



July 07, 2026

Major Projects Office
85 Sparks Street
Ottawa, Ontario K1P 5K9
Canada

Via Email to: DGRC-CDSCGP@mpo-bgp.qc.ca

Re: Major Projects - Deep Geological Repository for Canada's Nuclear Fuel Project - Grand Council Treaty #3

Grand Council Treaty #3 (GCT3) is the Traditional Government of the Anishinaabe Nation in Treaty #3 (comprised of 28 First Nations). Grand Council's mandate is to protect the future of the Anishinaabe people by ensuring the protection, preservation, and enhancement of inherent and Treaty rights. The Territorial Planning Unit (TPU) is a department within GCT3 that works with the Treaty #3 Leadership to protect the lands, water, and resources within the 55,000 square miles of Treaty #3 Territory. The TPU operates under the guidance of Manito Aki Inaakonigewin (Great Earth Law), rooted in Anishinaabe law.

Manito Aki Inaakonigewin embodies four teachings that guide decision making: respect, rights, reciprocity, and responsibilities amongst all relations. Ceremony is an integral part of following Manito Aki Inaakonigewin. The law signifies the duty to respect and protect lands affected by over-usage, degradation, and unethical processes. The law is unique to Treaty #3 territory and is passed on through Elders and knowledge keepers.

Since 2011, GCT3 and the TPU have taken the initiative to actively engage with the Nuclear Waste Management Organization (NWMO) in efforts to provide mutual education on a range of matters. We have done so under the umbrella of a series of formal agreements, supported by resolutions from GCT3 Chiefs-in-Assembly, that have become more focused as the NWMO proceeded from an initial pool of 22 interested communities through to the final selection of the Revel Lake site in Treaty #3 Territory in 2024. In entering into these agreements, GCT3 made it clear that our participation was not to be interpreted as the offering of consent, authorization, or prejudice any consultation on the proposed project. Activities under the agreements took place prior to any regulatory processes being initiated.

In 2011, Elders of Treaty #3 participated in an NWMO forum in Washagamis Bay First Nation. That forum led to Elders declaring that there should be no nuclear waste stored in Treaty #3 Territory with this declaration being supported by the Treaty #3 Chiefs-in-Assembly. Treaty #3 Chiefs-in-Assembly have also expressed an interest in continuing to educate their citizens, the private sector, and Canadians at large about their responsibility for the protection of Anishinaabe citizens and the land, air, and water resources in Treaty #3 Territory, and NWMO expressed an interest in learning more about Grand Council Treaty #3 and Manito Aki Inaakonigewin. While GCT3



remained open to the dialogue and education that was supported in the agreements, the Chiefs-in-Assembly have repeatedly upheld their support for the Elders Declaration.

Through 13 years of dialogue with the NWMO, GCT3 and the TPU were consistent in communicating a small number of core messages. One of these messages was that all consultations and project activities must follow Manito Aki Inaakonigewin. In recent years, discussions had progressed to visualizing a model for harmonization between Manito Aki Inaakonigewin and colonial laws, and a harmonized impact assessment process.

It was a shock to GCT3 when, following 13 years of dialogue under the subsequent agreements, the NWMO chose to unilaterally withdraw from engagement and commitments with GCT3 shortly after NWMO's announcement that WLON and the Town of Ignace (a municipality located approximately 40km from the proposed site) had been selected under the "willing host community" model that was unilaterally developed by the NWMO.

In the years of dialogue with the NWMO, GCT3 and the TPU were led to believe that NWMO staff understood the lessons and guidance that was offered on Manito Aki Inaakonigewin. This consensus was recorded in finalized principles for engagement, engagement log(s), and finalized visual representations of the framework, and GCT3 was committed to working collaboratively on harmonization of Manito Aki Inaakonigewin with the federal Impact Assessment Act (IAA). Beginning in 2020, GCT3 also began Nation-to-Nation discussions on Manito Aki Inaakonigewin/IAA harmonization for any nuclear used fuel site in Treaty #3 Territory.

Following on the announcement of the final site selection in late November, 2024, Ogichidaa Kavanaugh, on behalf of GCT3, sent a draft harmonization agreement to the NWMO in February, 2025. The draft agreement reflected the mutual understanding of a harmonized review process that had been developed in good faith with representatives of the NWMO. To the surprise of GCT3, the response from the NWMO was silence and, less than 11 months later, the release of an Initial Project Description (IPD) without any commitment to a harmonized impact assessment process that would have respected the rights of GCT3 and any Treaty #3 communities other than WLON¹.

With the release of the IPD in January, 2026, it became clear that the NWMO has now chosen to breach its commitments to GCT3. Furthermore, the IPD sought to avoid IAA review of serious social and unique technical challenges which led to the selection of the chosen site and failed to provide information demanded by both IAA regulations and the Manito Aki Inaakonigewin Framework. It also contained scoping issues and information deficiencies.

¹ GCT3 acknowledges that effects to WLON's rights and interests will be assessed through WLON's Regulatory Assessment and Approval Process.



We now have received another surprise announcement, that the proposed DGR has now been referred to the Major Projects Office.² We have not received any information regarding why and by whom the project has been referred to this process, or any information such as the Project Intake Form that might disclose this and other relevant information. GCT3 urgently requires access to the Indigenous consultation and engagement plan that will be followed under this new process. If the DGR is to be considered a project of national interest, then the Anishinaabe Nation in Treaty #3 must be meaningfully consulted and provided with a process that can result in free, prior, and informed consent from GCT3 and any impacted communities.

Grand Council Treaty #3 welcomes the opportunity to participate in further engagement with the Major Projects Office regarding the proposed Deep Geological Repository, and how the project may proceed in compliance with Manito Aki Inaakonigewin. If the review does proceed through the Major Projects Office, we urge the Office to partner with GCT3 in ensuring that a Nation-based Manito Aki Inaakonigewin process is followed. The key to a respectful process is ensuring that the Major Projects Office upholds the previous harmonization commitments that have not been upheld by IAAC. In addition to engagement with GCT3, a respectful process would also include engaging directly and in person, respecting local tradition and Ceremony, with each of the Treaty #3 communities that have identified a community interest in the proposed DGR.

In response to the Major Projects Office's June 26 e-mail providing notice about the referral, Grand Council Treaty #3 is:

1. requesting further information from the Major Projects Office on the June 26 e-mail and the proposed DGR (*see: enclosed GCT3 Information Requests Rd 1*); and
2. confirming interest in meeting with the Major Projects Office on the proposed DGR.

Grand Council Treaty #3 looks forward to hearing back from the Major Projects Office on this matter, and receiving responses to the Information Requests.

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Chris Herc
Director, Territorial Planning Unit
Grand Council Treaty #3

² For further information: see [Ogichidaa Francis Kavanaugh's Open Letter to Prime Minister of Canada for Nation-to-Nation Cooperation Regarding Canada's Proposed NWMO DGR Designation Under the Building Canada Act](#).

