



Asubpeeschoseewagong Netum Anishinabek

GRASSY NARROWS, ONTARIO P0X 1B0 • PHONE: (807) 925-2201 • FAX: (807) 925-2649

June 1, 2026

By Email (nuclearwaste-dechetsnucleaires@iaac-aeic.gc.ca)

Impact Assessment Agency of Canada
Place Bell, 22nd Floor
160 Elgin Street
Ottawa, Ontario K1A 0H3

To Whom it May Concern:

**RE: Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel Project
Proponent: Nuclear Waste Management Organization (NWMO)**

I am writing on behalf of Asubpeeschoseewagong Netum Anishinabek ("ANA" or "Grassy Narrows First Nation"). Chief and Council of Grassy Narrows have delegated mining and nuclear waste related matters to the Lands Protection Team, for which I act as the Lead Negotiator.

We write in respect of the draft Tailored Impact Statement Guidelines and the Public Participation Plan, which were posted for public comment. As detailed below, and in response to the request for public comment on, Grassy Narrows strongly objects to the nuclear waste storage site and demands that it be fully integrated into the Impact Assessment process so that the significant risks to our community will be meaningfully considered and its free, prior and informed consent is obtained.

Background on Grassy Narrows inherent Indigenous rights, and Aboriginal and Treaty rights

Grassy Narrows is an Anishinaabe First Nation with traditional territory in what is called northwestern Ontario. Grassy Narrows people exercise inherent Indigenous rights, and Aboriginal and Treaty rights. They have cared for and lived on their lands for countless generations. Grassy Narrows people hunt, trap, fish, and practice their Anishinaabe way of life to provide for themselves, their families, and their community.

The land and waterways of the Territory sustain Grassy Narrows people's way of life.

Grassy Narrows' Territory is the foundation of who Grassy Narrows people are as Anishinaabe people. They follow the teachings of their Elders to be responsible for their

Territory and to *Manaachitootaa Aki*, to protect the land. Asubpeeschoseewagong Anishinabek have a holistic, interconnected, and spiritual relationship to their sacred landscape. They say: “We are the land, and the land is us. What happens to the land happens to us and to our children for many generations.”

Grassy Narrows exercises their inherent right to self-determination and law-making powers. In addition to their inherent rights, Grassy Narrows people exercise Aboriginal rights and established Treaty 3 rights which are protected by section 35 of the *Constitution Act, 1982*.

In 1873, the Anishinaabe entered into Treaty 3. In entering that treaty, their ancestors did not give up the Anishinaabe way of life and the harvesting practices that allowed them to live on the land. A core Anishinaabe condition for entering Treaty 3 was that they would keep our harvesting rights as before.

The Treaty 3 Commissioner promised Grassy Narrows’ ancestors that the Treaty promises would protect their harvesting practices forever, which would allow their people to hunt, fish, trap, gather, and harvest throughout the Territory as they had before “as long as the sun shone and the waters flowed”. The Treaty 3 Commissioner wrote that without this strong promise the Anishinaabe would not have entered into the Treaty. Their ancestors did not agree to an increasing erosion of their harvesting rights that would significantly interfere with the exercise of their rights.¹

Grassy Narrows enacted the *Asubpeeschoseewagong Anishinabek Aaki Declaration* (Grassy Narrows Land Declaration or the “Land Declaration”) in October 2018. The Land Declaration is a sacred Grassy Narrows law of inherent right that sets out the will of Grassy Narrows people with respect to their Territory. The Land Declaration declares much of the Territory an Indigenous Protected and Conserved Area (“IPCA”); and bans certain land uses on their Territory, including a ban on nuclear waste disposal and transport.

The enclosed map sets out Grassy Narrows’ “Interim Core Area of Interest for Mining.” The area identified in that map includes areas in which upstream activities within the English-Wabigoon River watershed will have adverse impacts upon Grassy Narrows’ rights.

Impacts of NWMO’s DGR Project

NWMO is proposing a new underground deep geological repository system for used nuclear fuel (nuclear waste disposal). Wabigoon Lake Ojibway Nation and the Township

¹ *Keewatin v Minister of Natural Resources*, 2011 ONSC 4801, rev’d 2013 ONCA 1158, aff’d 2014 SCC.

of Ignace have been selected as the host communities for the proposed project, which is located 21 kilometres southeast of the WLON and 43 kilometres northwest of the Town of Ignace, Ontario along Highway 17.

As proposed, the Deep Geological Repository (DGR) for Canada's Used Nuclear Fuel Project would provide permanent storage for approximately 5.9 million bundles of used nuclear fuel. The project is expected to span approximately 160 years, encompassing site preparation, construction, operation and closure monitoring.

IAAC published draft Tailored Impact Statement Guidelines and a Public Participation Plan and requested comments by May 10, 2026. Unfortunately, due to many other overlapping demands for consultation, and the ongoing mercury crisis, Grassy Narrows is providing these comments shortly after the deadline. We ask that you consider these comments as you review next steps.

So far, only WLON has standing in IAAC's process. However, the nuclear waste storage site that you are considering is upstream of our Territory in the Wabigoon River watershed. We reiterate our concerns that nuclear waste poses the potential for the escape of radioactive material during transport and disposal over the course of hundreds of thousands and years, and that any escape would harm us for many generations; our lands would never be the same. Our watershed and our people have already suffered too many impacts from the results of industrial activity, including an ongoing mercury crisis. We cannot accept this further risk to the health of our river and our people.

IAAC's Public Participation Plan has not granted any of the downstream communities standing in the process. Nor does the TISG sufficiently address the risk related to the transportation of nuclear waste to the storage site, and the significant risk to communities on the transport route, such as our community. The TISG also does not sufficiently address the long-term risks that extend far beyond the 160 year project timeframe, and the extreme uncertainties associated with scientific and engineering projections of what will occur on timeframes of many hundreds of thousands of years – longer than homo sapiens have existed.

Grassy Narrows strongly objects to the nuclear waste storage site and demands that it be fully integrated into the Impact Assessment process so that the significant risks to our community will be meaningfully considered.

Grassy Narrows further demands that this project must not proceed without our free, prior and informed consent. The TISG must require that the proponent demonstrate that our right to free, prior, and informed consent has been respected, as well as our other rights

under international instruments including UNDRIP and the International Covenant on Economic, Social, and Cultural Rights.

We say 'no' to this project in our watershed.

We look forward to hearing from you as soon as possible.

Please address all future correspondence to me and ANA's Lands Team at the email addresses indicated below and copy ANA Chief and Council.

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<Signature removed>

Joseph B. Fobister
Lead Negotiator, Grassy Narrows Lands Protection Team

C.C.

Grassy Narrows Chief and Council

Chief Sherry Ackabee <contact information removed>
Deputy Chief Bear Copenace <contact information removed>
Councillor Arnold Pahpasay <contact information removed>
Councillor Aaron Kokopenace <contact information removed>

Grassy Narrows Lands Protection Team

Mike Fobister, Supervisor, Lands Protection Team <contact information removed>
David Sone, ANA Advisor <contact information removed>
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Canada

Minister Rebecca Alty, CIRNAC (ministrerca-ministercir@rcaanc-cirnac.gc.ca)
Minister Julie Dabrusin, ECCC (ministre-minister@ec.gc.ca)

Ontario

Minister Todd McCarthy, MECP (minister.mecp@ontario.ca)

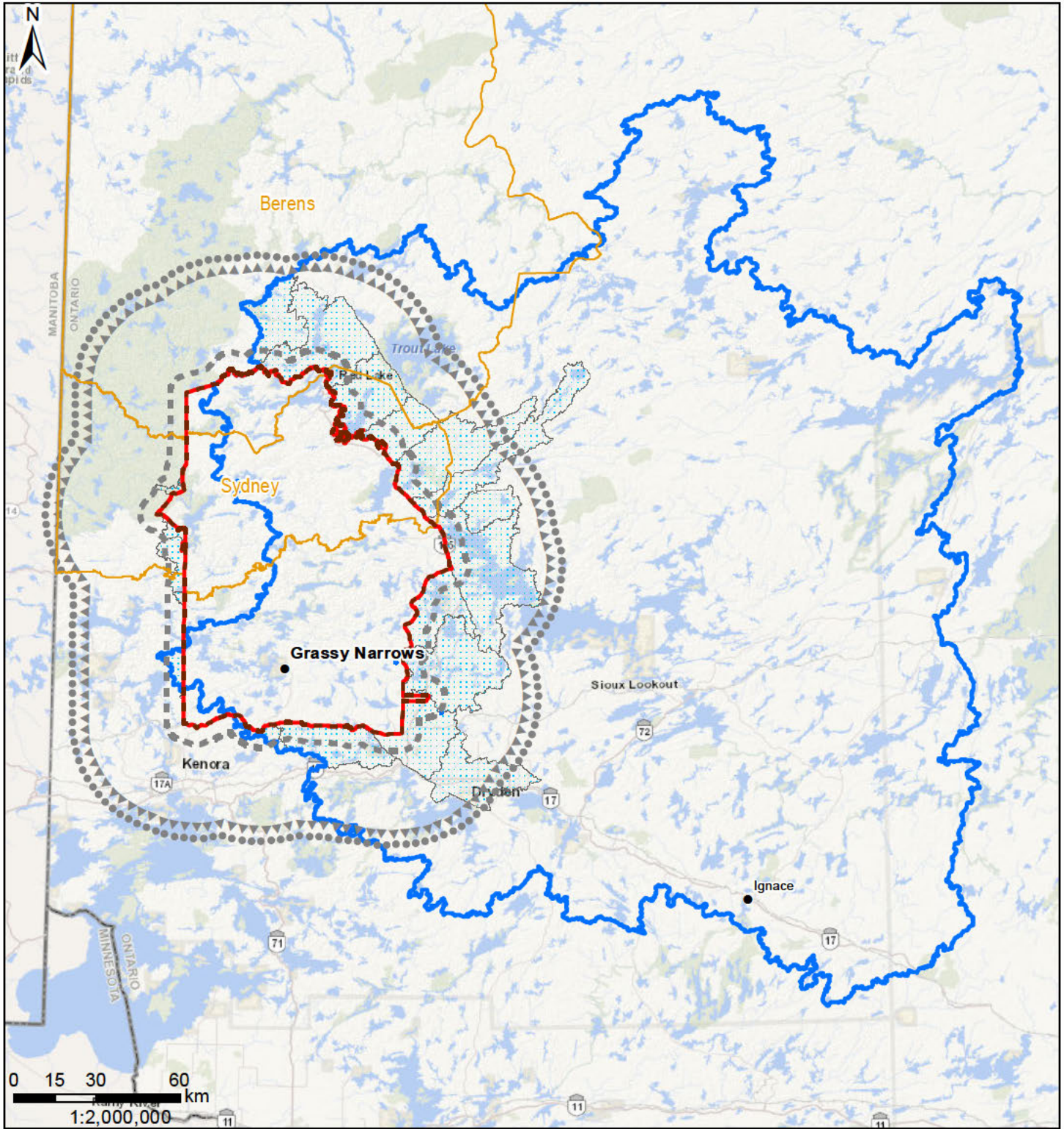
Minister Greg Rickford, IAFNER (minister.indigenouaffairs@ontario.ca)

NWMO

Bob Watts, VP of Indigenous Relations and Strategic Programs (bwatts@nwmo.ca)

Joe Heil, Director of Indigenous Engagement (jheil@nwmo.ca)

Asubpeeschosewagong (Grassy Narrows) Interim Core Area of Interest for Mining



-  Interim Core Area of Interest for Mining
-  Moose Home Range (6km)
-  Wolverine Home Range Area (36km)
-  Walleye Migration Area (40km)
-  Caribou Range Boundaries
-  Nearby Quaternary Watersheds That Flow Into The Core
-  English River Watershed at Separation Narrows

N.B. This is an interim product created under duress arising from the escalation of imposed mining activity by the Crown and industry and for the sole purpose of identifying an interim area for negotiations on mining related activity. It is not a complete representation of Grassy Narrows' area of interest. Due to unique circumstances and capacity constraints Grassy Narrows has not completed comprehensive studies required to fully determine its area of interest including, but not limited to, land use and occupancy, ethnohistory, archeology, biology, and hydrology. For example, rights and interests associated with air quality, migratory birds, travel routes, marten, lake sturgeon, wolves, eastern cougar, landscape intactness, climate resilience, biodiversity, genetic diversity, and many other factors are not reflected here. Also, linear boundaries are an imposed non-Indigenous concept that does not accord with the nature of Grassy Narrows' relationship with the land which includes extensive interconnectedness, reciprocity, travel, sharing, and trade. This map does not limit any claims by Grassy Narrows people to assert their rights and interests throughout their territory and to protect themselves from harm to their health, rights, way of life, livelihood, society, and environment. Grassy Narrows people have Treaty rights, and practice them, throughout the Treaty 3 area. Grassy Narrows people also have inalienable inherent rights given by the Creator, some of which are affirmed in international law and instruments. The Grassy Narrows people are the true experts about their land, rights, and interests.