



January 15, 2021

Mr. Brian Wilcox  
Director – Reactor Decommissioning  
Canadian Nuclear Laboratories (CNL)

**Subject: Outcome of CNSC Staff’s Completeness Check of the Revised Environmental Impact Statement and Dispositions to Federal and Provincial Comments for the Nuclear Power Demonstration Closure Project**

Dear Mr. Wilcox,

Thank you for your December 15, 2020 submission [1] to the Canadian Nuclear Safety Commission (CNSC) that included a revised draft environmental impact statement (EIS) for the proposed Nuclear Power Demonstration (NPD) Closure Project. CNSC staff have conducted a completeness check of Canadian Nuclear Laboratories’ (CNL) submission, including draft consolidated responses to the federal and provincial information requests (IRs) on the draft EIS [2], to form an opinion on whether the required information has been provided to enable the federal and provincial review team to proceed with the EIS technical review. CNSC staff have deemed the submission incomplete.

**Overall Review**

The scope of the completeness check for this submission was to review the revised responses to the 32 IRs that did not pass the completeness check of the previous submission, completed on May 05, 2020, including any relevant revisions to the revised EIS and supporting technical documents. In addition, CNSC staff evaluated the December 15, 2020 submission against the requests resulting from the previous completeness check, detailed in the letter issued on May 05, 2020 [3].

CNSC staff reviewed the materials in accordance with *Canadian Environmental Assessment Act 2012*, *Nuclear Safety and Control Act*, REGDOC 3.2.2 *Indigenous Engagement*, the “*Generic Guidelines Preparation of an Environmental Impact Statement Pursuant to the Canadian Environmental Assessment Act, 2012*” and additional guidance provided to CNL, and determined that the submission is incomplete.

**Information Requests**

The CNSC recognizes that overall, CNL has significantly improved the responses to IRs. However, 5 of the 32 responses to IRs did not follow the guidance provided to CNL. Therefore, CNSC staff have deemed the submission incomplete.

The main reasons for determining incompleteness of IR responses were that the supplementary material or changes to the EIS documents or TSDs provided as part of the response are



insufficient to adequately meet the request. The revised responses did not add sufficient information to address the original information request nor the additional guidance as per the completeness check of May 05, 2020 [3]. Detailed review feedback on the specific responses to IRs that were deemed incomplete is provided in the attached table (Annex 1).

## Indigenous Engagement

Based on the review of materials related to the requests made in the May 05, 2020 letter [3] relevant to Indigenous engagement, CNSC staff have deemed the submission incomplete.

On May 05, 2020, in the letter of outcome of the previous completeness check [3], the CNSC requested that CNL demonstrate they worked with AOPFN to address their comments on the EIS (provided in July 2020), and that they incorporate this information into the EIS and the IER. In addition, it was CNSC staff's expectation that CNL would demonstrate that AOPFN's issues, concerns and/or feedback, responses to these issues and validation of responses be incorporated into the draft EIS and the IER. In the May 05, 2020 letter, the CNSC also requested that for each identified Indigenous group, CNL demonstrate that they responded to issues, concerns and/or feedback raised, and validated their responses with the respective Indigenous groups. This information should similarly be included in the draft EIS and IER. CNSC staff requested that, should CNL not be able to fully address issues, concerns or feedback raised, this would be documented.

As part of the completeness check performed, CNSC staff were unable to find a response to any of the above requests, and therefore determined that the December 15, 2020 submission is incomplete in regards to this aspect.

The CNSC recognizes the significant effort CNL is putting into addressing the comments received from some of the identified Indigenous groups on the Project Description (PD) and on versions of the draft EIS. However, CNL should note that comments on the PD and draft EIS are but one part of the broader engagement process throughout the lifetime of the EA process. These comments, together with additional engagement activities carried out throughout the entire EA process, should help inform a summary of issues and concerns. As explained in previous meetings between the CNSC and CNL on these matters, the CNSC wishes to reiterate that it expects to see a summary of key concerns and how CNL is addressing them in the draft EIS as per the "*Generic Guidelines Preparation of an Environmental Impact Statement Pursuant to the Canadian Environmental Assessment Act, 2012*":

*The EIS will include, and the proponent should consider engaging with potentially affected Aboriginal groups to obtain their views on, the following: [...]*

- *comments, specific issues and concerns raised by Aboriginal groups and how the key concerns were responded to or addressed*

*A suggested format for providing the information above is the creation of a tracking table of key issues raised by each Aboriginal group, including the concerns raised related to*



*the project, proposed mitigation options, and where appropriate, a reference to the proponent's analysis in the EIS.*

### **Additional Information**

In conducting the completeness review of the draft EIS and IER, CNSC staff noted upon an initial scan of the documents that there are significant deficits in information related to Indigenous engagement. While these deficits do not affect a determination of completeness per se at this time, they will be followed up at the technical review phase with information requests. These deficits are flagged here so that CNL may choose to address them prior to resubmission in order to avoid further delays. In order to demonstrate appropriate engagement for the NPD project, CNL will need to provide information that verifies the following:

- CNL has provided relevant information to identified Indigenous groups sufficient to allow for them to understand the NPD project and its effects relevant to Indigenous peoples;
- CNL has engaged in two-way dialogue with identified groups to solicit issues, concerns, and/or feedback;
- CNL has addressed any issues, concerns, and/or feedback from identified Indigenous groups and how/whether this information was incorporated into the draft EIS or IER; and
- CNL has validated these responses with the respective Indigenous groups.

### **Next Steps**

CNSC staff expect CNL to take the time necessary to perform any additional work, including but not limited to technical revisions and potential additional Indigenous engagement, to then revise the submission and submit the updated EIS submission, including all references that underpin the responses according to the outcome of this completeness check. The CNSC is willing to hold a meeting with CNL to further elaborate on the outcome of this completeness check of the December 15, 2020 submission, and the expectations for a resubmission.

Upon resubmission of an EA package, CNSC staff will perform a subsequent completeness check. Should the EIS submission be deemed complete at that time, the technical review will commence.

Should you have any questions, please do not hesitate to contact the environmental assessment specialist for the NPD Closure Project, Marcelle Phaneuf, directly by phone at 343-551-4196 or by email at [Marcelle.Phaneuf@canada.ca](mailto:Marcelle.Phaneuf@canada.ca).

Sincerely,

*NKwamena*

Dr. Nana-Owusua Kwamena  
Director, Environmental Assessment Division



**c.c.:** CNSC: N. Kwamena, C. Cattrysse, L. Abellan, R. Clarke, M. Herod, M. Phaneuf, S. Watt, W. Yen

CNL: I. Bainbridge, P. Boyle, S. Brewer, S. Cotnam, J. D. Garrick, M. Gull, K. Hogue, S. Karivelil, B. Phillips, U. Senaratne, K. Schruder, C. Williams, J. Willman, D. Wood

**Annex 1:** Detailed Completeness Check of Revised Draft EIS and Responses to Information Requirements for Nuclear Power Demonstration Closure Project

**References:**

- Letter, K. Schruder (CNL) to M. Phaneuf (CNSC), *Submission of Revised Environmental Impact Statement for the Nuclear Power Demonstration Closure Project*, December 15, 2020 ([e-Doc 6446361](#))
- [1] *Environmental Impact Statement for the Nuclear Power Demonstration Closure Project*, December 15, 2020 ([e-Doc 6446361](#))
- [2] CNL, Nuclear Power Demonstration (NPD) Closure Project 2020 Dec 15 – Federal and Provincial Technical Responses ([e-Doc 6271273](#))
- Letter, CNSC to CNL, *CNSC Staff Completeness Check of Revised Environmental Impact Statement and Dispositions to Federal and Provincial Comments for the Nuclear Power Demonstration Closure Project*, May 05, 2020 ([e-Doc 6290679](#))
- [3] *Letter, CNSC to CNL, CNSC Staff Completeness Check of Revised Environmental Impact Statement and Dispositions to Federal and Provincial Comments for the Nuclear Power Demonstration Closure Project*, May 05, 2020 ([e-Doc 6290679](#))



Annex 1. Detailed Completeness Check of Revised Draft EIS and Responses to Information Requirements for Nuclear Power Demonstration Closure Project (Submitted December 15, 2020)

Reference #	Complete	Rationale	Context and Information Required for a Complete Response
Reference #: 11	Complete: Yes	Rationale: n/a	Context and Information Required for a Complete Response: n/a
Reference #: 19	Complete: Yes	Rationale: n/a	Context and Information Required for a Complete Response: n/a
Reference #: 30	Complete: Yes	Rationale: n/a	Context and Information Required for a Complete Response: n/a
Reference #: 35	Complete: Yes	Rationale: n/a	Context and Information Required for a Complete Response: n/a
Reference #: 75	Complete: Yes	Rationale: n/a	Context and Information Required for a Complete Response: n/a
Reference #: 78	Complete: Yes	Rationale: n/a	Context and Information Required for a Complete Response: n/a
Reference #: 90	Complete: Yes	Rationale: n/a	Context and Information Required for a Complete Response: n/a
Reference #: 110	Complete: Yes	Rationale: n/a	Context and Information Required for a Complete Response: n/a
Reference #: 116	Complete: Yes	Rationale: n/a	Context and Information Required for a Complete Response: n/a
Reference #: 123	Complete: Yes	Rationale: n/a	Context and Information Required for a Complete Response: n/a
Reference #: 127	Complete: Yes	Rationale: n/a	Context and Information Required for a Complete Response: n/a
Reference #: 132	Complete: Yes	Rationale: n/a	Context and Information Required for a Complete Response: n/a



Reference #	Complete	Rationale	Context and Information Required for a Complete Response
Reference #: 137	Complete: Yes	Rationale: n/a	Context and Information Required for a Complete Response: n/a
Reference #: 145	Complete: Yes	Rationale: n/a	Context and Information Required for a Complete Response: n/a
Reference #: 153	Complete: No	Rationale: The supplementary material or changes to EIS documents or TSDs provided as part of the response is/are insufficient to adequately meet the request.	<p><b>Context and Information Required for a Complete Response:</b></p> <p>As per feedback CNSC staff provided in May 2020:</p> <p><i>“The response does not follow guidance provided to CNL that responses should provide sufficient information to guide a technical review, on three points:</i></p> <p><i>1- The response does not specifically indicate what “existing information” on traditional use was referenced to validate the indication “that the typical types of traditional activities such as hunting and fishing were being carried out by Indigenous people in the Ottawa Valley.” As per the IR, CNSC staff expect the revised EIS and/or IER to consider this information. Please provide a list of resources that are being referred to as “existing information” and any documentation that was used to validate the statements made in the IR response. CNSC staff expect all documents/information to be provided as part of the complete EIS submission in order to begin the technical review.</i></p> <p><i>2- The response does not contain information specific to each Indigenous group or engagement with Indigenous groups. Please clarify where this information may be found. As per the IR, CNSC staff expect the revised EIS and/or IER to include detailed information on how engagement with Indigenous groups helped define the selection of VCs.</i></p> <p><i>3- The response references the MNO TKLUS however does not provide details on how and where information provided in the TKLUS was incorporated or informed the revised EIS submission in the context of this IR. Please clarify where this information may be found. As per the IR, CNSC staff expect the revised EIS submission to consider this information.”</i></p> <p><b>The response provided did not provide a detailed list of resources being referred to. The response also refers to Appendix H of the IER which does not contain enough information to demonstrate that CNL has validated information for all identified Indigenous groups. Please provide further evidence and information to support that validation work was</b></p>



Reference #	Complete	Rationale	Context and Information Required for a Complete Response
			<p><b>completed and then demonstrate that the EIS was updated based on conclusions of this validation work if required. If needed, provide a rationale where information was not obtained for some of the identified Indigenous groups.</b></p>
<p><b>Reference #:</b> 154</p>	<p><b>Complete:</b> <b>No</b></p>	<p><b>Rationale:</b> The supplementary material or changes to EIS documents or TSDs provided as part of the response is/are insufficient to adequately meet the request.</p>	<p><b>Context and Information Required for a Complete Response:</b></p> <p>As per the feedback CNSC staff provided in May 2020:</p> <p><i>“The response does not follow guidance provided to CNL that responses should provide sufficient information to guide a technical review, on three points:</i></p> <p><i>1- The response does not specifically indicate what traditional knowledge was considered in the development of the assessment boundaries. Please provide a list of resources that were considered as well as any documentation that was used to validate the statements made in the IR response.</i></p> <p><i>CNSC staff expect all documents/information to be provided as part of the complete EIS submission in order to begin the technical review.</i></p> <p><i>2- The response and indicated sections of the revised EIS and IER do not contain information specific to each Indigenous group or engagement with Indigenous groups. Please clarify where this information may be found. As per the IR, CNSC staff expect the revised EIS and/or IER to include detailed information on how engagement was conducted by CNL with Indigenous groups on this topic.</i></p> <p><i>3- The response references the MNO TKLUS under the “References” heading however does not provide details on how and where information provided in the TKLUS was incorporated or informed the revised EIS submission in the context of this IR. Please clarify where this information may be found. As per the IR, CNSC staff expect the revised EIS submission to consider this information.”</i></p> <p><b>The response provided does not answer requirement 1 and requirement 3 (above) in sufficient detail to guide a technical review. For MNO and all other identified Indigenous groups validation of the use of information including from the MNO TKLUS was not complete in Appendix H of the IER. In addition, the response provided discusses that the EIS was shared and that it included sections the identified Indigenous groups could comment on. However it was not made clear whether CNL directed Indigenous groups to</b></p>



Reference #	Complete	Rationale	Context and Information Required for a Complete Response
			<p>these sections, explained what information CNL was requesting from the identified Indigenous groups or validated the information with the Indigenous groups. Simply providing a draft EIS and an accompanying letter is not sufficient engagement. Please provide a complete list of resources and resources used to validate. Please also demonstrate validation and verification was completed. If needed, provide a rationale where information was not obtained for some of the identified Indigenous groups.</p>
<p>Reference #: 155</p>	<p>Complete: No</p>	<p>Rationale: The supplementary material or changes to EIS documents or TSDs provided as part of the response is/are insufficient to adequately meet the request.</p>	<p><b>Context and Information Required for a Complete Response:</b></p> <p>As per the feedback CNSC staff provided in May 2020:</p> <p><i>“The response does not follow guidance provided to CNL that responses should provide sufficient information to guide a technical review, on two points:</i></p> <p><i>1- There is very little detail included on discussions had and feedback received from each Indigenous group identified in table 7.3-1 in the revised EIS and how this feedback was taken into consideration or addressed by CNL in sections 7.6 and 9.9 of the revised EIS and section 4.5 of the IER. Please clarify where this information may be found. As per the IR, CNSC staff expect the revised EIS and/or IER to consider this information. CNL should demonstrate that through its engagement activities it had discussions with all identified First Nation and Métis groups regarding potential impacts to Indigenous and/or treaty rights, as well as potential impacts as per the requirements of the Canadian Environmental Assessment Act, 2012 (CEAA 2012) and has tracked and addressed any issues/concerns/feedback in the EIS and/or IER. If these discussions did not occur with any group, CNL should provide justification.</i></p> <p><i>2- The response references the MNO TKLUS however does not provide details on how and where information provided in the TKLUS was incorporated or informed the revised EIS submission in the context of this IR. Please clarify where this information may be found. As per the IR, CNSC staff expect the revised EIS submission to consider this information.”</i></p> <p><b>The response provided does not answer requirement 1 and requirement 2 (above) in sufficient detail to guide a technical review. In reviewing Appendix B and Appendix H of the IER as directed in the response, it is not clear to CNSC staff whether CNL presented information related to effects to fishing, sought specific feedback, responded to any feedback and validated this with identified Indigenous groups. For example, Appendix B of</b></p>





Reference #	Complete	Rationale	Context and Information Required for a Complete Response
			<p>the IER TSD lists the engagement opportunities but not their outcome. Moreover, Appendix H of the IER TSD states for many of the identified Indigenous groups including but not exclusive to MNO, AOPFN, AOO and AANTC that responses to concerns and validation thereof is pending. In addition, the response provided discusses that the EIS was shared and that it included sections the identified Indigenous groups could comment on. However, it was not made clear whether CNL directed Indigenous groups to these sections, or explained what information CNL was requesting from the identified Indigenous groups with respect to the effects to Aboriginal land and resource use and mitigation measures. Simply providing a draft EIS and an accompanying letter is not sufficient engagement. Please include sufficient information so as to demonstrate that CNL has provided information regarding the effects to Aboriginal land and resource use and mitigation measures, discussed, received feedback, responded to and validated the concerns of identified Indigenous groups regarding the project. If needed, provide a rationale where information was not obtained for some of the identified Indigenous groups.</p>
Reference #: 156	Complete: No	<p><b>Rationale:</b> The supplementary material or changes to EIS documents or TSDs provided as part of the response is/are insufficient to adequately meet the request.</p>	<p><b>Context and Information Required for a Complete Response:</b></p> <p>As per the feedback CNSC staff provided in May 2020:</p> <p><i>“The response does not follow the guidance provided to CNL that the response be self-contained, which means that while the response may refer to additional information contained elsewhere in the EIS or technical supporting documents, the response itself should summarize the key elements of this information and demonstrate how the information fully address the IR. The response and the referenced section 7.6 of the revised EIS do not specifically indicate whether the “renaturalization process” and its potential benefits to trapping, hunting, and gathering activities have been discussed with Indigenous groups, what feedback was received from each Indigenous group and how this feedback was taken into consideration or addressed by CNL.</i></p> <p><i>The response also indicates that sections 4 and 7 of the IER include an updated description of engagements, discussion and engagement results. However, these sections are broad and therefore these references are unspecific, and do not allow the reviewer to find and validate the referenced information.</i></p>



Reference #	Complete	Rationale	Context and Information Required for a Complete Response
			<p><i>Please clarify the following:</i></p> <ul style="list-style-type: none"> <li>- where the information specific to engagement on the “renaturalization process” and its potential benefits to trapping, hunting, and gathering activities may be found within section 4 of the IER (or elsewhere in the submission)</li> <li>- where the information specific to engagement on the “renaturalization process” and its potential benefits to trapping, hunting, and gathering activities may be found within section 7 of the IER (or elsewhere in the submission).”</li> </ul> <p><b>The response provided does not answer requirement 1 and requirement 2 (above) in sufficient detail to guide a technical review. Appendix B of the IER does not provide enough detail to demonstrate that information was provided, concerns discussed, responded provided by CNL and validated with Indigenous groups. The response provided discusses that the EIS was shared and that it included sections the identified Indigenous groups could comment on. However, it was not made clear whether CNL directed Indigenous groups to these sections, explained what information CNL was requesting from the identified Indigenous groups with respect to the renaturalization process and next land use of the NPD site. Simply providing a draft EIS and an accompanying letter is not sufficient engagement. Please demonstrate that CNL has presented this information, solicited feedback from identified Indigenous groups, responded to any comments or concerns and validated these responses with identified Indigenous groups related to the renaturalization process and next land use of the NPD site. If needed, provide a rationale where information was not obtained for some of the identified Indigenous groups.</b></p>
Reference #: 157	Complete: No	Rationale: The supplementary material or changes to EIS documents or TSDs provided as part of the response is/are insufficient to adequately meet the request.	<p><b>Context and Information Required for a Complete Response:</b></p> <p>As per feedback CNSC staff provided in May 2020:</p> <p><i>“The response does not follow the guidance provided to CNL that the response should provide a direct response to the question within the IR. In the case of an IR with several sub-sections, the response should address every sub-question within an IR clearly. This response states that section 9.9.3 of the revised EIS includes specific reference to potential effects of First Nation and Métis fishing rights. However, neither the response nor the referenced section 9.9.3 of the revised EIS contain information specific to each Indigenous group or engagement with Indigenous groups. Please clarify where this information may be found. As per the IR, CNSC</i></p>



Reference #	Complete	Rationale	Context and Information Required for a Complete Response
			<p><i>staff expect the revised EIS submission and/or IER to include detailed information on how CNL conducted engagement with Indigenous groups on this topic.”</i></p> <p><b>The response provided does not answer the requirement to identify where CNL engaged with identified Indigenous groups on this topic (fishing use) but rather refers to the entire Appendix B and Appendix H of the IER. In reviewing those it is not clear to CNSC staff that CNL presented information related to effects to fishing, sought specific feedback, responded to any feedback and validated this with identified Indigenous groups. The response provided discusses that the EIS was shared and that it included sections the identified Indigenous groups could comment on. However, it was not made clear whether CNL directed Indigenous groups to these sections, or explained what information CNL was requesting from the identified Indigenous groups with respect to effects to Aboriginal fishing activities. Simply providing a draft EIS and an accompanying letter is not sufficient engagement. Please demonstrate that CNL has presented information regarding effects to Aboriginal fishing activities, sought specific feedback, responded to any feedback and validated this with identified Indigenous groups. If needed, provide a rationale where information was not obtained for some of the identified Indigenous groups.</b></p>
Reference #: 159	Complete: No	<p><b>Rationale:</b> The supplementary material or changes to EIS documents or TSDs provided as part of the response is/are insufficient to adequately meet the request.</p>	<p><b>Context and Information Required for a Complete Response:</b></p> <p>As per the feedback CNSC staff provided in May 2020:</p> <p><i>“The response does not follow guidance provided to CNL that responses should provide sufficient information to guide a technical review. In addition, the response should be self-contained, which means that while the response may refer to additional information contained elsewhere in the EIS or technical supporting documents, the response itself should summarize the key elements of this information and demonstrate how the information fully address the IR. There is very little detail included on discussions had and feedback received from each Indigenous group identified in table 7.3-1 in the revised EIS related to CNL’s conclusion that there will be no residual effects on Aboriginal Land and Resource Use VCs during all phases of the project and how this feedback was taken into consideration or addressed by CNL. Please clarify where this information may be found. As per the IR, CNSC staff expect the revised EIS and/or IER to consider this information. CNL should demonstrate that through their engagement activities it were discussions with all identified First Nation</i></p>



Reference #	Complete	Rationale	Context and Information Required for a Complete Response
			<p><i>and Métis groups regarding potential impacts to Indigenous and/or treaty rights, as well as potential impacts as per the requirements of CEAA 2012 and has tracked and addressed any issues/concerns/feedback in the revised EIS and/or IER. If these discussions did not occur with any group, CNL should provide justification.</i></p> <p><i>In addition, the response does not specify what changes were made to sections 7 and 9 of the revised EIS and section 4 of the IER to address the comment. Therefore, the reviewer cannot confirm if the response is complete nor technically sound. In the IR response, please summarize clearly for each specific section what changes have been made to address the IR.</i></p> <p><i>Finally, the response references the MNO TKLUS however does not provide details on how and where information provide in the TKLUS was incorporated or informed the revised EIS submission in the context of this IR. Please clarify where this information may be found. As per the IR, CNSC staff expect the revised EIS submission to consider this information.”</i></p> <p><b>The response provided did not provide enough detail to conduct a technical review by demonstrating how engagement with identified Indigenous groups has informed CNL’s conclusion. The summary provided in the table does not indicate that CNL has done validation work to verify with identified Indigenous groups to ensure concerns related to effects on Aboriginal land and resource use VCs were responded to. Appendix B and Appendix H of the IER referred to in the response do not provide enough information to conduct a technical review. The response provided discusses that the EIS was shared and that it included sections the identified Indigenous groups could comment on. However, it was not made clear whether CNL directed Indigenous groups to specific sections, or explained what information CNL was requesting from the identified Indigenous groups with respect to the assessment of and conclusions that there are no residual effects on Aboriginal land and resource VCs. Simply providing a draft EIS accompanying a letter is not sufficient engagement. Please demonstrate that CNL has presented information to support conclusions for effects on Aboriginal land and resource use VCs, discussed and sought concerns, responded to concerns and validated responses with identified Indigenous groups. If needed, provide a rationale where information was not obtained for some of the identified Indigenous groups.</b></p>



Reference #	Complete	Rationale	Context and Information Required for a Complete Response
Reference #: 164	Complete: Yes	Rationale: n/a	Context and Information Required for a Complete Response: n/a
Reference #: 172	Complete: Yes	Rationale: n/a	Context and Information Required for a Complete Response: n/a
Reference #: 176	Complete: Yes	Rationale: n/a	Context and Information Required for a Complete Response: n/a
Reference #: 177	Complete: Yes	Rationale: n/a	Context and Information Required for a Complete Response: n/a
Reference #: 178	Complete: Yes	Rationale: n/a	Context and Information Required for a Complete Response: n/a
Reference #: 181	Complete: Yes	Rationale: n/a	Context and Information Required for a Complete Response: n/a
Reference #: 183	Complete: Yes	Rationale: n/a	Context and Information Required for a Complete Response: n/a
Reference #: 215	Complete: Yes	Rationale: n/a	Context and Information Required for a Complete Response: n/a
Reference #: 222	Complete: Yes	Rationale: n/a	Context and Information Required for a Complete Response: n/a
Reference #: 238	Complete: Yes	Rationale: n/a	Context and Information Required for a Complete Response: n/a
Reference #: 240	Complete: Yes	Rationale: n/a	Context and Information Required for a Complete Response: n/a
Reference #: 242	Complete: Yes	Rationale: n/a	Context and Information Required for a Complete Response: n/a
Document ID:	Complete: No	Rationale: No response was provided to Page 2 of May 2020 CNSC	Context and Information Required for a Complete Response: In the May 2020 letter, CNSC requested that CNL conduct engagement and validation work with AOPFN with respect to AOPFN's comments on the revised EIS and document this work



Reference #	Complete	Rationale	Context and Information Required for a Complete Response
<p><b>Page 2 of May 2020 CNSC Letter to CNL</b></p>		<p><b>letter to CNL in the response from CNL or the updated Table.</b></p>	<p>in the EIS. No answer was provided by CNL in their response package directing CNSC staff to a specific section of the EIS or IER. In reviewing the EIS and IER TSD, it is CNSC's understanding that AOPFN provided comments in July 2020, however it is unclear whether CNL provided a response to AOPFN or what validation work was completed to date.</p> <p>Additionally, CNSC staff requested that CNL clearly document in the revised EIS how they addressed the issues, concerns and or feedback raised by each identified Indigenous group. CNL has not provided a response to this question. In both the EIS and IER TSD it is not clear to CNSC staff how or whether CNL has adequately engaged identified Indigenous groups, through sharing information, discussing and collecting any concerns, responding to concerns and validating these responses with identified Indigenous groups.</p> <p><b>Please demonstrate the following through revisions to the EIS and IER (including but not limited to Appendix A and Appendix H):</b></p> <ol style="list-style-type: none"> <li>1- <b>How CNL responded to AOPFN's July 2020 comments on the EIS and validated responses with AOPFN.</b></li> <li>2- <b>How CNL engaged all identified Indigenous groups through sharing information (identifying potential effects of the project for areas of concern to Indigenous groups), <u>discussing</u> and collecting any concerns or issues, responding to those concerns and validating responses with the respective Indigenous groups. This can include but is not exclusive to comments on the draft EIS. Issues and concerns from each identified Indigenous group for the project should be captured throughout the entire process, then summarized, addressed and presented in the EIS as per the Guidelines. See also the cover letter for this completeness check.</b></li> </ol>