Comment	Reference	Issue / Concern	Recommendation or Request for Clarification
1	Acknowledgement of Truths, pages i and ii	It is stated: *The NWMO understands the unique long-term time scale of Canada's plan to build the Project, and the enduring relationship it will have with land and water for generations to come. The NWMO acknowledges that the Project will have an impact on traditional land and resource use, including through changes in access or perceptions of risk. The Project is located within the territory of WLON; which is the most proximate potentially impacted Indigenous group to the site. As such, the Anishinaabe peoples of WLON are expected to experience these impacts most. The NWMO commits to build respectful relationships, and to seek the free, prior, and informed consent of impacted peoples of WLON before proceeding with development of the Project.* *The NWMO is on a reconciliation learning journey.* *All of the NWMO's work with respect to Indigenous Peoples will be guided by Reconciliation.*	The IPD fails to acknowledge that the project also overlaps the Traditional Territory of Eagle Lake First Nation. If NWMO is on a reconciliation learning journey, and its work is guided by reconciliation, the IPD and NWMO's approach to the Project must be revised to recognize the impacts of the project on the rights, interests, and values of Eagle Lake First Nation. Areas of concern and valued components, as identified by Eagle Lake First Nation, must be considered and protected throughout the IA process.
2	Executive Summary, page ix	It is stated: *If the NWMO is successful in obtaining impact assessment and initial licensing approvals, the Impact Assessment (IA) decision statement and the licence issued by the CNSC will include enforceable environmental protection requirements, such as:* • *limits on radioactive and hazardous releases (e.g., water effluent and air emissions)* • *obligations for environmental monitoring and emissions reporting* • *emergency preparedness and response plans* *The NWMO will also be required to implement an Environmental Protection Program that monitors performance, ensures compliance, and drives continuous improvement.*	There are few details on what these environmental protection requirements will be based on, as well as what the Environmental Protection Program will include. How will Eagle Lake First Nation's concerns be addressed through both? As written, it implies that the resulting environmental protection requirements, and the Environmental Protection Program, will be designed to meet regulatory requirements. Eagle Lake First Nation abides by the Migisi Sahgaigan Maanachi Totaa-aki Declaration, and as keepers of the land, we work to protect the natural environment through Manitou Inaakonig'ewin – the Creator's sacred laws and teachings. Eagle Lake First Nation concerns and requirements must also be considered in equal weight to regulatory requirements given the Project will be situated within their Traditional Territory.
3	Executive Summary, page ix	It is important to recognise that the safety case extends into several millennia which results in very large uncertainty in social conditions and the physical state of the biosphere, particularly under current rate of climate change. This report concentrates on current conditions and construction.	This uncertainty needs to be emphasized throughout the assessment process. This Project Description summarises current conditions but does not adequately address future conditions.
4	Executive Summary, page x	It is stated: *Drawing on more than a decade of geoscientific research, environmental data collection, and safety assessments, the NWMO has confidence in the safety and suitability of the selected site.*	Additional details are required to better understand this statement. Presumably, this statement is based on scientific data collected over "more than a decade". What Indigenous Knowledge was included in the assessment to inform that statement. More specifically, how was Eagle Lake First Nation's Indigenous Knowledge used to inform the site selection.

Comment	Reference	Issue / Concern	Recommendation or Request for Clarification
5	Executive Summary, page x	It is stated: *Project activities that could result in environmental interactions include land clearing, blasting and excavation, water management, construction and operation of surface and underground facilities, materials handling, and in-site transportation*	Only in-site transportation has been considered in the IPD. According to the NWMO's Preliminary Transportation Plan (December, 2021), "for a site to be selected, the NWMO will need to demonstrate the following: 1) A deep geological repository can be safely implemented with a strong technical safety case; 2) The project can be implemented in partnership with informed and willing hosts; and 3) Confidence that a safe, secure and socially acceptable transportation plan can be developed. Eagle Lake First Nation notes that the safe transport of used nuclear fuel to the DGR site was a key determinant in site selection. Why, then, would this integral component of the site selection process be excluded from the IPD and IA process? Eagle Lake First Nation is not supportive of the IA process without used nuclear fuel transport, and associated impacts and risks, included.
6	Executive Summary, page x	It is stated: *Project activities that could result in environmental interactions include land clearing, blasting and excavation, water management, construction and operation of surface and underground facilities, materials handling, and in-site transportation. For the purposes of the Initial Project Description submission, the NWMO has applied a pathways-of-change screening approach to identify these interactions and to incorporate proven environmental protection measures drawn from comparable projects. Examples include:* • *air quality and dust control: water spraying, material covers, and wheel-washing stations* • *noise and vibration management: temporary barriers, controlled blasting, and limited work hours* • *erosion and sediment control: silt fencing, sedimentation ponds, and progressive revegetation* • *surface water protection: engineered drainage, water collection ponds, and treated effluent release* • *wildlife and habitat protection: seasonal clearing restrictions and habitat restoration* *With these measures in place, the likelihood of significant adverse environmental effects is expected to be low.*	Eagle Lake First Nation is concerned that the language used in the IPD is misleading. Environmental protection measures are typically referred to as "effective" but rarely as "proven". There is always a chance that chosen measures won't be as effective as anticipated in real world scenarios, and that impacts will occur.
7	Executive Summary, page xi	It is stated: *In the case of social, economic, and cultural components, the wealth of available baseline studies completed in the area suggests that many of the anticipated impacts are positive. The publicly available Ignace Hosting Agreement further outlines commitments that reinforce these positive outcomes through sustained investment in community well-being, infrastructure, and economic development.* *While the current baseline primarily reflects non-Indigenous and municipal communities, the NWMO recognizes that Indigenous data are not yet represented. The NWMO will work collaboratively with potentially affected Indigenous groups through the impact assessment process to ensure that Indigenous social, cultural, economic, and health data are respectfully incorporated into the assessment.*	Eagle Lake First Nation does not agree with the statement that "many of the anticipated impacts are positive" when the current baseline primarily reflects non-Indigenous and municipal communities. It must be acknowledged that over the past decades, the impacts of development projects in Northwestern Ontario have often been felt disproportionally by Indigenous communities who have, and continue, to experience impacts including loss of access to Traditional lands to carry out activities such as hunting, gathering, fishing, trapping, and ceremony. Stating that the project is anticipated to be positive overall, without full consideration of Indigenous social, cultural, economic and health data is unsubstantiated.

Comment	Reference	Issue / Concern	Recommendation or Request for Clarification
8	Executive Summary, page xii	It is stated: *The Project is expected to generate lasting socio-economic and cultural benefits, particularly for municipalities and regional economies. Uncertainty remains regarding potential effects to Indigenous Peoples based on baseline data collection to date and therefore cannot be ruled out as carrying a non-negligible risk of significant effects. These potential impacts will be a central focus of the Impact Statement and addressed through assessment studies with Wabigoon Lake Ojibway Nation and ongoing engagement with potentially affected Indigenous groups. This work is expected to be grounded in respect for Indigenous data sovereignty, ensuring that Indigenous Knowledge and information are used in accordance with community protocols.*	Eagle Lake First Nation must be fully considered in the Impact Statement and all stages of the IA process. Eagle Lake First Nation's Traditional Territory overlaps with the project area. It is not acceptable to only consider and include Wabigoon Lake Ojibway Nation in studies and assessments that have, and will be carried out, to inform the Impact Assessment and Impact Statement. Doing so is in direct violation of NWMO's statement in the IPD that "all of the NWMO's work with respect to Indigenous Peoples will be guided by Reconciliation".
9	Executive Summary, page xii	It is stated: *Land and resource use—The Project will result in some unavoidable changes to land and resource use, including access restrictions for safety and security, direct overprinting of land where infrastructure is located, and perceived concerns that may influence how surrounding lands and waters are used. These issues will be examined through Indigenous engagement, Indigenous Knowledge and land use studies, and harmonization with Wabigoon Lake Ojibway Nation's Regulatory Assessment and Approval Process.*	Eagle Lake First Nation fully disagrees with the approach of focusing the assessment of impacts to land and resource use on Wabigoon Lake Ojibway Nation's Regulatory Assessment and Approval Process. Given the project site is within our Traditional Territory, our community members' ability to exercise our Treaty rights will be impacted. Eagle Lake First Nation abides by the Migisi Sahgaigan Maanachi Totaa-aki Declaration, and as keepers of the land, we work to protect the natural environment through Manitou Inaakonig'ewin – the Creator's sacred laws and teachings. Our teachings, ways of knowing, and responsibility to protect our lands and waters must be respected throughout the IA process. The assessment and approval process of one First Nation does not represent that of all impacted First Nations.
10	Statutory Regulatory and Oversight Framework for the Project, Overview of the Project and Legislative Context, p.2.	It is stated: *As proposed, the Project would contain and safely isolate approximately 5.9 million bundles of used nuclear fuel. The Project is expected to span approximately 160 years, including site preparation, construction, operation (about 50 years), decommissioning and closure, and post-closure monitoring.*	Eagle Lake First Nation requests detailed information around post-closure monitoring. It is understood that not all information is available at this stage of the process. However, timelines, length and involvement of Eagle Lake First Nation in post-closure monitoring must be detailed. It is of utmost importance that we are involved in the development and implementation of the monitoring program to help ensure our interests and values are protected for generations to come (i.e., intergenerational approach).
11	Statutory Regulatory and Oversight Framework for the Project, Regulatory Oversight and Safety Framework, p.3-4	It is stated: *If the Project receives approval under the IAA and an initial licence from the CNSC, both the IA decision statement and the CNSC licence will include enforceable environmental protection requirements, such as:* *• limits on radioactive and hazardous releases to water and air* *•obligations for environmental monitoring and public reporting* *• emergency preparedness and response plans*	The project site overlaps our Traditional Territory. As such, Eagle Lake First Nation requires involvement in developing and implementing environmental monitoring programs, as well as in the development of emergency preparedness and response plans.

Comment	Reference	Issue / Concern	Recommendation or Request for Clarification
12	V. Objectives and Overview, p. 8	It is stated: *Two previous environmental assessments for proposed deep geological repositories in Canada concluded that, with the application of appropriate mitigation, the technology is safe and acceptable. Building on these findings, this IPD incorporates mitigation measures, lessons learned and a strengthened commitment to reconciliation, ensuring Indigenous voices, rights, and perspectives are integrated into all aspects of the assessment and decision-making process.*	Eagle Lake First Nation requests further information on the two previous environmental assessments being referred to. What pathways and impacts were included in the assessment? How were First Nations involved in the IA process? What similarities exist between the Project site and the sites that were the focus of these previous assessments.
13	3. Building Relationships with Anishinaabe Peoples of Wabigoon Lake Ojibway Nation and Other Indigenous Groups in Canada, p. 16	Initiatives like the use of traditional knowledge and western science to explain the interaction between water and the DGR are important but may be premature if the transport of groundwater through the vault and possible discharge to surface waters and terrestrial areas is still unknown.	The identification of discharge zones of groundwater will be a major step in identifying potentially sensitive areas in the biosphere for more detailed assessment.
14	3.2.2 - Areas of Focus and Shared Commitments with Wabigoon Lake Ojibway Nation, p. 21	It is stated *Data governance is a critical priority for the Nation. All data must be stored, shared, and applied in ways that uphold WLON's inherent data sovereignty, protect intellectual property, Nation-led protocols that reflect WLON's laws, responsibilities, and consent processes.*	This statement should apply to all First Nations actively involved in this process.
15	3.2.2 - Areas of Focus and Shared Commitments with Wabigoon Lake Ojibway Nation, p. 21	"Water is sacred. All water-related infrastructure, activities, and management plans must be co-developed with WLON…"	This is an important statement and applies to all First Nations in the area but may need to be re-evaluated when groundwater flow is more clearly defined and the potential for discharging to surface waters is better defined. These discharge areas may need to be considered in human radiation dose models.
16	9.3 Preliminary List of Project Activities Prior to Initial Licence, p 50-51	It is stated: *The transportation of nuclear materials (i.e., used nuclear fuel) and non-nuclear materials within established transportation corridors is not considered and incidental activity to the Project. This is because these activities are ongoing, independently regulated, would not require changes to federal or provincially approved design standards for existing highways and railways and these activities are expected to continue regardless of the Project's implementation. Movement of nuclear and nonnuclear materials within established transportation networks is governed by federal and provincial regulations, such as the CNSC's Packaging and Transport of Nuclear Substances Regulations, 2015 (Government of Canada 2015a) and the Transportation of Dangerous Goods Regulations, which ensure safety and oversight outside the scope of the Project. Since these transportation activities support broader national and regional systems and the public and interested parties, and do not require infrastructure upgrades or changes directly attributable to the Project, they are distinct and not subordinate or complementary to the designated activity (i.e., construction and operation of the DGR). Accordingly, the Project does not include the transportation of used fuel from reactor sites to the Project beyond the primary and secondary access roads at the Project site, as this is regulated separately under CNSC certification and uses existing transportation infrastructure.*	According to the NWMO's Preliminary Transportation Plan (December, 2021), "for a site to be selected, the NWMO will need to demonstrate the following: 1) A deep geological repository can be safely implemented with a strong technical safety case; 2) The project can be implemented in partnership with informed and willing hosts; and 3) Confidence that a safe, secure and socially acceptable transportation plan can be developed. Eagle Lake First Nation notes that the transport of used nuclear fuel to the DGR site was a key determinant in site selection. Why, then, would this integral component of the site selection process be excluded from the IPD and IA process? Eagle Lake First Nation is not supportive of the IA process without used nuclear fuel transport, and associated impacts and risks, included. We completely disagree with the statement that transportation of used nuclear fuel is a distinct activity from operation of the DGR. DGR operations will not occur without the transport of used nuclear fuel via road and/or rail. As well, in Section in 10.1 - Description of Production Processes, p.73, it is stated that used fuel arrives (approximately two trucks per day) at the UFPP from the interim storage sites and is received in the UFTP handling cells. This suggests that transportation is a major activity of the project, with impacts and risks needing to be evaluated.

Comment	Reference	Issue / Concern	Recommendation or Request for Clarification
17	Section 9.3, p. 51	It is stated: *For the licensing and impact assessment process, it is anticipated that the geographic extent of effects from the transportation of nuclear and non-nuclear materials would be limited to transportation along the new access roads and the rail spur and not within established transportation corridors*"	Omission of the entire transportation route from consideration in the licensing and impact assessment process is a serious gap. Transportation of nuclear materials in particular over more than 1600 km from southern Ontario to the DGR creates significant risk of contamination of aquatic and terrestrial environments and wildlife populations along both the truck and rail routes. The entire geographic extent of road and rail transportation routes needs to be included as pathways of change and potential impacts of these pathways to all valued components need to be comprehensively assessed.
18	9.4.1 Overview of the Activities, Infrastructure and Physical Works, p. 51	It is stated: *Effective water management is a central design priority for the Project, with the goal of minimizing potential impacts on water quality and downstream users. During site preparation, the NWMO proposes to establish an integrated water management system for the site to manage contact water from the surface facilities. The integrated system will include the collection and treatment of contact water as required.*	While this commitment is noted, the language "as required" introduces uncertainty regarding what contact water will be collected and treated and under which site conditions. Given the sensitivity of the receiving environment, the potential for contaminant loading through runoff, seepage, and drainage pathways, and the ongoing gaps in site wide water balance and groundwater/surface water interactions, we request that all contact water be collected and treated prior to discharge. Comprehensive treatment of all contact water is consistent with the stated goal of minimizing water quality impacts and protecting downstream users. This approach also reduces uncertainty in the assessment of water quality effects and avoids unaccounted for contaminant pathways. The proponent should clearly confirm that all contact water, regardless of source, operational phase, or contaminant profile, will be managed through the treatment system before release to the environment.
19	Section 9.4.2, p. 52-53; Table 19.4, p. 210, 214; Appendix E Table 4.1	It is stated that construction activities (including clearing, grubbing, grading, terracing, and construction) will be scheduled outside of environmentally sensitive periods and areas "*where practicable*" and "*to the extent practicable*".	This language is vague and discretionary and does not provide sufficient confidence or certainty that environmental valued components will be protected, nor does it demonstrate that the precautionary principle is being followed. It also fails to account for culturally sensitive periods such as community harvesting events or hunting events.

Comment	Reference	Issue / Concern	Recommendation or Request for Clarification
20	9.4.2 Listing of Site Preparation Phase Activities, p.55	It is stated: *Fresh water for the Project site will be sourced from a local water body or groundwater source in close proximity to the Project site. The source and location will be identified through future studies including engagement with Indigenous communities and regulatory authorities.*	A cumulative effects assessment is required, especially if it is determined that a surface withdrawal is the preferred option rather than a groundwater source. Is the same watercourse is being considered as both the source of freshwater and the receiving environment for treated effluent discharges? In such cases, cumulative impacts could include: •Altered flow regime from combined withdrawal and discharge, •Changes to thermal characteristics, •Changes to water chemistry (nutrients, chloride, metals, ammonia, etc.), •Effects on fish habitat and aquatic SAR, •Reduced assimilative capacity during low flow periods, •Potential compounding effects when combined with other watershed stressors. The proponent should confirm whether the same watercourse is under consideration for both water taking and effluent discharge and, if so, provide a comprehensive cumulative effects analysis and rationale demonstrating that environmental flows, water quality objectives, and habitat needs can be maintained under all operating scenarios.
21	9.4.2 Listing of Site Preparation Phase Activities, p. 55	It is stated: *The permanent on-site domestic sewage system is designed to collect and treat all domestic sewage at a central location. The domestic sewage treatment plant is likely to treat liquid effluent to a suitable quality for direct environmental discharge. A connected sludge treatment system is proposed to dewater and stabilize solid sludge for disposal in accordance with applicable regulatory requirements, partially by transport to an existing off-site landfill.*	No information is provided on whether a study will be undertaken to determine the capacity of the receiving watercourse to assimilate the sewage effluent. Please confirm whether an assimilative capacity study, mixing/dilution analysis, or equivalent water quality impact assessment will be completed. Such a study is necessary to evaluate: •the dilution available in the receiving watercourse under various flow conditions (including low flow and climate change scenarios); •the potential for cumulative effects if the same watercourse also receives treated site contact water or other project discharges; •whether effluent parameters remain within applicable water quality objectives after mixing; •the potential for short term and long term changes to aquatic habitat and downstream users. Without a mixing/dilution study, it is not possible to verify that "suitable quality for direct discharge" is protective of the receiving environment under all operating conditions. Please clarify the scope, timing, and methodology of the planned studies and confirm whether results will inform the final design and permitting of the sewage treatment system.

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22	9.5.2 Listing of Major Construction Activities, p. 59	It is stated: *Water pumped from the underground development activities, such as shaft sinking, is planned to be reused if suitable. If not fit for re-use, it would be directed to a collection pond for treatment prior to release to the environment.*	The Project Description report provides no information on the criteria or thresholds that will be used to determine whether this water can be reused. Please clarify the specific parameters, screening criteria, and decision process that will determine when underground development water cannot be reused. This should include consideration of: •Water quality criteria for reuse (e.g., turbidity, TSS, pH, metals, salinity/major ions, hydrocarbons, ammonia); •Procedures for characterization, sampling frequency, and analytical methods to determine reusability; •Triggers that would redirect water to treatment rather than reuse. Please provide the planned water quality screening approach and the decision framework that will determine if the water is suitable for reuse.
23	9.6 Operations (p. 68) and Appendix E. Table 4-1	It is stated: *The site water management systems as described in Section 9.5.2 would manage conventional water streams. Water from the nuclear operations would be directed to the active liquid water management system for further processing. All liquid waste generated as a byproduct of operation activities is planned to be collected, segregated, treated and stored in engineered structures prior to discharge. Contact water will be managed, monitored, and if required, treated, prior to discharge to a suitable receiving waterbody meeting regulatory requirements.*	Given that the Project may involve ongoing discharges of treated effluent and treated sewage to surface water, a cumulative effects assessment is required to evaluate the interaction of these discharges with other project stressors (e.g., erosion, altered drainage, sediment release, groundwater seepage). The proponent has acknowledged that the integrated site wide water balance and water quality modelling have not yet been completed, and therefore the receiving environment's response to these discharges cannot be reliably predicted at this stage. An assimilative capacity assessment is required to determine whether the receiving waterbody can safely accept effluent and sewage under a range of hydrological conditions, including low flow and climate change scenarios. Until these analyses are completed, conclusions regarding low risk or effective mitigation remain preliminary.
24	9.7.1 Overview Activities, Infrastructure and Physical Works, p. 68 - 69	It is stated: *A period of long-term monitoring is expected to provide further data to demonstrate the long-term safety of the Project. During this phase, limited activity would take place at the Project site beyond surveillance, co-emplacement of LLW and selective decommissioning of structures, systems, and components.*	Eagle Lake First Nation requests detailed information around post-closure monitoring. It is understood that not all information is available at this stage of the process. However, timelines, length and involvement of Eagle Lake in post-closure monitoring must be detailed. We also request information around thresholds/triggers for all monitoring endpoints, as well as details on adaptive management should monitoring results be different than expected based on previous studies. It is of utmost importance that Eagle Lake be involved in the development and implementation of the monitoring program to help ensure our interests and values are protected for generations to come (i.e., intergenerational approach).

Comment	Reference	Issue / Concern	Recommendation or Request for Clarification
25	9.7.2 Listing of Major Activities for Decommissioning and Closure, p. 70	It is stated: *The NWMO will demonstrate the site's long-term safety during the extended monitoring period. The actual duration of this period will be determined based on society's desire at the time as well as experience from other international DGRs for used nuclear fuel and CNSC oversight.*	Eagle Lake First Nation disagrees with the statement that the duration of the monitoring period will be based on society's desire at the time. To begin with, we, as rights holders, must be part of the decision around the long-term monitoring program that will follow completion of used fuel storage operations. In addition, details on long-term monitoring (including, but not limited to, activities, endpoints, triggers/thresholds, adaptive management, timelines, duration, responsibilities etc.) must be determined prior to the project proceeding. It is not sufficient to wait until project operations are nearing completion and must be detailed prior to project approval.
26	Table 12.4: Features for Option 4—Adaptive Phased Management, p. 84	It is stated: *Used fuel would be retrievable at all times. The technology to retrieve used fuel containers from a DGR would need to be further developed and demonstrated at the site.*	Eagle Lake First Nation is concerned with this statement. It appears as though the technology to retrieve the used fuel containers has not yet been established. How confident is NWMO that this technology will be in place prior to the IA being completed. Is there the possibility that used fuel may not be retrievable?
27	12.1.2.1 OBJECTIVES CONSIDERED IN COMPARATIVE ANALYSIS, p. 85	It is stated: *In the assessment of fairness, the NWMO considered issues of both substantive and procedural fairness. Substantive fairness focuses on the content or substance of the approach, including how the costs and benefits associated with the approach would be distributed among different people and between humans and other species. It also includes consideration of intergenerational fairness which considers if a balance struck between the current generation taking responsibility for resolving the problem versus the desire not to constrain future generations by the choices the NWMO makes today. Procedural fairness focuses on the processes used and is mainly a function of the degree to which the approach would allow for the participation of concerned citizens in key decisions about how the approach would be implemented.*	Eagle Lake First Nation does not agree with the statement that both substantive and procedural fairness was adequately considered in the process so far. Our Traditional Territory overlaps the Project, yet we have been overlooked in key decision-making steps so far. The assessment of impacts and risks, as well as mitigation measures, has not adequately captured the rights, values, concerns and interests of our First Nation. Our Indigenous Knowledge and use of the lands in the Project area for hunting, trapping, gathering, and fishing has not been meaningfully incorporated thus far.
28	12.1.2.1 OBJECTIVES CONSIDERED IN COMPARATIVE ANALYSIS, p. 85	It is stated: *Public health ought not to be threatened due to the risk that people might be exposed to radioactive or other hazardous materials. Similarly, the public should be safe from the threat of injuries or deaths due to accidents during used nuclear fuel transportation or other operations associated with the management of used nuclear fuel.*	Eagle Lake First Nation notes that in the Comparative Analysis, the threat of injuries or deaths due to accidents during used nuclear fuel transportation was considered. It is unclear why this potential impact pathway is considered in some areas of the IPD and not in others, and not in the overall IA process.

Comment	Reference	Issue / Concern	Recommendation or Request for Clarification
29	12.1.2.1 OBJECTIVES CONSIDERED IN COMPARATIVE ANALYSIS, p. 86	It is stated: *The assessments with respect to community well-being considered both the likely economic impacts of the approach, and the potential effects on social and cultural qualities of affected communities. On the economic side, consideration was given to potential effects on property values, jobs and businesses. Potential social and cultural impacts include raising fears and concerns of citizens and the risk of community polarization (e.g., contrasting beliefs between those who support and those who oppose locating a facility near their community). Some residents may see living near a radioactive waste management facility as placing a stigma on their community.*	The potential effects on social and cultural qualities has not been adequately considered and assessed for Eagle Lake First Nation. We have not been meaningfully engaged in the identification of valued cultural components, impacts to these same components, and required mitigations.
30	12.1.2.1 OBJECTIVES CONSIDERED IN COMPARATIVE ANALYSIS, p. 86	It is stated: *Assessing the degree of impact each approach would have on the natural environment required consideration of many factors, including the number and sensitivity of ecosystem elements that would potentially be affected, the likelihood of impact on each type of resource, and the significance of the potential consequences to affected resources. Many different types of valued and environmentally sensitive resources could be affected, including plants and animals, land, surface water, groundwater and the air (e.g., through air pollution created during the construction of a new facility). Also included in the assessment were various aesthetic impacts, such as noise, and visual changes to the natural scenery. As in the case of other objectives, it is necessary to consider not only the stresses that each approach would produce assuming that the approach performs as expected, but it is also necessary to consider the possibility of risk scenarios which go beyond normal operating parameters.* *An important factor to be considered here is the impact of significant changes in environmental conditions associated with climate change and the impact these types of changes may have on the performance of the management system.*	There are many valued and environmentally sensitive resources of high importance to Eagle Lake First Nation. Our community is intimately connected to the lands and waters within our Traditional Territory. The Project takes place in our Traditional Territory. We have not seen this reflected in the IA process to date. We have not been provided meaningful opportunity to identify areas, environmental and cultural features, as well as land use activities that must be considered and protected throughout the project. With respect to climate change, what factors have been or will be considered in the assessment (i.e., changing normal temperature ranges, rainfall events, flooding, drought, wildfires etc.). Eagle Lake First Nation is extremely concerned around shifts in weather patterns and severe weather events due to climate change impacts. Our Elders have noted shifts in the local environment related to changing environmental conditions. Not only should climate change impacts from a western science perspective be considered in the IA process, but also through the lens of Indigenous Knowledge and ways of knowing. How have Eagle Lake First Nation members been provided opportunity to share this critical information with NWMO to help inform Project decision-making?
31	12.1.2.2 SUMMARY OF FINDINGS AND RECOMMENDED OPTION, p. 88	It is stated: *The approach is designed to be fair in the distribution of the risks, benefits and uncertainties within this generation and across generations.*	Eagle Lake First Nation requests further details on how risks, benefits and uncertainties for generations to come have been assessed. Without the assessment of multi-generational impacts, including impacts to our culture, the IA process will be flawed.

Comment	Reference	Issue / Concern	Recommendation or Request for Clarification
32	13.2 Description of the Land and Surrounding Areas, p. 95-96	It is stated: On November 20, 2013, pursuant to Section 35 of the Mining Act (Government of Ontario 1990e), the NWMO was granted Withdrawal Order No. W-K-98/13 for areas of land situated in the Kenora Mining Division. Four parcels of land were withdrawn from prospecting, staking, sale and lease while the NWMO conducted preliminary field assessment activities to assist in the identification of a suitable site for a DGR. Following these field studies, one of the four parcels included in W-K-98/13 was selected as the preferred site for the Project and is referred to as the temporary withdrawal area ("Revell withdrawal area," approximately 17,600 ha), as shown by the orange rectangle in Figure 13.1. As the NWMO has done with lands in other potential siting areas, land that is not considered suitable will be identified to the provincial government so the land can be released from the withdrawal of prospecting and mining claims.	Please clarify whether an "activity exclusion" radius has been identified around the Project site or specific infrastructure components where certain activities (e.g., blasting, heavy equipment operation, excavation, or vibration generating activities) would not be permitted. Given the potential for blasting and related mining activities to potentially interfere with, disrupt, or pose safety risks to surface facilities, monitoring installations, groundwater infrastructure, or other sensitive site elements, it is important to understand whether defined setback distances or buffer zones have been established.
33	14- Biophysical Environment, p. 98	Are all studies that support the screening level assessment published and available for review?	The supporting studies need to be technically reviewed to identify gaps and ensure rigour.
34	14- Biophysical Environment, p. 99	It is stated: *The baseline environmental data collection programs initiated in 2020 were designed collaboratively with Anishinaabe peoples of WLON, residents of Ignace and other local community groups and were reviewed by IAAC and members of the federal review team in 2021, to ensure the programs would meet the needs of the regulators.*	Eagle Lake First Nation takes exception to the fact that baseline environmental data collection programs were designed without input from our community given the project will be located within our Traditional Territory. These programs should not only be designed to meet the needs of the regulator but also the needs of impacted First Nations. Without our input, baseline environmental data on environmental features of concern to our Nation (i.e., fish, wetlands, moose, deer, turtles, wild rice etc.) is likely lacking. How will this be addressed? It is important in this phase of data collection that adequate numbers of samples are taken to ensure high statistical power for all chemicals of potential concern as these data will provide comparisons for millennia. No statistical argument is presented here to ensure that changes in the environmental concentration of COPCs will be detected.
35	14. Biophysical Environment, p. 99, 125, 128, 130, 134 and 138	It is stated: *The report indicates that background reports were prepared outlining the methodology and design for baseline characterization of biodiversity - Zoetica. 2022. Biodiversity Impact Studies – Northwestern Ontario Region: 2022 Baseline Program Design. Zoetica Environmental Consulting Services.* *As well as baseline reports and reporting - Zoetica. 2023. Biodiversity Impact Studies – Northwestern Ontario Region: 2022 Baseline Report. Zoetica Environmental Consulting Services. Nuclear Waste Management Organization document, APM-REP-07000-0228.*	We have been unable to locate the two referenced documents on the NWMO website. As a result , we are not able to review the methodology and results of the Biodiversity Impact Studies (Zoetica 2022 and 2023) referenced in the IPD. Please provide access to these documents or confirm where they can be found.

Comment	Reference	Issue / Concern	Recommendation or Request for Clarification
36	14.2.1 Currently Available Baseline Data, p. 107	It is stated: *To date, in the Canadian Hazard Information Service dataset, there have not been any earthquakes above magnitude 3 mN, a magnitude typically felt by most humans, occurring within 50 km from the Revell Site. The majority of the seismic events recorded in the vicinity of the site were caused by human activity, such as from blasting activities at mines.*	Eagle Lake First Nation is deeply concerned with the potential impact of local blasting on the project. Mining activities in northwestern Ontario are widespread. How will blasting activities related to other Projects in the area be considered in the assessment of project risks?
37	Section 14.2.1 Geology and Geological Hazards - Currently Available Baseline Data, p. 108	NWMO states that "*Taking into account the identification of structural features in the batholith, a deep geological repository can be positioned between the larger-scale structures presently inferred to be fracture zones (FZs)*" (P. 108), and "*Geometry and properties of FZs at depth, in particular gently inclined and water-conducting features related to subordinate rock types present in the Revell batholith. This will require additional study to enhance confidence in groundwater flow and radionuclide transport modelling*" (P. 111)	NWMO should clarify the specific depths where fracture zones (or hydraulically conductive features) have been identified, and provide assurance that these fracture zones have been sufficiently mapped and their geometry and orientation are sufficiently understood (i.e., including geological maps indicating traces of faults and fracture zones), to ensure that fracture zones will not intersect any portion of the proposed DGR depth (~600-800 m). Additionally, specific methodology used to determine quality of bedrock (for example, the RQD (rock quality designation) of borehole cores) should be included (or referenced) in the Project Description, to ensure that bedrock quality at the proposed depth is sufficient and backed up with robust structural data. NWMO should produce (or provide specific reference to) geological maps showing the traces of any faults in the area, and the extent of fracture zones (i.e., on Figure 14.1), and descriptions of the geometry/orientation of any fractures should be reported following future studies. If this geological mapping has not yet been conducted, NWMO should indicate when additional geological mapping will occur, and provide a description of what information will be gathered through this study (and methodology), to ensure that fracture zone mapping and bedrock quality will be sufficiently reported and described. NWMO should provide the timeline for the development of the site-specific discrete fracture network model referenced on P. 111.

Comment	Reference	Issue / Concern	Recommendation or Request for Clarification
38	14.2.3 Planned Work, p. 111	It is stated: *Results of the geology and geological hazard baseline study completed to date indicate the need for a limited amount of additional data collection to support the initial licence application and Impact Statement. Additional data will be collected prior to submission of the initial licence application to address this data gap. Additional data collection, as summarized below, will support future licence applications and regulatory approvals/permits.* *Additional future planned work to be completed as part of ongoing site characterization and in support of future licensing activities will provide enhanced confidence in the geoscientific understanding, which includes surficial geotechnical data collection, additional borehole drilling and associated logging and testing, a 3D seismic survey, and surface characterization activities, such as geological mapping.* *It is understood that fractures in the geosphere are the primary potential pathway for radionuclide release into the geosphere. The development of both an updated site-specific geological model and a site-specific discrete fracture network model, using all available geoscientific information, are ongoing and will continue to be updated as additional site-specific information is collected* *Uncertainties remain regarding the likelihood and potential impact of post-glacial faulting. While the Project site is located in a region of low seismic hazard, microseismic monitoring is ongoing to determine if any active faults are present in the region around the site and an investigation of potential recent fault activity will be conducted as part of future detailed site characterization.*	Eagle Lake First Nation notes that NWMO has stated (Executive Summary) that "drawing on more than a decade of geoscientific research, environmental data collection, and safety assessments, the NWMO has confidence in the safety and suitability of the selected site". However, in this section of the IPD, it appears as though there is some degree of uncertainty remaining and that additional data needs to be collected. Please comment on the magnitude of uncertainty remaining with the site selection.
39	Section 14.2.3 Planned Work, p. 111	NWMO states that "*future drilling, logging, and testing of an additional suite of up to 10 deep boreholes and up to 10 shorter-length exploration boreholes are planned for collection of additional geoscientific information. Additional geological mapping and shallow geotechnical investigations will be undertaken*."	NWMO states that extensive future work is planned to complete ongoing site geological characterization (i.e., surficial geotechnical data, additional borehole drilling, logging and testing, 3D seismic surveys, geological mapping, site hydrology). Given the importance of this data in ensuring that baseline/preliminary interpretations are correct, NWMO should provide the expected timeline for each of these studies. Additionally, NWMO should clarify where the additional deep and shallow boreholes will be installed.
40	Section 14.3.1 - Geochemistry of Mined or Excavated Materials - Currently Available Baseline Data, p. 112	NWMO states that there are no sulphur-bearing minerals "in any appreciable quantities" that could cause acid rock drainage concerns in the granitoid rock based on initial geochemical testing of rock core samples (100 core samples), and that excavated rock is not expected to be acid-generating (as ~97% of the total rock core drilled length was biotite granodiorite-tonalite) (P. 92). However, even trace amounts of sulphide minerals could potentially cause acid mine drainage under the right conditions (i.e., presence of oxygen, low neutralizing potential in rock). Specific results and test methods used to determine percent sulphur content, and analysis/determination of the neutralization potential (i.e., calcium carbonate content), should be included (or referenced) in the Project Description, to increase confidence that PAG waste rock will not be encountered.	Provide (or reference) specific results and test methodology used to determine the percent sulphur content in the host rock samples as well as the neutralization potential thereof (e.g.., from 2023 reporting). Further, please provide (or reference) results from laboratory static and kinetic testing and/or field tests that demonstrate whether the measured sulphur content of the rock may result in acid generation. The answer should consider acid generation potential when the neutralization potential of the host rock is exhausted (i.e., breakthrough of acid generation potential).

Comment	Reference	Issue / Concern	Recommendation or Request for Clarification
41	Section 14.3.1 - Geochemistry of Mined or Excavated Materials - Currently Available Baseline Data, p. 112	NWMO states that planned geochemistry work includes additional geochemical testing related to excavated waste rock management, as well as sampling of other potentially exposed material, including overburden and materials planned for use during construction. Timelines for the collection and availability of this additional information (to confirm preliminary/baseline assumptions) was not provided.	Provide expected timelines for collection and availability of additional geochemical testing of host rock, overburden, and other materials, as well as specific details (or specific references) regarding methodology.
42	14.3.1 Currently Available Baseline Data, p.113	It is stated: *At this time, the geochemical testing program to support preliminary technical studies related to excavated rock management is underway; however, given the existing knowledge of the Revell Batholith geology, the results are not anticipated to demonstrate that the rock is potentially acid generating or possesses metal leaching condition potential (WSP-Golder 2023).*	Eagle Lake First Nation requests information on what NWMO plans to do if the rock is found to be PAG. Note that water quality is of utmost concern to our First Nation, and that waterbodies and watercourses downstream of the Project have been impacted by mercury causing health impacts for downstream First Nation communities.
43	Section 14.4 - Topography, Soil and Sediment; 14.4.1 - Currently Available Baseline Data, p. 114	NWMO states that 40 soil samples were collected as part of baseline definition, collecting samples from a range of soil types, habitat types and locations, however, a site plan showing these soil sampling locations is not provided or referenced. Further, the depth and physical description of each soil sample (e.g., colour, compaction, composition) should be indicated in a table, or referenced if already conducted in other NWMO reporting, for methodological clarity.	Provide (or specifically reference) a site plan (from the CanNorth 2023/2024 reporting) showing the soil sampling locations, to understand spatial coverage of the sampling program, and to understand where exceedances of chemicals of potential concern (COPCs) (e.g., hexavalent chromium and sulphur) representing natural background levels were detected. Specific reference to this should be included, for ease of review. Additionally, provide a table describing the physical characteristics and depth that each soil sample was collected from, if not already completed (if so, please provide specific reference to the report/section where this information can be found).
44	Section 14.4 - Topography, Soil and Sediment; 14.4.1 - Currently Available Baseline Data, p. 114	NWMO states that sediment samples were collected in 2022 from 23 sites (watercourses, lakes, ponds) around the project area, targeting depositional areas.	Additional detail regarding the sample locations should be provided (i.e., in a site plan), to understand program spatial coverage, and to determine whether sufficient sediment sampling from watercourses/lakes of FN cultural significance (besides Provincially-significant wetlands) were included in baseline sediment monitoring. Provide/specifically reference a site plan indicating sediment sampling locations in watercourses, wetlands, and lakes in the project area (i.e., from CanNorth 2023/2024 report), for ease of review. Additionally, please explicitly state/reference in the IPD which environmental quality guideline each parameter analyzed in soil and sediment was compared to, for ease of review.

Comment	Reference	Issue / Concern	Recommendation or Request for Clarification
45	Section 14.6 - Groundwater and Surface Water; 14.6.1 - Currently Available Baseline Data, p. 117-118	NWMO states that transmissivity of the host rock (at the approximate depth of the repository) was estimated to be between 10^{-13} and 10^{-10} m2/s, decreasing with depth (P. 117). However, hydraulic conductivity (K) of the host rock (expressed in m/s), is not reported in the Project Description. Hydraulic conductivity describes the permeability of the host rock and is necessary for evaluating groundwater flow characteristics.	Given the importance of hydraulic conductivity/transmissivity estimates in the hydrogeological characterization of the host rock, NWMO should identify how these transmissivity values were derived, (i.e., what hydraulic packer testing methods, interval lengths, assumptions), and provide clear reference to the specific section(s) of other reports where calculations or supporting data can be found, for ease of review. Please clarify why hydraulic conductivity (K) of host rock was not reported in the IPD.
46	Section 14.6 - Groundwater and Surface Water; 14.6.1 - Currently Available Baseline Data, p. 119	NWMO stated that "*the results [of groundwater geochemistry analysis] indicate that the shallow and deep hydrogeochemical zones contain fluids with different major ion chemistry and isotopic composition and have no direct connection* ." (P. 119). However, specific details regarding the major ion chemistry of the groundwater sampled (i.e., methodology and analytical results) were not indicated or specifically referenced. Additionally, NWMO asserts that "*from porewater samples analyzed to date for noble gas characterization, helium concentrations and isotopes in the deep hydrogeochemical zone, indicate the waters at such depths are old, with modelled porewater helium residence times in the subsurface of more than one million years.*" (P. 119), but the isotope results used to determine the residence time/age of the groundwater at the repository depth were not explicitly referenced, nor are details/assumptions used for modelling of porewater residence times understood. This information should be clearly referenced (i.e., specific sections from previous reports), for ease of review, and to increase public confidence in the conclusions presented.	Please provide specific reference to groundwater sampling methods, analytical results (i.e., major ion analytical chemistry results from sampled groundwater), and isotope testing results (and modelling results and assumptions) used to conclude the age of groundwater in the hydrogeological zone of the repository.
47	Section 14.6 - Groundwater and Surface Water; 14.6.1 - Currently Available Baseline Data, p. 119	Methods for evaluating cumulative effects from nearby mining activities (on both deep and shallow groundwater quality) were not described or referenced in the IPD. NWMO should clarify how they intend to evaluate and monitoring potential interacting effects between mining activities (and other industrial/construction activities) and repository site conditions.	Describe how cumulative effects (i.e., to shallow groundwater) from nearby mining activity and other industrial activities (in addition to the repository and associated construction-phase and operations activities) will be evaluated.
48	Section 14.6 - Groundwater and Surface Water; 14.6.1 - Currently Available Baseline Data, p. 120	NWMO states that a baseline groundwater investigation is in progress, which will be presented in the integrated licence application and Impact Statement (P. 120). Additionally, an initial groundwater model for the project site from the existing boreholes was stated to be planned for development in 2024-2025. It is unclear when this model would be released for review.	Clarify the timeline for the public release of the initial groundwater model (expected to have been developed in 2024-2025).
49	14.6.1 Currently Available Baseline Data, p. 121	It is stated: *Aerial photos indicate there has been considerable logging within and surrounding the Project site, which will influence the local hydrology, causing more runoff due to a decrease in interception and reduced infiltration. While there is a moderate change in elevation between the lowland areas with wetlands and watercourses, it is unclear whether local flooding occurs within the Project site.*	Given the extent of logging and the known impacts on runoff and infiltration, engineers being uncertain about whether local flooding occurs raises concerns about the sufficiency of the hydrological assessment. Flooding risk should be a clearly established parameter, not an open question. What studies will be done to address this?

Comment	Reference	Issue / Concern	Recommendation or Request for Clarification
50	14.6.2 Planned Work Hydrology, p. 125	It is stated: *Surface Water Quality - Additional planned work includes continued collection of surface water quality measurements on a quarterly or monthly frequency, depending on sampling location. COPCs include general water chemistry parameters, nutrients, ions, total and dissolved metals, parameters related to treated sewage effluent (e.g., total coliforms), a suite of radionuclides (including gross alpha and gross beta), and semi-volatile organic compounds in select study areas (CanNorth 2020).*	Please confirm that parameters associated with construction and blasting activities, specifically hydrocarbons (e.g., diesel range organics, oil and grease) and ammonia and related nitrogen species (e.g., nitrate, nitrite) resulting from explosive by products, are included in the proposed water quality sampling program. These construction and blasting related constituents have the potential to affect surface water quality during construction, and their inclusion is important to ensure that monitoring adequately captures any associated impacts.
51	Section 14.6.2 - Planned Work, P. 124	NWMO indicates that shallow groundwater monitoring will consist of "nests" of 3 closely spaced wells (up to 100 m deep) in 3 locations (assumed to be near the site). The 3 selected locations were not identified at this stage; therefore, it could not be determined whether the monitoring network would be sufficient to characterize baseline shallow groundwater quality. Baseline groundwater (and surface water) monitoring stations should be informed by groundwater flow and transport pathway modelling (where feasible), to ensure that monitoring stations are in agreement with potential contaminant pathways and receptors. Monitoring locations should also include groundwater-fed wetlands/watercourses (i.e., headwaters) of cultural significance to Eagle Lake First Nation, and areas where groundwater may be sourced as drinking water. In addition, baseline groundwater monitoring should include stations in the vicinity of the waste rock storage area (and other laydown areas), to characterize groundwater hydrogeology in this area, as COPCs associated with waste rock may migrate in shallow groundwater overtime (particularly if ARD occurs). Establishing robust pre-construction/project baseline data in this area is necessary and important for impact evaluation of the repository.	In designing the baseline groundwater monitoring program, NWMO should identify the rationale and criteria used to select the locations for shallow groundwater monitoring wells. Baseline monitoring stations should be informed by groundwater flow and transport pathway modelling (where feasible), to ensure that monitoring stations are in agreement with potential contaminant pathways and receptors. Monitoring locations should also include groundwater-fed wetlands/watercourses (i.e., headwaters) of cultural significance to Eagle Lake First Nation, areas where groundwater may be sourced as drinking water, and stations in the vicinity of the waste rock storage area and other laydown areas.
52	Section 14.7, Page 125; Section 14. 8, P. 128; Section 14.9, P. 130; Section 14.10, P. 134; Section 14.11, P. 138	NWMO refers to baseline results and reporting completed by Zoetica (2023) for vegetation; fish and fish habitats; birds, migratory birds and their habitat; terrestrial wildlife and wildlife habitat, and species at risk and their habitat, as well as Zoetica (2025) for SAR.	These documents are not provided for review and thus it is not possible to assess the quality or scope of data used in the baseline studies. Please provide the Zoetica (2023) and (2025) reports for review.
53	Section 14.7, p. 125	The Project Description provides baseline data for "*vegetation, riparian, and wetland environments within and surrounding the Project site*" however, the size and extent of the study area is not defined, making it impossible to determine the geographic scope of baseline studies.	Please explain the size and extent of the study area for vegetation, riparian, and wetland environments, justifying the geographic scope based on ecological criteria, and illustrate the study area in a figure.

Comment	Reference	Issue / Concern	Recommendation or Request for Clarification
54	Section 14.7, p. 125	It is stated: *To date, two vegetation species of conservation concern…eight species of interest to interested parties and/or rights holders, and six weedy/introduced/invasive species have been detected*	Incomplete information is provided on vegetation species recorded in the study area. Only one vegetation species of conservation concern is subsequently mentioned in the SAR section (Black Ash). Only three species of interest to rights holders are mentioned (Wild Rice, Balsam Fir, Balsam Poplar). No weedy/introduced/invasive species are discussed. In addition, the background review of vegetation species is based solely on limited background field work, and does not include an assessment of plant species with potential to occur in the study area based on review of background information and knowledge of habitats present. Furthermore, the background review does not include an assessment of plant species of cultural importance to Eagle Lake First Nation. Please clarify what vegetation species of conservation concern, interest to rights holders, and considered weedy/introduced/invasive have been documented in the study area. Please also provide a detailed assessment of potential vegetation species in each of these categories which could occur based on review of background information and knowledge of habitats present. Please consult with Eagle Lake First Nation to identify plant species of interest to include in the background review of vegetation species.
55	14.7.1 Currently Available Baseline Data, p. 126	It is stated: *No provincially significant wetlands were identified within the Project site.*	It should be noted that Provincially Significant Wetlands are not the only wetland type of concern to Eagle Lake First Nation. Wetlands provide medicines and food for our community members, and species on which we rely (i.e., moose aquatic feeding areas - MAFA). All wetlands should be included in the assessment of potential impacts.
56	Section 14.7.2, p. 128	It is stated: *Results of the vegetation, riparian and wetland baseline study completed to date indicate the need for additional data collection to support the initial licence application and IA process; however, are sufficiently advanced to support a risk-informed assessment of potential effects, providing early conclusions regarding the likelihood and significance of potential impacts...*	Given that the baseline studies were not provided for review it is not possible to assess whether baseline data is "sufficiently advanced" to support a robust and scientifically defensible preliminary impact assessment at this time. Furthermore, without access to the baseline studies, it is difficult to determine what gaps remain in field investigations with regard to methodology, field effort, timing, and spatial extent. Based on the limited baseline information provided in the IPD, it is premature to draw conclusions on likelihood and significance of potential impacts. Please demonstrate that baseline studies are sufficiently advanced to support preliminary risk-informed impact assessment by providing detailed information on the nature of field investigations conducted to date (included with regard to methodology, field effort, timing, and spatial extent). Multi-season/multi-year studies will be required to provide an accurate assessment of baseline conditions.

Comment	Reference	Issue / Concern	Recommendation or Request for Clarification
57	Section 14.7.2, p. 128	Vague and discretionary language is used to refer to additional vegetation field studies, making it unclear what additional work is planned. For example, "*Future field studies…may include a combination of florestic inventory and intuitive meander*". In addition, it is stated: *Depending on the rarity of candidate SWH ecosites, surveys for potential rare and exemplary plant communities will be conducted*.	How will it be determined what future field studies will be conducted? Is Ecological Land Classification (ELC) planned as part of field work? What is meant by "rarity of candidate SWH", and how will their rarity be determined? Does it mean a SWH that is a rare vegetation community? Or a SWH that is rare in the ecoregion or study area? Please clarify what additional vegetation field studies are planned and the rationale for those studies. Please include ELC in the scope of work. Please explain what is meant by rarity of candidate SWH ecosites and how this rarity will be determined.
58	14.8.1 Currently Available Baseline Data, p. 130	It is stated: *To date, no spawning, rearing or overwintering habitat has been identified through desk-based searches of existing information or during AHM surveys in any of the wetlands within the investigation areas.*	Eagle Lake First Nation underscores the importance of Indigenous Knowledge in the identification of spawning, rearing and overwintering habitat. Desktop studies alone do not suffice. Eagle Lake First Nation must be included in the design and implementation of additional baseline studies to characterize the project site within their Traditional Territory.
59	Section 14.9.1, Page 130	It is stated: *The 2021-2022 baseline results are based on desktop terrestrial and aquatic ecosystem mapping, habitat suitability modelling, and eDNA sampling...Population trends were also analyzed for select species*.	It is not possible to assess the quality of the data used in desktop mapping, modelling, eDNA sampling and population trend analysis to inform baseline results since no further details on methodology, source material, scope etc. are provided. Please provide detailed information on the desktop mapping, habitat suitability modelling, eDNA sampling, and population trend analysis including methodology, geographic extent, dates of data collection, and/or source of data.
60	Section 14.9.1, Page 130	The Project Description provides baseline data for "*studying birds and bird habitat within and surrounding the Project site*" however, the size and extent of the study area is not defined, making it impossible to determine the geographic scope of baseline studies.	Please explain the size and extent of the study area for birds and bird habitat, justifying the geographic scope based on ecological criteria, and illustrate the study area in a figure.
61	Section 14.9.1, Page 131; Table 14.6, Page 133	The project area is within the breeding range of Great Blue Heron, and this species has been documented by the Ontario Breeding Bird Atlas (OBBA) in squares overlapping with the project location. However, Great Blue Heron is not listed as a bird species detected in the study area. Great Blue Heron is one of the bird species afforded protection of its nests year round under the *Migratory Bird Regulations*.	Please include Great Blue Heron as a bird species detected within and surrounding the project site and discuss how future studies will determine whether its breeding habitat is found in the study area.

Comment	Reference	Issue / Concern	Recommendation or Request for Clarification
62	Section 14.9.1, Page 131; Section 14.9.2, P. 133	The project area is within the year-round range of the Sharp-tailed Grouse and this species has been document by the OBBA in squares overlapping with the project location. However, Sharp-tailed Grouse is not listed as a bird species detected in the study area, nor is candidate Sharp-tailed Grouse Leks Significant Wildlife Habitat (SWH) identified.	Please include Sharp-tailed Grouse as a bird species detected within and surrounding the Project site and include Sharp-tailed Grouse Leks SWH as a candidate SWH
63	Section 14.9.2, p. 133	It is stated: *Results of the bird and bird habitat baseline study completed to date indicate the need for additional data collection…however, they are considered sufficiently comprehensive [sic] support a risk-informed assessment of potential effects, providing early conclusions regarding the likelihood and significance of potential impacts...presented in Section E*	Given that the baseline studies were not provided for review it is not possible to assess whether baseline data is "sufficiently comprehensive" to support a robust and scientifically defensible preliminary impact assessment at this time. Furthermore, without access to the baseline studies, it is difficult to determine what gaps remain in field investigations with regard to methodology, field effort, timing, and spatial extent. Based on the limited baseline information provided in the Project Description, it is premature to draw conclusions on likelihood and significance of potential impacts Please demonstrate that baseline studies are sufficiently advanced to support preliminary risk-informed impact assessment by providing detailed information on the nature of field investigations conducted to date (included with regard to methodology, field effort, timing, and spatial extent). Multi-season/multi-year studies will be required to provide an accurate assessment of baseline conditions.
64	14.10.1 Currently Available Baseline Data, p.134 14.11.1 Currently Available Baseline Data, p. 137	It is stated: *While native to Ontario's northern forests, woodland caribou range has decreased significantly (ECCC 2020a), and the nearest woodland caribou range (Churchill range) is approximately 61 km north of the Project site.* *Therefore, there are currently no regulatory federal or provincial triggers for woodland caribou for this Project, and this species is not included as part of the NWMO environmental baseline studies.*	Through Traditional Knowledge and Land Use Studies completed by Eagle Lake First Nation, it has been noted that there is movement and migration of caribou within our Traditional Territory. This must be accounted for in the assessment of impacts. Similarly, species of cultural importance must be included in the assessment. This again, underscores the importance of Eagle Lake First Nation involvement in the design and implementation of baseline studies to assess areas and values of ecological and cultural concern.
65	14.10 Terrestrial Wildlife and Wildlife Habitat, p 134	It is stated: *Ungulate species in northwestern Ontario have historically included moose (Alces alces), whitetailed deer (Odocoileus virginianus), and woodland caribou (Rangifer tarandus) (Zoetica 2023).* *Due to their First Nation and community importance, moose are the only ungulate that have been studied further in the baseline studies. Baseline studies to date have focused on the identification of SWH for moose within the Project site and an approximately 30 km radius surrounding it and have confirmed SWHs for moose aquatic feeding area.*	It is unclear what this assumption is based on given that whitetailed deer and woodland caribou are both species of importance to Eagle Lake First Nation and should be fully considered throughout the IA process.

Comment	Reference	Issue / Concern	Recommendation or Request for Clarification
66	Section 14.10.1, p. 134	It is stated: *The NWMO is currently collecting baseline data for the characterization of terrestrial wildlife and habitat. Data from the first year are based on desktop information and select field aspects.*	Information is lacking on the baseline data currently being collected, including details on sources of desktop information and types and methodology of "field aspects". It is not possible to assess the quality and scope of data collected. Please provide detailed information on baseline data collection, including scope, sources of information, and field survey methodology.
67	Section 14.10.1, p. 134	It is stated: *Baseline studies to date have focused on the identification of SWH for moose with the Project site and an approximately 30 km radius surrounding it*	No rationale is given for assigning a 30 km radius around the Project site as the study area for Moose. Please demonstrate that a 30 km radius study area is sufficient for capturing the annual home range of Moose in the area.
68	Section 14.10.1, p. 134	It is stated: *Baseline studies to date...have confirmed SWHs for moose aquatic feeding area. Candidate SWH has been identified for seeps and springs, and mineral licks.*	Another SWH of importance to Moose is Moose Late Winter Cover SWH. However, this SWH type is not mentioned in the IPD. Given the high percentage of upland conifer habitat documented in the study area, it seems highly likely that this SWH occurs in the area. In addition, any time Moose Aquatic Feed Area and Mineral Lick Habitat SWH are identified, associated Cervid Movement Corridor SWH must be determined. Please include Moose Late Winter Cover SWH as a candidate SWH to be assessed and identify Cervid Movement Corridor SWH using appropriate field protocols.
69	Section 14.10.1, p. 135	It is stated: *Based on current range distributions, 14 terrestrial carnivore species potentially occur within the Project site and an approximately 25 km radius surrounding it.*	No rationale is given for assigning a 25 km radius around the Project site as the study area for carnivore species. Please demonstrate that a 25 km radius study area is sufficient for capturing the annual home ranges of the 14 carnivore species with potential to occur in the area. Please note that while the text says 14 terrestrial carnivore species, 15 species are actually listed.
70	Section 14.10.1, p. 135	It is stated: *Candidate SWH has been identified within and surrounding the Project site for mammal denning sites, and seeps and springs.*	Identification of Denning Sites for Mink, Otter, Marten, Fisher and Eastern Wolf SWH requires that associated Furbear Movement Corridor SWH also be identified. Please identify candidate Furbearer Movement Corridor SWH using appropriate field protocols.

Comment	Reference	Issue / Concern	Recommendation or Request for Clarification
71	Section 14.10.1, p. 135	It is stated: *Based on current range distributions and preliminary acoustic studies, six bat species occur or potentially occur within the Project site and an approximately 6 km radius surrounding it.*	No rationale is given for assigning a 6 km radius around the Project site as the study area for bats. Please demonstrate that a 6 km radius study area is sufficient for capturing the summer home range of bat species in the area.
72	Section 14.10.1, p. 135	It is stated: *…preliminary acoustic studies…*	Information is lacking on the preliminary acoustic studies conducted on bats, including methodology, dates, geographic extent, habitat locations, and findings. It is not possible to assess the quality and scope of data collected. Please provide detailed information on the preliminary acoustic studies conducted for bats.
73	Section 14.10.1, p. 135	It is stated: *Candidate SWH have been identified for amphibian breeding habitat.*	Movement corridors for amphibians moving between breeding and summer habitat should be determined in association with breeding habitat SWH. Please identify candidate Amphibian Movement Corridors SWH using appropriate field protocols.
74	Section 14.10.1, p. 135 and Section 14.11.1, p. 138	It is stated: *Of these four listed carnivore species, only the cougar was detected to date.* (Section 14.10.1) *There are four listed carnivore species that previously were determined to potentially occur in the area. These are cougar, American badger, wolverine and gray fox. Although there is the potential for cougar to occur in the area, this species occurs in extremely low densities and is a habitat generalist, using extensive areas in pursuit of prey.* (Section 14.11.1)	There is a discrepancy in reporting on the occurrence of Cougar in the study area. Section 14.10.1 states that Cougar has been detected, but Section 14.11.1 only reports it as potentially occurring. This should be clarified. Regardless, Cougar is a culturally important species to Eagle Lake First Nation and should be recognized as a species of interest to rights holders in the IA process.
75	Section 14.10.2, p. 137	It is stated: *Results of the terrestrial wildlife and wildlife habitat baseline study completed to date indicate the need for additional data collection…however, studies conducted to date are sufficient to support a risk-informed assessment of potential effects, providing early conclusions regarding the likelihood and significance of potential impacts to [sic] presented in Section E.*	Given that the baseline studies were not provided for review it is not possible to assess whether baseline data is sufficient to support a robust and scientifically defensible preliminary impact assessment at this time. Furthermore, without access to the baseline studies, it is difficult to determine what gaps remain in field investigations with regard to methodology, field effort, timing, and spatial extent. Based on the limited baseline information provided in the IPD, it is premature to draw conclusions on likelihood and significance of potential impacts to terrestrial wildlife and wildlife habitat. Please demonstrate that baseline studies are sufficiently advanced to support preliminary risk-informed impact assessment by providing detailed information on the nature of field investigations conducted to date (included with regard to methodology, field effort, timing, and spatial extent). Multi-season/multi-year studies will be required to provide an accurate assessment of baseline conditions.

Comment	Reference	Issue / Concern	Recommendation or Request for Clarification
76	Section 14.10.2, p. 137	It is stated: *For semi-aquatic mammals, future years of study will focus on determining the numbers and locations of beavers in a biodiversity value-specific study area, and their role in the effects of ecosystem services and function*	It is not clear what is meant by a "biodiversity value-specific study area". Please explain and clarify how such an area will be identified and delineated.
77	Section 14.10.2, p. 137	It is stated: *Future carnivore studies may include general community surveys…* *Future studies for small terrestrial mammals may focus on population-level studies of local snowshoe hares and potentially other small terrestrial mammals and/or key supporting habitat features (e.g., mast trees) for species of interest.* *Future years of study aim to provide a more through characterization of bat community composition within and surrounding the Project site and may include using techniques such as acoustic surveys, identification of roost and maternity colony trees, exit surveys for hibernacula and roost trees, and incidental observations.* *Future field studies for terrestrial invertebrates are to be determined. Study methods include targeted surveys for species of interest pending the results of previous studies.*	Plans for future study of wildlife and their habitat are uncertain. How will it be determined which of the listed studies and target species and habitats will be focused on? How many years of study will be conducted and over what geographic area? What are the pending results of previous studies referred to for terrestrial invertebrates? Please clarify the decision-making process for determining the focus and scope of future field studies, including type of studies and length, target species and habitats, and geographic area. Please clarify what pending results from previous studies will be used to inform terrestrial invertebrate monitoring.
78	14.11 Species at Risk and their Habitat, p. 139	It is stated: *Fish—One SAR, American eel, was detected in the Project site surrounding area through eDNA metabarcoding studies. This is outside the typical range for this species, and there is uncertainty in the results. Additional eDNA sampling and metabarcoding work is being completed to further investigate the validity of the American Eel detection.*	Confirm how specific the primers are for the species in question and what off target species or populations might create false positives? What additional work and effort will be completed to confirm the American Eel eDNA result? Has MECP and DFO been made aware of this finding?
79	Section 14.11.1, p. 137	It is stated: *Research to date has focused on…opportunistic identification of candidate SWH…*	Special Concern and Rare Wildlife Species SWH is not listed as a candidate SWH despite the fact that these species have potential or have been confirmed in the study area. Please identify candidate Special Concern and Rare Wildlife Species SWH based on species known or with potential to occur in the study area.

Comment	Reference	Issue / Concern	Recommendation or Request for Clarification
80	Section 14.11.2, p. 139	It is stated: *SAR studies completed to date indicate the need for additional data collection…however, studies completed to date are considered sufficiently advanced to support a risk-informed assessment of potential effects, providing early conclusions regarding the likelihood and significance of potential impacts presented in Section E …*	Given that the baseline studies were not provided for review it is not possible to assess whether baseline data is "sufficiently advanced" to support a robust and scientifically defensible preliminary impact assessment at this time. Furthermore, without access to the baseline studies, it is difficult to determine what gaps remain in field investigations with regard to methodology, field effort, timing, and spatial extent. Based on the limited baseline information provided in the Project Description, it is premature to draw conclusions on likelihood and significance of potential impacts to species at risk and their habitat. Please demonstrate that baseline studies are sufficiently advanced to support preliminary risk-informed impact assessment by providing detailed information on the nature of field investigations conducted to date (included with regard to methodology, field effort, timing, and spatial extent). Multi-season/multi-year studies will be required to provide an accurate assessment of baseline conditions.
81	14.13.1 Currently Available Baseline Data, p. 140	An "average" dose rate of 1.8 mSv/a for Canada is given here but, given the concern for radioactivity in the DGR, dose rates within the communities should be more closely examined. Radon is a major contributor to dose and is elevated in some homes in the Kenora district. Maps of effective dose in North America effective dose (Fig 14.9) aren't very helpful in this context.	At a minimum, radiation doses to people in the communities, including from radon and medical exposures, should be documented as part of socio-economic and food studies. These data would be used to verify dose models presented by the NWMO and CNSC.
82	14.13.1 Currently Available Baseline Data, p. 142	General Comment	Tissue samples from fish, wildlife and birds need to be coordinated with diet and food studies in the communities. For example, if organ meats (e.g., liver, kidney) are consumed, they should be tested for COPCs, including radionuclides. Moose kidney are known to accumulate cadmium to very high levels. Other ungulates may have detectable levels of cesium-137 and lead-210.
83	14.13.1 Currently Available Baseline Data, p. 142	There are very few guidelines for radionuclides. The presence of 2 man-made plutonium isotopes (both alpha emitters) is surprising - cesium-137 should also be present at very low levels.	It would be helpful to list the radionuclides that were analysed in soil and tissues to indicate the types of analysis conducted.
84	14.13.1 Currently Available Baseline Data, p. 142	It is stated: *No radionuclides exceeded the available guidelines in groundwater.*	Does this include uranium (U -Nat) as well? Usually uranium is elevated in groundwater.

Comment	Reference	Issue / Concern	Recommendation or Request for Clarification
85	14.13.1 Currently Available Baseline Data, p. 142	It is stated: *With respect to the tissue's samples, the NWMO is currently accepting donated samples of tissues from First Nation and other community members. First Nation and other community members have been invited to donate portions or hunted or harvested items such as berries, fish and game. Recently, moose tissue samples were donated as part of the program.*	Eagle Lake First Nation requests further details on how to submit samples (i.e., methodology) and whether the results will be shared with participating communities.
86	15. Health, Social & Economic Context, p. 145	It is stated: *In many cases, particularly for the social, economic, and cultural components studied, additional work will be undertaken to further support the impact assessment process, including the assessment for the Anishinaabe Peoples of WLON and other potentially affected Indigenous groups.* *The Project site is located within the territory of the WLON and within the area subject to Treaty #3.*	Eagle Lake First Nation takes exception to the statement acknowledging that the project will be located within the Traditional Territory of Wabigoon Lake Ojibway Nation alone. The project has been sited in the Traditional Territory of Eagle Lake First Nation and this must be acknowledged and considered throughout all phases of the IA process. As such, impacts to the social, economic and cultural components of the project must also be fully assessed for our community as it has been for our sister Nation of Wabigoon Lake Ojibway Nation.
87	15.4.2 Planned Work, p. 154	It is stated: *As discussed in Section 14.13, the NWMO's environmental data collection program includes a participatory tissue sampling program through which local community members can submit relevant foodstuffs for chemical and radiological analysis. This includes fish, wild game, fruits and vegetables, medicinal plants, maple syrup, and honey. In addition to continuing the participatory tissue sampling program, the NWMO will implement a targeted campaign to ensure that traditional foods consumed by Indigenous groups and local communities are sampled from a well-distributed area.*	Eagle Lake First Nation requests further details on how to submit samples (i.e., methodology) and whether the results will be shared with participating communities. We also request input into the targeted campaign to help ensure that foods and medicines of importance to our members, harvested within our Traditional Territory, are adequately included and characterized. A food and human health study should be conducted to provide a baseline for studies in the future to ensure food security of country foods. The food study would also support dose estimates developed by the CNSC and NWMO. It needs to be emphasized that tissue sampling for COPCs, including radionuclides, should be coordinated with diet studies, and enough samples of each type to provide strong statistically rigorous sample. Anything less will not allow the detection of changes in COPC concentrations in the future or support dose estimates from groundwater emerging from the vault. Given potential risks of the project, food studies should be combined with wildlife tissue sampling by First Nations to provide strong estimates of metal and radionuclide ingestion in 2026.

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88	19.1 Other Legislative Requirements and Application of Precedents, p. 194	It is stated: As the Project transitions to the Impact Statement phase, the NWMO will continue to work collaboratively with WLON and the Township of Ignace to ensure their perspectives are appropriately reflected in ongoing analyses and mitigation planning. With WLON, this collaboration is also anticipated to include, where appropriate, the harmonization of assessments and studies in areas where WLON-specific interests and concerns intersect with the topics and valued components already being examined through the NWMO's Impact Statement. The determination of whether and when such harmonization is appropriate will rest with WLON, in accordance with their own protocols and decision-making processes. Prior to site preparation, the NWMO will collaborate with WLON and the Township of Ignace to confirm the suitability of proposed mitigation measures and develop follow-up and monitoring programs to verify the accuracy of Section E findings. Where monitoring identifies the need for modified or additional measures, the NWMO will develop and implement these as soon as feasible and notify WLON, the Township, and the CNSC within a reasonable timeframe. The NWMO will report annually on the results of these programs to WLON, the Township, and the CNSC in accordance with the Licence Conditions Handbook, confirming the effectiveness of mitigation and verifying that the Project is achieving its intended outcomes.	Eagle Lake First Nation must be provided the same commitments as WLON and the Township of Ignace, as detailed in this section of the IPD. This must include: 1. working to ensure our perspectives are appropriately reflected in ongoing analyses and mitigation planning 2. harmonization of assessments and studies in areas where Eagle Lake-specific interests and concerns intersect with the topics and valued components already being examined through the NWMO's Impact Statement 3. collaborate with Eagle Lake First Nation to confirm the suitability of proposed mitigation measures and develop follow-up and monitoring programs to verify the accuracy of Section E findings. 4. report annually on the results of these programs to Eagle Lake First Nation.
89	Table 19.1: Valued Components and Associated Measurement Indicators and Assessment Endpoints	Measurement indicators for hydrogeology include concentrations of dissolved metals and radionuclides.	Eagle Lake First Nation requests rationale for why only dissolved metals and radionuclides will be assessed.
90	Table 19.1: Valued Components and Associated Measurement Indicators and Assessment Endpoints	Hydrogeology	Eagle Lake First Nation considers spring water a valued component that should be assessed and protected. It is important both culturally as well as for human health. Many gather water before camping, spending time out on the land, making medicines, or in ceremony. Springs are especially important to members because it is known as "Mother Earth's water".
91	Table 19.1: Valued Components and Associated Measurement Indicators and Assessment Endpoints	Topography, sediment and soils	Change to the landscape is a valued component to Eagle Lake First Nation. Changes to topography and other landscape features signify a change to Mother Earth that can often not be reversed. The land is often not viewed through the same lens after development. This needs to be considered in the assessment.

Comment	Reference	Issue / Concern	Recommendation or Request for Clarification
92	Table 19.4 Pathways of Change Screening for Intermediate and Valued Components, p. 209	It is stated: *Changes in hydrology and surface water quality are anticipated to be below regulatory guidelines and standards but measurable relative to baseline concentrations, resulting in low-degree residual effects.*	From a surface water perspective, the conclusion that residual hydrogeological effects pose a low level of risk is premature. The proponent notes that long term monitoring installations will continue to provide information on groundwater behaviour and the groundwater–surface water interface; however, this also indicates that the fundamental groundwater–surface water (GW–SW) relationship is not yet characterized.
93	19.2.3 Pathways of Change and Preliminary Risk Assessment Screening, p. 205	It is stated: *The NWMO will work collaboratively with the Anishinaabe peoples of WLON and the Township of Ignace to confirm the suitability of precedent mitigation measures before site preparation begins.*	The project site overlaps Eagle Lake First Nation's Traditional Territory. We must be involved in decisions around suitability of mitigation measures. Every First Nation differs in valued components and appropriate mitigations. In our Traditional Territory, being part of the decision-making process around protecting our identified valued components is imperative to the IA process.
94	Section 19.2.3, Table 19.4, p. 212-214	It is stated: *Changes in vegetation, riparian and wetland environments are anticipated to [sic] measurable, and residual effects are anticipated. Overall, following implementation of mitigation measures, residual effects of negligible degree are anticipated.* *Changes in migratory and SAR birds are anticipated to [sic] measurable, and residual effects are anticipated. Overall, following implementation of mitigation measures, residual effects of negligible degree are anticipated.* *Changes in terrestrial wildlife and wildlife habitat are anticipated to [sic] measurable, and residual effects are anticipated. Overall, following implementation of mitigation measures, residual effects of negligible degree are anticipated.*	Given that the baseline studies were not provided for review it is not possible to assess whether baseline data is sufficient to support a robust and scientifically defensible preliminary impact assessment at this time. However, based on the information provided, there are numerous gaps in baseline studies which preclude any conclusions on the degree of negligible effects on vegetation, riparian and wetland environments; birds, migratory birds and their habitat; terrestrial wildlife and wildlife habitat; and species at risk and their habitat. In particular, no comprehensive analysis has been conducted of (i) habitat fragmentation and loss of habitat connectivity; (ii) climate-driven shifts in habitat suitability; and (iii) cumulative effects (e.g., existing and future forestry, mining, transportation, regional development; fragmentation, sensory disturbance, climate change) related to the Project on these valued components. Based on the limited baseline information provided in the Project Description, it is premature to draw conclusions on likelihood and significance of potential impacts to these valued components. Please demonstrate that baseline studies are sufficiently advance to support preliminary risk-informed impact assessment by providing detailed information on field investigations conducted to date, or remove the preliminary determination of residual effects. Please conduct comprehensive analysis of (i) habitat fragmentation and loss of habitat connectivity; (ii) climate-driven shifts in habitat suitability; and (iii) cumulative effects (e.g., existing and future forestry, mining, transportation, regional development; fragmentation, sensory disturbance, climate change) related to the Project on these valued components.

Comment	Reference	Issue / Concern	Recommendation or Request for Clarification
95	Section 19.2.3, Table 19.4, p. 213	It is stated: *During applicable migratory periods, vegetation clearing will be limited. If vegetation clearing is required, nest sweeps will be undertaken to avoid disruption to breeding birds.*	A standard mitigation measure to protect migratory birds and their nests is to avoid vegetation clearing during the breeding bird period, not during "applicable migratory periods". Further, Environment and Climate Change Canada generally recommends against conducting active nest searches in most habitats during the breeding season. Nest surveys are recommended only for relatively simple habitats (e.g., urban park with lawn and a few scattered trees, a previously cleared area, or a human-built structure such as a bridge), not for areas with more complex habitat, such as forest or wetlands. Active searching for nests is not recommended because the probability of detecting nests is very low, while the risk of damaging or disturbing nests, causing predation to eggs or young, or causing nest abandonment by adults is very high. Given that most of the study area is upland conifer forest (77%), followed by swamp (10%) and fen (7%) nest sweeps during the breeding bird period are not appropriate. We thus recommend that vegetation clearing be avoided during the April 15 to August 31 period.
96	Section 19.2.3, Table 19.4, p. 214	It is stated: *If bats are observed nesting, roosting, or hibernating, do not disturb them, to the extent practicable.*	A standard mitigation measure to protect breeding and roosting bats is to avoid tree clearing during the bat active season (generally April 1 - September 30). We recommend that tree clearing be avoided during the April 1 - September 30 period.
97	19.2.3.1.2 Preliminary Risk Screening of Residual Effects, p. 216	It is stated: *Mitigation measures and monitoring requirements will be shared with WLON, the Township of Ignace, and regulatory agencies.*	The project site overlaps our Traditional Territory. We must be involved in decisions around development and implementation of mitigation measures, as well as monitoring programs. Every First Nation differs in valued components and appropriate mitigations and monitoring efforts. In our Traditional Territory, being part of the decision-making process around protecting our identified valued components is imperative to the IA process.
98	19.2.3.1.2 Preliminary Risk Screening of Residual Effects, p. 216	Air quality monitoring.	Eagle Lake First Nation notes that the air quality assessment for the project must include impacts from the transportation of used nuclear fuel to the DGR.

Comment	Reference	Issue / Concern	Recommendation or Request for Clarification
99	19.2.3.4.1 Pathways of Change Screening, p. 221	It is stated: *Additionally, extensive geochemical testing (outlined in Section 14.3.1) has been completed and indicated the excavated rock to be non-acid generating; therefore, residual effects on groundwater quality from seepage or contaminant transport are not anticipated.*	Eagle Lake First Nation notes that it is unclear in the IPD if the rock is non-acid generating or if additional baseline work needs to be undertaken to confirm. For example, the statements below from the IPD suggest that more work needs to be completed to confirm this assumption. - Baseline Data Collection Commitments App E - NWMO commits to perform additional leachate testing of excavated rock and complete a testing program to confirm the non-acid generating and non-toxic nature of repository horizon rock. - 9.5.2 Listing of Major Construction Activities, p.65. Geochemical testing to date indicates that the excavated rock is not expected to be acid generating or metal leaching.
100	19.2.3.4.2 Preliminary Risk Screening of Residual Effects, p. 221	It is stated: *A conceptual groundwater model for the Project is planned but not yet completed. This model will use baseline data to define groundwater-surface water interactions, aquifer properties, and flow directions. It will forecast potential changes in groundwater levels, drawdown, and impacts on wells, wetlands, and groundwater-dependent ecosystems due to Project activities. The model will also support contaminant transport analysis, informing direct and indirect effects under both baseline and Project scenarios.* *The modelling will be used to inform the site-specific water management strategy for the Project, site-specific mitigation measures and monitoring requirements, including the groundwater protection program and hydrogeological aspects of the environmental monitoring program. Any site-specific mitigation measures and monitoring requirements will be shared with WLON, the Township of Ignace, and applicable regulatory agencies.*	Eagle Lake First Nation is extremely concerned with impacts to groundwater and surface water from the project, and within their Traditional Territory. The Wabigoon River is already contaminated with mercury and continues to impact the health of our brothers and sisters downstream, including Grassy Narrows. We are seeing impacts to important wetlands from development activities, and subsequently impacts to wild rice and moose. It is imperative that we are involved in the identification of groundwater and surface water features of importance to our Nation, as well as decision-makers in the development and implementation of site-specific mitigation measures and monitoring requirements.
101	19.2.3.5.2 Preliminary Risk Screening of Residual Effects, p. 224	It is stated: *Changes in the hydrogeological regime, particularly groundwater drawdown, can result in an indirect effect on hydrology through a reduction in baseflow contribution to nearby surface water bodies such as streams, wetlands, or lakes. This reduction in groundwater discharge may lead to lower surface water levels and altered flow regimes, resulting in a potentially adverse effect on the hydrology intermediate component.* *With the implementation of proven, effective mitigation measures and other regulatory controls, including the NSCA that will require the completion of modelling to inform the site water management approach and monitoring plans and procedures, the degree of residual effects on hydrology are best characterized as low, with a moderate likelihood of occurrence. With a low degree and moderate likelihood of residual effects, the Project activities that would result in direct and indirect pathways of change to hydrology are anticipated to result in a low risk of adverse environmental effects*	Eagle Lake First Nation must be involved in the identification of valued groundwater and surface water features (including wetlands), and input into the Water Management Plan for the project. Mitigation measures must be designed to protect surface water features that support species of cultural and ecological importance to our Nation, including wild rice and moose. We note that on page 232 of the IPD, it is stated that "Select stands of wild rice were identified: one on the north shore of Mennin Lake and an additional 10 within and surrounding the Project site". We also note that there are likely other areas known to our members and needing protection.

Comment	Reference	Issue / Concern	Recommendation or Request for Clarification
102	19.2.3.7.2 Preliminary Risk Screening of Residual Effects, p. 230	It is stated: *Project activities that could result in residual effects on fish and fish habitat include the physical alteration or loss of fish habitat due to Project infrastructure, such as in-water construction, water intakes, effluent diffusers, and road crossings.* *Project-related activities, including the generation of air and dust emissions, altered site drainage, runoff, treated discharges, and sediment release, and groundwater seepage could indirectly effect fish and aquatic SAR habitat availability, survival, and reproduction.*	Eagle Lake First Nation notes that culturally important fish must be fully considered in the assessment. Our members fish from areas within our Traditional Territory and from waters in close proximity to the project. Our Traditional Ecological Knowledge must be used to assess project impacts to fish and fish habitat, and to develop and implement appropriate mitigation measures.
103	19.2.3.7.2 Preliminary Risk Screen of Residual Effects, p. 231-232	It is stated: *The preliminary risk assessment screening concludes that residual effects on the fish and fish habitat VC are anticipated to be low risk, given the proposed mitigation and environmental protection measures required and regulatory controls in place. Further assessment of effects on fish and fish habitat will be completed to meet licensing requirements under the NSCA and inform provincial permitting requirements. Further assessment of effects on fish and fish habitat under the IAA is expected to be applicable to assessment of VCs where moderate to extreme risks of residual effects are anticipated.*	The report states that the preliminary risk assessment screening anticipates low-risk residual effects on the fish and fish habitat VC. However, it also notes that further assessment under the IAA will be required where moderate to extreme residual risks are anticipated. This appears to be inconsistent. Please clarify whether moderate to extreme risks to fish and fish habitat are anticipated, and if so, how this aligns with the conclusion of low residual risk. Additional explanation is needed to reconcile these statements and to understand the actual level of residual risk and the rationale for the proposed level of further assessment.
104	19.2.3.8.2 Preliminary Risk Screening of Residual Effects, p.233	It is stated: *The NWMO will also be required to adhere to permitting requirements under the SARA and Ontario Endangered Species Act (Government of Ontario 2007).*	Eagle Lake First Nation notes that provincial permitting requirements are changing. Clarity on how NWMO will work to ensure SAR are adequately protected under changing requirements is requested. It is our preference that current permitting requirements around SAR be adhered to in order to conservatively assess and protect SAR from potential project impacts.
105	21.2 Initial Project Description Conclusions for Potential Effects on Wabigoon Lake Ojibway Nation's Anishinaabe People and Other Indigenous Peoples p. 252-254	This section of the IPD is WLON focused, including: Physical and Cultural Heritage, Land and Resource Use for Traditional Purposes, Indigenous Economic Conditions, Indigenous Health Conditions, Indigenous Social Conditions, Collaborative Implementation and Monitoring.	Eagle Lake First Nation fundamentally disagrees with the approach taken by NWMO. For each component of this section, the impacts to Eagle Lake must be considered, quantified, and mitigated. The Project overlaps with our Traditional Territory and impacts are certain to occur both directly and indirectly (loss of peaceful enjoyment of area, impacts to cultural practices and teachings, changes in how landscape is viewed (i.e., contaminated/harmed).

Comment	Reference	Issue / Concern	Recommendation or Request for Clarification
106	25. Overall Conclusions and Path Forward, p. 261	It is stated: *The preliminary pathways of change and risk screening indicate that, with the application of environmental design features, mitigation, and protection measures, residual effects on biophysical, health, social, and economic VCs are anticipated to be negligible to low risk. These findings help focus the forthcoming Impact Statement on components where residual effects may be more pronounced, including potential impacts on Indigenous Peoples.* *The NWMO will continue to engage collaboratively with WLON and the Township of Ignace, as well as other potentially affected Indigenous groups; to confirm the suitability of mitigation measures and ensure they reflect community priorities, knowledge systems, and pathways of change important to Indigenous Peoples.*	It is unclear how cumulative effects have been assessed or plan to be assessed for the project. The Traditional Territory of Eagle Lake First Nation has undergone significant development over the past decades including tourism, forestry operations, transmission line construction, and mining operations. How will the impact of these projects be considered in the impact assessment for the DGR. Eagle Lake First Nation requires a robust cumulative effects assessment as part of the IA process for the project. The characterization of the project impacts as low risk seemingly does not include impacts from unforeseen events due to operational failures. Will these be robustly evaluated in the IA process. Given proximity to the project site, and overlap with our Traditional Territory, these risks and impacts are of high concern to our members.
107	Commitments Made in the Initial Project Description Appendix, Table 5-1: Monitoring Commitments	It is stated: *In addition to the NWMO's initial monitoring commitments, NWMO is also working with WLON to implement environmental monitoring. In combination with standard Project monitoring processes, Indigenous monitoring would be used to verify Project performance and to determine if mitigations and controls are effective in protecting the receiving environment.*	Eagle Lake First Nation must be part of monitoring plan development and implementation, as well as effectiveness monitoring and commitment compliance monitoring. We abide by the Migisi Sahgaigan Maanachi Totaa-aki Declaration, and as keepers of the land, we work to protect the natural environment through Manitou Inaakonig'ewin – the Creator's sacred laws and teachings. Our teachings, ways of knowing, and responsibility to protect our lands and waters must be respected throughout the IA process, including monitoring programs on our Sacred lands.
108	Appendix E, Table 5-1	Table 5-1 lists monitoring commitments for various intermediate and valued components. However, no monitoring commitments are listed related to vegetation, riparian and wetland environments; birds, migratory birds and their habitat; terrestrial wildlife and wildlife habitat; or species at risk and their habitat.	A Project-specific Environmental Monitoring Plan should be developed to monitor changes to vegetation, riparian and wetland environments; birds, migratory birds and their habitat; terrestrial wildlife and wildlife habitat; and species at risk and their habitat for the site preparation and construction and operations phases of the Project.