address any gaps in radioactive waste management planning, while looking further into the future.

FNPA with the NWMO has developed an informational session and workshop for Indigenous communities. We believe that when Indigenous communities are meaningfully engaged in the dialogue with industry and government it will lead to reconciliation.

**When:** January 26th, 2021

**Time:** 10AM to 3PM

**Where:** Virtually through Pheedloop [registration link](#)

This information session will be beneficial to ensure knowledge transfer to make informed decisions and NWMO staff will be available to answer your questions.

An honorarium of \$300.00 per participant\* to attend the session virtually, the agenda is attached and a registration link is included.

If you need help with registration please do not hesitate to contact [Desiree Norwegian](#), [Rebecca Agecutay](#), [Joshua Thomas](#), or [Dawn Pratt](#).

Thank you,

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\*Per diem offered to First Nations by the community; Others are welcome to attend.

#### 8.4 NWMO Presentations

- [Introduction to NWMO](#), Bob Watts, Indigenous Relations & Strategic Program
- [Implementing Reconciliation](#), Jessica Perritt, Indigenous Knowledge & Reconciliation
- Adaptive Phased Management, Ulf Stammer,
- [Canada's Integrated Strategy for Radioactive Waste](#), Karinne Glen, Integrated Strategy for Radioactive Waste.

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MTI Summary Report for NWMO

May 25, 2022

Prepared by Kristie Halka-Glazier,  
 MTI Energy & Mines Coordinator

Activity Report:

NWMO, accompanied by Mi'gmaew'l Tplu'taqnn, engaged with eight First Nation communities currently represented by Mi'gmaew'l Tplu'taqnn; Amlamgog (Fort Folly) First Nation, Natoaganeg (Eel Ground) First Nation, Oinpegitjoig (Pabineau) First Nation, Esgenoôpetitj (Burnt Church) First Nation, Tjipôgtôtjg (Buctouche) First Nation, L'nui Menikuk (Indian Island) First Nation, Ugpi'ganjig (Eel River Bar) First Nation and Metepenagiag Mi'kmaq Nation (the Mi'gmaq in New Brunswick) virtually on March 31, 2022 presenting Canada's Integrated Strategy for Radioactive Waste. On April 7, 2022, an internal session, without NWMO present but on standby, took place. The purpose of these engagement sessions was to discuss and gain informative feedback from the eight Mi'gmaq communities on the Integrated Strategy for Radioactive Waste (ISRW).

Community engagement is an important part of Mi'gmaew'l Tplu'taqnn's mandate of protecting and implementing Aboriginal and Treaty Rights. Community members and NWMO were made aware the community engagement sessions are not considered consultation.

**Questions that Led this Discussion:**

- What's most important to get right?*
- Bury it or do we maintain a facility (rolling stewardship)?*
- How many facilities? One for all or one at/near each site?*
- Who should be responsible for implementing this strategy? CNSC? The waste owners?*

**Community Engagement:**

MTI tasked the community liaisons from each of the eight Mi'gmaq communities with choosing two Elders, two Youth Representative and two Knowledge Keepers to participate in the ISRW engagement sessions. All eight Mi'gmaq communities participated.

**Community Engagement Feedback:**

**Amlamgog – Fort Folly First Nation:**

- This should be reviewed by an independent consultant. How do we provide feedback on a topic we are not educated on?



- We need to deal with the waste we currently have and work harder towards not producing more. Nuclear energy is not green.
- The planet will be cleaner without the use of coal for energy.
- We need to focus on the future. The biggest mistake we can make is to wait. Collectively put pressure on clean energy development.
- We need to take action now and not wait for newer technology.
- A major concern expressed is that the waste owners will find a way to get out of paying for the clean-up. The nuclear waste exists and is a long-term (millennia) problem, so the solution must be equally long-term. To that end, there needs to be absolute assurances in place that the waste owners will be completely responsible, including financially, without any means of retracting from their agreement.

*Natoaganeg – Eel Ground First Nation:*

- Explain the difference between above and below ground storage.
- Accountability is important.
- Explain the recycling of the waste-water process at a nuclear facility.
- Describe the process of nuclear waste handling and storage in more depth.
- Describe the containment methods currently used.
- Describe potential impact on water tables if a leak were to occur in the storage container.
- Transportation of waste is a major concern.
- A 25-year relicensing request at the PLNGS is concerning.
- Nuclear energy is not clean – it produces waste that is now becoming a problem. Explore green energy alternatives.
- High costs of waste disposal may be a problem.
- Waste owners profiting from nuclear should be responsible for its disposal, however an independent body should regulate it.
- How many Indigenous communities have been consulted to date?
- If there was a power failure or any other issue, above ground can be seen and managed. It's not out of sight, out of mind. Above ground keeps you aware.

*Oinpegitjoig – Pabineau First Nation:*

- Is the province looking at transporting nuclear waste? What regulations do they have in place to guarantee this is being done safely?
- Concerns expressed about the life of radioactive waste and lack of control of it. No one can guarantee the control of waste that remains radioactive for that long a period.
- What is the plan for controlling waste with that kind of lifeline?
- What assurances are in place to protect against terrorism?
- What measures are in place for natural disasters, such as earthquakes?
- An independent review done with a consultant is needed.
- Are there proposed sites in mind?

- Are there containers in existence to store nuclear waste? If so, describe them.
- Are there tests done underground?
- What is safest for storage, above or below ground?
- Are there sites currently in New Brunswick storing nuclear waste?
- How many containers are we, or should we, be looking at/considering?
- Are there any radioactive waste materials being stored at the Brunswick Mine site?
- The waste owners should be responsible for their waste. A regulated rematriation budget should be mandatory – and not by using taxpayers’ dollars.
- Waste owners must be prevented from hiding behind corporations – Corporate Culture: hiding from responsibility. This must be prevented.
- Concerns expressed with running out of storage space.
- Explain the differences and feasibility of storing above and below ground.
- Can nuclear waste be recycled? Explain what waste will be recycled – for SMRs.
- Concerns with radioactive waste being stored 15-16 hundred feet below ground – there is still water below that level. What will happen to our drinking water?
- Is nuclear waste being dumped in the water today? Explain.
- Mining is a predatory industry preying on Mother Earth. What kind of society preys on its own mother?
- Concerns with nuclear waste dumping sites eventually filled beyond capacity.
- Concerns expressed in connection to radioactive materials used as fertilizers in the tobacco industry.
- There needs to be a collective willingness to adapt to newer technologies for energy.
- The holding pond in Ontario – is that for waste also? If so, why disturb it?
- Is the PLNGS driving this? What happens at the end of the station’s life?
- In the event of a leak into our water systems, no one can drink the water and we will all be equal to the results thereof.
- We didn’t cause this problem, but we all benefit from it. We are being asked to find a solution. We can’t leave it for the next seven generations to deal with.

*Esgenoopetitj – Burnt Church First Nation:*

- Where are the locations being considered for the DGR sites?
- Will there be employment opportunities for First Nation people with training?
- Are there set-asides for First Nation people? “The NWMO has not assigned a percentage or quota for Indigenous employment, nor do they foresee doing so. Rather, employment will be discussed or included in the hosting agreements that are being developed with Indigenous communities in the siting area.” – Karine Glenn, NWMO
- Concerns expressed with artifacts being in the possession of proponents in Blind River, the Cameco site.
- How much money has this project been funded?
- What exactly are the existing problems we are facing?

- Proponents creating the nuclear waste need to be responsible for it. Can nuclear waste remain where it currently is?
- Concerns expressed with the lifeline of the nuclear waste requiring more security measures in place to keep it contained.
- An independent review of the environmental studies must be done.
- Money should be invested in developing green energy rather than on the storage of nuclear waste and its production.
- What safeguards are in place for the transportation of nuclear waste?
- Would the public be aware of the transportation of nuclear waste through or near their communities?
- Concerns expressed with accidents – what are some preventative measures against catastrophes in the event of an accident?
- Describe the different levels of nuclear waste in clear language. Are there acceptable levels?
- Describe and explore all options of the disposal of nuclear waste in clear language.
- Who has been consulted/engaged before First Nation people?
- Why is this not in the media? Is there potential for managing this without the public's awareness?
- The environment is a priority for the next seven generations, but nuclear waste will outlive all seven generations and that is a concern. More clear discussion is required. Burying waste is a concern. This feels like out of site out of mind.
- One location may be better regulated but there can be no cutting corners. It must be done right.
- If one location is chosen, why not central in Quebec?
- Perhaps burying it all in a DGR is the best solution. More education needed.
- Concerns with transporting nuclear waste and the public not being aware. How protected/safe is the waste being transported?
- Send nuclear waste to space.
- Will we see a solution to this problem in our lifetime?
- How many nuclear plants are there in Canada and where are they located?
- This community would like to see and learn about successful existing plans in place from around the world.

*Tjipogtojg - Bouctouche First Nation:*

- When a site is being proposed, what is the scope of the impacts considered? Is it being taken into consideration these are ancestral territories?
- Are there hosts that are really are willing?
- On behalf of the Sawka Nation, there was a refinery that has been shut down because the proponent was digging up their buried. There are high cancer rates in that area too. Their buried and their artifacts have not been returned to them. How are you different? How do we know we won't be ignored?



- Are there tests being done underground, or just above ground? There are different pressures underground that can make quite a difference with testing and with reality.
- The time it takes for this waste to breakdown is unheard of. How did/do we allow this to happen?
- Is NBP preventing us from creating our own grid and selling our own energy?
- Use hydropower as an alternative.
- Concerns expressed about any type of exhaust emitting from the PLNGS – are there radioactive waste emissions going into our air?

*Ugpi'ganjig – Eel River Bar First Nation:*

- How long is waste buried?
- Explain the differences between low-intermediate level waste and how it's currently managed.
- Explain all alternatives for the disposal of waste.
- How can a bond be placed on either the regulator or waste owner that guarantees a safe cleanup in the instance of a spill or accident?
- Describe the SMR process of recycling nuclear waste.
- Reusing water that is used to cool the reactors – dumping in the Great lakes. These are concerns.
- Is there a proposed site in NB?
- Should each nuclear generating station have their own disposal site? Describe the feasibility of this.
- Independent study needed.
- Is DGR the safest method?
- Would a single site be more vulnerable for a terrorist attack?
- The waste owner should be responsible for their waste in all aspects with an independent body regulating it.
- Describe potential environmental dangers.
- Would multiple disposal sites have less of an impact if an accident or terrorist attack were to occur?
- This group would like to see proposed plans from other countries.

*Metepenagiag – Red Bank Mi'kmaq Nation:*

- Concerns expressed about proper consultation. This Elder was reassured this was only a “pre-engagement” session. – This is what Karine Glenn described it as.
- If the PLNGS were not approved for relicencing, would everything in that facility be considered contaminated waste?
- Will the communities be consulted on transportation routes and methods of transportation? Will nearby communities be forewarned?
- What happens to the water used for cooling the fuel once the facility closes?
- Concerns expressed about participants lacking real knowledge of the topics discussed. Provisions for capacity funding for a knowledgeable consultant should be a priority when engaging First Nations.

- Will having a disposal site open the door to producing more nuclear waste/energy? How can we ensure this doesn't happen?
- What will the energy sector look like in seven generations? How do we ensure our agreements now will not be misinterpreted in the future?
- What are the responsibilities of the waste owners if we allow nuclear waste to be stored in our territory? How do we guarantee their accountability?
- Concerns expressed with the nuclear site in Ukraine under possible attack from Russia. What are the safeguards there? Where is the regulator?

**Recommendations Based Upon Community Concerns:**

- Capacity funding for an independent consultant is required. This consultant will be chosen by the Mi'gmaq.
- Education is needed via face-to-face; capacity funding for a site visit to the PLNGS is a requirement for this group. Any materials that will be reviewed must be provided at least one month prior to the event. Proposed dates are early September 2022.
- Written responses to all comments, concerns and questions listed in this report must be provided at least one month prior to the PLNGS visit.



# PURPOSE OF THE ENGAGEMENT SESSIONS

The Government of Canada has directed the Nuclear Waste Management Organization to lead engagements to develop a Radio Active Waste Strategy for Canada. NWMO is seeking input and discussion in regards to the development of the strategy. NWMO posed the following questions to the session attendees:

- 1.What is most important to get right when developing an Integrated Strategy for Canada's Radioactive Waste?
- 2.How do we best deal with Canada's Low-Level Waste and Intermediate-Level Waste over the long-term?
- 3.What type(s) of facilities should we use? (Rolling stewardship vs disposal)
- 4.How many of them should we build?
- 5.Who should be responsible for implementing the strategy?

Treaty #3 has the right to be informed and have equal say in any decisions in regards to the environment. Primary objectives of the engagement session from a Grand Council Treaty #3 perspective were:

- Opportunity to implement Manito Aki Inakonigaawin and the Nibi Declaration
- Gather feedback on the proposed strategy, which represents Treaty #3 interests and values and ensures they are represented in Canada's Radioactive Waste Strategy
- Opportunity to express questions, comments and concerns in regards to the strategy
- Increase awareness and understanding of Canada's Radioactive Waste
- Write a report back to NWMO explaining Treaty #3 laws, history, comments and concerns.





## BACKGROUND

The Anishinaabe Nation in Treaty #3 brings unique Anishinaabe Knowledge into the development of Canada's Radioactive Waste Strategy, including the understanding of how Manito Aki Inakonigaawin (Great Earth Law) applies in Treaty #3 Territory. The law is unique to Treaty #3 Territory and passed on through Elders; meaning no other Nation is able to incorporate the same knowledge into a process that is guided by Manito Aki Inakonigaawin. Understanding how Anishinaabe Knowledge is properly incorporated into all processes and decision-making, requires Ontario to take next steps to understand Anishinaabe Inakonigaawin (law) and build relationships within Treaty #3.

The Nation is extremely rich with Anishinaabe Knowledge, which is completely unique to the region. This knowledge in our area is mostly unwritten and can only be learned through discussions with Elders and Knowledge Keepers.

One application of the traditional laws is Manito Aki Inakonigaawin, which is a guiding framework in the decision making process of the Anishinaabe Nation as it relates to activities impacting the Treaty #3 Territory. In this Anishinaabe framework, there is both a community decision making process and a Nation based decision making process that is outlined which are: application, engagement/consultation, authorization, and compliance and monitoring. This significantly increases the value-added for Ontario to continue to support and invest in the Nation of Treaty #3 as this information is not accessible through any other mechanism.

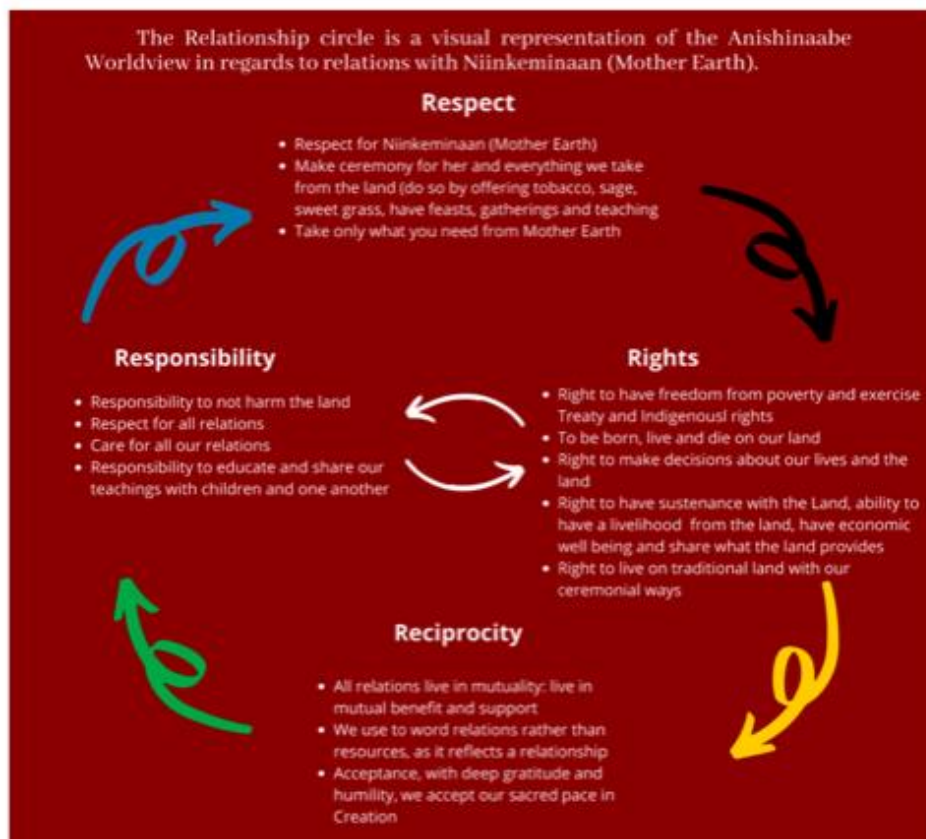
This report is intended to provide feedback to the Nuclear Waste Management Organization and the Government of Canada in regards to Treaty #3 laws and values. Treaty #3 members participated in the Radioactive Waste Strategy engagement session on June 23rd, 2022 via zoom. The concerns, considerations and recommendations portion of this Report are based on comments brought forth by Treaty #3 members.

Treaty #3 Communities have a right to meaningful consultation and engagement. During the COVID-19 pandemic there have been ongoing restrictions hindering the ability to have in-person engagement with Treaty #3 Communities. In this case as restrictions are continuing to be lifted Treaty #3 looks forward to moving ahead with meaningful in-person engagement. However, Treaty #3 does not support the notion that these engagement sessions fulfil the duty to consult.



The engagement sessions discussion and feedback was based around the following Manito Aki Inakonigaawin key principles:

- **Anishinaabe rights** (Inherent and Treaty Rights, right to be healthy, right to have a healthy environment)
- **Anishinaabe responsibilities** (care for the land, educate all generations)
- **Reciprocity with Mother Earth** (living in mutuality)
- **Respect to all beings** (extending to mother earth, animals, plants, traditional ceremony, offerings)



Developed by Kaaren Dannenman, traditional trapper and knowledge keeper, Trout Lake.



# DISCUSSION QUESTIONS

The engagement session had meaningful discussions in regards to how the development of a Radioactive Waste Strategy would impact Treaty #3 members and Treaty #3 Territory. Members from Grand Council Treaty #3 Women's Council and Men's Council were in attendance along with 2 Chiefs and 10 community members from Treaty #3.

Engagement questions that were asked included:

- What is most important to get right when developing an Integrated Strategy for Canada's Radioactive Waste?
- How do we best deal with Canada's Low-Level Waste and Intermediate-Level Waste over the long-term?
- What type(s) of facilities should we use? (Rolling stewardship vs disposal)
- How many of them should we build?
- Who should be responsible for implementing the strategy?

The session attendees felt as though these were large questions to be asking at the beginning of engagement. We did not come up with answers for these questions, however came up with concerns and recommendations to move forward, which will be explored further in this report.



# FEEDBACK

## A. Canada's Radioactive Waste Strategy Feedback

-Treaty #3 engagement session attendees propose the development of a Treaty #3 Radioactive Waste Strategy to ensure Treaty #3 rights and values are upheld through these processes and recommends the continued support from Canada and NWMO to fulfill this

-Canada and Ontario do not have a current understanding of Anishinaabe Inakonigaawin, such as Manito Aki Inakonigaawin and the Nibi Declaration

-As agreed upon in the signing of Treaty #3, Treaty #3 resource issues are discussed, approved, and/or refused/proceeded with under Manito Aki Inakonigaawin, not through government processes. Canada must take meaningful reconciliation seriously

-Canada must recognize First Nation self-determination and understand the complex issues and perspectives of Treaty #3 , therefore supporting a specific Treaty #3 Radioactive Waste Strategy is necessary

-Canada's Radioactive Waste Strategy must not conflict with Treaty #3 governance laws, which are guided by Treaty #3 Communities and Elders

-Canada requires a strategy to decolonize the way Anishinaabe Knowledge is utilized in frameworks and Nation-to-Nation dialogue. To enhance the effectiveness of a Radioactive Waste Strategy, a Treaty #3 strategy will be developed around Anishinaabe Knowledge from Treaty #3 Elders and Knowledge Keepers, which can only be gathered under traditional protocols set out by the Elders in the Nation of Treaty #3



**B. Engagement Concerns**

- The development of a radioactive waste strategy for all of Canada is a blanket approach to regions with very different needs and values
  
- Questions posed in engagement session were large questions that do not tackle basic decision making and foundational processes that must be considered prior to where the radioactive waste will be stored
  
- Transportation of radioactive waste is still a large concern for the Nation in Treaty #3 considering the vast amounts of water in the area and considering the sacred relationship to the land, waters and its inhabitants

**C. Recommendations**

- Manito Aki Inakonigaawin and the Nibi Declaration must be respected in Canada's Radioactive waste strategy
  
- How the strategy will benefit the Nation in Treaty #3 must be discussed (economically, socially, and environmentally)
  
- Engagement must be long-term and include all generations to decide how a strategy of this magnitude will be moved forward
  
- Ontario and Canada must learn and respect all Anishinaabe Inakonigaawin, including Manito Aki Inakonigaawin and the Nibi Declaration
  
- Treaty #3 laws and rights must be upheld and respected first and foremost
  
- Further meaningful and in person engagement with Treaty #3 communities needs to be held to develop next steps
  
- Elders and Knowledge Keepers guiding ceremony are necessary to this process
  
- Anishinaabe Knowledge and Western Science must be considered and respected on equal footing
  
- When the NWMO develops the "What We Heard" report, it should include steps as to how Canada will tackle each recommendation





efforts to facilitate collective engagement respecting the land and waters, as guided by the principles set out by Manito Aki Inakonigaawin.

Manito Aki Inakonigaawin has been an inherent law to Anishinaabe in Treaty #3 Territory since time immemorial. The law governs relationships with the land and its inhabitants throughout daily life. This includes:

- Respecting the lands and waters
- Giving offerings to spirits and Creator when you benefit from Mother Earth's gifts such as hunting, fishing or transportation
- Knowing your inherent rights that Treaty #3 members are born with
- Understanding the responsibility as a steward of the land

Since the law was formally written in 1997, it has helped uphold inherent and Treaty rights, and create a Nation based law-making process in the territory.

Manito Aki Inakonigaawin is written within and throughout nature- its spirit is within all living things on earth- from you, to the animals, to the trees, and to the air that we breathe. It is the natural law that governs the natural cycles of life. Manito Aki Inakonigaawin has its own spirit, as it itself is also living.

The law is eco-centric, which means the law considers and acknowledges that it's not only human beings that live on this land, but ALL things on Earth possess spirit and life. Manito Aki Inakonigaawin is based not only on rights- but also on the responsibilities we have as a collective to care for Mother Earth. The law is guided by Treaty #3 Communities in Treaty #3 Territory and supports the collective rights of the Nation as a whole, while affirming jurisdiction of Anishinaabe laws and respecting the jurisdictions held by Treaty #3 Communities. Manito Aki Inakonigaawin helps to provide a law-making (regulatory decisions/approvals/certificates/permits) process and is centered on the inherent relationship to Mother Earth.

Although the law was given to the Anishinaabe at the beginning of time- it's important to understand that the responsibility to protect and respect Mother Earth doesn't solely depend on Anishinaabe people- the law represents the collective duty of us all to protect Mother Earth.



Manito Aki Inakonigaawin states that there is the right to meaningful engagements and respect for inherent and Treaty rights. It is therefore considered to be unlawful to proceed with developments within Treaty #3 Territory without the proper consent of the Anishinaabe Nation in Treaty #3. Any Crown or proponent development/activity that occurs, which may affect natural resources must abide by these rights and roles of the duty to engage with the Anishinaabe Nation in Treaty #3. The obligation lies on all stakeholders who wish to develop or manage resources within Treaty #3 Territory to abide by Manito Aki Inakonigaawin. As such, MAI is considered a foundational process of mutual respect. Following a process that is guided by Manito Aki Inakonigaawin, it is possible for development to occur with the least amount of uncertainty and conflict. It also allows for the Anishinaabe Nation in Treaty #3 to weigh the burdens and benefits of any proposed major developments in order to provide rigorous recommendations to Treaty #3 Leadership on whether or not to approve/authorize major developments in Treaty #3 Territory.

By treaty with Her Majesty in 1873, the Nation shared its duties, responsibilities and protected its rights respecting 55,000 square miles of territory. The Anishinaabe Nation in Treaty #3 did not surrender any inherent rights of self-government by signing of the Treaty, instead believed the signing to be a mutual respect and sharing of the lands and resources. The Government of the Anishinaabe Nation in Treaty #3 continue to exercise its powers and authority throughout Treaty #3 Territory.

Treaty #3 was not a valid surrender instrument and notwithstanding the language of Treaty #3, which was written by the Crown in English, it would be unconstitutional for Anishinaabe to “surrender” the 55,000 square miles of territory. The Anishinaabe Nation in Treaty # 3 maintains rights and title to all lands and water in the Treaty # 3 Territory commonly referred to Northwestern Ontario and south-eastern Manitoba. Accordingly, any development in the Treaty # 3 Territory such as, but not limited to, forestry, mining, nuclear waste storage, hydro, highways and pipeline systems that operate in the Treaty # 3 Territory require the consent, agreement and participation of the Anishinaabe Nation in Treaty # 3.

In exercising its authority, the Grand Council expresses concern with proponents (corporations, developers etc.) who carry out business activities that may result in destruction to the environment or interfere with the rights-based activities of individual or collective members of the Anishinaabe Nation in Treaty # 3.





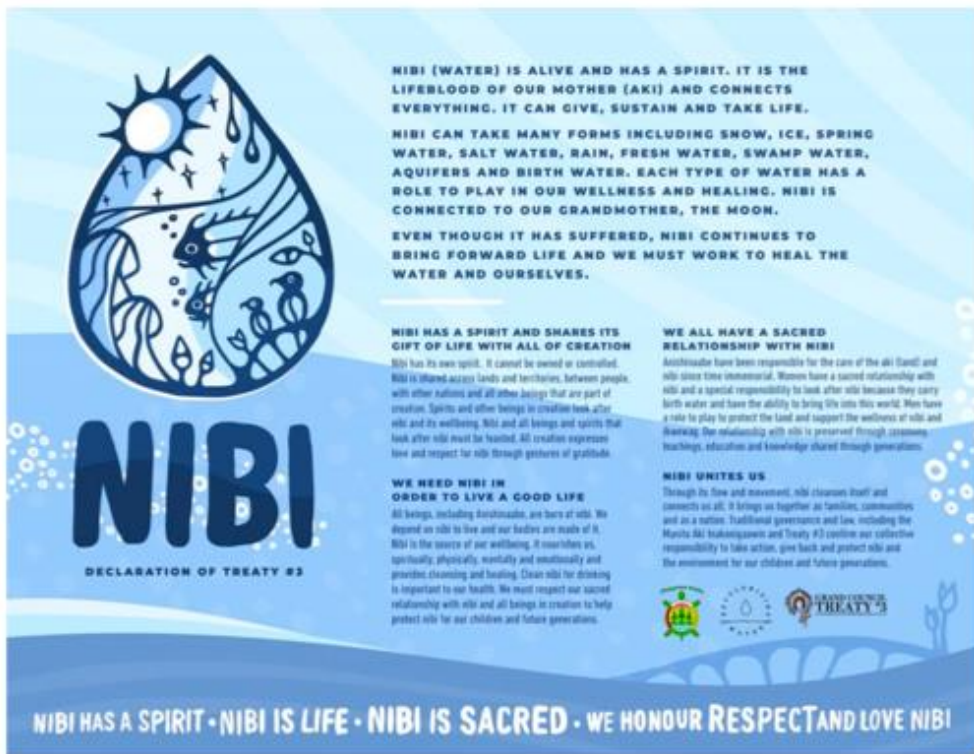
Manito Aki Inakonigaawin states that all resource developments should be done in honor with Anishinaabe rights and in respect to the natural resources. Therefore, Grand Council recognizes the potential for adverse effects in regards to exercising inherent and treaty rights that may be impacted through certain business activities. In order to eliminate, minimize, mitigate or otherwise accommodate these adverse effects, the Grand Council is prepared to hold discussions, engagements and potential negotiations with proponents, governments and other industry.

In accordance with Manito Aki Inakonigaawin process, proponents in Treaty #3 are required to contact Grand Council to seek specific Treaty # 3 authorizations, which will provide clear authority to conduct their business ventures and create legal certainty to legitimize these developments in Treaty # 3 Territory. These processes do not infringe on the rights of individual communities and it is recognized they have their own authorization and engagement protocols. It is the goal of the Grand Council to establish strong working relationships with any proponent who respects Anishinaabe laws, values and principles on the environment.



# WHAT IS THE NIBI DECLARATION?

The Nibi Declaration is a way for Treaty #3 to explain the Anishinaabe relationship to water. The Declaration can be a reflection of the sacred teachings of water held by Treaty #3 knowledge keepers/Gitizii m-inaanik to be shared with communities and those outside of the Treaty #3 Nation. It can speak to the sacred relationship and responsibilities that the Anishinaabe have to water, water beings and the lakes and rivers around them.



**NIBI (WATER) IS ALIVE AND HAS A SPIRIT. IT IS THE LIFEBLOOD OF OUR MOTHER (AKI) AND CONNECTS EVERYTHING. IT CAN GIVE, SUSTAIN AND TAKE LIFE.**

**NIBI CAN TAKE MANY FORMS INCLUDING SNOW, ICE, SPRING WATER, SALT WATER, RAIN, FRESH WATER, SWAMP WATER, AQUIFERS AND BIRTH WATER. EACH TYPE OF WATER HAS A ROLE TO PLAY IN OUR WELLNESS AND HEALING. NIBI IS CONNECTED TO OUR GRANDMOTHER, THE MOON.**

**EVEN THOUGH IT HAS SUFFERED, NIBI CONTINUES TO BRING FORWARD LIFE AND WE MUST WORK TO HEAL THE WATER AND OURSELVES.**

**NIBI HAS A SPIRIT AND SHARES ITS GIFT OF LIFE WITH ALL OF CREATION**  
Nibi has its own spirit. It cannot be owned or controlled. Nibi is shared across lands and territories, between people, with other nations and all other beings that are part of creation. Spirits and other beings in creation look after nibi and its wellbeing. Nibi and all beings and spirits that look after nibi must be treated. All creation expresses love and respect for nibi through gestures of gratitude.

**WE NEED NIBI IN ORDER TO LIVE A GOOD LIFE**  
All beings, including Anishinaabe, are born of nibi. We depend on nibi to live and our leaders are made of it. Nibi is the source of our wellbeing. It nourishes us, spiritually, physically, mentally and emotionally and provides cleansing and healing. Clean nibi for drinking is important to our health. We must respect our sacred relationship with nibi and all beings in creation to help protect nibi for our children and future generations.

**WE ALL HAVE A SACRED RELATIONSHIP WITH NIBI**  
Anishinaabe have been responsible for the care of the aki (land) and nibi since time immemorial. Women have a sacred relationship with nibi and a special responsibility to look after nibi because they carry birth water and have the ability to bring life into this world. Men have a role to play to protect the land and support the wellbeing of nibi and healing. Our relationship with nibi is preserved through ceremony, teachings, education and knowledge shared through generations.

**NIBI UNITES US**  
Through its flow and movement, nibi cleanses itself and connects us all. It brings us together as families, communities and as a nation. Traditional governance and law, including the Maa'nin da'i Neekwaganen and Treaty #3 confirm our collective responsibility to take action, give back and protect nibi and the environment for our children and future generations.

**NIBI**  
DECLARATION OF TREATY #3

NIBI HAS A SPIRIT - NIBI IS LIFE - NIBI IS SACRED - WE HONOUR RESPECT AND LOVE NIBI





# GRAND COUNCIL TREATY #3

THE GOVERNMENT OF THE ANISHINAABE NATION IN TREATY #3

Zhaagimaa Waabo



For more information or questions, please contact:

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nation to help ensure healthy, living *nibi* for all creation.

**Comments:**

GCT#3 has reviewed NWMO's ISRW which will be submitted to the Minister of Natural Resources Canada (**NRCan**).

GCT#3 requests that NWMO share these comments directly with the NRCan alongside its final ISRW as an Appendix. Similar to NWMO's caveat at p. 6 of the ISRW, GCT#3 also requests the opportunity to revisit these comments following the publication of the revised *Policy for Radioactive Waste Management and Decommission*. In this regard, we ask that NWMO notify the TPU should there be any consequential revisions to this draft ISRW.

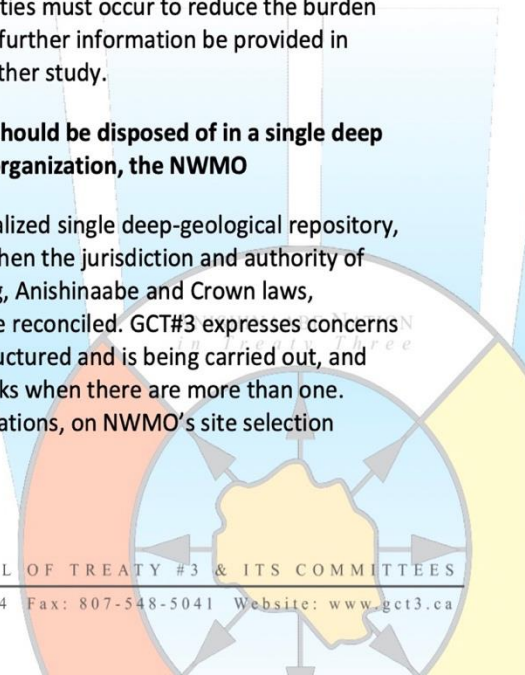
From GCT#3's perspective, Nation-to-Nation engagements with NRCan regarding the recommendations set out in NWMO's ISRW, Canada's Policy for Radioactive Waste Management and Decommission, are required prior to making decisions on the recommendations and policies contained therein.

**NWMO Recommendation 1: Low-level waste should be disposed of in multiple near-surface facilities with implementation resting with the waste owners**

**GCT#3 Comment:** GCT#3 questions how the location of the low-level waste near-surface facilities will be identified and assessed, including regional facilities. Should multiple near-surface facilities be further studied, including regional facilities, as recommended by NWMO at p. 53 of the ISRW, and a site in Treaty #3 Territory is being contemplated, GCT#3 must be involved in the site-selection process early. NWMO has not yet proceeded through the Anishinaabe Nation in Treaty #3's Manito Aki Inakonigaawin authorization process as it relates to its ongoing DGR site selection process.. GCT#3 emphasizes that an equitable distribution of the responsibility and risks of the low-level disposal facilities must occur to reduce the burden on the Anishinaabe Nation in Treaty #3. GCT#3 requests further information be provided in NWMO's ISRW on how the site(s) will be selected for further study.

**NWMO Recommendation 2: Intermediate-level waste should be disposed of in a single deep geological repository with implementation by a single organization, the NWMO**

**GCT#3 Comment:** Whether or not co-location or a centralized single deep-geological repository, should any site be identified within Treaty #3 Territory, then the jurisdiction and authority of the Anishinaabe Nation in Treaty #3 is engaged. Meaning, Anishinaabe and Crown laws, assessment tools and decision-making processes must be reconciled. GCT#3 expresses concerns in regards to how the DGR site selection process was structured and is being carried out, and questions how the consent of the host communities works when there are more than one. GCT#3 requires further visibility, and meaningful consultations, on NWMO's site selection processes.





decision-making authority with the Anishinaabe Nation in Treaty #3. It's unclear why the local communities, which are creatures of statute, are being categorized in the same way that as Indigenous peoples, as Indigenous peoples have privileges and rights that are affirmed by the Constitution and Charter.

**Recommendation 5: Design of facilities should prioritize the protection of water**

**GCT#3 Comment:** Site selection near major water sources impacts the inherent and treaty rights of the Anishinaabe in Treaty #3. The Anishinaabe Nation in Treaty #3 have the right and responsibility to protect the water, as the Nation is connected through watersheds. What occurs anywhere along the stream impacts all of life. Treaty #3 has the right to clean and safe water to sustain life, now and in the future. The Nibi Declaration must be followed and respected through following Manito Aki Inakonigaawin processes and principles set out by the Anishinaabe Nation in Treaty #3. The Government of Canada must support the implementation of the Nibi Declaration and Manito Aki Inakonigaawin through providing support for, and unlocking the potential of, Anishinaabe Nibi initiatives.

**Recommendation 6: Long-term caretaking should be established for disposal facilities**

**GCT#3 Comment:** GCT#3 supports, in principle, the fact that long-term caretaking must be established for potential disposal facilities. The Anishinaabe Nation in Treaty #3 have mechanisms in place such as Manito Aki Inakonigaawin that support the compliance and monitoring of the potential sites, which must be followed. Treaty #3 Project Assessments, including life-of-project environmental regulation processes, should be used for long term environmental monitoring, as well as enforcement and compliance.

**Recommendation 7: We need to take action now and not defer to future generations**

**GCT#3 Comment:** GCT#3 agrees, in principle, that action must be taken now and that there is a pressing need for change in regards to the ongoing and/or expected impacts of radioactive disposal for waste owners. That being said, as mentioned above, GCT#3 comments are being provided on a without prejudice basis to the 2011 Elders Declaration, and to support the Chiefs in Assembly position that any development in Treaty #3 Territory must be authorized through the Anishinaabe Nation in Treaty #3 protocols and Manito Aki Inakonigaawin

The Government of Canada must continue to create space for Anishinaabe led assessments, and NRCan should be mindful of this important mandate. Learning how to implement and respect Anishinaabe Knowledge requires Crown representatives to let go of control and to learn from and trust the Anishinaabe Nation in Treaty #3. It also requires substantive Nation-to-Nation dialogue.

These comments are prepared by the Territorial Planning Unit of Grand Council Treaty #3. If you require further information, please do not hesitate to reach out to the TPU at [hailey.krolyk@treaty3.ca](mailto:hailey.krolyk@treaty3.ca) or call us at 807.548.4214.



ADMINISTRATIVE OFFICES FOR THE GRAND COUNCIL OF TREATY #3 & ITS COMMITTEES  
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June 20, 2023

Sara Dolatshahi  
 Director, Strategic Projects  
 Nuclear Waste Management Organization  
[sdolatshahi@nwmo.ca](mailto:sdolatshahi@nwmo.ca)  
 [Delivered via email]

Dear Ms. Dolatshahi,

During our meetings on February 10 and April 14, 2023, we conveyed the Saugeen Ojibway Nation’s (SON) fundamental questions and concerns about the draft Integrated Strategy for Radioactive Waste (ISRW). As you are aware, the SON is host to the vast majority of Ontario’s low and intermediate level waste (I&ILW) and 40 percent of Canada’s spent fuel. Further, SON territory is one of two proposed sites for the Nuclear Waste Management Organization’s (NWMO) Adaptive Phased Management plan’s deep geological repository (DGR). Consequently, the development of an integrated long-term management strategy for all of Canada’s radioactive waste is of great importance to us.

The most fundamental challenge the SON has with the draft ISRW is that, from our perspective, it is not an integrated long-term management strategy at all. Rather, it is a report comprised of proposed high-level principles for radioactive waste management interwoven in a review of what was heard during the NWMO consultation processes. The NWMO should make clear that the ISRW seeks only to set guiding principles and that the implications of applying these principles are not meaningfully considered. How these principles are to be transformed into a strategic plan with specific end goals and the means for achieving these goals are not considered either. It is unclear to the SON what the next steps are following the submission of the draft ISRW to Natural Resources Canada (NRCan). It is also unclear how the responsibility for the draft ISRW will be allocated between NRCan and NWMO once submitted. For SON, this is cause for alarm as we have no assurance that our rights and interests will be properly considered and protected as this proposal solidifies into an actual plan. We ask that the NWMO explain the process going forward to ensure the SON remains informed.

In reviewing the draft ISRW, the SON has sought to understand the effects of the NWMO’s recommendations on SON People and Territory by anticipating their potential impacts. In so doing, it has become clear that seemingly neutral principles stand to have significant, disproportionately negative impacts on the SON. The impacts of certain recommendations, such as the proposed co-location of ILW with spent fuel in the NWMO’s DGR, are obvious. If the DGR is ultimately located in SON Territory, the SON will be subject to significant pressure to accept even more waste. Moreover, the possibility of co-location will cause further confusion and complexity for the SON and its People in their consideration of whether to accept the DGR in our Territory. The potential effects of other recommendations outlined in the draft ISRW, however, are much less evident without further consideration.

In grappling with how to properly dispose of LLW, for example, the NWMO recommends that the development of regional facilities as a strategy be considered further. The consequences to the SON of this potential approach only become apparent when it is considered in tandem with the ISRW's emphasis on avoiding transporting waste for various reasons, such as cost-savings. As Ontario Power Generation currently centralizes its LLW from all facilities in SON Territory, the proposal of regionalization will naturally lead to consideration or even bias towards permanently disposing of current and future streams of LLW in SON Territory. Coupled with the proposal of co-locating ILW with spent fuel, this leads to the conclusion that the majority of all types of radioactive waste produced in Canada could find its home in SON Territory forever. Unfortunately, because the draft ISRW leaves us to make these connections of the on-the-ground implications of the NWMO's recommendations, it fails to honestly portray what is likely to be asked of the SON People as Canada moves forward with its radioactive waste disposal plans.

During our April meeting, we were informed that the NWMO is considering amending its recommendations in response to the Government of Canada's newly released *Policy of Radioactive Waste and Decommissioning*. Specifically, the NWMO is proposing downgrading some of the recommended principles to mere considerations. This is of great concern to the SON. In particular, the proposition that the NWMO downgrade the principle of requiring an informed and willing host community is totally unacceptable. This essential commitment is a core pillar of the NWMO's engagement and a key aspect of its mandate. The trust that exists between the SON and the NWMO depends on this commitment. The NWMO's proposal of radically expanding the scope of the DGR to receive not just spent fuel but also ILW would be rendered completely impossible without the assurance of the principle of willingness.

The SON has already become host to the world's largest operating nuclear reactor and the majority of Canada's radioactive waste without its consent. It is essential that this history is not repeated. This is particularly true in light of the commitments Canada has made to implementing the *United Nations Declaration on the Rights of Indigenous Peoples*. We strongly disagree with NWMO's view that the modernized *Policy on Radioactive Waste and Decommissioning*, in and of itself, provides adequate guarantees that Canada will honour this fundamental commitment of a willing host. Of all the recommendations in the ISRW, this commitment is the most important to the SON.

In addition to the overarching concerns described above, the SON has provided specific proposed additions to the draft ISRW in the attached document. Due to the challenge of disentangling the NWMO's recommendations from its overview of "what we heard", the SON has limited its comments to the Executive Summary in which the NWMO's proposed principles are plainly articulated.

We look forward to our continued work with the NWMO on this important issue. It is imperative that we find appropriate and just solutions to the current radioactive waste management problem.

Regards,



Michael Chegahno | Energy Manager, Saugeen Ojibway Nation Environment Office

manager.energy@saugeenojibwaynation.ca

## DRAFT INTEGRATED STRATEGY FOR RADIOACTIVE WASTE

### EXECUTIVE SUMMARY

#### Proposed Recommendations for the Implementation of the Strategy

The following recommendations consider the inputs obtained from international benchmarking, stock taking, technical and cost estimate assessments, and public and Indigenous engagement. These recommendations address the existing gaps in Canada's long-term management of radioactive waste. These recommendations when taken along with the existing ~~ce~~ projects in operation or undergoing regulatory assessments at the time of writing form a complete ~~strategy~~ **set of guiding principles** to address all existing and future waste in Canada.

#### Recommendation 1: Low-level waste should be disposed of in multiple near-surface facilities with implementation resting with the waste owners

Disposal of low-level waste aligns with international best practices and was preferred by the majority of participants.

From a technical, financial and societal perspective, near-surface disposal is the best option to contain the waste until it no longer poses a hazard.

The Concrete Vault options is the recommended technical approaches to address all the low-level waste. The Engineered Containment Mound was the option most often preferred from a societal and financial perspective, but it is only suitable for 6% of the inventory based on preliminary technical assessments.

From a societal point of view, multiple facilities located in willing host communities were preferred given the large volumes of waste and transportation considerations. Centralization does garner significant support as well and, financially, economies of scale may favour centralization. Further detailed analysis, including the cost of transportation, is needed. The concept of regional facilities should be further explored. **Special attention should be given to the potential disproportionate impacts a centralized or regional facilities' approach would have on Indigenous Nations that may already be carrying a significant burden with respect to radioactive waste. Efficiencies due to reduced transportation costs should not justify adopting such an approach.**

#### Recommendation 2: Intermediate-level waste should be disposed of in a single deep geological repository with implementation by a single organization, the NWMO

Disposal of intermediate-level waste aligns with international best practices and was preferred by the majority of participants.

From a technical and societal point of view, disposal in a deep geological repository is the best option to isolate the waste from the environment. This approach would also be able to accommodate non-fuel high-level waste.

We heard from participants that having one central place in the country for intermediate level waste would be preferable to several regional facilities. From a societal perspective, co-location with irradiated fuel has the same level of support as a separate deep geological repository for intermediate-level waste. From a financial perspective, co-location is the most economical option.

We heard from participants support for the NWMO to be the organization to implement the solution for intermediate-level waste.

Commitment to the principles of informed consent and volunteerism from a willing host community are essential to the acceptability of this plan. This is especially important in the case of co-location where a host community may be asked to accept an “expanded” facility to house ILW with spent fuel. Technical, societal, and financial perspectives on the acceptability of the co-location of intermediate-level waste cannot come at the expense of these principles and of the commitments Canada has made to Indigenous peoples through the adoption of the United Nations Declaration on the Rights of Indigenous Peoples.

**Recommendation 3: A third-party, independent of the implementing organizations, should oversee the implementation of the strategy**

In the development of the ISRW, there was also considerable support expressed for independent oversight of the implementation of the strategy for radioactive waste, as well as for the greater ongoing involvement of interested parties throughout the lifecycle of the facilities. Waste owners would retain responsibility for funding, planning, development and operation of their radioactive waste disposal sites.

Natural Resources Canada should consider an appropriate oversight model that is independent of the implementing organizations. This oversight should consider how to incorporate the input or involvement of interested parties such as Indigenous peoples and civil society and should include representatives from Indigenous Nations deeply impacted by the nuclear industry.

**Recommendation 4: Consent of the local communities and Indigenous peoples in whose territory future facilities will be planned must be obtained in siting**

This consideration was prioritized by the majority of contributors. It is also aligned with the objectives of Canada’s draft Radioactive Waste Policy, in relation to the implementation of United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). This principle of informed consent and volunteerism must apply to the disposal of all levels of radioactive waste.

#### Recommendation 5: Design of facilities should prioritize the protection of water

While safety can be demonstrated from a technical standpoint regardless of location, it may be difficult to obtain societal support for facilities located in close proximity to major sources of drinking water. This was a priority for most participants who felt strongly that waste disposal sites should not be built near sources of drinking water as they felt these could contaminate it and affect their way of life.

While participants indicated that facilities should be located away from any major water sources, the reality of the Canadian landscape is that this would not be feasible. Protection of water is paramount, and therefore any disposal facilities must meet the highest standards of environmental and water protection.

#### Recommendation 6: Long-term caretaking should be established for disposal facilities

There should be oversight of the waste and of the facilities for as long as future generations deem it to be necessary to ensure that the environment remains protected. This concept also includes the transfer of knowledge of the waste and where it is located with future generations and periodic review of the monitoring plans, to determine whether they continue to be adequate or necessary. *Host Indigenous Nations should be aware of and participate in the retention and transfer of knowledge regarding the waste and the periodic review of the plans.*

#### Recommendation 7: We need to take action now and not defer to future generations

There is a need for an integrated strategy, and the approach to the long-term management of low-level and intermediate-level waste should be determined with a sense of urgency rather than leaving this to future generations. This will require on-going commitment and support from government, with a structure that will be empowered to deliver on the implementation of the strategy regardless of changes in power. *This sense of urgency, however, cannot come at the expense of proper reconciliation with Indigenous Nations deeply affected by the nuclear industry.*

#### Recommendation 8: Resolving legacy issues for host Indigenous Nations is an integral part of future waste management planning

Certain Indigenous Nations have been deeply impacted by the development of the nuclear industry in Canada. This industry was developed on their treaty territories without consultation or accommodation. The resolution of legacy issues, which include historical, on-going, and future impacts, should be integrated into the planning of future waste management and disposal to avoid perpetuating injustices.

**Additional Recommendations Outside of the Scope of the ISRW**

The ISRW did not consider options for additional waste processing, including volume reduction, beyond those planned and quantified by the waste owner. Subject to future study, the Integrated Strategy for Radioactive Waste may benefit from a holistic approach to waste processing upstream from disposal. Furthermore, an integrated approach may open avenues of waste processing resulting from economies of scale for waste processing options that have not yet been accessible for smaller waste owners.









**ብድርና ከፍተኛ ገቢዎች:** ብድርና ከፍተኛ ገቢዎች ይህ ለገቢዎች ስራዎች ማስፈጸም ለሚችሉ ናቸው።

**ጋራ ገቢዎች (LLW):** ጋራ ገቢዎች ለገቢዎች ስራዎች ማስፈጸም ለሚችሉ ናቸው። ጋራ ገቢዎች ለገቢዎች ስራዎች ማስፈጸም ለሚችሉ ናቸው። ጋራ ገቢዎች ለገቢዎች ስራዎች ማስፈጸም ለሚችሉ ናቸው።

**ገቢዎች ለገቢዎች:** ገቢዎች ለገቢዎች ስራዎች ማስፈጸም ለሚችሉ ናቸው። ገቢዎች ለገቢዎች ስራዎች ማስፈጸም ለሚችሉ ናቸው።

**ገቢዎች ለገቢዎች:** ገቢዎች ለገቢዎች ስራዎች ማስፈጸም ለሚችሉ ናቸው። ገቢዎች ለገቢዎች ስራዎች ማስፈጸም ለሚችሉ ናቸው። ገቢዎች ለገቢዎች ስራዎች ማስፈጸም ለሚችሉ ናቸው።

**ገቢዎች ለገቢዎች:** ገቢዎች ለገቢዎች ስራዎች ማስፈጸም ለሚችሉ ናቸው። ገቢዎች ለገቢዎች ስራዎች ማስፈጸም ለሚችሉ ናቸው። ገቢዎች ለገቢዎች ስራዎች ማስፈጸም ለሚችሉ ናቸው።

**ገቢዎች ለገቢዎች:** ገቢዎች ለገቢዎች ስራዎች ማስፈጸም ለሚችሉ ናቸው። ገቢዎች ለገቢዎች ስራዎች ማስፈጸም ለሚችሉ ናቸው።

**ገቢዎች ለገቢዎች:** ገቢዎች ለገቢዎች ስራዎች ማስፈጸም ለሚችሉ ናቸው። ገቢዎች ለገቢዎች ስራዎች ማስፈጸም ለሚችሉ ናቸው።

**ገቢዎች ለገቢዎች:** ገቢዎች ለገቢዎች ስራዎች ማስፈጸም ለሚችሉ ናቸው። ገቢዎች ለገቢዎች ስራዎች ማስፈጸም ለሚችሉ ናቸው።

ᑕᕕᕐᑎᑎᑦᑎᑦᑎᑦᑎᑦᑎᑦ ᑕᕕᕐᑎᑎᑦᑎᑦᑎᑦᑎᑦ: [info@radwasteplanning.ca](mailto:info@radwasteplanning.ca)

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22 ኑᓂᑎᑎᑦᑎᑦᑎᑦᑎᑦᑎᑦ ᑕᕕᕐᑎᑎᑦᑎᑦᑎᑦᑎᑦ,  
ᑎᑎᑎᑦᑎᑦᑎᑦᑎᑦᑎᑦᑎᑦ ᓄᑎᑎᑦᑎᑦᑎᑦᑎᑦ, ᑕᕕᕐᑎᑎᑦᑎᑦᑎᑦᑎᑦ,  
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