



Métis Nation of Ontario
Lands, Resources and Consultations

14 September 2019

Aimee Rupert, Environmental Assessment Officer
Canadian Nuclear Safety Commission
P.O. Box 1046 Station B
280 Slater Street
Ottawa ON K1P 5S9

BY ELECTRONIC MAIL

Dear Aimee Rupert:

Re: Global First Power's proposed Micro Modular Reactor Project at Chalk River

The Métis Nation of Ontario (MNO) would like to thank the Canadian Nuclear Safety Commission (CNSC) for providing the MNO with the opportunity to comment on the project description for Global First Power (GFP)'s proposed Micro Modular Reactor Project at Chalk River. On behalf of the MNO, which represents the rights and interests of Ontario's regional rights-bearing Métis community, please accept the following comments concerning the project description for GFP's proposed Micro Modular Reactor Project (the 'Project') at Chalk River as provided to the MNO by the CNSC on 15 July 2019.

The Métis Nation has Aboriginal rights in the lands, waters and natural resources within the area where the Cultural Heritage Resources noted above are located. The rights are held as collective rights, by the regional rights-bearing Métis community, as represented by the MNO. As you know, the Métis are one of three distinct Aboriginal peoples in Canada, whose rights, interests and way of life are constitutionally protected under section 35 of the *Constitution Act, 1982*. Accordingly, the Crown has the duty to consult with the Métis before making a decision, taking an action or issuing an approval that could impact the rights, interests or way of life of the Métis community.

The Project has the potential to negatively impact Métis citizens who use the traditional territory in the vicinity of the proposed location. To ensure the impacts are mitigated and where appropriate accommodated, the MNO will need to continue to be involved in this project through ongoing and active consultation.

- Section 4.3 of the GFP project description speaks to the affected indigenous communities. While MNO is included in this section and it correctly indicates that consultation will take place with regional consultation committees, it makes the error of referring to the community council addresses as the location of the 'Métis community'. The Métis people assert rights regionally through traditional territories, and as such the community council locations within the traditional territory do not represent 'community locations' rather, they are simply office locations. As the proposed project location is within a Métis traditional territory it is not possible to calculate a distance to the traditional territory. The inclusion of the distances to the office locations infers that the project is less significant to the MNO that it is to First Nations with closer reserves. This is not the case. The MNO would request that this outage is corrected in the project description.
- Due to the challenges in siting final disposal for nuclear waste materials, the MNO would like to request that GFP provide additional information as to the future disposal of low and intermediate level irradiated materials arising from operations and decommissioning. Does GFP intend to dispose of the materials in one of the currently proposed facilities? If so has the proponent of that disposal facility indicated that they believe there will be adequate capacity? If GFP proposes to dispose of the decommissioning materials in a yet to be proposed facility, what will the interim storage plans be? Disposal of nuclear waste materials is a significant concern for the MNO as it can impact how Métis citizens use the land in the vicinity of a disposal site. Because of this, it is felt that this concern should be reviewed as part of the project.

The project description provided by GFP, while providing an initial picture into the proposed project, is quite broad and additional concerns are likely to be revealed as the project details become more specific.

The MNO looks forward to working with the CNSC in its consideration of the proposed GFP project and any regulated activities that arise from it. We look forward to your consideration of these preliminary comments and to your response in due course. Should you have any questions or concerns regarding this letter please do not hesitate to contact Jesse Fieldwebster via email at <Personal Information Redacted> or by telephone at <Personal Information Redacted> .

Sincerely,

<Personal Information Redacted>

Joanne Meyer
COO, Métis Nation Ontario

cc. Margaret Froh, President
Métis Nation of Ontario

Region 6 Consultation Committee

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