



Ojibway Nation of Saugeen
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February 4, 2026

TO: The Impact Assessment Agency of Canada
22nd Floor, Place Bell
160 Elgin Street,
Ottawa, ON
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AND TO: The Honourable Julie Aviva Dabrusin
Minister of the Environment, Climate Change and Nature

AND TO: Terence Hubbard
President, Impact Assessment Agency of Canada

**Re: Issues with the NMWO's Proposed DGR –
Excluded Transportation Risks and Inadequate Consultation**

The Ojibway Nation of Saugeen (ONS) was recognized in 1985 as an "Indian Band" under the *Indian Act*, R.S.C., 1985, c. I-5 as an Indigenous Governing Body. Prior to that date, its members were dispersed; some were pushed out of the Ignace area in the early twentieth century and settled near Savant Lake or transferred to other First Nations in the area including Lac Seul First Nation.

Despite ONS members having lived in various locations throughout the region, in 1997, the federal government set apart lands near Kashawagama Lake as a reserve for the ONS at the request of the Former Chief of the ONS, Edward Machimity.

Edward Machimity was registered as a member of the Ignace Band.

The Ignace Band, being the historic rights-bearing group of the contemporary ONS, traditionally occupied the territory southeast of Ignace, up to the north shore of

Wabakimi Lake, and running parallel to Highway 17 from the southwest shore of Raleigh Lake towards Wabigoon Lake Ojibway Nation. Not only is the DGR site within the traditional territory of the Ignace Band, but so too is the 50 kilometer stretch of Highway 17 between Ignace and the proposed site which will be used to transport approximately 5.9 million used nuclear fuel bundles over a period of up to 50 years.

In recognition of this fact, the ONS was first engaged by the Nuclear Waste Management Organization's (NWMO) on April 27, 2016 and signed a Learn More Agreement on September 12, 2018, which has since expired. Under the Learn More Agreement, the NWMO purportedly engaged in consultation activities with the ONS between 2017 and 2018. However, the ONS has never provided its free, prior, and informed consent to this project.

As a result, the ONS respectfully requests that the Impact Assessment Agency of Canada (IAAC) initiate the impact assessment process, but put it on hold until all territorial disputes related to the proposed DRG site are resolved and all affected First Nations have provided their free, prior, and informed consent to both the transportation and the storage/disposal of the radioactive nuclear waste.

1. Transportation to the DGR Site was excluded from the initial project description

The NWMO's recently released Initial Project Description states that transportation to the DGR site is excluded from the project scope. In doing so, the NWMO has failed to take into account the significant risks associated with transporting radioactive nuclear waste to every community located along the highways and/or railways leading to the DGR site. Highways 11 and 17 will be the primary routes by which radioactive nuclear waste will be transported via truck. This corridor remains largely a single-lane highway in each direction and is often closed due to weather conditions and fatal accidents. There are significant gaps in police surveillance and regulation enforcement along this route in addition to poor emergency response times and a lack of adequate maintenance. The 5.9 million used nuclear fuel bundles intended to be transported along this route will increase the likelihood of accidents involving trucks carrying radioactive waste; such an accident would not only have detrimental effects on the drivers who are directly involved, but also on innocent parties who are driving through or living in nearby communities.

The proposed DGR site and 50 kilometers of Highway 17 are located within the ONS's traditional territory. It is important that the IAAC requires the NWMO to provide a revised project description that includes the transportation of nuclear waste to ensure that each community along the proposed route(s) is consulted in accordance with Canada's commitments under the *United Nations Declaration on the Rights of Indigenous Peoples* and the *United Nations Declaration on the Rights of Indigenous Peoples Act*.

2. Consultation was inadequate and has not fulfilled the Crown's obligations

Despite the NWMO's repeated references to "reconciliation", they fall short of fulfilling Canada's commitments under the *United Nations Declaration on the Rights of Indigenous Peoples* and the *United Nations Declaration on the Rights of Indigenous Peoples Act*. The *Impact Assessment Act* was intended to fulfil these obligations by ensuring its processes and decision-making framework adequately consider Indigenous rights and knowledge in seeking the free, prior, and informed consent of affected Indigenous groups.

Despite purportedly engaging in consultation activities with Wabigoon Lake Ojibway Nation, Eagle Lake First Nation, Seine River First Nation, Lac des Mille Lacs First Nation, Lac Seul First Nation, the Metis Nation of Ontario, and the ONS, only Wabigoon Lake Ojibway Nation has entered into a final agreement with the NWMO. Many other First Nations and several regional/treaty organizations for northwestern Ontario have passed resolutions opposing the proposed DGR:

- Grand Council Treaty 3 passed a 2024 resolution declaring that nuclear waste will never be disposed of in Treaty 3 territory
- The Anishinabek Nation passed a 2025 resolution restating its longstanding opposition to the transportation and disposal of nuclear waste in its members' territories
- The Nishnawbe Aski Nation passed a resolution opposing the NWMO's proposed DGR in 2022
- The Chiefs of Ontario passed a resolution against nuclear waste transportation and burial without First Nations' consent on November 19, 2025.
- Fort William First Nation, Red Rock Indian Band, and Netmizaaggamig Nishnaabeg are located along potential transport routes and have all passed resolutions and issued statements opposing the transportation of nuclear waste through their territories

- Eagle Lake First Nation has filed a territorial claim in the Federal Court of Canada encompassing the DGR site, which has yet to be resolved
- Grassy Narrows First Nation, which is located downstream of the proposed DGR site, has also publicly opposed the NWMO's proposal

Despite the widespread opposition from key stakeholders and First Nations in the area and along the proposed transportation route, the NWMO continues to rely solely on the financially incentivized consent of Wabigoon Lake Ojibway Nation.

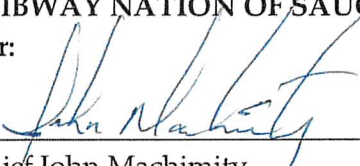
Without a federal impact assessment, affected First Nations' constitutional and treaty rights will continue to be disrespected. The NWMO has failed to fulfil of Canada's obligations under the *United Nations Declaration on the Rights of Indigenous Peoples* and the *United Nations Declaration on the Rights of Indigenous Peoples Act*, both of which specifically require that "no storage or disposal of hazardous materials shall take place in the lands or territories of Indigenous Peoples without their free, prior, and informed consent."

The ONS has not provided its free, prior, and informed consent for nuclear waste to be stored or transported within its traditional territory. The IAAC must direct the NWMO to file a revised project description that includes the transportation of nuclear waste and specifically requires the free, prior, and informed consent of all First Nations who have a reasonable claim to the territory surrounding the proposed DGR site. In order to do so, this process must be put on hold until such claims have been properly identified and resolved.

Sincerely,

OJIBWAY NATION OF SAUGEEN

Per:

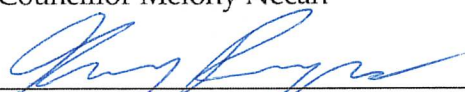


Chief John Machimity



Councillor Harley Machimity

Councillor Melony Negan



Councillor Kenneth Rogers