

Comments re Initial Project Description summary

Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel Project

The Nuclear Waste Management Organization has announced that Wabigoon Lake Ojibway Nation has been selected along with the town of Ignace in NW Ontario as the location for the building of a DGR that will contain all the used radioactive material from nuclear plants across Canada.

A federal impact assessment must take place, given the dangers involved and the distances the nuclear waste has to be transported on roads and highways across Canada and through the many communities located on those routes along the way.

As a registered member of Lac Seul First Nation, signatory to Treaty 3 in northwestern Ontario, I am not in favour of locating a DGR in Treaty 3 Territory, and I oppose the deep burial of any nuclear waste. I also have relatives who are members of Serpent River First Nation, which is in the Robinson Huron Treaty area. I reside in Sault Ste. Marie, ON.

The Site Selection Process

The Revell site will be co-hosted by Ignace and the Wabigoon Ojibway First Nation. The Grand Council of Treaty Three has developed a natural resources law, Manito Aki Inakonigaawin. This law was developed by their elders and affirmed in ceremony.

"The Great Earth Law states that the Anishinaabe Nation in Treaty #3 maintains rights to all lands and water in the territory throughout Northwestern Ontario and Southeastern Manitoba. Accordingly, any development in the Treaty #3 territory, including forestry, mining, hydro, highway, pipeline, and other consultation approaches, require the consent, agreement, and participation of the Anishinaabe Nation in Treaty #3." (<https://gct3.ca/environmental/manito-aki-inakonigaawin>)

Wabigoon First Nation is part of Treaty Three. However, I do not know if Wabigoon Ojibway First Nation supported the Great Earth Law when it was approved in 1997. Treaty Three reaffirmed its opposition in a resolution <https://wethenuclearfreenorth.ca/wp-content/uploads/2024/11/ca-24-14-position-on-nuclear-waste-and-resource-development-in-treaty-3.pdf>

Lac Seul First Nation has also stated its opposition on this as well.

<https://lacseulfn.org/news/chief-and-councils-position-on-nuclear-waste-storage/>

Despite this, Wabigoon Ojibway First Nation has agreed to be a co-host for a DGR in their area. Wabigoon is a relatively small First Nation of 533 registered members with 175 members on reserve. Although a referendum was held and 87% agreed to Wabigoon Lake becoming a co-host, I could find no indication of how many members voted in favour of this project. In any case, it seems that a small fraction of Treaty Three FN members made a decision on a project whose impacts are far beyond the actual site as well as having significant opposition from other Treaty Three First Nations.

If NWMO respected the treaty and Indigenous rights of First Nations, then the collective decision of Treaty Three First Nations should also be respected.

As the political voice of their communities, the Anishinabek Nation, the Assembly of First Nations, and the Chiefs of Ontario have clearly expressed their opposition.

Transportation

It is concerning that transportation is not included as part of the assessment. This is a serious issue for First Nations as Canada's major highways pass through the territories as well as the reserve lands of many First Nations. Many of our communities are situated on the highway or close to it. Transportation is a major component of this Project that encompasses the management of radioactive nuclear waste from sources across the country. It should not be taken lightly and be left to whatever regulations are currently in place.

Use of these routes would mean routine exposure to low level radiation as well as the potential for accidents to occur. It is not clear how often or how many of these transport vehicles would be passing through these communities. But risk increases as the numbers rise. One would have to also assess the impact of transportation by rail. The IPD should be revised to include a clearly laid out plan and presented to the affected communities and the general public.

Area Resource Extraction

The Initial Project Description (IPD) describes the completed scope of the project on page vii and viii. The Project also mentions that NWMO's initial license application to the CNSC will be submitted together with the Project's Impact Statement. However, the scope of this initial application leaves out any mention of the actual nuclear waste, instead focusing on non-nuclear infrastructure related to site preparation.

The IPD also states that the application will be prepared "*in general accordance with the guidance in REGDOC-1.2.3, Licence Application Guide: Licence to Prepare Site for a Deep Geological Repository.*"

The Nuclear Safety Commission has also posted online Regulatory document REGDOC-1.2.1, Guidance on Deep Geological Repository Site Characterization that sets out guidance for a deep geological repository (DGR) facility for radioactive waste. (<https://www.cnsccsn.gc.ca/eng/acts-and-regulations/regulatory-documents/published/html/regdoc1-2-1/>) According to this regulatory document, under 4.3.1, the "*licensee or applicant should include a quantitative assessment of natural resource potential that includes historical and current data.*"

The Thunder Bay Economic Development Corporation has recently released a map that illustrates a number of sites of interest concerning mine development, including critical minerals.

<https://www.facebook.com/photo?fbid=1272579141737901&set=a.482457827416707>

The town of Ignace is situated in the middle of this map. Nexgold Mining is on this map. Nexgold's proposed Goliath Complex near Dryden would be the largest deep mine and open pit gold mine in Canada if it proceeds. The complex is 56 km from Revell Lake. One would hope that this kind of information would inform the development of the initial license application to the CNSC.

The Future of Nuclear Energy

The nuclear energy industry is not sustainable in the long run. The process creates more problems than it solves. There is no safe way to deal with the waste. The best way is to not create it in the first place, and as some have said it is a dangerous and expensive way to create steam.

Due to the damage it could potentially cause to the environment if an accident should occur, the best place to store it is above ground where monitoring is ongoing and where accidents can be properly contained. And to reduce the possibility of an accident, the fuel should be stored as close as possible to where it was created.

When considering the impact of a DGR, it must be remembered that the half life of radioactive waste is many thousands of years and the certainty that the containers will eventually degrade and the waste will still remain. No one knows how this will impact the water ways that flow nearby. Is this really the legacy we want to leave for future generations?

There are many ways of creating energy that are more environmentally sustainable than nuclear energy and that pose less risk to the environment. The wise course would be for the government to provide opportunities for more investment in solar, wind, thermal and renewable energy. Another option is for consumers to use less energy instead of using more. To say that this project will be protected and guarded for 160 years is a refusal to accept our responsibility for the waste we have created and will be the burden left to future generations whose impacts we will never know.

I am requesting that full review of this project be undertaken by the Impact Assessment Agency and that a public hearing be held to ensure that people are fully informed about all the impacts from all phases of the project from beginning to end.

Miigwech,

Submitted by Elizabeth Angecneb

<personal information removed>

c.c Francis Kavanaugh, Grand Chief, Grand Council Treaty Three,
Clifford Bull, Chief, Lac Seul First Nation