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January 29, 2026

Impact Assessment Agency of Canada
NuclearWaste-DechetsNucleaires@iaac-aeic.gc.ca

Delivered by Email

Dear Impact Assessment Agency of Canada,

RE: Curve Lake First Nation (CLFN) Consultation Department Comments for submission to: Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel Project - summary of Initial Project Description (IPD)

On behalf of our Consultation Department at Curve Lake First Nation (CLFN), we are writing to submit to you our review of the Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel Project - summary of Initial Project Description (IPD). CLFN consultation team has provided a thorough review and has the following comments and questions outlined in the bulleted list below.

- **The Transportation Corridor:**
 - The IPD does not adequately integrate the transportation corridor into the scope of assessment, despite confirmation that many First Nations are located along routes that will carry used nuclear fuel and many of these First Nations have expressed concern about nuclear waste transportation across their homelands
 - Transportation of approximately 5.9 million bundles of used nuclear fuel over a 160-year project lifespan represents a significant, long-term impact that must be assessed as a core project component, not treated separately under CNSC licensing
 - Communities located along transport routes should be formally recognized as potentially affected First Nations, for consultation, and participation in decision-making
 - Emergency preparedness and response planning for transportation incidents must be co-developed with corridor Nations and municipalities, including resourcing, training, and Indigenous-led protocols
- **The assessment should include:**
 - Identification of all proposed transportation routes
 - Frequency and duration of shipments
 - Potential impacts on Treaty Territory and homelands of Curve Lake First Nation and other First Nations, and culturally significant sites along corridors



- Cumulative effects on communities already burdened by nuclear infrastructure
- **Cumulative effects assessment should include:**
 - Existing nuclear waste movements
 - Historical and ongoing environmental burdens
 - Long-term social, cultural, and land-use impacts on Indigenous communities along transport corridors
- **Existing and Historic Waste Decisions:** Given that Curve Lake territory already hosts significant nuclear waste and nuclear waste transport, this represents an issue of environmental justice and intergenerational equity. Curve Lake and surrounding communities are already disproportionately burdened by nuclear-related risks without meaningful involvement in historic decisions. The Impact Assessment must explicitly acknowledge this legacy burden and evaluate cumulative and long-term impacts on Indigenous Rights, land use, cultural practices, and community well-being, ensuring future generations are not left to bear unacceptable risks.
- **Indigenous Knowledge** specific to transportation landscapes (waterways, harvesting areas, spiritual sites, and community safety concerns) must be meaningfully incorporated into baseline studies and effects assessment.

Our Consultation Department emphasizes environmental protection and sustainability as an integral component of the future of Curve Lake First Nation. Working with Curve Lake to develop policies in early and ongoing engagement is necessary as part of our process. All plans and activities must be viewed through the lens of environmental protection and sustainability. These requirements ensure that Curve Lake First Nation's interests and rights are being protected within our territory; that we are able to protect the ability to exercise our rights as a people – physically, culturally, and spiritually; that we are able to foster sovereignty, cultural identity, and sustainable succession. This is central to all relationships being progressed with various regulators and proponents.

Curve Lake First Nation is the steward and caretaker of the lands and waters within our territory in perpetuity, as we have been for thousands of years, and we have an obligation to continue to steadfastly maintain this responsibility to ensure their health and integrity for generations to come. Protection, conservation, and sustainable collaborative management are priorities for Curve Lake First Nation.

Curve Lake's vision statement must be central to development in the territory: "Upon the foundation of community values and vision that promotes and preserves our relationship with mother earth, which has defined and will continue to define our identity and culture as Anishnaabe People, the Consultation Department will build and secure the framework for our First Nation lands by putting into place ways and laws that will provide both the protection and the freedom for each person, their family, and the whole community to fulfill their potential. Each way and law will be given the consideration to its importance for our next seven generations."

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We do this work to uphold our responsibilities to care for the earth and waters, for our people, our nation, and for all our relations. Our foundational belief is balance; our values and principles are built upon the respect, care, and nurturing of all life as part of an interconnected whole and necessary for the balance and harmony required for Mino-Bimaadiziwin now and for future generations.

Sincerely,

<Original signed by>

Francis Chua
Support to CLFN Consultation Department

cc:

Delaney Jacobs, Director of Lands, Environment & Consultation CLFN
Paige Williams, Manager of Consultation, CLFN
Lily Boggs, Energy Lead, CLFN
Kayla Wright, Support to CLFN Consultation Department