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Re: Comments of the Michi Saagiig Anishinaabeg Communities of the Williams Treaties First Nations on Ontario Power Generation's Initial Project Description for the New Nuclear Wesleyville Project

The consultation departments of Alderville First Nation, Curve Lake First Nation, Hiawatha First Nation, and the Mississaugas of Scugog Island First Nation, collectively the Michi Saagiig Anishinaabeg Nations of the Williams Treaties First Nations (MS-WTFNs) have jointly prepared this submission regarding Ontario Power Generation's (OPG, "the Proponent") Initial Project Description (IPD) for the proposed New Nuclear Wesleyville Project ("the Project").

The MS-WTFNs are signatories to several pre-confederation treaties, as well as the Williams Treaties of 1923, which after over 90 years of dispute came to a final settlement agreement in 2018. These treaties form the relationship between Ontario, Canada and the MS-WTFNs. They are legally binding and are living documents.

The Project is located within MS-WTFNs traditional territory, along the north shore of *Gchi Nibi* (Lake Ontario), and contemplates utilizing the unceded lakebed and waters. As such, the Crown holds fiduciary and legal obligations to the MS-WTFNs. The obligations may materialize through the common law, Section 35 of the *Constitution Act, 1982*, the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), the United Nations Declaration on the Rights of Indigenous Peoples Act (*UNDA*), the Truth and Reconciliation Commission, and related government commitments. All such obligations are rooted in the Honour of the Crown as established in the 1763 Royal Proclamation.

We are participating in the federal Impact Assessment (IA) process while also collaboratively conducting an MS-WTFNs-led impact assessment. These processes are expected to inform and strengthen one another. We also contributed initial community perspectives, Knowledge, and concerns to the IPD early in the Planning Phase. We want to reiterate for the record that our contributions to the IPD do not equate to support for, or approval of, the Project, and is not consultation.

Given these existing contributions, many of the issues raised in this submission are constructive and forward-looking, intended to support a transparent, accountable, and



respectful assessment process grounded in a strong Nation-to-Nation relationship.¹ The purpose of this letter is therefore to:

- Uphold the MS-WTFNs' responsibilities to our Lands, Waters, and other Relatives, as well as to future generations;
- Exercise the MS-WTFNs' inherent Rights, including the Right to self-determination and sovereignty over MS-WTFNs homelands and Treaty Territories;
- Reiterate the MS-WTFNs' constitutionally protected Rights, and underscore the Crown's² responsibilities and duties, as well as the MS-WTFNs' expectations for meaningful consultation, decision-making, and the Nation-to-Nation relationship;
- Outline some preliminary concerns raised at the staff and leadership levels of the MS-WTFNs based on the level of information available about the project plans so far. Note that these concerns will be expanded upon as the MS-WTFNs-led impact assessment process continues, more project details are shared, and as we are able to engage more members; and
- Emphasize foundational matters and recommendations that should shape next steps in the IA, including for the Summary of Issues and the Tailored Impact Statement Guidelines (TISGs), as well as further into the IA.

The concerns identified here are preliminary and reflect an early stage of understanding project details and their interaction with the Rights, Responsibilities, culture, and long-term wellbeing of the MS-WTFNs.

Key interests, issues and concerns requiring Crown attention

We ask that the following issue areas be reflected in the Summary of Issues and TISGs (in addition to future issues identified through Summary of Issues and TISG comment processes) and are carried forward through IA planning and implementation.

The interests, issues and concerns raised are interconnected and relate to decision-making authority and consent, impact-characterization and severity, cumulative and long-term effects, and the role of the MS-WTFNs in the IA. Where an issue raised by the MS-WTFNs is not reflected in the Summary of Issues or TISGs, our staff request a clear explanation of how and where it will be addressed.

¹ "Nation-to-Nation" refers to government-to-government decision-making between the MS-WTFNs, as First Nations with inherent and Treaty-recognized governing authority, and the Crown, as the federal government exercising constitutional obligations (including the Duty to Consult and Accommodate) and statutory authority. OPG participates at this table as the project proponent, with responsibility to respond to, align with, and adjust project planning based on the outcomes of these Nation-to-Nation discussions.

² In this submission, references to "the Crown" mean the Government of Canada as represented by federal authorities responsible for this Impact Assessment and related regulatory decisions, including the Impact Assessment Agency of Canada (IAAC), the Canadian Nuclear Safety Commission (CNSC), and any other federal authorities exercising assessment and consultation responsibilities in relation to the Project.



Governance, meaningful consultation, information sharing, and Free, Prior and Informed Consent (FPIC)

The IPD does not yet establish how the MS-WTFNs' decision-making authority will be exercised and respected. While we appreciate that the United Nations Declaration the Rights of Indigenous Peoples (UNDRIP) and commitments to engagement are referenced, the IPD does not explain how meaningful consultation, as defined by the MS-WTFNs (and underscored by UNDRIP), will be defined and achieved; how Free, Prior and Informed Consent (FPIC) will be realized; or how MS-WTFNs' consensus positions will influence Crown and/or Proponent decisions. These gaps create a risk that the MS-WTFNs are treated as public stakeholders rather than Rights-holding First Nations with decision-making authority.

It is important to note that the 1923 Williams Treaties have historically negated the MS-WTFNs' ability to engage in FPIC; our ability to enforce meaningful consultation, and Duty to Consult and Accommodate processes; and our abilities to enforce Ownership, Control, Access, and Possession (OCAP) with regards to our cultural heritage, history, and Knowledge.

At this stage the IPD relies on high-level descriptions and preliminary assumptions that limit informed understanding of the Project. We have also experienced delayed disclosure of critical information, including findings related to Relatives of specific interest and concern to the MS-WTFNS, such as *Manoomin* (Wild Rice) and *Makwa* (Bear) (discussed further below). Timely, complete, and transparent information sharing is essential to informed decision-making and meaningful consultation.

MS-WTFNs-led assessment and studies

While the IPD references future studies, there is no explicit discussion of how the MS-WTFNs-led impact assessment process and studies will shape IA scope, methods, or conclusions. Since we are still planning the process, this is to be expected; however, the MS-WTFNs will need to see commitments for funding and support for our process before the IA proceeds further. We would like to see these commitments reflected in the TISGs.

A MS-WTFNs-led assessment is required to determine the assessment scope, how impacts are identified, characterized and understood, and what constitutes acceptable outcomes of the IA process through the lens of the MS-WTFNs Members' Rights, Responsibilities, and ways of knowing and being. There must also be clear commitments on funding, timing, integration of findings, and decision weight.



Manoomin (Wild Rice)³

Manoomin (Wild Rice, The Good Berry) is a Relative with profound cultural, spiritual, and environmental importance to the MS-WTFNs. *Manoomin* is inseparable from cultural identity, Responsibilities, food systems, ceremony, and intergenerational knowledge transfer. Community members have shared that the MS-WTFNs live, and have lived, in this area because *Manoomin* grows here. Its presence sustains relationships between people, Waters, Lands, and other Relatives. The finding of *Manoomin* within the NNW site underscores the importance of the input and Knowledge that the MS-WTFNs provided within the IPD.

Across MS-WTFNs' homelands, opportunities to relate to, cultivate, harvest, care for, and pass on knowledge of *Manoomin* have already been severely impacted due to significant reduction in the presence of *Manoomin* as a result of shoreline development, altered water levels, dredging, introduced invasive species, and other cumulative disturbances. Very few places remain where *Manoomin* grows freely.

The proposed Project is located in an area where *Manoomin* remains, underscoring the significance of this area to our Communities. Its ongoing presence is an indicator of water quality and habitat for many Relatives. There remains opportunity to support *Manoomin* and the broader ecosystems in this area through ongoing rehabilitation and *chi weshjigaadeg nike gaazhnaagwaak mewzha* (restoration) efforts. Community members continue to actively teach and practice *Manoomin* cultivation, harvesting and processing, supporting intergenerational Knowledge transfer and cultural longevity.

Manoomin is especially sensitive to disturbance, changes in water quality and hydrology, shoreline and sediment disruption, and long-term contamination risks associated with nuclear development. Recovery areas can be lost quickly if water levels or sediment conditions shift. Impacts to *Manoomin* have cascading effects on animal and aquatic Relatives, food systems, Knowledge transmission, as well as Responsibilities, and ongoing relationships with Relatives. For this reason, potential impacts to *Manoomin* are among the most serious concerns associated with this Project and must be treated with exceptional care and respect.

We are concerned that OPG consultants identified *Manoomin* and other Relatives of specific interest or concern to our Communities within the project area, but did not invite the MS-WTFNs to participate in these surveys and did not clearly or promptly share this information at the time it was recorded. This limited our ability of to assess risk early, influence project framing, and uphold responsibilities to protect *Manoomin* during a critical planning period.

³ This section draws on community discussions, guidance from Elders, and input from MS-WTFN staff, reflecting lived experience, intergenerational knowledge, and ongoing stewardship responsibilities connected to *Manoomin* and related Lands, Waters, and Relatives; along with the following sources:

- McMann, G. (2026). *Southern Ontario prairies need fire to flourish, and a place to grow*. The Narwhal. <https://thenarwhal.ca/alderville-black-oak-savanna-conservation/>
- Muskraat, K., & Cowie, T. (n.d.). *Gathering Traditional Knowledge & Stories on Wild Rice*. *Community Voices for Manoomin*. (n.d.). *Lindsay Advocate article*. <https://communityvoicesformanoomin.ca/lindsay-advocate-article>
- Community Voices for Manoomin*. (n.d.). *Manoomin: The Wonderous Seed* (video series). <https://communityvoicesformanoomin.ca/manoomin-wonderous-seed>



OPG's limited content on *Manoomin* within the IPD does not reflect or negate its importance, the vulnerability of recovery areas, or the seriousness of potential impacts.

Going forward, assessment and planning must prioritize protection and balance among these Relatives, and their habitats. This requires early and transparent information sharing, MS-WTFNs participation in all related studies, and collaborative planning to ensure that project decisions respect *Manoomin* as a Relative and support long-term recovery rather than further loss.

Lands, Waters, Relatives, and Responsibilities

The Lands and Waters surrounding the proposed project site include areas that MS-WTFNs Members remain connected to; are in relatively good ecological condition; and are seen as places for potential reconnection, *chi weshjigaadeg nike gaazhnaagwaak mewzha*, and long-term management by the MS-WTFNs following generations of dispossession. These are places where Members can exercise Rights and their ability to carry forward Responsibilities, Knowledge, and practices to future generations. Decisions made now will shape whether these relationships will be strengthened or further limited.

MS-WTFNs hold ongoing Responsibilities to care for and maintain balance with Relatives,⁴ and the interconnected cultural landscapes that sustain them. Nuclear development introduces distinct and long-lived pressures that require careful, collaborative planning to avoid harm and uphold these Responsibilities.

As stated in the IPD, MS-WTFN Members' direct relationships with the Relatives who live within and visit the NNW site and surrounding areas have been disrupted for generations. This disruption has resulted from colonization, the imposition of Crown jurisdiction, and the unlawful taking up of Lands and shorelines into private ownership. The Lands within, and surrounding the NNW site, remain inaccessible to our Members, not by choice, but because of this imposition, despite Treaty promises. MS-WTFNs Members can no longer freely live, visit, gather, harvest, care for Relatives, or practice ceremony, directly within these Lands and Waters. Despite the existing pressures, the MS-WTFNs connections, relationships, and Responsibilities to these Lands, Waters and all Relatives have not ceased to exist. Our Members look forward to returning to freely accessing the NNW site and surrounding areas, as they once did since *me'wzha*.

Animal Relatives, including large and small Mammals, who continue to use and move through the project area. *Makwa* (Bear) are respected protectors and teachers whose presence reflects balance in the Lands, and are a Relative of specific interest and concern to the MS-WTFNs. Observations of Bear use in and near the project area confirm that this landscape continues to be used by *Makwa* Relatives. Maintaining the coexistence, balance, and the ability for Relatives to move freely across the landscape is the responsibility of the MS-WTFNs.

Fish Relatives are central to the MS-WTFNs' cultural identity, food systems, ceremonies, and teachings. Given the sensitivity of *Gchi Nibi*, wetlands, and tributaries to thermal and hydrological changes, sedimentation, and contamination (among other impacts), early,

⁴ Throughout this letter, the term "Relatives" refers to Animal Relatives, Bird Relatives, Fish Relatives, Plant Relatives, Rock Relatives, Insect Relatives, Celestial Relatives, Ancestor Relatives and Spirit Relatives.



complete information and MS-WTFNs-led impact assessment are essential to understanding and avoiding impacts to fishing practices and aquatic systems.

Plant Relatives sustain MS-WTFN culture, health, medicines, ceremony, and intergenerational Knowledge. The Lands, Waters, shorelines, wetlands, and forests around the project site and region more widely support, and have historically supported, a wide range of plant Relatives, including those of specific interest and concern to the MS-WTFNs, such as medicinal plants, berry-producing plants, and tree species. Many of these Relatives are sensitive to changes in water, soil, invasive species, and long-term contamination, and require careful consideration over the full life of the Project.

Cultural landscapes, including shorelines, wetlands, watercourses, travel routes, gathering areas, ancestral burial grounds, archaeological sites, and areas where Manoomin and other medicines grow, are living, interconnected systems shaped by long-standing Relationships and Responsibilities. These areas are central to cultural identity, are Treaty-protected, and play a critical role in sustaining food security, cultural longevity, and represent areas where the MS-WTFNs can exercise the Right to engage in our ways of life, including harvesting. Nuclear projects introduce unique and long-lived risk pathways into these systems, making avoidance of harm and long-term care of Lands and Waters essential considerations from the outset.

Across all of these areas and more, we emphasize the importance of early, transparent information sharing, MS-WTFNs-led identification and assessment of concerns, and MS-WTFNs-led monitoring at the study phase, so that real and potential impacts can be understood, avoided where possible, and addressed collaboratively. With the right processes in place, the Planning Phase presents an opportunity to design an assessment that supports healthy systems, restores and maintains balance, and strengthens long-term relationships between the MS-WTFNs, the Crown, and OPG.

Impacts to Rights, culture, wellbeing, and safety

The proposed Project raises important considerations related to the exercise of MS-WTFNs' inherent Rights, constitutionally protected Aboriginal Rights, and Treaty Rights. As outlined in the IPD, the MS-WTFNs identified the following aspects of MS-WTFN Members' Inherent Rights to include, but are not limited to:

- the Right to maintain identity, including culture, cultural longevity and cultural identity, language, spirituality, and ways of knowing and being;
- the Right to self-determination, including self-governance, the Right to economy, and to make decisions regarding the Lands, Waters, *aanikoobigiganaanan* (Ancestors), *kina ngadmawaad* (archaeological resources), and other Relatives within the homelands;
- the Right to maintain an undisturbed relationship with the Lands, Waters, *aanikoobigiganaanan*, *kina ngadmawaad*, and other Relatives, as well as to areas and places of cultural and spiritual significance within our homelands;
- the Right to harvest, consume, make, manage, and maintain traditional medicines, food, and ceremonial items;
- the Right to access the necessities of life, including water quality and access to clean drinking water;
- the Right to community wellbeing, safety, and sense of place;



- and more.

These matters are fundamental to MS-WTFN Responsibilities and must be addressed clearly and deliberately as the IA moves forward. Real and potential adverse impacts and effects to constitutionally protected Rights have typically been understood through western paradigms, as limited to those impacts that are related to harvesting practices. MS-WTFN Members' Rights are not simply limited to harvesting but rather extend to encompass relationships and connections to Relatives and homelands and Treaty Territories, from which flow our *nike gaabinjibaad Nishnaabe, kina ngadmawaad, kina gaabmishjigewaad, nike wanishaawaad*, our identity, values, Responsibilities, spirituality, and our ways of knowing and being.

Further, as stated in the IPD, MS-WTFNs Members expressly reserved Rights to all lakebeds, shorelines, islands, points, wetlands, maple stands, rice beds, mouths of rivers and creeks, and beaver houses as part of the negotiation and establishment of pre-Confederation Treaties. The 1923 Williams Treaties process does not address lakebeds and waters in the MS-WTFNs traditional territories. The Canadian Nuclear Safety Commission (CNSC) recognizes the MS-WTFNs' jurisdiction over the water. The waters and lakebeds in the MS-WTFNs' Territories have never been ceded. The proposed NNW Project requires discharge of thermal effluent and treated water directly into these unceded waters, which triggers an immediate Crown Duty to Consult and Accommodate (DTCA) regardless of whether the CNSC's current mandate acknowledges environmental jurisdiction. We require unceded-waters protections for underwater transmission interties and similar infrastructure works directly associated with OPG nuclear facilities. This assertion does not prevent nuclear operations; rather, it requires the Crown (through CNSC licensing conditions) to acknowledge the unceded territory, embed accommodations including, but not limited to, MS-WTFNs-led monitoring and consent mechanisms in discharge permits, and methods to ensure that thermal/effluent pathways are disclosed and are subject to MS-WTFNs-led impact assessment prior to license approval.

Nuclear development introduces long-term considerations – such as continued disruption and altered access, contamination concerns, uncertainties around long-term waste storage, emergency risk, uncertainty extending across generations, and more – that can affect how Rights, culture, Responsibilities, and identity are carried forward. These impacts must be assessed in terms of the future ability to reconnect, restore, and uphold Responsibilities, the MS-WTFNs' way of knowing and being, including exercising our Right to cultural practices, such as hunting, fishing and harvesting.

At this stage in the IA, it is necessary to seek to collectively ensure that impacts to Rights, cultural longevity, wellbeing, and safety, are explicitly scoped as part of the IA, assessed through OPG-funded MS-WTFNs-led studies and assessments, and integrated into decision-making alongside technical and biophysical considerations. This approach will support an assessment process that reflects MS-WTFN Responsibilities, addresses long-term implications, and enables informed decisions about whether and how the Project may proceed.

Cumulative effects, long-term change, and intergenerational Responsibilities

MS-WTFN homelands and Treaty Territories are already subject to immense cumulative effects from historic and ongoing development, including nuclear and non-nuclear OPG projects, hydroelectric infrastructure, agriculture, transportation corridors, land privatization, and past and ongoing government decisions. At the same time, the project area includes Lands and



Waters in relatively good condition that could be used to practice Rights if access was restored. Cumulative effects must be assessed through MS-WTFNs-led analysis to inform decisions about whether additional burdens can be carried within this landscape.

Waste management, transportation, decommissioning, and emergency preparedness

Nuclear waste management, transportation, and decommissioning represent enduring and intergenerational impact pathways. Interim storage decisions shape exposure pathways, monitoring obligations, emergency preparedness, and trust. Decommissioning decisions affect land use, contamination risk, and care and *chi weshjigaadeg nike gaazhnaagwaak mewzha* responsibilities. The IPD does not yet provide sufficient clarity on these matters, including transportation and waste management alternatives, or demonstrate how UNDRIP Article 29(2)⁵ and FPIC will apply.

Emergency preparedness and radiological risk communication are also discussed at a general level without clear MS-WTFN roles, authority, and community readiness supports. It is critical that the Impact Statement include a robust analysis of alternatives to the project, fuel transportation options, and long-term waste storage options.

Archaeology, cultural heritage, and intangible culture

As demonstrated through our input to the IPD, the project site and surrounding area represents a cultural landscape that is central to our identity, sense of place, and ways of knowing and being. From a western-science perspective, the project site (and indeed most of Northumberland County) has a relatively unknown archaeological record. Our preliminary research efforts suggest that much of the archaeological record was disturbed through early settler activities and looting. As such, we underscore the need for OPG to proceed with an abundance of caution as it pertains to real and potential impacts to *kina ngadmawaad* and *aanikoobigiganaanan*. We are particularly concerned that our Knowledge of the area will be dismissed and/or downplayed in favour of western interpretations. We request that the entirety of the project site be considered and treated as having archaeological potential.

The 1923 William Treaties process has allowed for industry, development and infrastructure to encroach on MS-WTFNs' Lands without consent, consultation or possibilities for partnerships with the MS-WTFNs. Significant amounts of *nike gaabinjibaad Nishnaabe*, *kina ngadmawaad*, *kina gaabmishjigewaad*, *nike wanishaawaad* (cultural heritage) and ancestors have therefore been lost, destroyed or removed without the MS-WTFNs' knowledge or consent.

Nike gaabinjibaad Nishnaabe, *kina ngadmawaad*, *kina gaabmishjigewaad*, *nike wanishaawaad* must be understood as part of a living landscape, directly connected to the MS-WTFNs. Any archaeological discovery is significant as it may provide clues or information about the history of the MS-WTFNs, regardless of the size, ground disturbance, impacts to erosion, or isolated finds. All archaeological information is significant for the process of reclaiming history that has been lost to the MS-WTFNs as a result of hundreds of years of colonial disturbances to the Lands and Waters. The removal of an archaeological site from the land also removes the

⁵ UNDRIP Article 29(2) requires States to obtain the free, prior, and informed consent of Indigenous Peoples before the storage or disposal of hazardous materials on Indigenous lands or territories. In this assessment, the provision is directly relevant to nuclear waste storage, transport, and long-term management decisions.



footprints, homes, belongings, lifeways and skeletons of our Ancestors from *Shkakimekwe* (Mother Earth), which impacts our connection to them.

As such, our Communities must be involved in decision-making processes around archaeological studies and activities impacting Michi Saagig Anishinaabeg *nike gaabinjibaad Nishnaabe, kina ngadmawaad, kina gaabmishjigewaad, nike wanishaawaad*, as per Section 35 of the Constitution Act (1982), Articles 11.1, 11.2, 12.1 and 12.2 of UNDRIP, as legislated through the UNDA (2021), and Canada's commitment to reconciliation through the Truth and Reconciliation Calls to Action (2015).

Information gaps and project definition

The project description remains incomplete in areas that determine impact pathways and risk, including spatial detail, infrastructure configuration, operational assumptions, waste systems, and project boundaries. The IPD does not consistently distinguish between what is known, assumed, or undecided, limiting meaningful assessment and consent. These information gaps should be filled before proceeding further with the IA.

Recommendations

To establish a strong, respectful, and accountable foundation for the IA, we propose several required next steps. These recommendations are interconnected and should be advanced together. In addition to the recommendations here, we have developed a detailed list of concerns and recommendations to be discussed between the Crown, OPG and the MS-WTFNs.

- **MS-WTFNs-led impact assessment:** The Crown and OPG must formally recognize and support an MS-WTFNs-led impact assessment as a core and authoritative component of the IA. This includes committing to predictable funding and confirmation that MS-WTFNs-led findings will inform IA scoping, study design, impact characterization, mitigation requirements, accommodation, and decision-making with equal weight to proponent-led analyses.
- **Process workplans, capacity, and information sharing:** Prior to finalizing IA scoping, the Crown and OPG must work with MS-WTFNs to develop process workplans and capacity agreements that clearly define roles, sequencing, timelines, integration points with the federal IA, and expectations for proactive, timely, and transparent information sharing (including sharing data, maps, study findings, management plans, project plans, etc.). These process workplans must support MS-WTFNs' governance timelines and internal decision-making processes.
- **Governance, decision-making authority, and FPIC:** The Crown and OPG must establish Nation-to-Nation governance structures that recognize the MS-WTFNs as Rights-holding authorities. This includes decision-making Rights, entering into a formal FPIC Agreement prior to proceeding with the federal IA, identifying consent-related decision points, and establishing a Nation-to-Nation Table to guide coordinated decision-making, oversight, and issue resolution throughout the Project lifecycle.
- **Lands, Waters, Relatives, and long-term care:** The Crown and OPG must support MS-WTFNs-led studies, assessment, and sovereignty over the care of and responsibility to Lands, Waters, and Relatives; access; and cultural landscapes. Assessment and planning must prioritize avoidance of harm, with MS-WTFNs determining required mitigation and protection measures based on our Responsibilities and Knowledge.



- **MS-WTFNs-led monitoring and long-term oversight:** The Crown and OPG must support MS-WTFNs-led monitoring during the IA and across all Project phases, including construction, operation, waste management, and decommissioning. Monitoring programs must be co-developed, adequately funded, and led by us, with authority to interpret findings, recommend adaptive management and mitigation, and participate in oversight and response where thresholds or concerns are identified.
- **Rights, culture, wellbeing, and safety:** Impacts to Rights, including our ability to exercise them, to cultural longevity, wellbeing, safety, and sense of place must be explicitly scoped as part of the IA. The Crown and OPG must fund and support MS-WTFNs-led assessment of these impacts and ensure findings inform IA conclusions, mitigation requirements, accommodation, emergency planning, and long-term governance.
- **Archaeology, Aanikoobiganaanan, and nike gaabinjibaad Nishnaabe, kina ngadmawaad, kina gaabmishjigewaad, nike wanishaawaad:** Additional research must be conducted to ensure a complete understanding of the presence of our Ancestors within and surrounding the project site. We request that the entire project site be considered as having archaeological potential and be treated with utmost caution, using mutually agreed upon protective measures and methodologies. The Crown and OPG must support MS-WTFNs-specific archaeological and *nike gaabinjibaad Nishnaabe, kina ngadmawaad, kina gaabmishjigewaad, nike wanishaawaad* protocols from the earliest stages of the IA. These must encompass decision-making authority, including the ability to guide archaeological methods, interpretation and responses throughout the Project lifecycle.
- **Benefits and long-term community wellbeing:** Early in the Planning Phase, the Crown and OPG must engage with the MS-WTFNs to establish an MS-WTFN-directed approach for identifying, negotiating, and securing benefits associated with the Project. This must include meaningful opportunities aligned with the priorities, governance processes, and long-term wellbeing of the MS-WTFNs, and must not be deferred until project parameters or procurement strategies are already set.

Closing and Next Steps

As the MS-WTFNs, we submit this letter to support clear next steps in the IA process. The collaborative nature of this submission reflects the interconnected nature of the homelands of the MS-WTFNs, and our Responsibilities and Rights.

As next steps, we request:

- Confirmation from IAAC on how the issues raised will be reflected in the Summary of Issues and the TISGs, including clear rationale where any issue is not included;
- Early engagement with our staff to align on sequencing, timelines, and information-sharing expectations; and
- Timely discussion with the Crown and OPG on the proposed workplans, agreements, and governance structures required to support MS-WTFNs' participation and the MS-WTFNs-led assessment.



We appreciate the opportunity to provide this input and look forward to continued dialogue as the Planning Phase progresses.

Baamaapii,

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