



Canadian Nuclear
Laboratories

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Nuclear Power Demonstration (NPD) Indigenous Engagement Report

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Revision 6

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Land Acknowledgement

CNL respectfully recognizes and acknowledges that the Nuclear Power Demonstration Site is located on the unceded and un-surrendered territory of the Algonquin Anishinaabe people. As an organization, CNL recognizes and appreciates their historic connection to this place. CNL also recognizes the contributions that First Nations, Métis, Inuit and other Indigenous peoples have made, both in shaping and strengthening this community in particular and this province and country as a whole.

1. Introduction

1.1 Purpose

In 2016 April, Canadian Nuclear Laboratories (CNL) initiated the environmental assessment (EA) process required to obtain regulatory approval for the closure of the Nuclear Power Demonstration (NPD) reactor and facility, located in Rolphton, Ontario.

An important step in this process, is the completion of an Environmental Impact Statement (EIS). The EIS has reporting components that require content specific to Indigenous engagement.

This Indigenous Engagement Report (IER) is a technical supporting document to the EIS, prepared in accordance with the Canadian Nuclear Safety Commission (CNSC) Indigenous Engagement regulatory document: REGDOC-3.2.2 Indigenous Engagement [1]. This report outlines CNL's approach to Indigenous engagement to support the EA process for the planned Project. The IER is a more detailed version of Section 6 of the EIS that provides additional information and context on CNL's Indigenous engagement activities for the NPD Closure Project. The IER remains a living document that will continue to be updated as engagement continues.

1.2 Scope

As per REGDOC-3.2.2 [1], the scope of this IER includes:

- identification of Indigenous peoples (identified through discussion with the CNSC);
- Indigenous engagement activities that have taken place up to the date of writing, and a proposed schedule for interim reporting on these activities to the CNSC; and
- the plan on how CNL has and will continue to engage with Indigenous peoples.

CNL has enhanced the scope of the IER by adding the following:

- a section demonstrating compliance with regulatory requirements;
- an enhanced summary of each identified Indigenous Nation, community or organization demonstrating CNL's understanding of the historical, legal, socio-economic, traditional use and other characteristics including documenting (where available) their interests in the region and near the Project;

- a section providing a discussion and summary of the engagement results;
- a section on project Valued Components (VCs) as identified by Indigenous Nations, communities, and organizations;
- a description of Traditional Land and Resource Use within the vicinity of the Project;
- a summary of the assessment of the potential impacts of the NPD Closure Project on Traditional Land and Resource Use;
- a description of Indigenous Socio-Economics and Health within the vicinity of the Project;
- a summary of the assessment of the potential impacts of the Project on Indigenous Socio-Economic and Health, including a description of an Indigenous receptor; and
- a section describing CNL's approach to long-term relationships with Indigenous peoples.

With these enhancements, the IER is a comprehensive document with respect to CNL's engagement with Indigenous peoples.

After the filing of the EIS, CNL will continue to engage with Indigenous peoples with regards to the NPD Closure Project as well as more broadly about CNL-managed sites and other projects. CNL is working towards developing long-term relationships with Indigenous peoples on whose traditional territory CNL operates and with those that have territory and modern-day interests near CNL operations consistent with the Government of Canada's approach to reconciliation. CNL is working closely with Atomic Energy of Canada Limited (AECL), a federal Crown corporation and owner of the site, to engage and build long-term relationships with Indigenous peoples on matters beyond the scope of this EIS, and the EA and licence amendment for the NPD Closure Project. Engagement regarding Indigenous interests has demonstrated that Indigenous peoples are also interested in fostering such long-term relationships with CNL and AECL.

As the parties involved see their relationships as evolving and beyond the scope of a single regulatory project such as the NPD Closure Project, discussions regarding long term relationships and on specific aspects of projects will be ongoing before, during and after the CNSC Commission hearing for the NPD Closure Project. Due to the ongoing nature of these discussions and relationships, CNL intends to provide a revised IER as part of the Commission Member Document package for the CNSC Commission hearing on the NPD Closure Project. The revised IER will document the ongoing engagement and discussions with Indigenous peoples related to the NPD Closure Project.

This IER is intended to be a living document; it will be updated over the course of the Project based on engagement with Indigenous peoples. Revision 0 supported the submission of the Project Description to initiate the EA process, Revision 1 supported the submission of the draft EIS in 2017, and Revision 2 captured general updates and feedback during engagements. Revision 3, 4 and 5 were prepared to support revisions of the draft EIS submitted to the CNSC in

2020 and 2021. Revision 6 has been updated to include the most recent engagement activity and accompany the 2024 submission of the revised draft EIS to the CNSC.

1.3 Background

Nuclear Power Demonstration (NPD) was the first Canadian nuclear power reactor and the prototype for the CANDU® reactor design. It was put into operation in 1962 and shutdown in 1987. NPD served as the training and simulation centre for generations of Canadian and international CANDU® operations staff.

NPD was brought to a safe shutdown state by Ontario Hydro, with assistance from AECL. This state consists of a permanently shut down, defueled reactor and associated structures. Control of the NPD site was turned over to AECL in 1988. The facility is presently in a safe state with a regime of “storage-with-surveillance”. A more detailed description of the Project is available in CNL’s Project Description document [2].

In 2015 September, CNL transferred to a government-owned, contractor-operated company. CNL plans to begin executing the project, pending CNSC approval, in 2026. In-situ disposal is the preferred strategy; minimizing the possibility of radiological contamination migrating to the environment and reducing the risks of worker exposure from activities associated with the dismantling of the facility and movement of radioactive wastes.

CNL recognizes that it must conduct its business in a manner that is both socially and environmentally responsible. One way CNL demonstrates this commitment is through the CNL Public Information Program [3][3]. The program aims to inform stakeholders about ongoing activities at CNL sites, the potential impacts of these activities on the health and safety of workers, members of the public and on the environment. The program builds public awareness, understanding and a supportive appreciation of the Laboratories’ value and relevance to Canadians.

This forms the basis of communication efforts with Indigenous Nations, communities, and organizations and helps to direct the establishment of long-term mutually beneficial working relationships with communities in proximity to our sites. CNL is responsive to evolving best practices, and guidance including the REGDOC, which guides and informs the content of this report.

1.4 Acronyms

AAN	Algonquin Anishinabeg Nation
AANTC	Algonquin Anishinabeg Nation Tribal Council
ACMR	Annual Compliance Monitoring Reports
AECL	Atomic Energy of Canada Limited
AFA	Algonquin Forestry Authority
AIAI	Association of Iroquois and Allied Indians
AKLUS	Algonquin Knowledge and Land Use Study
AN	Algonquin Nation
ANPSS	Algonquin Nation Programs and Services Secretariat
ANR	Algonquin Negotiation Representatives
ANS	Algonquin Nation Secretariat
ANTC	Algonquin Nation Tribal Council
AOO	Algonquins of Ontario
AOPFN	Algonquins of Pikwàkanagàn First Nation
ATRIIS	Aboriginal and Treaty Rights Information System
BIC	benthic invertebrate community
C-14	Isotope Carbon-14
Cl-36	Isotope Chlorine-36
CAP	Community Advisory Panel
CD	Census Division
CEAA	Canadian Environmental Assessment Act
CEA Agency	Canadian Environmental Assessment Agency
CIRNAC	Crown-Indigenous Relations and Northern Affairs Canada
CNL	Canadian Nuclear Laboratories
CNSC	Canadian Nuclear Safety Commission
CRL	Chalk River Laboratories
CSA	Canadian Standards Association
CLFN	Curve Lake First Nation
DecomSA	Decommissioning Safety Assessment
DRL	Derived Release Limit
EA	Environmental Assessment
EcoRA	Ecological Risk Assessment

EIS	Environmental Impact Statement
ESC	Environmental Stewardship Council
FNMHF	First Nations Market Housing Fund
Ha	Hectare
HMP	Harvest Management Plan
HC	Health Canada
HFN	Hiawatha First Nation
IAA	Impact Assessment Act
IC	Institutional Control
IEMP	Independent Environmental Monitoring Program
IER	Indigenous Engagement Report
INAC	Indigenous and Northern Affairs Canada
IRPS	Indigenous Relations Procurement Strategy
KFN	Kebaowek First Nation
KZA	Kitigan Zibi Anishinabeg
Km	Kilometres
MECP	Ontario Ministry of the Environment, Conservation and Parks
MELCC	Ministère de l'Environnement, de la Lutte contre les changements climatiques, de la Faune et des Parcs
MNC	Métis National Council
MNO	Métis Nation of Ontario
MNRF	Ministry of Natural Resources and Forestry
MOE	Ontario Ministry of the Environment
MOECC	Ontario Ministry of the Environment and Climate Change
MOEE	Ontario Ministry of the Environment and Energy
MOU	Memorandum of Understanding
MRC	Municipalité régionale de comté
mSv	Millisievert
MTO	Ministry of Transportation Ontario
NO _x	Nitrogen Oxides
NPD	Nuclear Power Demonstration
NSDF	Near Surface Disposal Facility
OVF	Ottawa Valley Forest
PCMNO	Provisional Council of the Métis Nation of Ontario

PFP	Participant Funding Program
PIC	Post-Institutional Control
PM _{2.5}	Particulate matter <2.5 µm
PM ₁₀	Particulate matter <10 µm
PostSA	Post closure Safety Assessment
REGDOC	Canadian Nuclear Safety Commission Regulatory Document
RIA	Rights Impact Assessment
sq.	Square
SO ₂	Sulphur Dioxide
TKLUS	Traditional Knowledge and Land Use Study
TLD	Thermoluminescent Dosimeter
TSD	Technical Support Document
TSP	Total Suspended Particulate
UOI	Union of Ontario Indians
VC	Valued Component (used instead of VEC)
VOC	Volatile Organic Compound
WTFN	Williams Treaties First Nations

2. Alignment with Regulations

In 2019 August, the Impact Assessment Act (IAA) came into force, repealing CEAA 2012. The IAA contains transitional provisions for environmental assessments of designated projects commenced under CEAA 2012 and for which the CNSC is the Responsible Authority. The CNSC has informed CNL that the Environmental Assessment for the NPD Closure Project will continue under CEAA 2012 [4]. CNSC notes that as per the transition provision described in subsection 182 of the IAA: “Any environmental assessment of a designated project by the Canadian Nuclear Safety Commission or the National Energy Board commenced under the 2012 Act, in respect of which a decision statement has not been issued under section 54 of the 2012 Act before the day on which this Act comes into force, is continued under the 2012 Act as if that Act had not been repealed.” As outlined in subsection 182, given that the NPD Closure Project was commenced under CEAA 2012 and a decision statement has not yet been issued, it therefore will continue to be completed under its current process.

The *Canadian Environmental Assessment Act* (CEAA, 2012) [4] indicates the following with consideration to Indigenous peoples:

“5. (1) For the purposes of this Act, the environmental effects that are to be taken into account in relation to an act or thing, a physical activity, a designated project, or a project are:

c) with respect to Aboriginal Peoples, an effect occurring in Canada of any change that may be caused to the environment on:

- i. health and socio-economic conditions;*
- ii. physical and cultural heritage;*
- iii. the current use of lands and resources for traditional purposes;*
- iv. any structure, site or thing that is of historical, archaeological paleontological or architectural significance”.*

Therefore, CEAA [4] provides a clear description of the environmental effects on Indigenous peoples that are to be taken into account.

More detailed information on Indigenous engagement is also available from the CNSC in the form of REGDOC-3.2.2, *Indigenous Engagement* [1]. REGDOC-3.2.2 sets out the “requirements and guidance for licensees” with respect to Indigenous engagement. It also provides procedural direction for licensees.

REGDOC-3.2.2 identifies that an IER is to be prepared in support of a licence application. CNL has indicated that it will continue to use the IER as the key record of engagement activities for the NPD Closure Project. Section 4.2.2 of the REGDOC-3.2.2, “Summary of Indigenous Engagement Activities” recommends that licensees are to document all engagement activities, which suggests that the IER is also intended to be a report. This coincides with CNL’s intention to provide the next revision of this IER prior to the CNSC Hearing as part of the package for Commission members.

In addition to the formal revisions of the IER, interim reporting on Indigenous engagement activities is provided monthly to the CNSC by means of the *CNL-CNSC Executive Management Committee Meeting*.

REGDOC-3.2.2 does clearly indicate that an effects assessment component should be undertaken. Section 3 “Applicability” of the REGDOC indicates:

“Licensees shall conduct a review to consider whether the activity described in their licence application requesting authorization from the Commission:

- Could result in impacts to the environment;*
- Could adversely impact an Indigenous group’s potential or established Aboriginal and/or treaty rights, such as the ability to hunt, trap, fish, gather or conduct ceremonies” (Section 3 Applicability, page 4).*

As REGDOC-3.2.2 is specific about the above rights and activities (hunt, trap, fish, gather or conduct ceremonies) those issues are specifically addressed in this IER and the NPD Closure Project EIS. Note that the term “Aboriginal and treaty rights” is recognized and affirmed in section 35 of the Constitution Act and may be referred to as ‘Indigenous rights’ in this document.

There are other CNSC requirements that are to be addressed or considered with respect to Indigenous peoples. All the requirements to the knowledge of the CNL team are outlined below

in Table 2-1 including a column is provided that indicates the section of the EIS and / or IER that addresses the requirement.

On 2017 March 08, the CNSC released a Record of Decision addressing expectations on the scope of factors to be assessed in the environmental assessments of three CNL designated projects under CEAA, 2012, including the NPD Closure Project. Pursuant to Section 19 of CEAA, 2012, the CNSC determined the project scope for the environmental assessment must include the factors mandated in paragraphs 19(1) (a) to (h) of *CEAA*, 2012, with no additional factors. The Record of Decision also set out that the environmental assessment must consider the CNSC's Generic EIS Guidelines [5] with respect to information and requirements for identifying VCs and spatial and temporal boundaries and engaging Indigenous peoples and the public on these key points.

See 428 Appendix A the Record of Decision.

Table 2-1: Summary of Guideline Requirements and Concordance

Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and / or IER
CEAA 2012 [4]	5. (1) For the purposes of this Act, the environmental effects that are to be taken into account in relation to an act or thing, a physical activity, a designated project or a project are: c) with respect to Indigenous peoples, an effect occurring in Canada of any change that may be caused to the environment on: i. health and socio-economic conditions; ii. physical and cultural heritage; iii. the current use of lands and resources for traditional purposes; iv. any structure, site or thing that is of historical, archaeological paleontological or architectural significance.	Section 7.1, 7.2 and 7.3 (this IER) and Section 9.9 and 9.10 (EIS)
CNSC (2016) [5] Part 1: Section 2.4	The proponent will provide Indigenous peoples with opportunities to learn about the project and its potential effects, to communicate their concerns about the project's potential effects, and to discuss measures to mitigate those effects. The proponent will make reasonable efforts to consider traditional Indigenous knowledge into the assessment of environmental impacts.	Section 4 to 6 (this IER) and Section 6 and Section 9 (Project EIS, Indigenous Engagement and Traditional Land and Resource Use)
CNSC (2016) [5] Part 1: Section 3.3.2	The EIS will document the following: • The traditional knowledge information gathered. • How the traditional knowledge information was gathered (e.g. interviews with key community leaders and elders, collaborative field research, Indigenous traditional knowledge studies, etc.). • The source of the traditional knowledge information. • How the traditional knowledge information gathered was taken into consideration by the proponent in the assessment, including both methodology (e.g. identifying VCs, establishing spatial and temporal boundaries, defining significance criteria) and analysis (e.g. baseline characterization, effects prediction, development of mitigation measures).	Section 3 (this IER) – some limited traditional knowledge information included and Sections 4 to 6 (this IER) and Section 6, and Section 8.9, 9.9 (Project EIS, Indigenous Engagement and Traditional Land and Resource Use)

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Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and / or IER
CNSC (2016) [5] Part 2: Section 2	The [EIS executive] summary will include the following: A summary of the consultation conducted with Indigenous peoples the public, and government agencies, including a summary of the issues raised and the proponent's responses.	Executive Summary (Project EIS)
CNSC (2016a) [5] Part 2: Section 3.2	The EIS will contain a description of the geographical setting where the project will take place. This description should include those aspects of the project and its setting that are key to understanding the project's potential adverse environmental effects, including: - Description of local and Indigenous Nations, communities, and organizations, - Traditional Indigenous territories, treaty lands, reserve lands and Métis harvesting regions and / or settlements.	Section 3 (this IER) and Section 6 (Project EIS, Indigenous Engagement)
CNSC (2016) [5] Part 2: Section 3.3	The EIS should identify: Any treaty or self-government agreements with Indigenous peoples that are pertinent to the project and / or the EA.	Section 3 (this IER)
CNSC (2016) [5] Part 2: Section 4.2	The proponent will complete the following procedural steps for addressing alternative means: - Identify the effects of each technically and economically feasible alternative means: - The effects referred to above include both environmental effects and potential adverse impacts on potential or established Indigenous and Treaty rights and related interests.	Section 4.2 (Project EIS, Alternative Means of Carrying out the Project)

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Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and / or IER
CNSC (2016) [5] Part 2: Section 4.3.2	Sufficient information will be included to predict environmental effects and address concerns identified by the public and Indigenous peoples. The EIS will include a summary of the changes that have been made to the project since originally proposed, including the benefits of these changes to the environment, Indigenous peoples, and the public.	Section 4.4 (this IER) and Appendices J through BB: Tables of Interests and Concerns of each Indigenous Community/Organization (this IER) and Section 4.3.3 (Project EIS, Scope Changes) and Sections 6 and 9 (Project EIS, Indigenous Interests; and Assessment & Mitigation of Environmental Effects)
CNSC (2016) [5] Part 2: Section 5.2.1	The final list of VCs to be presented in the EIS will be completed according to the evolution and design of the project and reflect the knowledge on the environment acquired through public consultation and Indigenous engagement. The EIS will identify those VCs, processes, and interactions that were identified to be of concern during any workshops or meetings held by the proponent, or that the proponent considers likely to be affected by the project. In doing so, the EIS will indicate to whom these concerns are important and the reasons why, including environmental, Indigenous, social, economic, recreational, and aesthetic considerations.	Section 5 (this IER) and Section 5.2.4 and 6.3 (Project EIS, Valued Components, Indigenous Interests)
CNSC (2016) [5] Part 2: Section 5.2.2	The proponent is encouraged to consult with the CNSC, Federal and Provincial Government departments and agencies, local government and Indigenous peoples, and take into account public comments when defining the spatial boundaries used in the EIS. Spatial boundaries will be defined by taking into account, but not limited to, the following criteria: g) community and Indigenous traditional knowledge, ecological, and technical considerations. Community and Indigenous traditional knowledge should factor into decisions around temporal boundaries.	Section 6.1.1 (this IER) and Sections 5.2.1, 6, 8.9 and 9.9 (Spatial & Temporal Boundaries, Project EIS, Indigenous Engagement and Traditional Land and Resource Use)

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Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and / or IER
CNSC (2016) [5] Part 2: Section 7	The EIS will describe the proponent's engagement activities with potentially affected Indigenous peoples. The EIS will include, and the proponent should consider engaging with potentially affected Indigenous peoples to obtain their views on, the following: • The objectives of and the methods used for Indigenous engagement activities. • Each Indigenous peoples potential or established rights including geographical extent, nature, frequency, timing and maps and data sets (e.g. fish catch numbers) when this information is provided by a group to the proponent or available through public records.	Entire IER and Section 4 (this IER) and Appendices J through BB: Record of Engagement 2016 October – 2024 March (this IER) and Appendices J through BB: Tables of Interests and Concerns of each Indigenous Community / Organization (this IER) and Section 6 (Project EIS, Indigenous Engagement) and Formal comments from Indigenous peoples, and the prepared responses, will be submitted by the project proponent to the CNSC (responsible authority) and posted on the CEAA Registry under project #80121

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Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and / or IER
CNSC (2016) Part 2: Section 7	- Comments, specific issues and concerns raised by Indigenous peoples and how the key concerns were responded to or addressed. - The potential adverse impacts of the project on potential or established Indigenous or treaty rights. - Effects of changes to the environment on Indigenous peoples (health and socioeconomic conditions; physical and cultural heritage, including any structure, site or thing that is of historical, archaeological, paleontological or architectural significance; and current use of lands and resources for traditional purposes) pursuant to paragraph 5(1) (c) of the CEAA 2012. - VCs suggested by Indigenous peoples for inclusion in the EIS, whether they were included, and the rationale for any exclusions. - Measures identified to mitigate or accommodate potential adverse impacts of the project on the potential or established Indigenous or treaty rights and effects of changes to the environment on Indigenous peoples, including suggestions raised by Indigenous peoples. A suggested format for providing the information above is the creation of a tracking table of key issues raised by each Indigenous peoples, including the concerns raised related to the project, proposed mitigation options, and where appropriate, a reference to the proponent's analysis in the EIS.	Section 4 and 5 (this IER) and Appendices J through BB: Tables of Interests and Concerns of each Indigenous Community / Organization (this IER) and Section 6, 8.9, 8.10.2, 9.9 and 9.10.2 (Project EIS, Indigenous Engagement, Valued Components, Traditional Land and Resource Use, Indigenous Health) and Formal comments from Indigenous peoples, and the prepared responses, will be submitted by the project proponent to the CNSC (responsible authority) and posted on the CEAA Registry under project #80121
CNSC (2016) [5] Part 2: Section 12	The EIS should provide discussion on the follow-up program's requirements, and include: - Roles and responsibilities to be played by the proponent, regulatory agencies, Indigenous people, local and regional organizations and others in the design, implementation and evaluation of the program results. - Possible opportunities for the proponent to include the participation of the public and Indigenous peoples, during the development and implementation of the program.	Section 6 and 12 (Project EIS, Summary of Monitoring and Follow-up Programs)

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Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and / or IER
REGDOC 2.9.1 [6] Section 2.2	When evaluating applications for licences or making regulatory decisions, the CNSC considers the following factors: Engagement with identified Indigenous peoples whose Indigenous or treaty rights may be affected by the proposed facility or activity.	Entire IER and Section 6 (Project EIS, Indigenous Interests)
REGDOC 2.9.1 [6] Section 2.4	Participation opportunities for the public and for Indigenous peoples are an important component of the CNSC's licensing process. The CNSC determines the appropriate level of participation opportunities on a case-by-case basis. The criteria include: - Interests of the public and Indigenous peoples. - The complexity of the facility or activity and its potential interactions with the environment and the public. - Additional factors such as other jurisdictional mandates or type of decision.	Section 3 and 4 (this IER) and Section 6 (Project EIS, Indigenous Engagement)
REGDOC 2.9.1 [6] Appendix A	An EA under CEAA 2012 includes information prepared by the applicant and CNSC staff, as well as comments received from Indigenous peoples and the public.	Section 4 (this IER) and Appendices J through BB: Tables of Interests and Concerns of each Indigenous Community / Organization (this IER) and Section 6 (Project EIS, Indigenous Engagement) and Formal comments from Indigenous peoples, and the prepared responses, will be submitted by the project proponent to the CNSC (responsible authority) and posted on the CEAA Registry under project #80121

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Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and / or IER
REGDOC 2.9.1 [6] Appendix A.2	Indigenous consultation activities are integrated in the EA process to the extent possible.	Sections 4 (this IER) and Section 6 (Project EIS, Indigenous Engagement)
REGDOC 2.9.1 [6] Appendix A.3.8	Subsection 19(3) of CEAA 2012 states that community and Indigenous traditional knowledge may be considered in the EA. The CNSC staff will provide guidance to the applicant at the earliest possible stage in the EA process concerning the extent to which community and Indigenous traditional knowledge shall be considered in the EA.	Primarily direction for CNSC but Section 6 (this IER) and Section 8.9, 9.9 (Project EIS, Traditional Land and Resource Use)
REGDOC 2.9.1 [6] Appendix B.8	Identify the lands, water and resources of specific social, economic, archaeological, cultural or spiritual value to Indigenous people, including established and asserted Indigenous or treaty rights that may be affected by the facility or activity.	Sections 3 and 6 (this IER) and Section 8.9, 9.9 (Project EIS, Traditional Land and Resource Use)
	Describe Indigenous land and resource use at the site and in the local and Regional Study Areas (RSA).	Sections 3 and 6 (this IER) and Section 8.9, 9.9 (Project EIS, Traditional Land and Resource Use)
	Identify traditional activities, including activities for food, social, ceremonial and other cultural purposes, in relation to such lands, waters and resources with a focus on the current use of lands, waters and resources for traditional purposes.	Sections 3 and 6 (this IER) and Section 8.9, 9.9 (Project EIS, Traditional Land and Resource Use)
	Describe the traditional dietary habits and dependence on country foods and harvesting for other purposes, including harvesting of plants for medicinal purposes. The analysis should focus on the identification of potential adverse effects of the facility or activity on the ability of future generations of Indigenous people to pursue traditional activities or lifestyle.	Sections 3, 6, and 7 (this IER) and Section 8.9, 9.9 and Section 9.10.2 (Project EIS, Traditional Land and Resource Use and Indigenous Health)

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Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and / or IER
REGDOC 2.9.1 [6] Appendix C.6	To support the assessment of human health (see Section 3.2.7), the licensee should provide information on radiation levels to which members of the public may be exposed, including consideration of consumers of country food whose exposure pathways may differ due to cultural norms; for example, any dietary characteristics of Indigenous peoples.	Section 8 (this IER) and Section 9.8 and 9.10.2 (Project EIS, Human Health and Indigenous Health and Indigenous Receptor)
REGDOC 2.9.1 [6] Appendix C.7	The licensee should describe the potential effects of the facility or activity on the physical well-being of Indigenous peoples, and other people resulting from biophysical effects, including the effects of the facility or activity on all environmental components (for example, atmospheric environment) and the resulting effects on human health.	Section 9.8 and 6 (Project EIS, Human Health and Indigenous Interests)
REGDOC 2.9.1 [6] Appendix C.8	Identify any change that the facility or activity is likely to cause in the environment and any effect of any such change on the health and socio-economic conditions, physical and cultural heritage and on the current use of lands and resources for traditional purposes by any Indigenous peoples including effects on hunting, trapping, fishing and gathering.	Section 6 (this IER) and Section 7, specifically 8.9 (Project EIS, Indigenous Interests, Traditional Land and Resource Use)

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Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and / or IER
	Identify any concerns raised by Indigenous people about the facility or activity in relation to any Indigenous or treaty rights.	Section 4 (this IER) and Appendices J through BB: Tables of Interests and Concerns of each Indigenous Community / Organization (this IER) and Section 6 (Project EIS, Indigenous Engagement) and Specific comments and concerns raised by indigenous peoples pertaining to rights are identified and responded to in: Formal comments from Indigenous peoples, and the prepared responses, will be submitted by the project proponent to the CNSC (responsible authority) and posted on the CEAA Registry under project #80121.

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Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and / or IER
REGDOC 3.2.2 [1] Section 4.1	Licensees shall conduct research to identify Indigenous peoples who's potential or established Indigenous and / or treaty rights may be adversely affected by the activity described in their licence application, and determine the appropriate level or scope of engagement activities to be conducted with each identified group. Key factors to consider when determining which Indigenous peoples to engage include: • Historic or modern treaties in the region of the regulated facility. • Potential impacts to the health and safety of the public, the environment and any potential or established Indigenous and / or treaty rights and related interests. • Proximity of the regulated facility to Indigenous Nations, communities, and organizations. • Existing relationships between Indigenous peoples and licensees or the CNSC. • Traditional territories. • Traditional and current use of lands. • Settled or ongoing land claims. • Settled or ongoing litigation related to a potentially impacted group. • Membership in a broader Indigenous collective or tribal council or Indigenous umbrella group.	Section 3 (this IER) and Section 6.2.2 (Project EIS, Identified Indigenous Communities)
REGDOC 3.2.2 [1] Section 4.2	The IER shall include: 1. a list of Indigenous peoples identified for engagement; 2. a summary of any Indigenous engagement activities conducted to date; 3. a description of planned Indigenous engagement activities; 4. the proposed schedule for interim reporting to the CNSC.	Section 2, 3 (Table 3-1), 4.4, 4.5 and 9 (this IER) and Appendices J through BB: Record of Engagement 2016 October – 2021 November (this IER) and Section 6 (Project EIS, Indigenous Engagement)

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Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and / or IER
	The IER shall be submitted: 1. as part of a licence application, or 2. as part of a project description if an EA decision under CEAA 2012 is being sought prior to a licensing decision.	This IER is a Technical Support Document (TSD) to the Project EIS and accompanies the EIS in its submission as part of the licence application.
REGDOC 3.2.2 [1] Section 4.2.1	Licensees should provide the methodology and rationale used to develop the list of identified Indigenous peoples.	Section 3 (this IER) and Section 6.2.2 (Project EIS, Identified Indigenous Communities)
REGDOC 3.2.2 [1] Section 4.2.2	Licensees should document all Indigenous engagement activities to track issues and concerns raised as well as any steps taken to minimize impacts or to address issues.	Section 4 (this IER) and Appendices J through BB: Record of Engagement 2016 October – 2024 March (this IER) and Appendices J through BB: Tables of Interests and Concerns of each Indigenous Community / Organization (this IER) and Section 6 (Project EIS, Indigenous Engagement) and Formal comments from Indigenous peoples and the prepared responses, will be submitted by the project proponent to the CNSC (responsible authority) and posted on the CEAA Registry under project #80121

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Section of the Guidelines	Summary of Guideline Requirements	Section of the EIS and / or IER
REGDOC 3.2.2 [1] Section 4.2.3	The Indigenous engagement report shall include a high-level outline of proposed engagement activities.	Chapter 4.5 (this IER) and Section 6 (Project EIS, Indigenous Engagement)
CEAA (2015) [7]	Once an EA has commenced, the approach and level of effort applied to addressing alternative means is established on a project-by-project basis, taking into consideration: the level of concern expressed by Indigenous peoples or the public.	Section 4.4 (this IER) and Appendices J through BB: Tables of Interests and Concerns of each Indigenous Community / Organization (this IER) and Section 6 (Project EIS, Indigenous Engagement)

Public and Indigenous Engagement: Indigenous Engagement. REGDOC-3.2.2. 2019 August. Government of Canada [1].

The Canadian Environmental Assessment Act (CEAA) and its Regulations [4].

Generic Guidelines for the Preparation of an Environmental Impact Statement, pursuant to the CEAA, 2012. 2016 May [5].

Environmental Protection: Environmental Policy, Assessments and Protection Measures. REGDOC-2.9.1. DRAFT. 2015 November [6].

Addressing "Purpose of" and "Alternative Means" under the CEAA, 2012. 2015 March [7].

3. Identified Indigenous Communities

A proposed list of Indigenous Nations, communities, and organizations with a potential interest in the project was identified by CNL and included in this IER. Identification of communities was based on consultation with the CNSC, through CNL historical relationships, and through the use of publicly available sources of information including:

- Indigenous community and organization websites;
- The Aboriginal and Treaty Rights Information System (ATRIS)[8]; and
- Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) Indigenous community profiles.

The proposed list was based on the identified potential or established Indigenous Nations, communities and organizations based on the proximity of their communities, treaty areas or unceded traditional territories to the NPD site, as well as those that expressed interest in the NPD Closure Project or CNL's activities who may have rights or interests in the project as summarized in Table 3-1, which distinguishes between rights bearing and non-rights bearing Indigenous Nations, communities and organizations. The inclusion of specific communities considers the nature of the established and / or claimed rights and potential impacts on those rights caused by the proposed project based on a preliminary assessment of existing and available information. As such, the working list is subject to change based on information and dialogue with the identified Nations, communities and organizations.

Table 3-1: Identified Indigenous Nations, Communities and Organizations

Indigenous Nations and Communities that have established or asserted treaty and / or Aboriginal rights	Indigenous Nations, communities and organizations that have interests
The NPD Closure Project is situated on land that are the treaty lands and/or traditional territories of: • Algonquins of Pikwàkanagàn First Nation (AOPFN) • Barriere Lake First Nation • Timiskaming First Nation (TFN) • Wolf Lake First Nation (WLFN) • Métis Nation of Ontario (MNO) • Kitigan Zibi Anishinabek (KZA) • Kebaowek First Nation (KFN) • Williams Treaties First Nations ○ Alderville First Nation ○ Beausoleil First Nation ○ Chippewas of Georgina Island First Nation ○ Chippewas of Rama First Nation ○ Curve Lake First Nation ○ Hiawatha First Nation	NPD Closure Project is situated on lands that are of interest to: • Algonquin Anishinabeg Nation Tribal Council (AANTC) • Algonquins of Ontario (AOO) • Anishinabek Nation • Algonquin Nation Secretariat

○ Mississaugas of Scugog Island First Nation	

This IER provides information on these Indigenous Nations, communities and, organizations with a potential interest in the project and includes, where possible, reference to each individual community's elected council, geographic location, population and associations or memberships. The IER is revised as these communities and organizations provide additional information. The information summarized in this IER reflects a summary information available to CNL as of 2024 March.

CNL has undertaken a verification process (as outlined in section 4.4 of this IER) with the identified Indigenous Nations, communities, and organizations. Where an Indigenous Nation, community or organization has not responded to CNL, CNL continues to follow-up as opportunities still exist for their involvement in the project. CNL also welcomes engagement from those Indigenous Nations, communities and organizations who have not engaged with the NPD Closure Project up to this point. The ongoing updates will be incorporated into the IER TSD, as it is a living document. CNL will continue to follow-up on engagement with all identified and interested Indigenous Nations, communities and organizations.

CNL has offered and provided capacity funding to Indigenous Nations, communities, and organizations to support participation in the EA process.

3.1 Indigenous Communities and Populations around the NPD Site

3.1.1 Indigenous Communities

The Indigenous Nations, communities, and organizations with a potential interest in the NPD Closure Project Table 3-1 are described in more detail in this chapter of the IER. Table 3-2 below identifies and describes each of the Indigenous Nations, communities, and organizations in terms of their location, approximate distance to the NPD site and whether the specific Indigenous community is a physical community with one defined location such as a First Nations Reserve. Knowing whether the Indigenous community is located in one physically defined location is helpful in understanding socio-economic information associated with the community (e.g., Census of the Population data potentially available for First Nation communities on reserves is not available for Indigenous communities where there is no single physical location). Figure 3-1 below is a map that shows the home location (reserve or office) of Indigenous Nations, communities, and organizations in relation to the NPD site.

Table 3-2: Indigenous Nations, Communities and Organizations Location Description

Algonquins of Pikwàkanagàn First Nation	AOO community Recognized Status First Nation by federal government Reserve at Golden Lake (Pikwàkanagàn No. 06216)	Yes – Golden Lake	75 km
Antoine Algonquin Nation	• AOO community • No Reserve • Population is generally in Mattawa and area further west	No	84 km
Algonquin Nation Kijicho-Manito Madaouskarini	• AOO community • No Reserve • Population is generally in the Bancroft area	No	127 km
Bonnechere Algonquin First Nation	• AOO community • No Reserve • Population is generally in the Renfrew / Golden Lake area	No	75 km
Algonquins of Greater Golden Lake First Nation	• AOO community • No Reserve • Population is generally in the Golden Lake area	No	75 km
Mattawa-North Bay Algonquin First Nation	• AOO community • No Reserve • Population is generally in the Mattawa – North Bay area	No	84 km
Ottawa Algonquin First Nation	• AOO community • No Reserve • Population is generally in the Ottawa area	No	174 km
Shabot Obaadjiwan First Nation (Sharbot Lake)	• AOO community • No Reserve • Population is generally in the Sharbot Lake area	No	175 km
Snimikobi (Ardoch) (Beaver Creek Algonquin First Nation)	• AOO community • No Reserve • Population is generally in the Ardoch and Sharbot Lake area	No	175 km
Whitney Area Algonquins	• AOO community • No Reserve • Population is generally in the Whitney area	No	90 km
Algonquin Anishinabeg Nation			
Kebaowek First Nation (Formerly Eagle Village First Nation)	• Recognized Status First Nation by federal government • Reserve lands associated with this community include the Eagle Village First Nation - Kipawa No. 06140	Yes – Lake Kipawa	122 km

	Reserve is situated on the shore of Lake Kipawa to the northeast of Témiscamingue, Quebec		
Kitigan Zibi Anishinabeg First Nation	- Recognized Status First Nation by federal government - Kitigan Zibi Anishinabeg First Nation occupy one area of reserve lands: Kitigan Zibi No. 06100 - Situated to the south-west of the borders of Maniwaki in the Outaouais region of Quebec	Yes – adjacent to Maniwaki, Quebec	130 km
Métis Nation of Ontario			
MNO Mattawa Métis	MNO registered citizens generally in the Mattawa area	No	84 km
MNO North Bay	MNO registered citizens generally in the North Bay area	No	140 km
MNO Sudbury	MNO registered citizens generally in the Sudbury area	No	256 km
Williams Treaties First Nations			
Alderville First Nation	- Recognized Status First Nation by federal government - Located at Alderville, Ontario near Rice Lake	Yes – Rice Lake	226 km
Beausoleil First Nation	- Recognized Status First Nation by federal government - Located on Christian Island, Georgian Bay	Yes – Christian Island, Georgian Bay	250 km
Chippewas of Georgina Island First Nation	- Recognized Status First Nation by federal government - Located on Georgina Island, Lake Simcoe	Yes – Georgina Island, Lake Simcoe	240 km
Chippewas of Rama First Nation	- Recognized Status First Nation by federal government - Located near Orillia, Ontario	Yes – Rama/Orillia, Ontario	214 km
Curve Lake First Nation	- Recognized Status First Nation by federal government - Located on Curve Lake, near Peterborough, Ontario	Yes – Curve Lake, near Peterborough, Ontario	199 km
Hiawatha First Nation	- Recognized Status First Nation by federal government - Located on shore of Rice Lake, Ontario	Yes – Rice Lake, Ontario	227 km
Mississaugas of Scugog Island First Nation	- Recognized Status First Nation by federal government - Located on Lake Scugog, near Port Perry, Ontario	Yes – Lake Scugog, Ontario	242 km

Table 3-2 demonstrates that there is only one Indigenous community with a physically defined location within 100 km of the NPD site. That community is the Algonquins of Pikwàkanagàn First Nation (AOPFN). More information on the AOPFN is provided below. There is a much larger population of Indigenous individuals in the Regional Study Area (RSA) living on off-

reserve lands. The Indigenous population in the surrounding region is described in Section 3.1.2.

3.1.2 Indigenous Population

While the AOPFN is the only physical Indigenous Nation within 100 km of the NPD site, there are many individuals of Indigenous identity in the wider region. This section includes a population estimate of Indigenous peoples within four large census divisions surrounding the NPD site. These include: Renfrew County, Ontario; Nipissing District, Ontario; Pontiac Regional Municipality, Quebec; and Témiscamingue Regional Municipality, Quebec. Large areas of these four Census Divisions extend beyond 100 km from the NPD site (note that there are relatively small portions of six other census divisions just within the 100 km radius, including Haliburton, Hastings, Frontenac, and Lennox and Addington within Ontario, and La Vallée-de-la-Gatineau and Les Collines-de-l'Outaouais within Quebec).

These Census Divisions are shown in Figure 3-2 below. The figure also shows four census subdivisions which are discussed in this section. These are: AOPFN Reserve; the Town of Deep River, Petawawa, and the Town of Laurentian Hills where the NPD site is located.

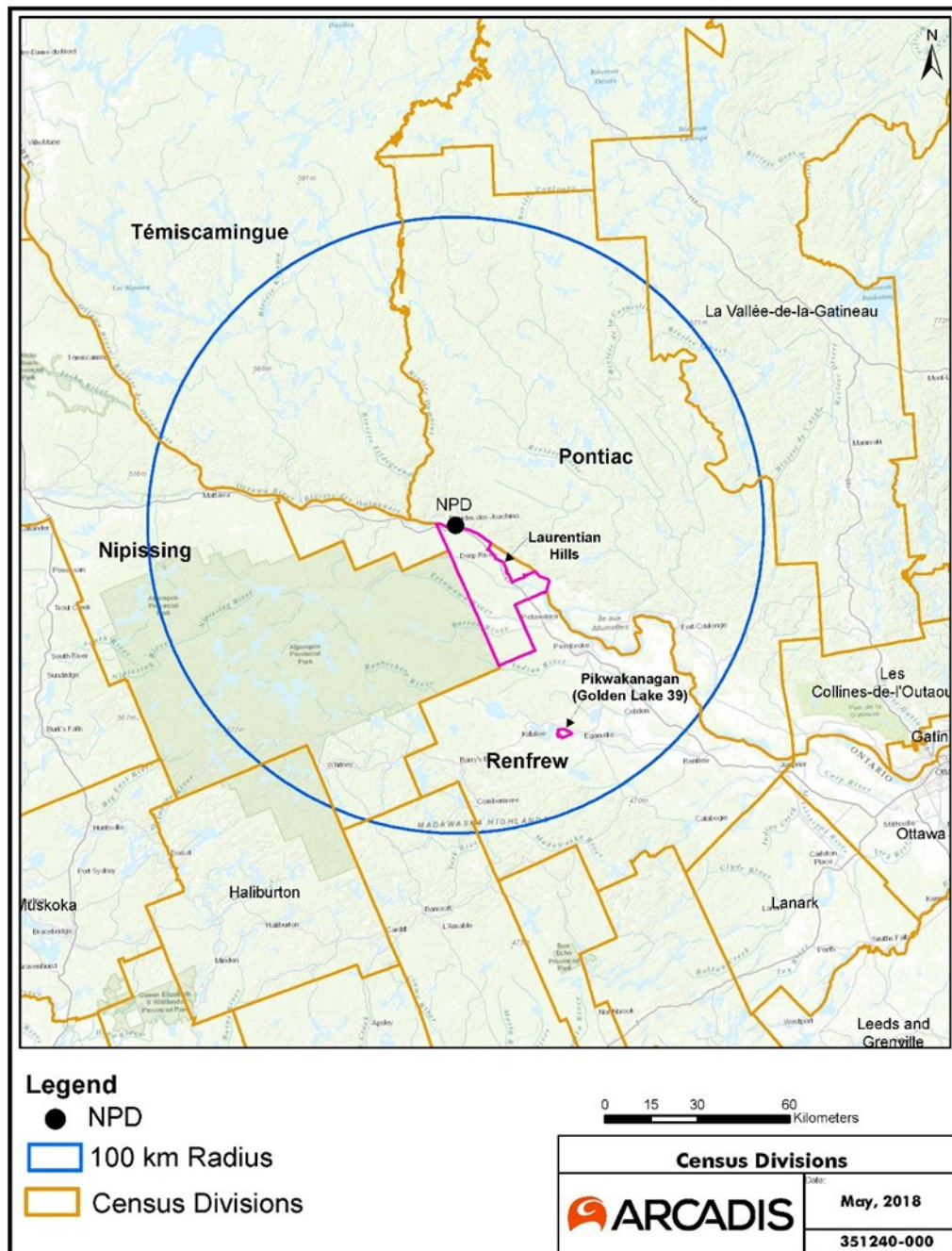


Figure 3-2: NPD Site and the Census Divisions of Renfrew, Nipissing, Pontiac and Témiscamingue

Table 3-3: Indigenous Peoples in Surrounding Census Divisions

	Renfrew County (CD) [10]	Nipissing County (CD) [11]	Témiscamingue MRC (CD)	Pontiac MRC (CD) [14][15]	Total	Percent of the Population
Total Population	106,365	84,716	16,132	14,764	221,977	
Mother Tongue – Indigenous Languages	25	185	65	0	275	0.1%
Knowledge of Indigenous Languages	80	530	150	0	760	0.3%
Indigenous Population (Indigenous Identity)	9,045	11,995	2,380	2,420	25,840	11.6%
Indigenous Identity – First Nations	5,095	6,720	1,940	700	14,455	6.5%
Indigenous Identity – Métis	3,540	4,775	395	1,595	10,305	4.6%
Registered or Treaty Indian	2,750	4,805	995	375	8,925	4.0%

Source: Statistics Canada [10][11][14][15]

CD = census division; MRC = Municipalité régionale de comté.

The 2021 Census of the Population reports that approximately 11.6% of the population of Renfrew County, Nipissing District and the Regional Municipalities of Témiscamingue and Pontiac identify as Indigenous. Of that 11.6%, 6.5% identified as First Nations individuals and 4.6% as Métis¹. The MNO has a more involved citizenship test than self-identification. Also, 4.0% of the population identified themselves as a Registered or Treaty Indian (under the *Indian Act*).

The four combined Census Divisions represent a very large land area stretching in the northwest to include North Bay and Temagami, Ontario, in the northeast beyond Témiscamingue, Quebec and southeast to Bristol in Quebec.

The NPD site is located within the municipal boundary of the Town of Laurentian Hills. Details about the Indigenous population within the Town appear in

Table 3-4.

¹ It should be noted that the Census of the Population relies on self-identification of Indigenous identity. The MNO requires all of its potential applicants to meet the citizenship requirements of its Registration Policy. Therefore, the population of Métis peoples as represented by the census versus the MNO may and likely are different.

Table 3-4: Town of Laurentian Hills – Indigenous Population

	Number	Percent
Total Population	2,885	—
Mother Tongue - Indigenous	5	0.2%
Knowledge of Indigenous Languages	0	0%
Indigenous Population - Indigenous Identity	440	15.3%
Indigenous Population - Indigenous Identity - First Nations	230	7.9%
Indigenous Population - Indigenous Identity - Métis	90	3.1%
Registered or Treaty Indian	150	5.2%

Source: Statistics Canada [10][11][14][15].

According to the 2021 Census, the percentage of the population that identifies themselves as Indigenous is 15.3%, of which slightly over than three quarters identify themselves as a First Nations individual and slightly less than one quarter as Métis.

3.2 Algonquins of Ontario

The Algonquins of Ontario (AOO) is an organized collective of communities assembled to enable a unified approach to reaching a settlement over a comprehensive land claim including an area of over 3.6 million hectares (ha) within the Ottawa River and Mattawa River watersheds in eastern Ontario [16]. The area that is the subject of the Algonquin Land Claim in Ontario includes the National Capital Region, all of Renfrew County and most of Algonquin Park.

The AOO are comprised of ten Algonquin communities:

- Antoine Algonquin Nation;
- Algonquins of Pikwàkanagàn First Nation (AOPFN);
- Algonquin Nation Kijicho-Manito Madaouskarini;
- Bonnechere Algonquin First Nation;
- Algonquins of Greater Golden Lake First Nation;
- Mattawa / North Bay Algonquin First Nation;
- Ottawa Algonquin First Nation;
- Shabot Obaadjiwan First Nation;
- Snimikobi (Ardoch) (Beaver Creek) Algonquin First Nation; and,
- Whitney Area Algonquins.

Sixteen Algonquin Negotiation Representatives (ANRs), serving three-year terms represent these communities. The ANRs are comprised of the Algonquins of Pikwàkanagàn First Nation

Chief and Council along with one representative from each of the other Algonquin communities listed above.

The ANRs are responsible for representing AOO interests concerning treaty negotiations with the Federal and Provincial governments related to lands identified by the AOO as their traditional territory. A technical advisory group also supports ongoing treaty negotiations [16].

Having never signed a treaty with the Crown, the AOO submitted a comprehensive land claim based on unresolved rights and title [17]. The Algonquin Land Claim covers an extensive area populated by approximately 1.2 million people (Figure 3-3). Currently under negotiation, it is a large and complex land claim. At present the federal government, the Province of Ontario and the AOO are working toward a resolution through a negotiated Final Agreement, forming a modern-day treaty [17].



Source: Government of Canada [8] (with addition of Project location)

Figure 3-3: Algonquins of Ontario Settlement Boundary

The Algonquins of Golden Lake (now known as the Algonquins of Pikwàkanagàn First Nation) initiated the land claim by formally petitioning the Governor General in 1983 and the Province of Ontario in 1985. In 1991, the claim for negotiations was accepted by the Province and in 1992 the Federal Government agreed to also enter claim negotiations. A Framework Agreement was signed by the Federal Government in 1994 and in 2012, a preliminary Draft Agreement-in-Principle was released by the federal and provincial governments for public review. Extensive negotiations were undertaken in 2013 as revisions to the draft agreement were negotiated. A proposed Agreement-in-Principle, reflecting negotiations, was released in 2015. The AOO held a vote on the proposed agreement in early 2016. The non-binding Agreement-in-Principle was signed by all three parties in 2016 October. Negotiations are still underway toward a Final Agreement. The agreement, if successful, will serve to protect Indigenous and treaty rights protected under Section 35 of the Constitution Act (1982) in the form of a modern-day treaty [16]and [17].

3.2.1 Algonquins of Pikwàkanagàn First Nation

Table 3-5 provides an overview of the land base size and registered population for the Algonquins of Pikwàkanagàn First Nation. The other AOO communities are not recognized First Nations and therefore there is no description of them on the Crown-Indigenous Relations and Northern Affairs Canada website.

Table 3-5: Algonquins of Ontario First Nations Land Base Population

First Nation	Land Base Description	Total Land Base Size (ha)	Registered Population		Total Registered Population
			On Reserve Lands	Off Reserve Lands	On and Off Reserve Lands
Pikwàkanagàn First Nation	Pikwàkanagàn (No. 06216)	688.8	453	2,645	3,095

Source: INAC, 2021b [18]

AOPFN occupy one area of reserve lands: Pikwàkanagàn No. 06216 (Table 3-5). Situated on the southeast shore of Golden Lake where it flows into the Bonnechere River, in Renfrew County, Ontario, the reserve covers an area of 688.8 ha. Pikwàkanagàn First Nation has a total registered population of 2,943 (as of 2021 April). Roughly 89 per cent of the registered population reside on off reserve lands (2,645). The reserve was established through a Crown patent in 1873 following several petitions from the community who were known at the time as Golden Lake.

AOPFN have voted in favor of the “Algonquins of Pikwàkanagàn Land Code” and “Individual Agreement” with the Government of Canada under the federal *First Nations Lands Management Act* (1999) which provides the First Nation with the authority to develop land laws associated with the reserve lands, resources and the environment, and according to the community, enabling increased opportunity for economic development and the potential addition of lands. The Individual Agreement transfers control over the Algonquins of Pikwàkanagàn First Nation land and resources previously under the *Indian Act* to the Algonquins of Pikwàkanagàn First Nation under their Land Code [19].

The Algonquins of Pikwàkanagàn First Nation have linguistic traditions in the Algonquin language [19]. Within the community, efforts are being taken to revitalize the language and culture through language programs and the community’s Algonquin Way Cultural Centre. The Centre is operated by a not-for-profit organization, Omàmiwininì Pimàdjwowin, established by the First Nation’s Council in order to foster and preserve the Algonquin cultural traditions, customs, practices, heritage, language and arts. The organization stewards a collection of approximately 600 historical / cultural objects including: ceremonial, hunting and trapping, canoe and water transportation, and military paraphernalia at the Centre [19] and [20].

Traditional activities such as trapping and hunting are also practiced by community members and efforts are made to pass on this traditional knowledge. Moose and elk are harvested by community members both within and outside of Algonquin Provincial Park, within this First Nation’s traditional territory [19].

The First Nation manages its own moose and elk harvest under a Harvest Management Plan (HMP) and total harvest numbers are allocated through agreements to work in conjunction with the Ministry of Natural Resources and Forestry (MNRF), including taking part in information gathering activities. The HMP is reviewed and updated annually, and contains provisions specifying the Sustainable Harvest Target, eligible participants, and the season and geographic location for harvesting activities. The current Harvest Management Plan is representative of all ten Algonquin First Nation communities within the AOO [21]. The First Nation is also one of several communities that chose to participate in the planning of the Ottawa Valley Forest (OVF) Forest Management Plan [22].

AOPFN is governed by an elected council comprised of a Chief and six councillors. The types of electoral systems undertaken by First Nations in selecting a chief and councillors falls under one of four processes: a custom system, the *Indian Act* election system, the *First Nations Elections Act*, or under the provisions of a self-governing agreement. The electoral system for this community is a Custom Electoral System and council election occurs every three years through voting members of the First Nation. Several standing committees are present within the First Nation's administration, each of which is represented by at least one council member. These committees provide planning and decision-making processes and includes: Health and Social; Education; Finance; Personnel and General Administration; Lands, Estates and Membership; Economic Development, Housing and Archaeology [19]. AOPFN is a member Nation of the AOO and is also associated with the Anishinabek Nation - Southeast Region [8], [18].

AOPFN is a signatory of the AOO Agreement-in-Principle (2016) described above in Section 3.1, as well as the earlier issued Algonquins of Ontario (1983) Comprehensive Land Claim. Based on information provided in ATRIS, the community is also part of the Anishinabek Nation (Union of Ontario Indians) – Governance – Sectoral Self-Government negotiations which ATRIS indicates is in a phase of acceptance for negotiations. ATRIS also identifies two active and one dormant court cases [8].

3.2.2 Antoine Algonquin Nation

The Algonquin community of Antoine, also known as the Antoine Algonquin Nation, is a non-status community centred around Mattawa, Nipissing District, Ontario. The community has an administrative office in Mattawa.

The community is affiliated with the AOO represented Harvest Management Plan noted above in Section 3.2.1. Further, the community is noted as having chosen to participate in the planning of the OVF Forest Management Plan [22]. The importance of hunting and trapping to the Antoine community is also documented in the Antoine Nation Aboriginal Background Information Report to the Nipissing Forest Management Plan. Other resource use activities described in that report included: berry picking, the collection of traditional medicines and traditional crafts and skills [23].

3.2.3 Algonquin Nation Kijicho-Manito Madaouskarini

The Algonquin Nation Kijicho Manito, also members of the Madaouskarini Band, are an

Algonquin community situated in North Hastings County, Ontario. There is limited information describing this community, although its website notes origins in the Bancroft region and identifies a Band Council comprised of a Chief and eight council members. The community site references support to community members through community economic development initiatives, as well efforts to increase awareness of Indigenous culture, history and language through the facilitation of community workshops and other cultural activities [24].

The community is affiliated with the AOO Harvest Management Plan noted above in Section 3.2.1. Further, the community is noted as having chosen to participate in the planning of the OVF Forest Management Plan [22].

3.2.4 Bonnechere Algonquin First Nation

The Algonquins of Bonnechere, formerly also referred to as the Bonnechere Métis Association, renamed their community through referendum in 2003 as the Bonnechere Algonquin First Nation and claim both status and non-status members within its community [25]. The community is located around the Bonnechere River near Golden Lake, and the community administrative office is situated in Renfrew, Renfrew County, Ontario. Limited information on the history of the Bonnechere was present on the community website at the time this research was undertaken.

The Bonnechere note linguistic traditions in the Algonquian language. Efforts to educate community members in Algonquin cultural traditions are evident through a youth group, materials presented within the community website, and community cultural workshops [25].

Harvesting information presented on the community website relates to harvest of moose, deer and elk and the community is affiliated with the AOO represented Harvest Management Plan noted above in Section 3.2.1. Further, the community is noted as having chosen to participate in the planning of the OVF Forest Management Plan [22].

3.2.5 Algonquins of Greater Golden Lake First Nation

The Algonquin community of Greater Golden Lake First Nation is centred around Golden Lake, Renfrew County, Ontario. There is no reserve land specifically associated with the Greater Golden Lake community. The community website has limited information but indicates members are mainly situated in the Pembroke and Petawawa area and the surrounding Ottawa Valley [26].

Based on information available on the website, the First Nation has over 3,000 community members across Canada with some in the USA and Europe. The community presents its members with opportunities to revive and promote traditional language [26].

Harvesting information presented on the community website relates to harvest of moose, deer and elk and the community is affiliated with the AOO represented Harvest Management Plan

noted above in Section 3.2.1. Further, the community are noted as having chosen to participate in the planning of the OVF Forest Management Plan [22]. Based on information presented on the community website, the First Nation has participated in the development of the: Ottawa Valley Forest, Bancroft Minden Forest and the Mazinaw-Lanark Forest Management Plans.

3.2.6 Mattawa-North Bay Algonquin First Nation

The Algonquin community of Mattawa-North Bay is centred around Mattawa, Nipissing District, Ontario. A community administrative office is situated in Mattawa.

The governing structure of the community is currently through an elected Chief and Council with six acting council members. The community also has an elected board of directors for its Madadjiwan Economic Development Corporation [27].

The community notes that while hunting or delivering furs, its ancestors used Mattawa as a staging point for resting and canoe repair before and / or after attempting the Mattawa River run. A more permanent settlement of Mattawa arose in the early eighteen-hundreds [27].

Harvesting information presented on the community website relates to harvest of moose and elk and the community is affiliated with the AOO represented Harvest Management Plan noted above in Section 3.2.1. Further, the community are noted as having chosen to participate in the planning of the OVF Forest Management Plan [22].

A 1998 Report by Settlement Surveys Inc., titled Native Background Information Report and Values Maps for the Mattawa Algonquin community, which was a supporting document to the 2009 Forest Management Plan for the Nipissing Forest [28] included a series of what could be considered traditional knowledge interviews. Assuming that the Mattawa Algonquin community was a predecessor to the current Mattawa-North Bay Algonquin First Nation the traditional knowledge interviews asked questions about use of various resources in the area. While the survey was dedicated to the Nipissing Forest, it could be assumed that the same resources would have been harvested elsewhere in their traditional territory. The tree resources sought included: poplar, red and white pine, oak, birch, white cedar, basswood, etc. Berry resources included cranberries, chokecherries, blueberries and raspberries. Fish species included golden eye. Animal resources included partridge.

3.2.7 Ottawa Algonquin First Nation

The Ottawa Algonquin First Nation is a community that appears to be based out of Wendover, Ontario, to the east of Ottawa. The community claims both status and non-status members within its community [29]. Information regarding the community is limited. The community website was accessed in 2017 and identified a Resource Management Policy and reference to an area with defined boundaries of:

“the Algonquin Nation as described by the Ottawa River Watershed and the margins of adjacent

watershed where Algonquins have harvested in contemporary, historic and pre-European contact time.” [29].

The community website appears to no longer be active. The community is affiliated with the AOO represented Harvest Management Plan noted above in Section 3.2.1.

3.2.8 Shabot Obbadjiwan First Nation

The Shabot Obaadjiwan First Nation is a community with an administrative address identified as west of Arden, Ontario, north of Kingston with a mailing address in Sharbot Lake. There is little information presented in the community website describing the community although some cultural information is present, and a Chief is identified. Some detail is provided with respect to moose and elk harvesting procedures and protocols, as well as some information on traditional cultural etiquette and teachings, and employment opportunities [30].

The community is affiliated with the AOO represented Harvest Management Plan noted above in Section 3.2.1.

3.2.9 Snimikobi (Ardoch) Algonquin First Nation

The Algonquin community of Snimikobi, also known as the Ardoch Algonquin First Nation or Beaver Creek, resides largely at the headwaters of the Mississippi River and Rideau River, around the Ardoch and Sharbot Lake area, north of Kingston, Ontario [31]. Its administrative office is located in Ardoch, Ontario.

The community expresses its traditional heritage through the Omàmiwinini (a pre-‘Algonquin’ reference) with Anishinabe linguistic traditions, and has a strong traditional harvesting relationship with a self-seeding aquatic plant (‘wild rice’) known as Manòmin [32].

The governing structure of the community, while based on a traditional family head system, is currently under the review of a community Interim Council. The council is working toward determining a system based on an extended family system, although not centred exclusively in genealogical ties, but rather one that is consensus-based [32].

The community is affiliated with the AOO represented Harvest Management Plan noted above in Section 3.2.1. Further, the community is noted as having chosen to participate in the planning of the OVF Forest Management Plan [22].

3.2.10 Whitney and Area Algonquins

Information regarding the Whitney and Area Algonquins community is limited. The community resides in and / or around the Town of Whitney, Ontario which is near the Algonquin Park East Gate side of Algonquin Park in Renfrew County.

The community is affiliated with the AOO represented Harvest Management Plan noted above in Section 3.2.1.1.

3.3 Algonquin Anishinabeg Nation Tribal Council (AANTC)

The Algonquin Anishinabeg Nation (AAN), also referred to as the Algonquins of Western Quebec, or Algonquin Anishinabeg Nation Tribal Council (AANTC) was voluntarily established in 1992. Its purpose was to provide representation in land claim development and negotiation for member nations. Traditional territories claimed include the Ottawa River valley Figure 3-2. At its inception, it comprised five member nations: Kebaowek First Nation (Kipawa), Lac Simon First Nation, Abitibiwinni First Nation, Kitigan Zibi Anishinabeg First Nation, and Long Point First Nation (Winneway). In 1999, Kitcisakik First Nation also became a member. In 2000, Wahgoshig First Nation affiliated as a political member, without becoming a formal tribal council member [33],[8].

The AANTC identifies its fundamental priorities as:

“...the protection and advancement of the human rights of Indigenous peoples, particularly those of the Algonquin Nation, and to provide support to the member communities in human resources management, policy, communications and construction.” [33].

The Chief of each participating Algonquin member community, a Grand Chief and a Vice Grand Chief (the official designated spokespersons), and an Elder, a Women and a Youth Representative, all collectively make up the Board of Directors, or Nation Council. All Representatives are elected through a community vote [33].



Source: Government of Canada [8] (with addition of Project location)

Figure 3-4: Algonquin Anishinabeg Nation (2010) Claim Area

Table 3-6: Algonquin Anishinabeg Nation First Nations Land Base and Population

First Nation	Land Base Description	Total Land Base Size (ha)	Registered Population		Total Registered Population
			On Reserve Lands	Off Reserve Lands	On and Off Reserve Lands
Eagle Village	Kebaowek (No. 06140)	50.6	300 300	774	1,047
Kitigan Zibi Anishinabeg	Kitigan Zibi (No. 06100)	21,009	1,647	1,934	3,578

Source: INAC, 2021i and 2021j [34][35]

3.3.1 Kebaowek First Nation (formerly Eagle Village)

Kebaowek First Nation (Kipawa) (KFN), formerly known as Eagle Village First Nation, is one of the eleven currently federally recognized Algonquin communities in Quebec. The area of reserve land of this community is small in comparison to some of the other First Nations in Quebec, as well as compared to many First Nations elsewhere in Canada. Lands upon which the community reside were set apart as a Reserve in 1975 following their purchase from a third party [34]. Reserve lands associated with this community include the Kebaowek First Nation No. 06140. The reserve is situated on the shore of Lake Kipawa to the northeast of Temiscaming, Quebec, and is approximately 50.6 ha in size Table 3-6.

The total registered population of this community is 1,074 (as of 2021 April) Table 3-6. Approximately 72 per cent of the registered population reside off reserve lands (774). Within the community, the languages spoken include English, Algonquin and French. Community members reside, work, study, shop and maintain family ties in both Quebec and Ontario [36]. Various positions are held within the band government structure to administer services to the community (e.g., medical, education, land management, recreation etc.) [36].

KFN is governed by an elected council comprised of a Chief and three councillors. The electoral system occurs under the Indian Act. Kebaowek First Nation is a member Nation of the Algonquin Anishinabeg Nation Tribal Council [8], [33].

KFN is a signatory of the Algonquin Anishinabeg Nation Comprehensive Land Claim (2010) (Figure 3-4). The claim asserted rights of the seven member / affiliated communities of the AANTC over identified traditional territory [8].

This First Nation, although not a formal member of the Algonquin Nation Secretariat (see Section 3.7 below), made a joint assertion with two of its represented communities (Timiskaming First Nation and Wolf Lake First Nation) claiming traditional territory in the Ottawa River valley (ANS, 2013 Comprehensive Land Claim) (see Figure 3-4) [37], [8].

KFN is also associated with an earlier comprehensive land claim: River Desert Indian Band, with others (1989) [8]. Further detail on this claim is provide above in Section 3.3.2.

On 2013 January 23, KFN along with Wolf Lake First Nation (WLFN) and Timiskaming First Nation (TFN) jointly released a Statement of Asserted Rights (SAR) which summarizes the Aboriginal rights, including title, which our three First Nations assert and provides detailed evidence to substantiate it. Copies of the SAR, maps and background documentation were transmitted to the governments of Canada, Quebec and Ontario in 2013 January.

KFN have not relinquished Aboriginal rights and title, over lands that straddle the Ottawa River basin on both sides of the Quebec-Ontario boundary.

3.3.2 Kitigan Zibi Anishinabeg First Nation

The Kitigan Zibi Anishinabeg First Nation (KZA), also known also as the River Desert Band or Maniwaki, is one of the nine currently federally recognized Algonquin communities in Quebec. Of these, the community resides on the largest area of reserve lands which were founded in 1851 [38]. The Kitigan Zibi Anishinabeg First Nation occupy one area of reserve lands: Kitigan Zibi No. 06100. Situated to the south-west of the borders of Maniwaki in the Outaouais region of Quebec, on the west bank of the Gatineau River, the reserve covers an area of 21,009 ha (Table 3-6). As a result of earlier displacement by the encroachment of Europeans along the Ottawa River this community became a place for many Algonquins to settle [35].

KZA has a total registered population of 3,578 (as of 2021 April) (Table 3-6), the largest population of the nine Algonquin First Nations recognized by the federal government in Quebec. Approximately half of the registered population reside off reserve lands (1, 934). Band administration oversees various departments providing services to the community (e.g., employment, land management, education etc.) [38]. The community has developed a business association to provide support to small and new businesses, has developed capabilities in manufacturing (e.g., tree products), is a member of the Canadian Council for Aboriginal Business, and conducts eco-tourism both on and off reserve lands. Cultural activities such as hunting, survival and cultural camps have been established along with a cultural centre and annual traditional Pow Wow [37].

Within the community, extensive efforts have been made to preserve its traditional language, Anishinabe, through community signage, translation at meetings, at traditional talking circles, local radio, and in school. Further, all Band employees are encouraged to learn the language [38].

KZA is currently governed by an elected council comprised of a Chief and six councillors. The electoral system occurs under the Indian Act, with a council quorum of a minimum of four members of Band Council to pass council decisions. This First Nation is a member Nation of the AANTC [8], [33].

Several comprehensive land claims have been submitted to the federal government by KZA. In 1986, the KZA submitted the River Desert Indian Band (1986) Comprehensive Land Claim to the federal government, claiming Aboriginal Rights within Ontario and Quebec. Based on information provided through ATRIS, the claim was accepted for review and additional supporting information requested of the First Nation, although the Chief resubmitted the claim that same year arguing the original information was sufficient. The reissued claim was not accepted for review. A second independent claim was submitted in 1987 as the River Desert Indian Band (1987) Comprehensive Land Claim. This claim was not accepted for review as a comprehensive claim [8].

In 1989 a third comprehensive land claim: River Desert Indian Band, with others (1989) was submitted asserting rights and title in Quebec and Ontario within the Ottawa River Valley. The claim had the support of other Algonquin First Nations within Quebec including Eagle Lake First Nation, Timiskaming First Nation, Wolf Lake First Nation and Lac Simon First Nation. Combined, these communities comprised a majority of the Quebec Algonquin population. The claim was accepted for review however the federal government noted an overlapping claim with the Ontario Algonquin First Nation (Algonquins of Golden Lake, now known as Pikwàkanagàn First Nation). The government also noted that other Quebec Algonquin communities were excluded from the submission (Grand lac First Nation and Barriere Lake First Nation). In 1991, following a meeting of the nine Algonquin community Chiefs where a decision was made to prepare a collective claim, Eagle Lake First Nation, Timiskaming First Nation and Wolf Lake First Nation withdrew their support of the 1989 claim. In 1994, the Kitigan Zibi Anishinabeg First Nation suspended their 1989 claim in order to provide an opportunity for the other Algonquin First Nations to undertake research in support of a future claim [8].

Later in 1994, in the absence of a mobilized Algonquin community toward a claim of traditional territory in the Ottawa River Valley, the Kitigan Zibi Anishinabeg (1994) Comprehensive Land Claim was submitted. It was modified in 1997, and then presented in 1998 as a “declaration of rights and self-determination and territorial claim”. While the First Nation submitted the claim independently for lands within Quebec as their traditional territory, it was not accepted by the federal government based on the argument that it could not be negotiated separately from other western Quebec Algonquin First Nations. The First Nation was provided the opportunity to either proceed with a collective claim among itself and the other Algonquin First Nations or with a binding sign-off to the Kitigan Zibi Anishinabeg claimed territory from the other Algonquin First Nations. KZA rejected this position and re-asserted its claim. Based on information provided through ATRIS, the claim was not accepted for negotiation [8].

KZA is a signatory of the Algonquin Anishinabeg Nation Comprehensive Land Claim (2010) (Figure 3-4). The claim asserted rights of the seven member / affiliated communities of the AANTC over identified traditional territory. Based on information provided through ATRIS, the claim stage indicates the claim was submitted/under review [8].

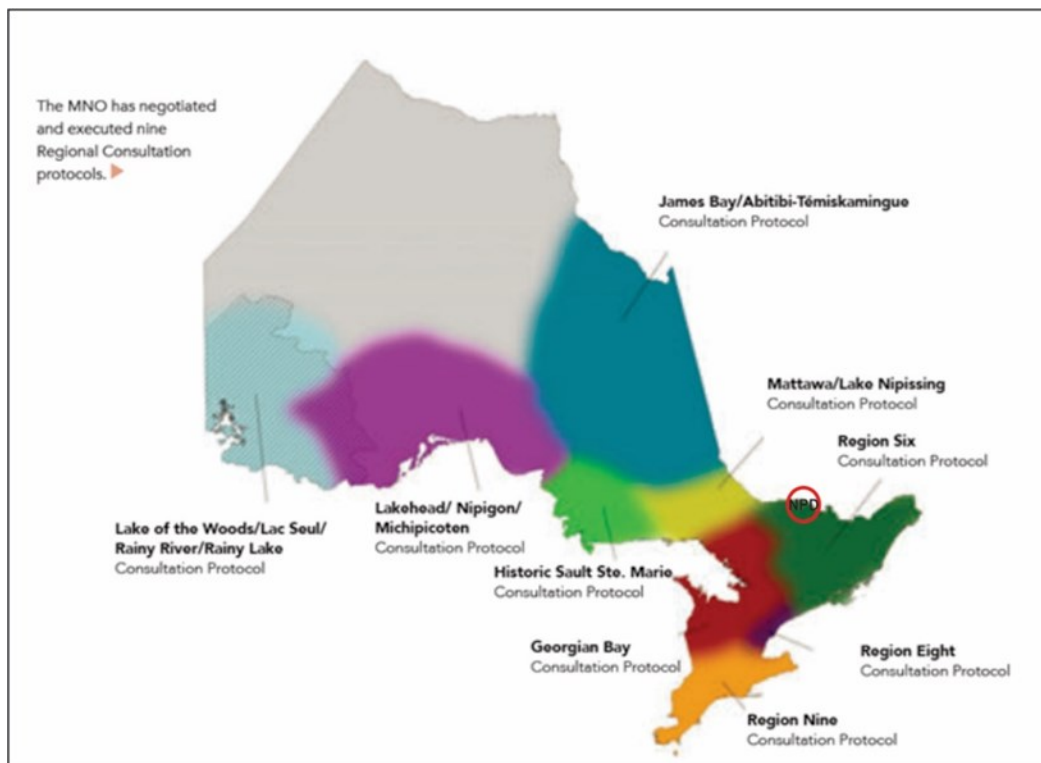
Numerous specific claims have been submitted by this First Nation based on information provided through ATRIS. Three active court cases are also identified on the site [8].

3.4 Métis Nation of Ontario

Three Indigenous peoples are constitutionally recognized by the government in Canada, as per s.35 (2) of the *Constitution Act*, 1982: First Nations, Inuit and Métis. The term “Métis” is defined by the Métis National Council (MNC) as: *“a person who self-identifies as Métis, is distinct from other Aboriginal peoples, is of historic Métis Nation Ancestry and who is accepted by the Métis Nation.”* [40].

The Métis Nation of Ontario (MNO) was formed in 1993 to represent communities and individuals recognized by the Métis Nation within Ontario and works to represent the rights, interests and collective aspirations of Métis people and communities throughout the province. The MNO identifies a registry of over 25, 000 Métis citizens [41].

The organization uses a democratic process across Ontario in defining its structure. At four-year intervals, provincial and regional leadership are elected through a voting system by Métis citizens. Through signed Charter Agreements, MNO Community Councils established throughout the province are mandated to support local governance, and work collectively among the councils and with the MNO to represent the interests and rights of regional rights-bearing Métis communities throughout Ontario [42]. Across the province there are approximately 31 Chartered Community Councils representing local Métis citizens [41]. In combination with the Community Code and Community Electoral Code, the MNO Charter Agreements function as policy documents for Community Councils to refer to during community elections. A Lands, Resources and Consultation Branch engages with the Community Councils to assist in enabling fulfillment of their mandates. Community Council interests are represented through one of nine Regional Councillors at a Provisional Council of the Métis Nation of Ontario (PCMNO) [43]. Nine Regional Consultation protocol areas are identified below in Figure 3-5.



Source: Métis Nation of Ontario Annual Report, 2016-2017 (with addition of Project location)

Figure 3-5: Geographic Locations of Traditional Métis Harvesting Territories in Ontario and the NPD Site

Members of the MNO Mattawa / Lake Nipissing Métis Traditional Territory Consultation Committee and MNO Lands, Resources and Consultation Branch have participated in CNL's Indigenous Engagement Program for the Project. The Consultation Committee was comprised of representatives from the following: a PCMNO Region 5 Councillor, two members of the Sudbury Métis Council, and a member from each of the Mattawa Métis Council and North Bay Métis Councils. Several staff representing the MNO Lands, Resources and Consultation Branch have also participated.

In 2008 the MNO signed an Ontario-Métis Nation Framework Agreement with the provincial government. An accommodation agreement has also been negotiated between Ontario and the MNO with respect to Métis harvesting rights. This agreement effectively allows harvesting of food by Métis without a license in traditional territories provided they hold a Harvester's Certificate [44].

A new Framework Agreement on Métis Harvesting rights was signed in 2018 replacing a previous interim agreement from 2004. The Framework Agreement provides for the Ontario Government recognition of the MNO Harvesting Policy, including MNO Harvesters Cards issued under the policy within the MNO's identified Harvesting Areas. The agreement also sets out processes for collaboration and timelines for discussions and negotiations in future [44].

In 2017 the Province of Ontario and the MNO identified that a “a historic Métis community developed from the inter-connected Métis populations at Mattawa and spanning the Ottawa River from Lac des Allumettes (Pembroke) to Timiskaming and environs (the “Historic Mattawa / Ottawa River Métis Community”). It would be noted that: “Identifying historic Métis communities is a necessary part of the legal requirements for establishing Métis rights, protected by section 35 of the Constitution Act, 1982, however, the identification of historic Métis communities alone does not define contemporary rights-bearing Métis communities, determine who in Ontario is Métis, who holds Métis rights, or define Métis harvesting areas or territories.” [45]

3.5 Williams Treaties First Nations

Several First Nations situated within Central Ontario and along Lake Ontario’s north shore of Lake in the late 1800s, claimed fishing, hunting and trapping rights. These rights were associated with certain lands where title had not been extinguished by surrender or otherwise. A lawyer, Angus Seymour Williams, who was representing the Department of Indian Affairs, chaired a Federal Commission which led to the acquisition of three separate land parcels located in Central and Southern Ontario in 1923. The purchases were known collectively as “the Williams Treaties”, taking its name from the head of the Royal Commission. It was under the Williams Treaties that First Nation signatories surrendered their right, title and interest in the lands described therein R. V. Howard (1994). This included the loss of fishing and hunting rights. Three parcels of land were set aside in two Williams Treaties. On 1923 October 31, the first treaty was made between the Chippewas Indians of Christian Island, Georgina Island and Rama and His Majesty the King. On 1923 November 15, a second treaty was made between the Mississauga Indians of Alderville, Mud Lake, Rice Lake and Scugog Lake and His Majesty the King. Much of the land in question was being used for settlement or economic ventures in the lumber and mining industries at the time the treaties were signed. The treaty negotiations involved the Government of Canada with legislative authority over “lands and lands reserved for Indians” and the Government of Ontario with control over “all lands, mines, minerals and royalties”[46].

The agreements which provided for the acquisitions were associated with the following areas of land:

1. A section enclosed by the northern shore of Lake Ontario, about one township in depth between the Trent River and the Etobicoke River.
2. A parcel of land lying between the northern extremity of (1) above and Lake Simcoe. This area was bounded (approximately) by the Holland River and the boundary between the counties of Victoria and Ontario. This southern tract is approximately 6,475 square (sq.) kilometre (km) and runs along the north shore of Lake Ontario from Toronto to the Bay of Quinte, north to Lake Simcoe and Rice Lake and east to the Trent River.
3. A large tract of land between Lake Huron and the Ottawa River bounded on the north by the Mattawa River-Lake Nipissing and French Line and on the south by earlier treaties concluded in 1818 and 1819 [46].

Figure 3-6 provides the land cessions established under the Williams Treaties.



Source: Government of Canada [8] (with addition of Project location)

Figure 3-6: Williams Treaties (1923)

Seven First Nations comprise the Williams Treaties First Nations: the Mississaugas of Alderville First Nation, Curve Lake First Nation, Hiawatha First Nation, Scugog Island First Nation, the Chippewas of Beausoleil First Nation, Georgina Island First Nation and the Rama First Nation. The Williams Treaties First Nations currently work collectively to review developments associated with land and resources that occur in their treaty area, as well as independently depending upon where developments are occurring.

In 2018 September, the Government of Canada, the Province of Ontario and the seven Williams Treaties First Nations announced that the Federal Court had granted a discontinuance of the Alderville litigation as a result of the parties reaching a negotiated settlement that resolves the litigation. Terms of the settlement included: financial compensation, an entitlement for each First Nation to add additional lands; recognition of continuing harvest rights and a commitment

to work together to implement those rights; and a commitment by Ontario and Canada to a formal apology [47].

Williams Treaties First Nations are also associated with varying tribal councils and representative organizations as noted in the overview of individual First Nations below. The following is a brief description of the Ogemawahj Tribal council, Anishinabek Nation, and Association of Iroquois and Allied Indians.

The Ogemawahj Tribal Council is a tribal council which represents the economic, political and social well-being of the Mississaugas, Ojibwa and Potawatomi First Nations within southern Ontario. Six member communities are associated with the tribal council: Alderville First Nation, Beausoleil First Nation, Chippewas of Georgina Island First Nation, Chippewas of Rama First Nation, Mississaugas of Scugog Island First Nation, and Moose Deer Point First Nation. The Chief and one Elder from each of the six member First Nations comprise the tribal council board of directors. A political and advocacy staff are also maintained [48].

Information on the Anishinabek Nation is provided below in Section 3.6.

The Association of Iroquois and Allied Indians (AIAI) advocates the political interests of its member Nations in Ontario. Member Nations are of the Oneida, the Mohawk, the Delaware, the Potawatomi and the Ojibway and include: Batchewana First Nation Ojibways, Caldwell First Nation, Delaware Nation at Moraviantown, Hiawatha First Nation, Mohawks of the Bay of Quinte, Oneida Nation of the Thames and Wahta Mohawks. It is a non-profit organization providing a political alliance to protect the collective Aboriginal and Treaty rights of its member Nations [49].

The following is an overview of Williams Treaties First Nations and that were included in CNL's Indigenous engagement outreach. Land base size and registered population both on and off reserve lands for each of the Williams Treaties First Nations included in CNL's Indigenous Engagement Program is presented in Table 3-7.

Table 3-7: Williams Treaties First Nations Land Base and Population

First Nation	Land Base Description	Total Land Base Size (ha)	Registered Population		Total Registered Population
			On Reserve Lands	Off Reserve Lands	On and Off Reserve Lands
Alderville First Nation	Alderville First Nation (No. 06211)	1,199.8	320	983	1,303
	Sugar Island 37A (No. 06212)	40.5			
Beausoleil First Nation	Chippewa Island (No. 06338)*	3.1	683	2,260	2,943
	Christian Island 30 (No. 06199)	5530.0			
	Christian Island 30A (No. 06200)	7.9			
	Chippewa Island (No. 06338)*	3.1	209	720	929

First Nation	Land Base Description	Total Land Base Size (ha)	Registered Population		Total Registered Population
Chippewas of Georgina Island First Nation	Chippewas of Georgina Island First Nation (No.06198)	1353.0			
	Chippewas of Georgina Island First Nation 33A (No. 06341)	1.3			
Chippewas of Rama First Nation	Chippewa Island (No. 06338)*	3.1	749	1,304	2,053
	Chippewas of Rama First Nation (No. 06195)	908.4			
	Indian River (06207)	1.0			
Curve Lake First Nation	Curve Lake 35A (No. 06214)	202.3	803	1,819	2,622
	Curve Lake First Nation 35 (No. 06213)	765.7			
	Islands in the Trent Waters 36A (No. 06197)**	139.6			
Hiawatha First Nation	Hiawatha First Nation (06215)	868.2	205	654	859
	Islands in the Trent Waters 36A (No. 06197)**	139.6			
Mississaugas of Scugog Island First Nation	Islands in the Trent Waters 36A (No. 06197)**	139.6	53	196	249
	Mississaugas of Scugog Island (No. 06196)	334.5			

Source:[50][51][52][53][54][55][56]

*Chippewas Island is an Island located in Twelve Mile Bay in Georgian Bay. Beausoleil First Nation, the Chippewas of Georgina Island First Nation and the Chippewas of Rama First Nation occupy this land.

**Islands in the Trent Waters 36A is a group of islands in Peterborough County, located in Pigeon, Buckhorn and Stony Lakes. The Curve Lake First Nation, the Hiawatha First Nation and the Mississaugas of Scugog Island First Nation occupy this land.

3.5.1 Alderville First Nation

The Alderville First Nation is a community of the Mississauga Anishinabeg of the Ojibway Nation, with linguistic traditions in the Ojibway language [57], although many within the First Nation do not speak the language and have made efforts more recently to learn and teach it to younger members of the community [58]. Since the mid-1830s, Mississauga Anishinabeg have resided in Alderville [57]. Lands associated with this community include Alderville First Nation Reserve No. 06211, situated in Roseneath, Northumberland County on the south side of Rice Lake approximately 21 km southwest of Peterborough, Ontario, and Sugar Island 37A Reserve No. 06212, located on an island in the north end of Rice Lake, Peterborough County, approximately 14 km southeast of Peterborough. The combined land base is approximately 1,240 ha Table 3-7.

The total registered population of this community is 1,303 (as of 2021 April) Table 3-7. While Alderville First Nation Reserve No. 06211 comprises the predominant land base for the

community, approximately 75 per cent of the registered population reside off reserve lands (983). Many community members are employed by either the First Nation or by community members with self-owned businesses both in and outside of the community. Community members own most of the homes within the reserve [59].

The Alderville First Nation is governed by an elected council comprised of a Chief and four councillors. The electoral system occurs under the *Indian Act* and council elections occur every two years through ballot vote. The Alderville First Nation is a member Nation of the Ogemawahj Tribal Council and is also associated with the Anishinabek Nation - Southeast Region, [50].

The Alderville First Nation is a signatory of the 1923 Williams Treaties and preceding Southern Ontario Treaties (1764-1862). The community is part of the Anishinabek Nation – Governance – Sectoral Self-Government negotiations which, according to ATRIS, is in a phase of negotiations stage. The community is associated with several specific claims and assertions, many of which, based on information provided through ATRIS, are settled or concluded.

3.5.2 Beausoleil First Nation

The Beausoleil First Nation is largely a community of the Ojibway Nation, with some connection also to the Pottawatomi Nation. Ojibway is the traditional language (Government of Canada, Date unknown).

The Beausoleil First Nation occupies three areas of reserve lands Table 3-7. Christian Island 30 No. 06199 is the largest (5,330 ha) area of reserve lands associated with this community and is an island situated in southeastern Georgian Bay, in Simcoe County, Ontario. ‘Chimnissing’ is another name used by some community members for the island, meaning “Big Island” in Ojibway [60]. The community has been present here since the mid 1800’s [61]. Two other small islands (Hope Island and Beckwith Island to the north and west respectively) are associated with this reserve area. The land base for this reserve is 5,530 ha.

Christian Island 30A No. 06200, the second reserve area associated with this community, is 7.9 ha in size and is located to the east of Christian Island 30 and rests at Cedar Point, on the mainland of Simcoe County, approximately 16 km west of Midland, Ontario. Primary access to Christian Island 30 is via ferry transportation, although access during the winter can also occur via ice road or hovercraft [62].

The smallest reserve area associated with this First Nation is Chippewa Island No. 06338 (3.1 ha), which is located to the north in Twelve Mile Bay in Georgian Bay, approximately 30 km South of Parry Sound Island. The Beausoleil First Nation occupies this land along with Chippewas of Georgian Island First Nation and the Chippewas of Rama First Nation. The combined land base of the First Nation is 5,541 ha (3.1 ha of which is shared with other First Nations at Chippewa Island).

The Beausoleil First Nation has a total registered population of 2,943 (as of 2021 April).

Approximately 75 per cent of this community (2,260) resides off reserve lands, Table 3-7. Community members living on-reserve reside predominately on Christian Island 30 [62]. There are several privately owned and band owned businesses associated with residential and seasonal services [61].

The Beausoleil First Nation is governed by an elected council comprised of a Chief and six councillors. The electoral system occurs under the *Indian Act* and council elections occur every two years. The Beausoleil First Nation is a member Nation of the Ogemawahj Tribal Council and is also associated with the Anishinabek Nation - Southeast Region [63],[49].

The Beausoleil First Nation is a signatory of the 1923 Williams Treaties and preceding Southern Ontario Treaties (1764-1862). The community is part of the Anishinabek Nation – Governance – Sectoral Self-Government negotiations which, based on information provided through ATRIS, is in a phase of negotiations stage. ATRIS also identifies the community as associated with several specific claims and assertions. A closed court case is also identified [8].

3.5.3 Chippewas of Georgina Island First Nation

The Chippewas of Georgina Island First Nation are an Anishinaabe people with linguistic traditions in the Ojibway language. The First Nation are descendants of a larger group known as the Chippewas of Lakes Huron and Simcoe [64].

Three areas of reserve lands are associated with Chippewas of Georgina Island First Nation Table 3-7. The Chippewas of Georgina Island First Nation Reserve 06198, the largest reserve area, is comprised of three islands (Georgina Island, Snake Island and Fox Island) in the southeastern portion of Lake Simcoe within the Regional Municipality of York, Ontario. This reserve has an approximate land base of 1,353 ha. The smallest area of reserve lands associated with this community are on the mainland Chippewas of Georgina Island First Nation 33A No. 06341 (1.3 ha), to the south of Snake Island, at Island Grove on the southern shore of Lake Simcoe. A ferry is the predominant means of connecting the island community to the mainland. Seasonal use of an ice road also permits access [64]. A third land base associated with this First Nation is Chippewa Island No. 06338 (3.1 ha) which is located to the north in Twelve Mile Bay in Georgian Bay, approximately 30 km South of Parry Sound Island. The Chippewas of Georgina Island First Nation occupies this land along with Beausoleil First Nation and the Chippewas of Rama First Nation. The combined land base associated with this community is approximately 1357 ha (3.1 ha of which is shared with other First Nations at Chippewa Island).

The First Nation has a total registered population of 929 (as of 2021 April) Table 3-7. Approximately 78 per cent (720) of the community resides off reserve lands. Employment within the community is supported through the Band office, ferry / shuttle service to and from the mainland, a marina, and a restaurant. Various administrative services are provided through the Band office to support the community (e.g., medical centre, water system plant, emergency services, school etc.). The establishment of a ferry service has enabled the leasing of properties with cottages. Properties with leased cottages are present on Snake, Georgina and Fox Islands

[65].

The Chippewas of Georgina Island First Nation has an elected Council comprised of a Chief and four Councillors. The First Nation's election system is under the *First Nations Elections Act* and band elections are held every two years. The First Nation is a member of the Ogemawahj Tribal Council and the Anishinabek Nation - Southeast Region [59][52].

The Chippewas of Georgina Island First Nation is a signatory of the 1923 Williams Treaties and preceding Southern Ontario Treaties (1764-1862). The community is part of the Anishinabek Nation – Governance – Sectoral Self-Government negotiations which, based on information provided through ATRIS, is in a phase of negotiations stage. ATRIS identifies the community as associated with several specific claims and assertions. A closed court case is also identified [8].

3.5.4 Chippewas of Rama First Nation

The Chippewas of Rama First Nation are an Anishinaabe people with linguistic traditions in the Ojibway language, and are descendants of the Chippewas of Lakes Simcoe and Huron [66].

The Chippewas of Rama First Nation occupies three areas of reserve lands Table 3-7 [49]. The largest area is the Chippewas of Rama First Nation No. 06195 which is 908.4 ha and situated approximately five km northeast of Orillia on the eastern shore of Lake Couchiching, in Simcoe County, Ontario. Another land base associated with this community is Chippewa Island No. 06338 (3.1 ha) which is located to the north in Twelve Mile Bay in Georgian Bay, approximately 30 km South of Parry Sound Island. The Chippewas of Rama First Nation occupies this land along with Beausoleil First Nation and the Chippewas of Georgina Island First Nation. The third reserve area is Indian River No. 06207 which is one ha in size and adjacent to the Village of Port Carling on Bank of Indian River, Township of Muskoka Lakes, Ontario. This last reserve is shared with the Wahta Mohawk First Nation. The combined land base associated with this community is approximately 912.5 ha (3.1 ha of which is shared with other First Nations at Chippewa Island, and 1 ha of which is shared at Indian River).

The First Nation has a total registered population of 2,053 (as of 2021 April) and approximately 64 percent (1,304) of the community reside off reserve lands Table 3-7.

The Chippewas of Rama First Nation reserve was selected as the location for a First Nation casino in 1994. Tourism associated with the casino have resulted in First Nation community employment, as well as development of business and local services [66].

The Chippewas of Rama First Nation has an elected Council comprised of a Chief and six Councillors. The First Nation's election system is under the First Nations Elections Act and band elections are held every four years. Separate polls are held for the office of Chief and each of six councillor positions, and each seat must be nominated prior to elections are undertaken [66]. The First Nation is a member of the Ogemawahj Tribal Council, and the Anishinabek Nation - Southeast Region [52].

The Chippewas of Rama First Nation is a signatory of the 1923 Williams Treaties and preceding Southern Ontario Treaties (1764-1862). The community is part of the Anishinabek Nation – Governance – Sectoral Self-Government negotiations, which is in a phase of negotiations stage. The community is associated with several specific claims and assertions. A closed court case is also identified [8].

3.5.5 Curve Lake First Nation

The Curve Lake First Nation is a community of the Mississauga Anishinabeg of the Ojibway Nation, with linguistic traditions in the Ojibway language.

Three areas of reserve lands are associated with Curve Lake First Nation Table 3-7. The largest is Curve Lake First Nation 35 No. 06213 (765.7 ha), which is located on a peninsula situated between Buckhorn Lake and Chemong Lake in Peterborough County, Ontario. To the west of this reserve is Curve Lake 35A No. 06214 (202.3 ha), which is situated on Fox Island in Buckhorn Lake. A third area, Islands in the Trent Waters 36A No. 06197 (139.6 ha), comprises a group of several smaller islands in Pigeon, Buckhorn and Stony Lakes, Peterborough County. This reserve area is shared with the Hiawatha First Nation and the Mississaugas of Scugog Island First Nation.

The total registered population of this community is 2,622 (as of 2021 April) with approximately 68 per cent (1,679) of the registered population residing off-reserve lands Table 3-7. The population is diverse, including both members and non-members of the First Nation residing on territorial lands [67].

The current government structure employs a large staff of approximately 100 full-time and approximately 18 part-time employees across various administrative departments. A First Nation owned, and year-round operated Cultural Centre serves as a draw to tourists into the area, providing additional revenue to the community. Curve Lake First Nation also shares management authority of the nearby Petroglyphs Provincial Park (located east of reserve lands), through an agreement with MNRF Ontario Parks branch. The site is considered sacred by the First Nation [68] and contains the largest known concentration of petroglyphs within Canada [69].

The Curve Lake First Nation has an elected council comprised of a Chief and eight council members with band elections held every three years. The First Nation's election system is under the Custom Electoral System that adheres to a Curve Lake First Nation Leadership Selection Code [68], [54]. Curve Lake First Nation is not affiliated with any tribal council but is associated with the Anishinabek Nation - Southeast Region [8].

The Curve Lake First Nation is a signatory of the 1923 Williams Treaties and preceding Southern Ontario Treaties (1764-1862). The community is part of the Anishinabek Nation – Governance – Sectoral Self-Government negotiations, which is in a phase of negotiations stage based on information provided in ATRIS. The community is associated with several specific claims and assertions. A closed court case is also identified [8].

3.5.6 Hiawatha First Nation

The Hiawatha First Nation, also known as the Mississaugas of Rice Lake, is a community of the Mississauga with linguistic traditions in the Ojibway language.

This First Nation occupy two areas of reserve lands Table 3-7. Hiawatha First Nation Reserve No. 06215 is located on the north shore of Rice Lake, east of the Otonabee River in Peterborough County, Ontario. The reserve has an approximate land base of 868.2 ha. A second area, Islands in the Trent Waters 36A No. 06197 (139.6 ha), comprises a group of islands in Pigeon, Buckhorn and Stony Lakes, Peterborough County. This reserve area is shared with the Curve Lake First Nation and the Mississaugas of Scugog Island First Nation. The Hiawatha First Nation has a total registered population of 859 (as of 2021 April) with approximately 76 per cent (654) of the registered population residing off-reserve lands Table 3-7.

The First Nation owns Serpent Mounds Park to the east of the community where it previously provided tourism services such as camping, cottage rentals and boating. The park was closed to the public in 2009 due to a decline in the tourism market. The park is the location of the National Historic Site of Serpent Mounds, an ancient historic and burial site, which is currently under the care of the Hiawatha First Nation [70]. First Nation operated businesses include a gas-bar, restaurant, tent and trailer park. Despite the park closure, tourism is considered an important component of economic development for the community with visitors encouraged to attend the annual Pow Wow displaying traditional dancing, singing and drumming [70].

The Hiawatha First Nation has an elected Council comprised of a Chief and five council members [70]. The First Nation's election system is under the Indian Act with a council quorum of a minimum of four members of Band Council to pass council decisions [70]. The Hiawatha First Nation is not affiliated with any tribal council but is a member of the Association of Iroquois and Allied Indians [8]. The Hiawatha First Nation is currently in the process of developing its own Land Code, reflecting its own unique laws, priorities and traditions [71].

The Hiawatha First Nation is a signatory of the 1923 Williams Treaties and preceding Southern Ontario Treaties (1764-1862). The community is associated with several specific claims and assertions based on information provided in ATRIS. A closed court case is also identified [8].

3.5.7 Mississaugas of Scugog Island First Nation

The Mississaugas of Scugog Island First Nation is a descendent of the Mississauga Nation. Efforts are underway to restore the Mississauga language within the community as the population rebounds from smaller numbers [72].

Two areas of reserve lands are occupied by the Mississaugas of Scugog Island First Nation Table 3-7 Mississaugas of Scugog Island No. 06196 is located approximately 42 km southwest of Peterborough at the north end of Scugog Island in Lake Scugog, Regional Municipality of Durham. The Island is 334.5 ha in size. The second reserve area, Islands in the Trent Waters 36A No. 06197 (139.6 ha), comprises a group of islands in Pigeon, Buckhorn and Stony Lakes, Peterborough County. This reserve area is shared with the Curve Lake First Nation and the Hiawatha First Nation.

Compared to other communities described above, the Mississaugas of Scugog Island community is smaller in number. This community has a total registered population of 249 (as of 2021 April), with approximately 79 per cent (196) residing off reserve lands Table 3-7.

Compared to the 1980's when the population allegedly was fewer than 15 community members [73] this population reflects a considerable increase and efforts to revitalize the culture of this First Nation are being undertaken, including Elder teachings and restoration of the traditional Mississauga language within the community. Efforts to support the community have also been made through economic development programs and services leading to local employment opportunities. Included among these is the Great Blue Heron Casino, owned and operated by the First Nation, and which is located on reserve lands on Scugog Island [73].

The Mississaugas of Scugog First Nation has an elected Council comprised of a Chief and two Councillors. The First Nation's election system is under the *Indian Act*. Band elections are held every two years. The Mississaugas of Scugog Island First Nation is a member of the Ogemawahj Tribal Council and is associated with the Anishinabek Nation - Southeast Region [8],[56].

The Mississaugas of Scugog Island First Nation is a signatory of the 1923 Williams Treaties and preceding Southern Ontario Treaties (1764-1862). The community is part of the Anishinabek Nation – Governance – Sectoral Self-Government negotiations which, based on information provided through ATRIS, is in a phase of negotiations stage. The community is associated with several specific claims and assertions. A closed court case is identified as well as an additional case, although the status is not noted [8].

3.6 Anishinabek Nation

The Anishinabek Nation (formerly known as the Union of Ontario Indians or UOI) is a political organization which advocates for 39 member First Nations within Ontario, divided among four strategic geographic regions: Northern Superior, Lake Huron, Southwest and Southeast. Approximately one third of the First Nation population (roughly 65,000) in Ontario is represented by the Anishinabek Nation.

Of the First Nation communities associated with this organization, seven are included in CNL's Indigenous Engagement Program: Alderville First Nation, Beausoleil First Nation, Chippewas of Georgina Island First Nation, Chippewas of Rama First Nation, Curve Lake First Nation, Mississaugas of Scugog Island First Nation and Pikwàkanagàn First Nation. All the communities fall within the Anishinabek Nations Southeast district.

The Anishinabek Nation Leadership Council is comprised of a Grand Council Chief a Grand Council Elder, four Regional Deputy Grand Council Chiefs and, as well as elders and council members representing each of the Anishinabek Nation's four geographic regions. 'Rules of Procedure' are enacted by the Grand Council as a means of governing council. Rules are administered by the Anishinabek Nation Government [74].

As a political organization, the Anishinabek Nation traces its roots back to the Confederacy of Three Fires, prior to European contact. In 1949, the Anishinabek Nation was incorporated by the Anishinabek Nation. The Anishinabek Nation is headquartered near North Bay, Ontario at the Nipissing First Nation. Satellite offices are present in Thunder Bay, Curve Lake First Nation,

and Munsee-Delaware First Nation. Various services and programs are provided to member communities through the Anishinabek Nation including those relating to: education, health, social services, treaty research and intergovernmental affairs. The Anishinabek Nation currently has approximately seventy staff [74].

3.7 Algonquin Nation Secretariat

The Algonquin Nation Secretariat and Algonquin Nation Programs and Services Secretariat (ANPSS) form the Algonquin Nation Tribal Council (ANTC), a bicameral organization. The ANTC represents three federally recognized Algonquin Communities within Quebec: Timiskaming First Nation, the Algonquins of Barriere Lake, and Wolf Lake First Nation. The Council's administrative office is based in Notre Dame Du Nord, Quebec, at Timiskaming First Nation. The Algonquin Nation Secretariat serves as the Council's political arm with the mandate of providing services associated with lands and resources, policies, and political developments. The service arm of the Council is the ANPSS, mandated to provide support services to member communities [75].

The Algonquin Nation Secretariat (2013) Comprehensive Land Claim was a joint assertion of Algonquin rights in the Ottawa River valley. Figure 3-7 provides the boundary of the asserted area which includes over 34,000 sq. km, straddling the Ontario-Quebec border along the Upper Ottawa River [76].

From 1992 to 2010, Barriere Lake First Nation, Timiskaming First Nation and Wolf Lake First Nation were represented by the Algonquin Nation Secretariat and research was presented to the federal government in 2001 on behalf of these communities. From 2010, Timiskaming and Wolf Lake First Nations were represented and jointly made this assertion of rights with Eagle Lake First Nation in 2013. Based on information provided through ATRIS, there is no record indicating the claim was either accepted for review or for negotiation [63]. Based on a 2020 March review of ATRIS it is unclear exactly the status of this assertion.



Source: Government of Canada [63] (with addition of Project location)

Figure 3-7: Algonquin Nation Secretariat (2013) Claim Area

Table 3-8: Algonquin Nation Tribal Council First Nations Land Base and Population

First Nation	Land Base Description	Total Land Base Size (ha)	Registered Population		Total Registered Population
			On Reserve Lands	Off Reserve Lands	On and Off Reserve Lands
Timiskaming First Nation	Timiskaming (No. 06092)	1852	659	1,723	2,382
Algonquins of Barriere Lake	Rapid Lake (No. 06135)	29.7	336	459	795
Wolf Lake First Nation	n/a	-	6	239	245

Source: INAC, 2021c, 2021l and 2021m [77][78][79]

3.7.1 Timiskaming First Nation

The Timiskaming First Nation is an Algonquin community which occupy one area of reserve lands at Timiskaming No. 06092 in western Quebec near the Ontario border, approximately 600 km from Ottawa. The reserve is 1,852 ha in size Table 3-8 and was originally established in

1851. In 1854, the community receive an area of 110,000 acres situated at the head of Lake Temiskaming. The reserve adjoins the municipality of Notre-Dame-du-Nord [80].

This community has a total registered population of 2, 382 (as of 2021 April), with approximately 72 per cent (1,723) residing off reserve lands Table 3-8.

The Timiskaming First Nation has an elected Council comprised of a Chief and six Councillors. The First Nation's election system is under the Custom Electoral System [78] and elections are held every three years. The Timiskaming First Nation employs approximately 133 employees, including management, Department staff full time and part-time as well as temporary employees and contractors. Many seasonal jobs and students are added during the summer. In addition, Timiskaming First Nation has various administrative departments that serve the community such as housing, income assistance employment, education, economic development, health etc.) [80].

The Timiskaming First Nation is a signatory of the Algonquin Nation Secretariat (2013) Comprehensive Land Claim described above. This First Nation is also associated with an earlier comprehensive land claim: River Desert Indian Band, with others (1989). Based on information provided in ATRIS, the First Nation withdrew its support of this claim in 1991. Further detail on this claim is provided above in Section 3.3.2. The community is associated with two specific claims, both of which are identified as concluded. Two active court cases are also identified [8].

3.7.2 Algonquins of Barriere Lake

The Algonquins of Barriere Lake First Nation, also known as Mitchikanibikok Inik, are located on the shores of Rapid Lake, on the shore of the Cabonga Reservoir, in Quebec, roughly 134 km north of Maniwaki.

The Algonquins of Barriere Lake First Nation occupy one area of reserve lands which was created in 1961 [36]. The community previously was situated at the site of Barriere Lake. Rapid Lake No. 06135 is 29.7 ha in size. This community has a total registered population of 795 (as of 2021 April), with approximately 58 per cent (459) residing off reserve lands Table 3-8.

The traditional territory of Barriere Lake is identified as being entirely within the province of Quebec [81]. The community notes traditional activities including trapping, hunting, harvesting and fishing over an area of more than 10,000 sq. km within Quebec. The Algonquin language is spoken fluently within the community, as well as English and French [81].

The Algonquins of Barriere Lake First Nation has an elected Council comprised of a Chief and six Councillors. Based on information provided through ATRIS, the First Nation's election system is under the Indian Act with a council quorum of a minimum of four members of Band Council to pass council decisions [77].

The Algonquins of Barriere Lake Nation entered into a Trilateral Agreement with the federal government and the Province of Quebec in 1991. The main objective of the Agreement was to develop an integrated renewable resources management plan. Since that time there has been a history of various disputes with both governments [77]. While the Barriere Lake First Nation was represented by the Algonquin Nation Secretariat prior to the Algonquin Nation Secretariat

(2013) Comprehensive Land Claim described above, it was not a signatory to the claim [63]. Three active court cases are identified [8].

3.7.3 Wolf Lake First Nation

The Wolf Lake First Nation, or Algonquins of Wolf Lake, are the smallest of the three member communities currently represented by the Algonquin Nation Secretariat and are situated approximately 37 km northeast of the town of Témiscamingue on Hunter's Point Lake, Témiscaming, Quebec. No reserve lands are designated for this First Nation although six members of the community reside on other reserves. Their administrative office is located in Témiscaming. The community has a total registered population of 245 (as of 2021 September) Table 3-8 [82].

The ANTC identifies traditional territory of this First Nation as being the Dumoine River watershed and the Kipawa region [83]. The community is associated with a project aimed at protecting heritage and cultural traditions of the Anishinabe through the practice and teachings of medicinal plant harvest [75]. It has also undertaken initiatives in culture-based tourism such as establishing and operating the Algonquin Canoe Company in order to supplement its social, economic and cultural development [82]. The community is of Anishinabe origins, and the language of the present community is primarily English [74].

The Wolf Lake First Nation has an elected Council comprised of a Chief and two Councillors and their election system is under the Custom Electoral System [79].

4. Indigenous Engagement

Engagement opportunities with Indigenous peoples provide valuable input to help enrich the Environmental Assessment process. This section summarizes CNL's Indigenous engagement objectives, includes a brief description of the Indigenous Nations, organizations, and communities that CNL has engaged with on the NPD Closure Project, the methods adopted to meet engagement objectives, engagement activities that have been undertaken and feedback received as of 2024 March, and future engagement activities. As of 2024 March, CNL has verified (or attempted to verify) the interests and concerns of identified Indigenous Nations, communities, and organizations. In many cases CNL has also verified the resolution of these concerns and / or laid out a path forward and next steps. This includes formulating commitments to address outstanding interests and concerns. The revised draft EIS and IER TSD also incorporate responses to CNSC's request for further information on engagement and verification of Indigenous content in the revised draft EIS.

This report documents CNL's engagement with Indigenous Nations, communities and organizations as the proponent of the NPD Closure Project. In some cases, AECL participated with CNL and the Indigenous Nation, community or organization in engagement activities related to the NPD Closure Project. AECL's participation is documented in this report and where required in relation to CNL's activities.

Table 4-1 below quantitatively describes and summarizes the broad Indigenous engagement activities undertaken for the NPD Closure Project related to this EIS as of 2024 March 31. The table is intended to demonstrate two key points:

- CNL has utilized a wide assortment of engagement tools including, information sharing, formal two-way dialogue, supporting detailed investigative studies, providing capacity funding, and the consideration of long-term relationship agreements. The engagement activities in the columns reflect the increasing degree of engagement.
- CNL has reached out to and / or engaged all Indigenous Nations, communities, and organizations on the list below. Each Indigenous Nation, community and organization has their specific interest in the type and depth of engagement on the Project. CNL has listened to the preferences of each Indigenous Nation, community and organization and has adapted its engagement activities accordingly.

Table 4-1: Identified Indigenous Nations, Communities and Organizations Engagement and Involvement

Identified Indigenous Nations and Organizations	Comments submitted via EA (2016 Project Description or 2017 Draft EIS)	CNSC Participant Funding Issued	MOUs & Contribution Agreements ² (CNL Funding)	TKLUS or Other Studies	Comments on the 2020 or 2021 Revised Draft EIS	Long Term Relationship Agreement
Algonquins of Ontario (AOO)	- Comments on the Project Description - Comments on the 2017 Draft EIS	YES	MOU (2018) Contribution Agreement (2019)	Algonquin Knowledge and Land Use Study (AKLUS)	None received	Discussion paused
Algonquins of Pikwàkanagàn First Nation (AOPFN)	None received	YES	Contribution Agreement (2020)	- AKLUS - Diet and Harvest Study - Culture and Rights Study - Alternative Means Assessment (in progress)	YES (2020)	SIGNED (2023)
Métis Nation of Ontario (MNO)	Comments on the 2017 Draft EIS	YES	MOU (2018)	MNO TKLUS	None received	Drafted
Algonquin Anishinabeg Nation Tribal Council (AANTC)	Comments on the 2017 Draft EIS	YES	Discussion paused	None received	None received	-
Kebaowek First Nation (KFN)	None received	YES	Framework Agreement (2022)	None received	YES (2021)	-
Kitigan Zibi Anishinabeg First Nation (KZA FN)	Comments on the 2016 Project Description	Not requested	-	None received	YES (2021)	-
Alderville First Nation	None received	Not requested	Not requested	None received	None received	-

² CNL has also funded community engagement meetings with Indigenous Nations, communities, and organizations outside of formal agreements.

Identified Indigenous Nations and Organizations	Comments submitted via EA (2016 Project Description or 2017 Draft EIS)	CNSC Participant Funding Issued	MOUs & Contribution Agreements ² (CNL Funding)	TKLUS or Other Studies	Comments on the 2020 or 2021 Revised Draft EIS	Long Term Relationship Agreement
Curve Lake First Nation	None received	Not requested	Contribution Agreement (2021)	None received	YES (2020)	-
Hiawatha First Nation	None received	Not requested	Contribution Agreement (2023)	None received	None received	-
Mississaugas of Scugog Island First Nation	None received	Not requested	Not requested	None received	None received	-
Chippewas of Rama First Nation	None received	Not requested	-	None received	None received	-
Chippewas of Georgina Island First Nation	None received	Not requested	-	None received	None received	-
Beausoleil First Nation	None received	Not requested	-	None received	None received	-
Algonquin Nation Secretariat	None received	Not requested	-	None received	None received	-
Wolf Lake First Nation	None received	Not requested	Capacity Funding Agreement (2022)	None received	YES (2021)	-
Barrier Lake First Nation	None received	Not requested	-	Not requested	None received	-
Timiskaming	None received	Not requested	-	Not requested	None received	-
Anishinabek Nation	None received	Not requested	-	-	None received	-

4.1 Objectives

CNL's engagement activities seek to understand the interests and concerns of Indigenous Nations, communities and organizations while also building awareness and understanding of NPD Closure Project activities. CNL seeks to reach a mutual understanding of the potential effects of NPD Closure Project activities on the environment and any potential negative impacts on Aboriginal and / or treaty rights including, but not limited to, rights to trap, hunt, fish, gather, or harvest as well as the access to lands for perform cultural and spiritual activities.

CNL's engagement approach strives for collaboration with Indigenous Nations, communities and organizations to share information; identify opportunities to collaborate; understand concerns and issues, and potential impacts of a project on Aboriginal and / or treaty rights and opportunities for participation; and work together to address these through incorporating Indigenous Knowledge Systems, values and perspectives when considering avoidance and mitigations strategies.

Regulatory requirements for Indigenous engagement are set out above in Section 2 of this IER. As noted earlier, CEAA (2012) provides a clear description of the environmental effects on Indigenous peoples that are to be taken into account. CNSC REGDOC-3.2.2 [1] provides more detailed information and sets out the "requirements and guidance for licensees" with respect to engagement.

Additional CNSC requirements that are to be addressed or considered with respect to Indigenous peoples can be found in CNSC REGDOC 2.9.1, and the CNSC's Guidelines for the Preparation of an Environmental Impact Statement. These requirements are summarized in Table 2-1 of this IER.

Key requirements identified in that table generally relate to identifying Indigenous community perspectives and / or information associated with:

- VCs identified for the NPD Closure Project;
- spatial and temporal boundaries used in this EIS;
- adverse impacts to potential or established Indigenous and / or Treaty rights;
- potential positive or negative effects of the NPD Closure Project on the natural environment, community socio-economic conditions / elements, community health and diet, traditional and current land and resource use (e.g., hunting, trapping, fishing and gathering), and physical and / or cultural heritage features;
- mitigation suggested in the EIS with respect to potential effects;
- Indigenous treaties and litigation associated with the NPD site;
- traditional Indigenous knowledge associated with the NPD site; and
- the NPD Closure Project Indigenous engagement process.

On 2017 March 08, the CNSC released a Record of Decision addressing expectations on the scope of factors to be assessed in the EAs of three CNL designated projects under CEAA, 2012, including the NPD Closure Project. Pursuant to Section 19 of CEAA, 2012, the CNSC determined the project scope for the EA must include the factors mandated in paragraphs 19(1) (a) to (h) of CEAA, 2012, with no additional factors. The Record of Decision also set out that the EA (and thus this EIS) must consider the CNSC's Generic EIS Guidelines [5] with respect to information and requirements for identifying VCs and spatial and temporal boundaries, and engaging Indigenous peoples and the public on these key points. See Appendix A of this IER for a copy of the Record of Decision.

CNL's Indigenous engagement objectives include, without limitation:

- **Build awareness and mutual understanding** by supporting and facilitating opportunities for mutual learning, including current and traditional use, and values and perspectives on nuclear decommissioning, environmental remediation and radioactive waste management demonstrate CNL's long term commitment and approach to safe and responsible management of AECL's radioactive waste and decommissioning liabilities (e.g., through Project and site monitoring activities).
- **Share information on the Project including the potential effects on the environment.** This includes developing meaningful, user-friendly information and communication products for Indigenous Nations, communities, and organizations, and provide accessible and current information on Project activities.
- **Seek input and feedback from Indigenous Nations, communities, and organizations** regarding Project related activities, and traditional and current uses of the land surrounding the NPD site. Initiate early and meaningful two-way communication channels between CNL and Indigenous Nations, communities and organizations to determine the best methods for sharing information and to provide opportunities for Indigenous peoples to provide input on project considerations including design, the EA and EIS process, and assessment of impacts.
- **Develop long lasting relationships with Indigenous Nations, communities, and organizations** to support continued involvement in the project, CNL's broader operations and reconciliation. This will extend beyond the scope of the EA process for NPD.
- **Meet or where possible exceed all regulatory-based communication and engagement requirements** and facilitate engagement that reflects agreements between the parties, and that takes into account the interests, needs and schedule of each Indigenous Nations, community or organization.

In addition, CNL applied CNSC's guidance on engaging with Indigenous Nations, communities and organizations and appropriate methodologies for assessing effects and impacts on Indigenous peoples and their rights, notwithstanding that a determination of impacts to rights is a Crown responsibility, which will be carried out by CNSC staff through a Rights Impact Assessment (RIA).

To meet these objectives, CNL has developed specific strategies to increase the effectiveness of its Indigenous Engagement outreach. These strategies include:

- Presenting information in easy to understand formats using plain language (e.g., webinars, infographics, one-pager summary documents);
- Engaging technical experts to communicate information through a variety of formats;
- Accomplishing all required activities in a timely manner;

- Providing various means for Indigenous Nations, communities, and organizations to access information (i.e., presentations, infographics, site tours, website information, community visits, etc.);
- Providing support and capacity funding for meaningful and timely engagement and the development of longer-term relationship agreements with Indigenous Nations, communities and organizations; and
- Supporting Indigenous Nations, communities, and organizations' review of the EIS documentation to validate that CNL has documented their interests and concerns accurately.

Over the course of the EA for the NPD Closure Project, CNL has evolved in its approach to Indigenous engagement and grown its relationship with several Indigenous Nations, communities and organizations both in the context of the project and CNL's broader operations. The way CNL meets and measures these objectives is evolving to match the unique engagement with each Indigenous Nation, community and organization as the relationships develop. CNL is working with Indigenous Nations, communities and organizations to verify that the information that is recorded in the EIS, especially their interests and concerns and any traditional knowledge that has been shared, is captured appropriately from the perspective of each Indigenous Nation, community and organization. CNL is also working with Indigenous Nations, communities and organizations to continue to address ongoing interests and concerns. These efforts and the validation efforts are further described in Section 4.4 of this IER.

4.2 Identified Indigenous Nations, Communities and Organizations

A proposed list of Indigenous Nations, communities, and organizations with a potential interest in the Project was identified by CNL, through consultation with the CNSC, and is included above in Section 3 of this IER. The proposed list of Indigenous Nations, communities, and organizations is provided above in Table 3-1, along with a brief rationale for inclusion. The proposed list is subject to change has evolved since the outset of the project based on information and dialogue with the identified Nations, communities, and organizations. Background information presented in this IER on these Nations, communities and / or representative organizations with a potential interest in the Project will be revised as additional information is provided through the engagement process.

CNSC and CNL have made extensive efforts and provided capacity to allow Indigenous Nations, communities, and organizations to participate in the environmental assessment process for the NPD Closure Project. Along with CNSC's Participant Funding Program to support Indigenous peoples' participation, CNL has provided supplementary funding to further enhance participation from Indigenous peoples.

The AOPFN, the AOO, the MNO, Curve Lake First Nation, Hiawatha First Nation, Kebaowek First Nation and Wolf Lake First Nation have all worked individually with CNL to come up with an agreement for each Nation or organization that allows for enhanced participation in the both the NPD Closure Project and the NSDF Project. These agreements are confidential but were intended to allow each Indigenous Nation, community or organization to identify how they

thought their Nation or organization should be involved and carry out participation in the two environmental assessments. The AOPFN, the AOO and the MNO are also all working separately with CNL to develop long-term relationship agreements.

Five Indigenous Nations, communities, and organizations have submitted formal comments to the CNSC over the course of the EA. Three Indigenous Nations or organization (the AOO, Curve Lake First Nation and KZA) submitted comments on the project description and three Indigenous Nations or organization submitted comments on the 2017 revised draft EIS (the AOO, the MNO and the AANTC). All formally submitted comments by Indigenous communities can be found at <https://iaac-aeic.gc.ca/050/evaluations/proj/80121/contributions>.

It should be noted that the AOPFN, Curve Lake First Nation and Wolf Lake First Nation all shared comments on the 2020 and 2021 revised draft EIS directly to CNL in 2020 July, 2021 July and 2023 March. Subsequently KZA and KFN reviewed the 2021 revised draft EIS and submitted comments directly to CNL in 2024.

In summer 2020 CNL and the AOPFN worked together to establish and sign a contribution agreement (signed 2020 September) that enabled support of the AOPFN's participation in the environmental assessment processes for the NPD Closure Project and the NSDF Project as well as AOPFN-led specific studies.

In 2021 November, CNL and Curve Lake First Nation signed a contribution agreement. The Agreement was an important step to build the relationship between CNL and Curve Lake First Nation to ensure that Curve Lake is engaged in a respectful and meaningful manner in respect of CNL's environmental assessment processes, including the NPD Closure Project. The Agreement established the monthly working group meeting, site tours and in-person community meetings, and provides capacity for Curve Lake's review of the EIS.

In early 2023 CNL worked with Curve Lake First Nation to renew the contribution agreement and establish a contribution agreement with Hiawatha First Nation (signed Summer 2023) to assist with joint engagement activities with these two First Nations. The Agreements will enable support of both First Nations participation in the environmental assessment processes for the NPD Closure Project and the NSDF Project.

In 2022 January CNL and KFN signed a Letter of Intent, including the establishment of capacity support, monthly meetings, informing and assisting KFN in engagement on the NPD Closure Project and NSDF Project and agreeing to negotiate a long-term framework agreement. CNL and KFN developed the Framework Agreement over the course of 2022/2023, it was signed 2023 January. The signing of this agreement represents an opportunity to build trust and a collaborative relationship with KFN, enable KFN's engagement on the NPD Closure Project and other activities going forward, and to respect KFN's asserted Indigenous rights and interests generally and specifically where they may be impacted by CNL's activities. In 2024 July CNL, AECL and KFN signed an amendment to the Framework Agreement to provide KFN capacity for NPD specific engagement and studies.

In 2022 November CNL received a request from WLFN to develop a contribution agreement to fund a review of the environmental assessment report. During the month of 2022 December CNL and WLFN drafted a contribution agreement to facilitate WLFN's review of the NPD and

NSDF EIS' and other technical supporting documents. The agreement was signed at the end of 2022.

As such, many of the engagement activities that are described in Section 4.4 were either specifically or mutually identified by the parties.

4.3 Engagement Methods

Section 4.4 describes the engagement that CNL has undertaken with the identified Indigenous Nations, communities, and organizations: Algonquins of Ontario (AOO), Algonquins of Pikwàkanagàn First Nation (AOPFN), Métis Nation of Ontario (MNO), Algonquin Anishinabeg Nation Tribal Council (AANTC), Kitigan Zibi Anishinabeg First Nation, Kebaowek First Nation, Williams Treaties First Nations (WTFN), Anishinabek Nation, the Algonquin Nation Secretariat and Wolf Lake First Nation. CNL recognizes the importance of seeking direction from the Indigenous Nations, communities, and organizations on how they want to engage on this Project. CNL also recognizes and respects that each Indigenous Nation, community, and organization is unique and may have different approaches, needs, and interests for engagement on this Project. A full record of the engagement is included in Appendix J through Appendix BB: Record of Engagement – 2016 October to 2024 March.

Various engagement methods were designed to communicate information to and encourage input from identified Indigenous Nations, communities, and organizations, while fulfilling CNL's corporate and regulatory objectives. CNL engages in ways that are highly diverse and vary based on expressed community need and desired methods. Engagement includes general information sharing, focused community meetings and workshops and other activities as part of long-term relationship building. In Section 4.4, these activities are described for each community but, in general, engagement methods are summarized in Table 4-2.

In 2020 March, the COVID-19 pandemic impacted in-person engagement activities. CNL adapted to the restrictions and provided online platforms for virtual meetings, project updates and virtual open houses with Indigenous Nations, communities, and organizations. CNL will continue to utilize multiple methods to continue to engage with Indigenous Nations, communities, and organizations.

While this IER focuses on engagement related to the NPD Closure Project, CNL recognizes that the establishment of long-term relationship agreements (LTRA) with Indigenous Nations, communities and organizations will help facilitate engagement and develop relationships.

Table 4-2: Project-specific Engagement Methods

Engagement Method	Example Activities
Project Specific Agreements, MOU and Long-Term Relationship Meetings and Negotiations	• Project-specific agreements (i.e. Memoranda of Understanding (MOUs), contribution agreements or engagement frameworks with the AOO, the MNO, Curve Lake First Nation, Hiawatha First Nation, KFN, Wolf Lake First Nation and the AOPFN): ○ Provision of funding to assist in resource capacity development; ○ Capacity assistance, as appropriate, such as basic costs to support meetings such as hall rental or production of print materials, in-kind access to the technical expertise of CNL staff, reimbursement for some expenses to participate in engagement activities such as site visits, tours; ○ Provision of funding to assist in technical reviews of project documents; ○ Provision of funding for Indigenous led studies; ○ Peer review studies and engagements with Indigenous organization consultants and staff; ○ Work plan development to formalize engagement processes with communities and / or organization representatives. • Broader relationship discussions with CNL.
Project Specific Meetings and Workshops	• Virtual and / or in-person meetings / workshops with Indigenous Nations, communities and organization representatives to discuss the project and potential effects; • Community meetings / open houses; • Presentations to Indigenous Nations, communities, and organizations representatives upon request; • Targeted community initiatives; • Workshop attendance and cultural awareness training; • Technical meetings to provide an opportunity to discuss more detailed technical information concerning the NPD Closure Project; • Site visits and facility tours.

Engagement Method	Example Activities
Specific Communications Activities and Information Sharing	• Letters to Indigenous Nations, communities, and organization representatives (accompanied by follow-up calls); • Email correspondence and/or phone calls; • Distributing the IER; • Distributing copies of maps, technical studies or reports upon request; • Providing written response to comments, questions and concerns on the draft EIS; • Webinars and online meetings; • Project notifications and newspaper advertisements; • ESC meetings and meeting information (for ESC member communities); • Public information sessions, including display materials and handouts; • Media notifications/releases; • Webpage content; • Site visits and participation in National Indigenous Peoples Day; • Participation and presentation at Indigenous Youth Summit; • NPD site visits and facility tours; • Indigenous ceremony on site.

4.4 Engagement Activities Completed

This section describes the engagement that CNL has undertaken with the AOO; the AOPFN; MNO; the AANTC; KZA; KFN, the WTFN; Algonquin Nation Secretariat including Barrier Lake First Nation, Temiskaming First Nation and Wolf Lake First Nation (WLFN), and the Anishinabek Nation.

Formal notification of the NPD Closure Project in the form of a letter was sent to all identified Indigenous Nations, communities, and organizations in 2016 July. The letter provided information about the NPD Closure Project and provided mechanisms for comments and / or questions. Follow up outreach (i.e., phone contact) was conducted with recipients to confirm receipt of the NPD Closure Project information and to ascertain the best means for ongoing contact.

Engagement activities have varied and are at the discretion and guidance of the Indigenous Nation, community or organization and subject to their availability. Table 4-2 provides a summary of engagement activities that have continued through to 2024 March. As the NPD Closure Project and environmental assessment process progresses, the IER will be updated and maintained as a living document capturing any additional engagement activities undertaken and progress made on engagement issues. Detailed tables of Indigenous engagement activities for each Nation, community organization are provided in the appendices of this IER (Appendix J through Appendix BB).

There was cross-over in many cases in engagement activities for the NPD Closure Project and CNL's NSDF Project given the geographic proximity and original timelines of each project. As such, engagement that addresses both projects are also noted here as it would be difficult to extract specific discussions regarding the NSDF Project from the summary. All records of meeting presentations are kept by the project and can be provided upon request.

The Indigenous Nations, communities, and organizations included in Table 3-1 are described in this section and in more detail in Section 3. These sections also describe the rationale for the inclusion of the various Nations, communities, and organizations. Figure 3-1 above shows the home location (reserve or office) of these various communities in relation to the NPD site.

More frequent and deeper engagement has generally occurred with Indigenous Nations, communities, and organizations that are located closer to the NPD site, have populations living closer to the NPD site, and, as identified by the communities and organizations themselves, have larger numbers of individuals practicing traditional activities near the NPD site.

The appendices (each Indigenous Nation, community or organization has a dedicated appendix) include a record of engagement, a mapping of how the key interests and concerns relate to detailed feedback and input from Indigenous Nations, communities or organizations, and tables summarizing the key interests and concerns of each Indigenous Nation, community or organization (Tables of Interests and Concerns). The Tables of Interests and Concerns were updated and enhanced for this revised draft EIS and are intended to describe in more detail the interests and concerns raised by each Indigenous Nation, community or organization, including CNL's response, relevant sections of the EIS that address these interests, changes to the EIS or EA process, status of the interest or concern and next steps. The interests and concerns have been gathered from a variety of sources including (but not limited to):

- comments on the 2017 draft EIS submitted as part of the formal comment period for the NPD Closure Project EA;
- written submissions to CNL including targeted technical comments and comments on the 2020 and 2021 revised draft EIS;
- questions, comments, concerns and interests raised during engagement activities such as meetings, tours, and correspondence; and,
- results and recommendations from traditional knowledge and other studies.

Engagement with individual Indigenous Nations, communities and organizations is not at the same stage. Some Indigenous Nations, communities and organizations became engaged early on with NPD Closure Project, often on highly specific topics while other communities have only more recently shown an interest in the NPD Closure Project. As well, some Indigenous Nations, communities and organizations may have engaged early on in some interests and concerns but

only more recently on others. As such, CNL has had significant discourse and formal exchange of comments and responses to some Indigenous Nations, communities and organizations on some interests and concerns with results having been incorporated into the EIS while with other Indigenous Nations, communities and organizations the engagement is not as advanced.

With all Indigenous Nations, communities, and organizations, in addition to seeking the information on Indigenous interests required by the CNSC and CEAA 2012, CNL developed and adapted its engagement activities according to their unique interests, information needs and concerns of the communities. CNL provides a brief description of each Indigenous Nation, community or organization and then the engagement is described under the following headings.

Engagement. This subsection summarizes the engagement CNL has had with the Indigenous Nation, community or organization in a narrative summary to illustrate the development of the relationships between the Indigenous Nations, communities, and organizations and CNL related to the NPD Closure Project. More context and further information on engagement activities with each community can be found in Appendices. This sub-section also discusses the engagement related to verification.

Feedback. This sub-section describes the specific topics of interests or concern each Indigenous Nation, community or organization has identified through a number of input pathways including: comments on the draft EIS (2017, 2020, 2021 and 2023), comments on other technical documents, traditional knowledge studies, during engagement activities like meetings, and in correspondence. Each bullet point represents a general theme of interest or concern identified by the respective Indigenous Nations, communities, and organizations. This section corresponds to Column two (Key Interests and Concerns) of the summary table of interests and concerns.

Summary Discussion of Interests and Concerns. This subsection addresses each of the interests or concerns identified under the Feedback subsection. CNL has also provided a narrative discussion that describes the interest or concern raised, a summary of CNL's response to the interest / concern and discussions on the topic. This section corresponds to Column 3 (interest/concern) and Column 4 (impacts on the EIS) of the *Tables of Interests and Concerns*.

Verification. CNL is working with Indigenous Nations, communities and organizations to verify that their interests and concerns have been accurately accounted for and addressed through either verbal or written confirmation from the Indigenous Nation, community or organization. Verification ensures that the way in which CNL has addressed (or responded to) the Nation, community, or organization's interests or concerns has either been accepted, or in cases where CNL is unable to fully address interests or concerns, this is understood and acknowledged by the Nation, communities, or organization.

Based on the CNSC's guidance, as well as practices commonly employed in EIS work by other proponents, verification includes:

- Consolidating all interests or concerns raised to confirm accuracy in reporting and tracking. This has been done through sharing the summary of *Table of interests and Concerns* with each applicable Indigenous Nation, communities, or organization.
- CNL provided the *Tables of Interests and Concerns* to all Indigenous Nations, communities, and organizations that have voiced feedback related to the NPD Closure Project and requested confirmation (1) that CNL had captured accurately the interests and concerns, and (2) where possible, that the Indigenous Nation, communities, or organization was satisfied with how the interests or concerns have been addressed by CNL. Where this satisfaction was not expressed, the *Table of Interests and Concerns* reflects the status of the issue and identifies next steps.
- Providing a summary of how an interest or concern has led to an EIS change; and providing an opportunity to review the consolidated material in the context of the EIS. Where applicable this has been done through sharing drafts of specific sections of the EIS where traditional knowledge has been incorporated or directing to specific sections that have been changed due to a particular interest or concern.
- Responding to all comments on the 2017 draft EIS, the 2020 draft EIS and / or 2021 draft EIS and sharing responses to the respective Indigenous Nation, community, or organization. In some cases, the interest or concern raised has been resolved. However, there are also other issues where there may be a difference of opinion and the Indigenous Nation, community or organization may have not confirmed that the response by CNL is deemed acceptable. In this case, the acceptable verification is an acknowledgement and understanding of the differing positions of CNL and the Nation or organization.
- Where direct submissions or comments from specific Indigenous Nations, communities, and organizations were received, including targeted technical comments on the 2017 draft EIS and comments on the 2020 and 2021 revised Draft EIS, CNL has provided written responses to the Indigenous Nations, communities, and organizations, indicating where changes have been incorporated in the EIS.
- CNL requested feedback from all identified Indigenous Nations, communities, and organizations on assumptions CNL had made in the EIS with respect to traditional land use around the NPD site. CNL has incorporated information from traditional land use and knowledge studies that have been completed by the AOO, the AOPFN and the MNO and has asked these Indigenous Nations, communities, and organizations for verification that the studies are accurately reflected in this EIS.
- CNL has provided a summary of commitments CNL has made to the respective Indigenous community or organization during NPD Closure Project engagements, to seek confirmation that they are accurately recorded from the Indigenous Nations, communities, and organizations.

Next Steps. This sub-section describes the key next steps for engagement both from a relationship building and environmental assessment perspective. Within the verification framework, some issues go beyond the scope of the NPD Closure Project and / or there remains a difference of opinion on certain concerns. CNL is listening and attempting to meaningfully respond to and address, if possible, all interests and concerns raised. This section corresponds to the last column of the *Table of Interests and Concerns*.

As part of this EIS and its engagement with Indigenous Nations, communities, and organizations, CNL has been as explicit as possible in indicating and demonstrating whether issues or concerns are related to the NPD Closure Project, what issues are broader CNL issues and what issues are beyond the scope of CNL or this EA. CNL recognizes that there is a complex history associated with CNL's and various Crown operations in the Ottawa Valley, however, the NPD Closure Project is not the forum in which to resolve this history. CNL is committed to engagement with Indigenous Nations, communities, and organizations on the NPD Closure Project and CNL's broader operations in the Ottawa Valley.

4.4.1 Algonquins of Ontario (AOO)

The Algonquins of Ontario (AOO) is an organized collective of Algonquin communities assembled to enable a unified approach to reaching a settlement over a comprehensive land claim including an area of over 3.6 million hectares (ha) within the Ottawa River and Mattawa River watersheds in eastern Ontario (AOO, 2020b) [16]. The area that is the subject of the Algonquin Land Claim in Ontario includes the National Capital Region, all of Renfrew County and most of Algonquin Park. The AOO is comprised of ten Algonquin communities located within the Ottawa Valley: Antoine Algonquin Nation; Algonquins of Pikwàkanagàn First Nation; Algonquin Nation Kijicho-Manito Madaouskarini; Bonnechere Algonquin First Nation; Algonquins of Greater Golden Lake First Nation; Mattawa / North Bay Algonquin First Nation; Ottawa Algonquin First Nation; Shabot Obaadjiwan First Nation; Snimikobi (Ardoch) (Beaver Creek) Algonquin First Nation; and, Whitney Area Algonquins. Sixteen Algonquin Negotiation Representatives (ANRs), serving three-year terms represent these communities. The ANRs are comprised of the Algonquins of Pikwàkanagàn First Nation Chief and Council (six Councillors) along with one representative from each of the other Algonquin communities listed above. The CRL property is located within unceded Algonquin Territory. The Algonquins of Ontario have asserted existing Indigenous rights and title throughout the Settlement Area, including the NPD site. This land claim is currently under negotiation by the Algonquins of Ontario and the Governments of Canada and Ontario. A fuller description of the AOO can be found in Section 3.

In 2018, the AOO, AECL and CNL signed a tri-partite Memorandum of Understanding (MOU) to guide dialogue between the parties on matters of mutual interest. More specifically the MOU was intended to be a vehicle to work towards the development of a Long-Term Relationship Agreement amongst the parties. The MOU identified the need for both a Technical Group to deal with the NPD Closure Project and a Long-Term Relationship Group that would advance a Long-Term Relationship Agreement amongst the parties. The MOU broadly identified potential topic areas for the Long-Term Relationship Agreement. Over 2019 and 2020, the AOO, AECL

and CNL developed a Terms of Reference and work plan for the Long-Term Relationship Agreement. The Long-Term Relationship Agreement is intended to cover such topics as: AOO involvement in environmental and cultural monitoring and stewardship; employment / training; contracting; communications; consultation; etc. The Long-Term Relationship Agreement is intended to cover the interests of all three parties with respect to both the CRL and NPD sites as well as other further projects and / or initiatives across the AOO Settlement Area. The LTRA discussions are relevant to NPD as it is expected that certain project specific initiatives and commitments will be implemented or realized through this agreement. Since 2020, discussion on the LTRA have not progressed. CNL, AECL and AOO are still working together on the NPD Closure Project. CNL is willing to work with the AOO and AECL on an LTRA and are currently working towards signing an NPD project specific contribution agreement.

4.4.1.1 Engagement

Table J-1 in Appendix J includes a complete list of engagement activities (such as vital information sharing on interests between AOO and CNL and other engagements that are aligned with the requirements of CEAA 2012) that have occurred with AOO on the NPD Closure Project as of 2024 March 30. CNL has also provided a narrative summary of engagement with the AOO.

Relationship-building and Developing Agreements

CNL first reached out to representatives with the Algonquins of Ontario (AOO) in 2016 June, after receiving a copy of the AOO's comments on the Project Description for the NPD Closure Project, with an invitation to meet and discuss the project. Engagement activities with the AOO commenced in 2016 August after receipt of the CNL NPD Closure Project introductory letter sent in 2016 July.

In 2016 August, CNL hosted AOO Consultation Office and technical staff for a meeting at the CRL site and the NPD site, including a Chimney Swift viewing at the NPD ventilation stack. Late 2016 and early 2017 included discussions on archaeological liaison participation at the NPD site as well as sharing documents of interest to the AOO, including a biodiversity report, the safety analysis, environmental reports, archaeological information, aerial photos and topographical maps of the NPD site.

In the spring of 2017, CNL and the AOO met on two separate occasions. The AOO Consultation Office staff and the ANRs met with CNL in April to discuss future engagements on the project. In June, CNL hosted the ANRs to the CRL and NPD sites. Also in 2017 June, an information session for AOO community members was held in Pembroke. This included a project overview as well as an opportunity for one-on-one discussions with technical NPD Closure Project team members. More than 8,000 AOO community members were sent the invitation by mail and approximately 15 community members attended the information session.

In 2017 November, CNL shared the NPD Closure Project draft EIS and invited the AOO to participate in the public and Indigenous comment period following the draft EIS submission. In

late 2017 CNL shared the NPD Closure Project Indigenous Engagement Report with the AOO and requested community input and feedback for incorporation into the project. The AOO submitted 70 comments to the CNSC on the draft EIS in early 2018. CNL provided access to all technical support documents to assist with this review. Discussions on these comments and how CNL is addressing them have been an ongoing part of engagement with the AOO since 2018, with the AOO responding to dispositions with further clarifying comments and questions and CNL working to provide more information.

CNL and the AOO started discussions on developing a Memorandum of Understanding (MOU) in early 2018, which included multiple meetings and email correspondence resulting in a signed MOU in July 2018. The MOU set the platform for AOO, AECL and CNL to enter into discussions on an LTRA. The MOU identified the need for both a Technical Group to deal with the NPD Closure Project and a Long-Term Relationship Group that would advance an LTRA amongst the parties. The MOU broadly identified potential topic areas for the LTRA. Over 2019 and 2020, the AOO, AECL and CNL developed a Terms of Reference and work plan for the LTRA, which intended to cover such topics as: AOO involvement in environmental and cultural monitoring and stewardship; employment/training; contracting; communications; consultation; etc. The LTRA is intended to cover the interests of all three parties with respect to both the CRL and NPD sites as well as other further projects and/or initiatives across the unceded Algonquin traditional territory. The LTRA discussions are relevant to NPD as it is expected that certain project specific initiatives and commitments will be implemented or realized through this agreement. Since 2020, discussion on the LTRA has not progressed. CNL, AECL and AOO are still working together on the NPD Closure Project. CNL is willing to work with the AOO and AECL on an LTRA.

Throughout 2018 and 2019, CNL evolved project engagements to meet Indigenous and public feedback. This included the development of a regular routine of Indigenous and public engagement events, such as the bi-monthly Breakfast Briefings and quarterly webinar updates. In early 2020, due to the COVID-19 pandemic, CNL combined the bi-monthly Breakfast Briefings and quarterly webinars into a bimonthly webinar update on the NSDF Project. The AOO received invitations to all engagement activities and have attended select events to date.

Upon request, the NPD Closure Project provided an update to the AOO's Planning and Environmental Working Group in September 2019 to share updates on the project and engagement, as well as clarify remaining steps. This meeting addressed the specific areas of follow-up the AOO had identified to CNL in the letter of 2019 May. These were: alternative means, future land use (site restoration), EA Follow-up Program, value components, archaeological assessment, Postclosure Safety Assessment (PostSA TSD), and site characterization. All questions were verbally addressed at the meeting.

The majority of the meetings in 2020 between the AOO and CNL focused on LTRA discussions. In May 2020, CNL shared a preliminary version of the 2020 revised draft EIS and an updated IER and indicated an interest in meeting with the AOO. The AOO replied to the May 2020 letter in

July 2020. This letter enclosed the AOO responses to the CNL's Table of Interests and Concerns; AOO comments and recommendations on Indigenous Socio-economic and Health Sections; identification of VCs for Consideration; AOO comments and recommendations on the draft follow-up monitoring plans (environmental, effluent and groundwater); AOO comments and recommendations on derived release limits and AOO comments and recommendations on the Environmental Site Assessment. This letter also identified the need for capacity to complete a technical review of the draft EIS. CNL sent a reply to the AOO's comments in September 2020. During the latter part of 2020 and into 2021, the AOO and CNL exchanged correspondence on the NPD project.

In October 2021, the AOO and CNL meet to discuss how to prioritize the work plan for the NPD Closure Project and the NSDF Project. A path forward to verify the AOO's interests and concerns for the NPD Closure Project was also discussed and the AOO agreed to review the interests and concerns by the end of November. During the later months, the AOO and CNL continued to discuss the AOO's interest and concerns. In 2021 and early 2022, due to focus on the NSDF Project, final EIS submission and acceptance by the CNSC in July 2021 and subsequent hearings engagement on the NPD Closure Project was limited.

In 2022, the AOO and CNL began to have monthly Working Group meetings on the NPD Closure Project and continues to discuss the Table of Interests and Concerns. Into 2023, CNL and the AOO have maintained regular communications and ongoing engagement activities to address AOO specific questions and concerns about the project (Section 4.4.1.1 of the IER). As well, to ensure meaningful participation throughout the EA, the AOO and CNL have a work plan and budget in place. CNL has been invited to attend ANRs meetings, and the AOO attended a site tour at NPD in the summer of 2023.

In 2024, CNL and the AOO started discussions on developing an NPD project specific contribution agreement, which includes a workplan for the full year. CNL anticipates signing of the agreement in 2024.

Algonquin Knowledge and Land Use Study (AKLUS)

The AOO identified the need and requested funding for an AKLUS to allow Algonquin traditional knowledge to be collected. The CNSC and CNL provided separate supplemental funding to the AOO to support an Algonquin Knowledge and Land Use Study (AKLUS), which commenced in 2019. CNL provided an NPD Closure Project overview presentation in 2019 June at the AKLUS Workshop in Deep River, ON. In 2020 December, CNL received the final report from the AOO AKLUS. In 2021 May, CNL shared draft sections of 8.9 and 9.9, which had been further updated, to verify that the information from the AKLUS has been appropriately incorporated. In 2021 September, CNL shared responses to the recommendations in the AOO AKLUS with the AOO and indicated an interest in continuing discussions on the inclusion of AKLUS content in the EIS. The AOO assessed the adequacy of the AKLUS recommendation responses in 2021 December and AOO and CNL met 2022 January to discuss the responses. CNL shared the most up to date AKLUS recommendation responses with the AOO 2023 February. At the 2023 May working group meeting CNL and the AOO reviewed each of the AOO's recommendations and identified draft commitments that were proposed to address the recommendations.

Comments on the Draft EIS

Following up on earlier dialogue through correspondence on the draft EIS comments, CNL and the AOO's Planning and Environmental Working Group met in 2019 September to share updates on the project and engagement. This meeting discussed which comments from the AOO had been resolved as well as the path forward on further addressing the outstanding AOO comments on the NPD Closure Project draft EIS, which had not been satisfactorily addressed (or addressed at all) in the responses CNL had sent in 2019 January.

In 2020 May, CNL sent a letter to the AOO enclosing a revision of the draft EIS, as well as the updated IER to seek input on the draft EIS and the IER. As well, this letter outlined the status of issues brought forward by the comments on the draft EIS and indicated an interest in a meeting between the AOO and CNL. The AOO responded to this letter in 2020 July, sharing comments on the outstanding issues.

Later in the year (2020 September), CNL shared a complete and comprehensive set of dispositions to all 70 of the AOO registry comments on the draft EIS. The AOO acknowledged receipt of CNL's dispositions.

To ensure new AOO consultation staff had access to up-to-date correspondence, in 2023 January, CNL resent all technical responses prepared by CNL that address AOO comments. This includes the draft EIS comments and 2020 July technical response to assist AOO. The AOO confirmed receipt. Currently, CNL does not expect any further feedback from AOO on the EIS comment responses. Instead, the parties are focusing on a short list of outstanding areas of interest and the finalization of commitments.

Summary of Interests and Concerns

In 2021 June, CNL shared a draft *Table of Interests and Concerns*, seeking to verify this summary and where possible the resolution of interests and concerns with the AOO. The AOO responded to this indicating a need for an updated budget and work schedule to enable the AOO's participation in the remaining aspects of the EA for the NPD Closure Project. The AOO provided this updated budget and work schedule in 2021 August and CNL sent a letter accepting it in 2021 August. In parallel to this, CNL followed up with the AOO between July and September of 2021, seeking confirmation that CNL had accurately summarized the interests and concerns of the AOO on the NPD Closure Project. CNL indicated their intention to submit the revised EIS in the fall of 2021 and that any additional input on the content from the AOO would be required by 2021 August 31. The AOO indicated that this deadline was not achievable and CNL agreed to delay their submission of the revised draft EIS to enable the AOO to provide feedback on the *Table of Interests and Concerns*. The AOO provided feedback in November 2021 which CNL used to improve its description of the AOO's interests and concerns. CNL understands this *Table of Interests and Concerns* (presented in Appendix J (Table J-2) of the IER) is inclusive of all interests identified by the AOO current to 2021 November. More recently, CNL has developed a simplified *Table of Interests and Concerns* (Table J-4 in Appendix J), and a table which maps how this simplified table relates to detailed input and feedback from the AOO (Table J-3 in Appendix J). Feedback from the CNSC to CNL in 2022 January resulted in revisions and repackaging of the summary tables of interests and concerns. CNL shared the updated table with the AOO in early 2022 April. In 2022 May, the AOO confirmed consistency between the spring 2022 version of the *Table of Interests and Concerns* and the 2021 December version that was previously verified by the AOO. As of 2022 May, AOO advised CNL that they had no further comments on the attached NPD EIS *Issues and Concerns Table*. Due to the importance of the summary *Table of Interests and Concerns* and the AOO's input on verifying its completeness and accuracy, CNL shared the most updated version of this table 2023 May. CNL noted the updates to the *Table of Interests and Concerns*, primarily related to the recent progress made discussing outstanding issues. Specifically, CNL had made updates to its response to the interest or concern and the status of the concern. The AOO confirmed receipt in 2023 May, and in July, the AOO and CNL held a working-level meeting to review and revise together the status of each interest and concern and next steps. Updated tables were shared back to AOO in 2023 July.

The AOO Key Interests and Concerns are the result of collaborative development through the AOO-CNL Working Group, with validation of the status and next steps occurring at the AOO Working Group level through focused discussions in 2023 June and July (Section 4.4.1.4). Note that validation of the interests and concerns was already achieved with the AOO in 2022 May. Regular ANR meetings have not been occurring since 2023 March and therefore the updates have not been reviewed and vetted by the ANRs. CNL and the AOO continue to work together, the AOO-CNL Working Group will bring the updates to the ANR Table for validation. Overall, CNL has continued to make positive steps forward with the AOO and have completed some of the next steps that were identified together.

Commitments

In 2021 May, CNL shared a preliminary list of draft commitments as well as draft sections of the EIS (8.9 and 9.9) with the AOO to initiate verification discussions. The AOO followed up in 2021 June, sharing that the AOO were creating a work plan to support participation in the remaining aspects of the EA process for the NPD Closure Project. In 2021 August, the AOO provided a work plan and budget to enable the AOO's meaningful participation in the NPD EA, which CNL accepted later the same month. In 2021 November, the AOO and CNL discussed a work plan to move forward with the AOO's participation in the EA process for the NPD Closure Project, including a path to develop a final set of commitments, which will be submitted in a commitments report, as part of the final EIS package. At the beginning of 2022 October, CNL send a letter to the AOO. The letter provided a project update and the engagement status with the AOO, CNL requested using the list of commitments from 2022 April moving forward. CNL and the AOO discussed the next steps for addressing commitments at the 2022 November working group meeting. At the 2023 May working group meeting CNL and the AOO reviewed each of the AOO's recommendations and identified commitments already made to address the recommendation. The discussion resulted in a joint to decision to simplify the commitments list into themes. Through collaboration at the AOO-CNL Working Group level, both the AOO and CNL acknowledge the progress made so far to develop and progress actionable commitments. This demonstrates an ongoing commitment to progress relationship building between CNL and the AOO.

Work Plan Development and Coordination of Engagement

In 2021 November, the AOO and CNL discussed a work plan to move forward with the AOO's meaningful participation in the EA process for the NPD Closure Project. CNL and the AOO have a prioritized schedule of continued engagement on the NPD Closure Project. January and November 2022 capacity constraints within the AOO prevented progress against the work plan. Subsequently in 2022 November, monthly working group meetings resumed, providing CNL and the AOO the opportunity to work together again. The work plan was updated in November 2022 with a focus on the next six-month period to reflect the AOO's interest in certain topics and availability of third parties. This work plan remains evergreen and will be adjusted as the capacity, needs and interests of the AOO evolve. The 2023 June working group meeting included a review of the remaining steps in the EA process, the key activities to be progressed between AOO and CNL and will help form the next steps and capacity needs for the work plan. In 2023 July CNL and AOO updated the workplan to extend to the end of 2023. At the 2024 February working group meeting CNL and the AOO discussed an NPD Project specific contribution agreement with an accompanying workplan, extending to the end of 2024. During the 2024 February, meeting, CNL and the AOO continued to work together to update the NPD workplan and budget to enable AOO activities of interest for the NPD Closure Project.

4.4.1.2 Feedback

The AOO provided feedback on the original Project Description in 2016 and formal comments on the 2017 EIS (CNL also coordinated open houses for all AOO members in 2017 and 2019). Beyond those interests and concerns raised through formal EA process, including written comments submitted to the CNSC, the AOO also brought forward a number of interests and concerns through direct engagement with CNL. This included interests and concerns identified in the AOO AKLUS, correspondence (including correspondence on specific VCs), comments provided on technical documents (including the three draft follow-up monitoring plans) and through discussion during meetings. These more detailed and specific comments are summarized in the Mapping Table, Appendix J.3 showing how they have been rolled up to the key interests discussed below and summarized in Table J-4.

The Summary of AOO Key Interests and Concerns are the result of collaborative development through the AOO-CNLC Working Group, with validation of the status and next steps occurring at the AOO Working Group level through focused discussions in June and July of 2023. Note that validation of the interests and concerns was already achieved with the AOO in 2022 May. Regular ANR meetings have not been occurring since March of 2023 and therefore the updates have not been reviewed and vetted by the ANRs. As soon as regular ANR meetings resume, taking into consideration the priorities and availability of the ANRs, the AOO-CNLC Working Group will bring the updates to the ANR Table for validation.

The interests and concerns from the AOO are briefly identified below, and described in detail in Section 4.4.1.3 Summary Discussion of Interests and Concerns, as well as in the *Table of Interests and Concerns*, Table J-4 of Appendix J.

Algonquin Knowledge, Land and Resource Use and Cultural Impacts. The AOO identified the need and requested funding for an AKLUS to allow Algonquin traditional knowledge to be collected. The AOO identified that Algonquin knowledge needed to be incorporated in the EIS; they voiced concerns that the project may impact on ability to practice traditional activities; there was concern about safety of harvested and gathered foods, concern about the lack of AOO-specific mitigation measures and monitoring program and also about the risks of impacts to ancestral values from long-term nuclear waste storage.

Algonquin Settlement Area. The AOO made the request that a statement be placed in the Project Description acknowledging NPD is in the Algonquin Settlement Area.

Alternatives. The AOO expressed concern about the suitability of in-situ disposal (ISD) and concern that the EIS does not provide enough information on the alternatives to ISD.

Archaeology and Cultural Heritage. The AOO expressed concerns about the impact of the project on features of cultural importance.

Accidents & Malfunctions. The AOO have concerns about the long-term integrity of the concrete facility (exterior walls and foundations) and is concerned about who will be responsible if environmental events (such as earthquakes) affect the facility over the long-term.

Economic Opportunities. The AOO is seeking to discuss opportunities for employment and / or procurement.

Engagement. CNL engages with the AOO communities through the ANR representation. This is the process that has been indicated by the AOO to CNL. The AOO also requested both AECL and CNL enter into negotiations to establish an LTRA.

EA Process and Methodology. The AOO raised questions and concerns on EA methodology and process including: identification of potential project-environment interactions; interests in additional cumulative effects analysis; and concerns about the methodology for determination of significance of adverse residual effects.

End State, Site Restoration and Future Use of the Lands. The AOO wants to ensure they are engaged on end state, site restoration and future land use of the NPD site. They have also indicated interest in participating in site restoration activities. Also related to end state and future use of the lands, AOO has concerns about potential impacts to the Ottawa River shoreline, the impact of future socio-political changes on land use and the long-term liability of the site beyond decommissioning.

Environmental Effects and Mitigation Measures. The AOO is concerned about potential impacts to the Ottawa River shoreline, fish, wildlife and plants.

Indigenous Health. It is important to the AOO that the Algonquin lifestyle is accurately reflected when modelling impacts (predicted radiation doses) to AOO citizens.

Monitoring. The AOO is seeking to be involved in activities related to environmental and cultural heritage stewardship and monitoring. Further, the AOO identified interest in reviewing CNL's draft monitoring plans, the AOO had recommendations and requests for additional monitoring and were concerned about the process by which changes to the monitoring plan design and implementation are communicated.

Protection of the Ottawa River. The AOO has expressed via various mechanisms the importance of protecting the Ottawa River and has raised concerns about the potential for contamination to reach the Ottawa River and surrounding environment.

Protection of Flora and Fauna. The AOO is concerned about potential impacts to habitat and biota and ensuring suitable follow-up program elements are incorporated to measure potential impacts. The AOO have also identified several Species at Risk that are of interest to their members (e.g., lake sturgeon, Chimney Swifts and other avian SAR).

Socio-Economic. The AOO identified that CNL's EIS was missing an assessment of Indigenous socio-economic conditions and effects as well as VCs through which to assess this environmental component. The AOO is also concerned that the monitoring plans do not include measures to assess effects to the Indigenous socio-economic environment.

Technical. The AOO provided specific technical comments on: emissions (noise, dust, air), cement (and natural analogues), the batch plant; ecological risk assessment methodology, the terrestrial study area and the Derived Release Limits (DRLs).

Valued Components (VCs). The AOO indicated they wished to be engaged and provide input into VC selection. Further, they expressed concerns regarding the limited VCs selected for the NPD Closure Project.

4.4.1.3 Summary Discussion of Interests and Concerns

This Summary Discussion of Interests and Concerns is taken from the *Table of Interests and Concerns* (Table J-4 of Appendix J) and is CNL's understanding based on written submissions (to the CNSC and to CNL) and oral discussions with the AOO. CNL has made its best efforts to document the position the AOO has taken on each interest / concern while acknowledging that the AOO may articulate the perspective somewhat differently.

The key interests and concerns discussed in this Section were derived from various engagements with the AOO (Table J-1 of Appendix J) as described in Section 4.4.1.1 above.

Algonquin Knowledge, Land and Resource Use, and Cultural Sites

In their review of the NPD Project Description and the 2017 draft EIS, the AOO identified the need for traditional knowledge to be incorporated into the NPD Closure Project EA. As such, both the CNSC and CNL provided financial capacity to the AOO to undertake an AKLUS. The AOO shared this study with CNL in 2020 December. Through the AKLUS report the AOO identified several specific interests and concerns related to Algonquin Knowledge, land and resource use and cultural sites, for instance, a request for funding of an Algonquin Country foods survey and monitoring program designed to monitor species harvested and gathered by Algonquins.

The NPD EIS has assumed traditional uses occur near the NPD site (e.g., the Ottawa River, private land, accessible lands or provincial Crown land outside the restricted / fenced area) and this assumption was confirmed by the AKLUS. The AOO expressed concerns over the impact of the NPD Closure Project on the capacity of Indigenous peoples to exercise their rights. However, because of the site access restrictions to the NPD site, traditional land and resource use is not permitted at the NPD site. The EIS has demonstrated there are no predicted adverse impacts from the project on the site study area, local study area, and regional study area.

Therefore, the EIS concluded that traditional land use and resource will not be negatively impacted by the NPD Closure Project (EIS Section 9.9.3.5).

CNL provided the AOO with the sections of the EIS that have been updated to reflect the AKLUS for AOO review. CNL shared the updated sections where AKLUS information has been incorporated with the AOO in 2021 May.

CNL had a focused discussion with the AOO that included an overview of how the Indigenous receptor is modelled in our long-term safety assessment. This discussion is helping to build confidence that harvesting and gathering of foods is safe both now and in the future is safe. Confidence in the safety of the NPD site and surrounding environment is key to resolving the AOO's outstanding concerns related to Algonquin Knowledge and land and resource use. As of 2024 January, CNL understands that this concern is ongoing from the AOO perspective with resolution progressing through the implementation of agreed commitments AOO-1 – Socio-Economic Considerations, Monitoring and Mitigations AOO-4 - Site Visit and Survey Work, AOO-5 - Participation in monitoring and sharing of results and AOO-10 - Ongoing Collaboration. The details of these commitments are included in Section 4.4.1.4 below.

Acknowledgement of Algonquin Settlement Area

In the AOO's comments on the 2016 Project Description, the AOO requested that CNL, through the NPD Closure Project's EIS, should acknowledge that the NPD site is located in the unceded Algonquin Settlement Area.

CNL fully acknowledges that the NPD site is located in unceded Algonquin Territory. This is stated in the 2017 draft EIS in Sections 3.1 and 8.9.2. The following quote was also added to Section 4.4.1 above: *"The NPD site is located within unceded Algonquin Territory. The Algonquins of Ontario have asserted existing Indigenous rights and title throughout the Settlement Area, including the NPD site."* In 2019 May, the AOO accepted that CNL had acknowledged the Algonquin Settlement Area in the draft EIS. CNL considers this issue resolved as CNL has since made this language change in the 2023 revised draft EIS. CNL understands the AOO will need to review the final EIS to confirm this issue has been addressed. Next steps, including the AOO's technical reviews, are discussed in Section 4.4.1.5 below.

Alternatives

Through their review of the 2017 draft EIS, the AOO expressed an interest in alternative means to manage the waste liability at NPD. The AOO was concerned about the suitability of in-situ disposal as a permanent disposal solution for NPD and specifically identified concerns around whether CNL's Alternative Means Assessment met the requirements of CEAA, 2012. The AOO expressed that CNL did not provide sufficient discussion of alternatives to in-situ disposal in the 2017 draft EIS. The AOO requested that CNL provide a quantitative assessment of the impacts of each alternative means on valued components to address their concerns. CNL has added a quantitative assessment of alternatives, which would support the understanding of the radiological and other safety risks to each alternative option (e.g., projected radiological dose, industrial safety risk). These were detailed in the Alternative Means Assessment TSD and

summarized in the EIS. CNL has expanded the discussion of alternative means in the EIS and provided the AOO with additional information regarding the suitability of in-situ disposal for NPD.

To support resolution of this concern, CNL shared with the AOO in 2022 November the alternative means assessment, links to CNL's webinar on alternative means and recent posters on the topic. The AOO-CNL working group had a focused discussion in 2022 December on the AMA. As a follow up, CNL gave a presentation on the AMA to the Algonquin Negotiation Representatives at the 2023 February Infrastructure Working Group. The presentation walked through the alternatives considered, CNL's evaluation of alternatives and the AOO's comments on alternative means for NPD. Following the presentation and question period CNL was thanked by the AOO. Along with information provided by CNL, the AOO also asked their consultant to provide summary remarks about CNL's AMA. CNL has received no further comments on this topic and believes that it has resolved the AOO's outstanding concerns in this area.

As of 2023 July, CNL understands that this concern is ongoing from the AOO perspective with resolution progressing through the implementation of agreed commitment AOO-10 - Ongoing Collaboration. The details of this commitment are included in Section 4.4.1.4.

Archaeology

Since their review of the NPD Project Description in 2016, potential historical and archaeological artefacts at the NPD site has been of great interest to the AOO. This interest was reiterated in the comments on the 2017 draft EIS and came up in the AKLUS report's recommendations, as follows: funding for further archaeological assessments across the NPD property, protection of areas of archaeological potential during Project decommissioning, the development of a stop-work process and the development of a sustainable archaeological research program.

To address this interest, CNL shared a summary of the Phase I Archaeological Assessment; this is also included in Section 8.11.4 of the EIS along with a description of Indigenous Cultural Resources and Ceremonies in Section 8.9.3 of the EIS. EIS section 9.9.3.2 describes proposed mitigation measures that will be employed if undocumented archaeological resources are discovered during NPD Closure Project activities. The revised draft EIS has incorporated AOO archaeological interests as reported by the AOO in the AKLUS. CNL's support for the AKLUS also helped address this interest by facilitating the collection of traditional knowledge related to cultural resources.

As of 2023 July, CNL understands that this concern is ongoing from the AOO perspective with resolution progressing through the implementation of agreed commitment AOO-3 – Cultural Protection. The details of this commitment are included in Section 4.4.1.5 below.

Accidents and Responses

In their review of the 2017 draft EIS, the AOO voiced concerns about whether CNL has prepared effective contingency plans for extreme weather and natural hazard scenarios that may impact or damage the NPD facility. The AOO highlights that such incidents are expected to increase in frequency and intensity as a result of climate change, so proper contingency planning is crucial. In the event of a natural hazard (e.g., flood, ice storm, hurricane, tornado, earthquake), there is potential for radiological and non-radiological contaminants from the NPD facility to be released to the environment, in particular to the Ottawa River.

The AOO requested that CNL provide more detailed information regarding its contingency planning for extreme weather and natural hazard contingency planning, and a more detailed discussion of the potential impacts of flooding and the types of releases that would occur if the NPD facility was inundated. To address this concern, CNL has responded in writing to the AOO's comments, outlining where and how such events have been assessed.

The NPD site has an Emergency Procedure that will remain in place and be updated as required throughout the Decommissioning Execution and Institutional Controls phases of this project. This procedure focuses on the prevention, mitigation of, preparedness for, response to, and recovery from a wide range of abnormal and emergency conditions including fires, floods, hazardous spills, loss of power, earthquakes, and tornados. The Emergency Procedure also defines the actions of specific staff / roles in such events. Following any of these emergency events, as soon as it is safe for staff to do so, site and facility condition will be evaluated, and any necessary actions will be taken to make repairs. The NPD Emergency Plan is developed and maintained in accordance with CNL's company-wide Emergency Preparedness Program that has been accepted to meet the CNSC's requirements (under REGDOC-2.10.1 - Nuclear Emergency Preparedness and Response).

AOO specifically expressed concern about the integrity of the NPD under in-situ disposal in the event of natural disasters. CNL has assessed the probabilities and potential impacts of flooding, seismic activity, above-ground natural hazards and extreme temperature change throughout all project phases (Decommissioning Execution, Institutional Controls and Post-institutional Controls), and has concluded that these events will have no undue effects on people or the environment around the site. The Decommissioning Safety Assessment and Post closure Safety Assessment TSDs examine a range of scenarios that encompass the potential impacts from extreme weather and natural hazards. In all cases, CNL has communicated to the AOO that the predicted doses from these events were estimated to be below the relevant dose criteria (i.e. the NPD disposal site will maintain its safety features within its expected life cycle). The potential natural disasters to which NPD may be exposed are elaborated in Section 8.12 of the EIS, while a summary of the effects of the environment on the project is discussed in Section 9.14.

As of 2023 July, CNL understands that this concern is ongoing from the AOO perspective with resolution progressing through the implementation of agreed commitment AOO-10 - Ongoing Collaboration. The details of this commitment are included in Section 4.4.1.5 below.

Engagement

The AOO expressed interest in being involved with the NPD Closure Project EA as early as 2016 and have continued to express this interest through comments on the 2017 draft EIS and demonstrated involvement with additional technical reviews and the development of the AKLUS report. In particular, the AOO have requested continued engagement using best practices and have requested a commitment from CNL and AECL to discuss future use and ownership of the NPD property. Further, the AOO have also brought forward an interest in AOO-specific engagement plan.

To meet this interest, CNL and the AOO have maintained regular communications and ongoing engagement activities to address AOO specific questions and concerns about the project (Section 6.2.4.2.1 of the EIS). As well, to ensure meaningful participation throughout the EA, the AOO and CNL have a workplan and budget, in place.

Since 2020, discussion on the LTRA has not progressed. CNL, AECL and AOO are still working together on the NPD Closure Project. The LTRA discussions are relevant to NPD as it is expected that certain project specific initiatives and commitments will be implemented or realized through this agreement. CNL is willing to work with the AOO and AECL on an LTRA. In the interim CNL and the AOO are working to sign a Project Specific contribution agreement to facilitate the AOO's continued participation in the EA process.

As of 2023 July, CNL understands that this concern is ongoing from the AOO perspective with resolution progressing through the implementation of agreed commitment AOO-10 - Ongoing Collaboration. The details of this commitment are included in Section 4.4.1.5 below.

Environmental Assessment Methodology and Process

In their review of the 2017 draft EIS, the AOO voiced concerns about potential project-environment interactions, determination of significance of adverse residual effects and cumulative environmental effects as a result of the NPD disposal activities.

CNL has responded to all of the AOO's comments on the 2017 draft EIS and understands the AOO will be providing further feedback on these comments. At a high level, the dispositions point to various EIS sections, such as Section 9.13, which provides the process for evaluating cumulative effects and the assessment of cumulative effects for the NPD Closure Project. In response to AOO's request that CNL employ a lower threshold for determination of significant adverse residual effects, CNL proposes a workshop with the AOO to review the methodology for determining significance of effects.

As of 2023 July, CNL understands that this concern is ongoing from the AOO perspective with resolution progressing through the implementation of agreed commitment AOO-10 - Ongoing Collaboration. The details of this commitment are included in Section 4.4.1.5 below.

End State, Restoration and Future Use of the Lands

In their review of the 2017 draft EIS and in conjunction with their concerns about traditional land use, the AOO expressed great interest in site restoration and land transfer agreements. The key interests and concerns expressed include: engagement and consultation on the site restoration plan; AOO participation in site restoration and long-term monitoring activities; potential impacts to the Ottawa River shoreline and to fish, wildlife and plants; and the impact of future socio-political changes on land use. The topics of future land use and site restoration as well as end state have been the subject of or have been discussed in at least eight engagement activities with AOO since the submission of the Project Description in 2016 (including meetings, site tours, and information session). CNL also shared the Environmental Site Assessment for NPD with the AOO to provide additional details on the assessment of current conditions at the NPD site, supporting and informing the discussion on site restoration. The AKLUS report also identified interests and concerns related to end state, site restoration and future use of the land, including a request for involvement in follow-up monitoring and restoration work.

To address these interests and concerns, CNL provided draft and updated dispositions to address AOO comments on the general plans for restoration and end state with reference to Section 4.3.1.9 of the revised EIS and the Environmental Site Assessment for NPD.

Many aspects of future land use and land transfer are beyond the scope of the NPD Closure Project EA. These topics may be included in the future LTRA discussions with the participation of AECL as the owner of the NPD site. CNL will be sharing a draft site restoration plan with the AOO in the summer of 2024.

As of 2023 July, CNL understands that this concern is ongoing from the AOO perspective with resolution progressing through the implementation of agreed commitments AOO-2 – Restoration Planning and AOO-4 - Site Visit and Survey Work, AOO-5 - Participation in monitoring and sharing of results and AOO-10 - Ongoing Collaboration. The details of these commitments are included in Section 4.4.1.5 below.

Environmental Effects and Mitigation Measures

In their review of the 2017 draft EIS and in conjunction with their concerns about traditional land use, the AOO expressed concerns about potential impacts to Ottawa River shoreline and to fish, wildlife and plants.

In discussions with AOO, CNL agreed that protection of the Ottawa River shoreline and fish, wildlife, and plants is important. The EIS demonstrated there are no predicted adverse impacts from the project on the Ottawa River shoreline or on any fish, wildlife or plants. Effects to the

shoreline are evaluated in the EIS as part of the Surface Water Environment discussion. There will not be any changes to or disturbance of the Ottawa River shoreline from NPD Closure Project activities. The EIS does not predict any adverse residual effects on the Surface Water Environment (Section 9.3.3.5).

The EIS also does not predict any adverse residual effects on the aquatic environment (Section 9.4.3.3) or the terrestrial environment (Section 9.6.3.3) resulting from potential emissions during the NPD Closure project.

CNL has developed mitigation measures and monitoring plans for the protection of the Kichi-Sibi (Ottawa River) (EIS Sections 9.3.3.2 and 12.3) and for the protection of flora and fauna (EIS Sections 9.4.3.2 and 9.6.3.2 and 12.3). Follow-up monitoring for the NPD Closure Project will include monitoring of environmental components that the AOO has identified as important.

Confidence in the safety of the NPD site and surrounding environment is key to resolving the AOO's outstanding concerns related to environmental effects and mitigation measures. As of 2023 July, CNL understands that this concern is ongoing from the AOO perspective with resolution progressing through the implementation of agreed commitments AOO-2 – Restoration Planning, AOO-4 - Site Visit and Survey Work, AOO-5 - Participation in monitoring and sharing of results and AOO-10 - Ongoing Collaboration. The details of these commitments are included in Section 4.4.1.5 below.

Indigenous Health

In their comments on the 2017 EIS, the AOO expressed concern that the Algonquin lifestyle be accurately reflected when predicting radiation doses to AOO citizens. In response, CNL's updated post closure safety assessment, issued in 2020 March, included a Potential Exposure Group consisting of a family of self-sufficient Indigenous receptors in the NPD Area. The exposure profile in the post closure period was developed based on a traditional Indigenous lifestyle, pre-European contact [84]. This lifestyle results in a very cautious dose estimate than that based on current-day lifestyle, where some food is store-bought and likely not from the contaminated area. The predicted peak dose to an Indigenous receptor (from the 3rd iteration PostSA) is 0.0004 mSv/yr which is 500 times less than the dose criterion. The analysis demonstrates that the impact on the public, Indigenous and the environment is negligible.

In 2023 April, CNL made a presentation to the AOO working group summarizing how the Indigenous lifestyle is evaluated through the post closure safety assessment looking specifically at how an Indigenous person might interact with the land and biota at and surrounding the NPD site.

Confidence in the safety of the NPD site and surrounding environment is key to resolving the AOO's outstanding concerns related to Indigenous Health. AOO involvement in monitoring activities will help to promote confidence in verifying EIS predictions. As of 2023 July, CNL understands that this concern is ongoing from the AOO perspective with resolution progressing

through the implementation of agreed commitment AOO-10 - Ongoing Collaboration. The details of this commitment are included in Section 4.4.1.5 below.

Monitoring

Since the submission of the Project Description in 2016, the AOO have continuously expressed interest in CNL's Environmental Protection Program including direct involvement in environmental monitoring at CNL sites and a role in cultural heritage stewardship and monitoring. In their review of the 2017 draft EIS, the AOO commented on several aspects of environmental monitoring: monitoring plans for groundwater, monitoring of the terrestrial environment and monitoring effects on traditional land and resource use. CNL provided dispositions in 2019 January and 2020 September. In 2020 July, the AOO provided technical comments on the follow-up monitoring plans, which identified more specific interests and concerns related to monitoring including a request that CNL undertake annual sediment monitoring and the inclusion of effectiveness monitoring of SAR mitigation measures in the environmental follow-up monitoring plan at the CNL-wide or corporate level.

CNL has committed to involving Indigenous Nations, communities, and organizations in its monitoring programs.

At the project level, follow-up monitoring for the NPD Closure Project will include monitoring of environmental components critical to the AOO and is outlined in Section 12 of the EIS. The finalization of the follow-up monitoring plans will incorporate feedback from the AOO topic of monitoring remains on the work plan for further discussion in 2023 and is a key area for commitments. CNL will continue to engage with the AOO regarding NPD-specific environmental monitoring and cultural heritage stewardship.

As of 2023 July, CNL understands that this concern is ongoing from the AOO perspective with resolution progressing through the implementation of agreed commitments AOO-1 – Socio-economic Considerations, Monitoring and Mitigations, AOO-4 - Site Visit and Survey Work, AOO-5 - Participation in monitoring and sharing of results and AOO-10 - Ongoing Collaboration. The details of these commitments are included in Section 4.4.1.5 below.

Protection of the Kichi-Sibi (Ottawa River)

The AOO expressed that the protection of the Kichi-Sibi (Ottawa River) is of high priority throughout engagement with CNL. The AOO have consistently voiced their concern over the proximity of the NPD disposal site to the Kichi-Sibi (Ottawa River) and the risk of release of radiological and other hazardous wastes into the river through surface water discharge. The AOO AKLUS reported great concern for loss of connection to the land and waters of the Kichi-Sibi as well as water use and potential contamination to its tributaries and ecological components.

CNL's commitment to protect the Kichi-Sibi (Ottawa River) is reflected in its in-design mitigation measures to contain and isolate NPD's waste inventory (Section 4.1) and the NPD EIS does not

predict any adverse residual effects on the surface water environment encompassing the Kichi-Sibi (Ottawa River) (Section 9.3.3.5). In order to effectively address this concern, CNL is engaging with AOO community members and the AOO staff and their consultants regarding the results of the NPD EIS with respect to the protection of the Kichi-Sibi (Ottawa River). CNL has provided information on in-design mitigation measures that will ensure discharges do not cause adverse environmental effects to the Ottawa River. Based on AOO feedback, CNL has updated and expanded mitigation measures for the protection of surface water (Section 9.3.3.2 in the EIS) and the incorporation of an improved definition of the requirements for a washout pit (Section 4.3.1.3).

As of 2023 July, CNL understands that this concern is ongoing from the AOO perspective with resolution progressing through the implementation of agreed commitments AOO-1 – Socio-economic Considerations, Monitoring and Mitigations, and AOO-10 - Ongoing Collaboration. The details of these commitments are included in Section 4.4.1.5 below.

Protection of Flora and Fauna

The AOO have expressed the importance of flora and fauna to their communities, culture and Aboriginal Rights through the comments on the 2017 draft EIS and in the AKLUS report. In response to AOO concerns over species at risk at the NPD site, CNL has updated the EIS to include additional mitigation measures to ensure the protection of species such as milkweed (important habitat for monarch butterflies), migratory birds, bats, chimney swifts and milk snakes (Section 9.6.3.2). Furthermore, CNL has revised the EcoRA TSD to include a clearer description of the method with which risk is assessed for ecological receptors. The EIS continues to predict no effects on biota. Predictions made in the EIS will be verified through environmental monitoring as detailed in the NPD follow-up monitoring plans.

As of 2023 July, CNL understands that this concern is ongoing from the AOO perspective with resolution progressing through the implementation of agreed commitments AOO-4 - Site Visit and Survey Work, AOO-5 - Participation in monitoring and sharing of results and AOO-10 - Ongoing Collaboration. The details of these commitments are included in Section 4.4.1.5 below.

Socio-Economic

Several of the AOO's comments on the 2017 draft EIS were related to socio-economic and well-being interests, and the lack of Indigenous-focused socio-economic and well-being information and assessment in the EIS. The AOO's concern is that CNL does not acknowledge the linkages between ecological, human health, well-being and socio-economics as inter-connected impacts on the AOO. This was also an interest that came through in the AKLUS report, with a specific recommendation for the development of a socioeconomic accommodation plan. The AOO also expressed concern that the 2017 draft EIS did not discuss employment or procurement opportunities for the AOO.

To address AOO concerns over the lack of discussion of Indigenous socio-economic interests in the EIS, CNL has added Sections 8.10 and 9.10 in the EIS which discuss Indigenous Socio-

economic and Health interests. Section 8.10 characterizes current Indigenous socio-economic and health conditions, and Section 9.10 assesses the potential effects of the project on these components. These sections aim to include the interests of Indigenous Nations, communities, and organizations, such as the AOO, in the consideration of the potential impacts of the NPD Closure Project. For example, Section 9.10.1.2 of the EIS describes the interactions of the Indigenous Socio-economic environment and the NPD Closure Project to determine potential effects (direct and indirect) and mitigation measures as appropriate. CNL has revised the EIS to include economics and employment as VCs under the Indigenous Socio-economic component.

Section 9.10.3 of the EIS discusses the potential economic and employment opportunities that may result from the project, and how CNL plans to make these opportunities available to the AOO and other Indigenous Nations, communities and organizations. This topic does extend beyond the scope of the NPD Closure project and may be a topic of mutual interest as part of future LTRA discussions.

The EIS has demonstrated that there are no off-site ecological effects predicted as a result of the NPD Closure Project (e.g., as in the case for terrestrial and aquatic environment as well as ambient radioactivity), therefore there are no pathway linkages to socio-economic VCs and thus further assessment is not required. As sociological aspects such as socio-economics and health demographics will evolve and change over time, CNL is committed to maintaining communication around this interest throughout the different phases of the NPD Closure Project.

In renewed communications late in 2022 and into 2023, the AOO have indicated an interest in obtaining economic benefits from the NPD Closure Project and CNL in general. CNL and the AOO have also discussed the need for a socio-economic study. Budget and timeline for this study are still being finalized however the study has significant potential to inform monitoring activities and additional mitigations for the project. It is expected that completion of the study will resolve AOO's concern about a lack of current socioeconomic data and its recommendations will support the resolution of other outstanding areas of interest and the refinement of commitments.

CNL is committed to improved economic participation and benefits for Indigenous peoples from its projects. In response to Call to Action #92 in the Truth and Reconciliation report to actively promote economic opportunity for Indigenous Businesses, CNL has developed an IRP Strategy, which has been endorsed by AECL. AECL, the federal Crown Corporation that provides oversight of CNL, has reviewed, and endorsed the strategy. CNL shared the IRP strategy with the AOO in 2023 March. To ensure that CNL can begin to take a more active role in stimulating the Indigenous business sector in the future, the strategy became effective as of 2023 April, and includes targets for 2023/2024. CNL recognizes that there will be ongoing opportunities to enhance its approach to reflect feedback from Indigenous Nations, communities and organizations. Discussions on employment and contracts/ procurement opportunities may be advanced within a future LTRA.

As of 2023 July, CNL understands that this concern is ongoing from the AOO perspective with resolution progressing through the implementation of agreed commitments AOO-1 – Socio-economic Considerations, Monitoring and Mitigations, AOO-9 – Economic Participation and Benefit and AOO-10 - Ongoing Collaboration. The details of these commitments are included in Section 4.4.1.5.

Technical Aspects of the Environmental Assessment

In their review of the 2017 draft EIS, the AOO requested further clarification to understand technical aspects of the NPD Closure Project EA such as the operation of the NPD Closure Project (e.g., atmospheric emissions (noise, dust, air), cement to be used for grouting, the batch plant, and DRLs). Direct dispositions were provided by CNL in response to these technical questions. Dispositions to the AOO's comments included references to the EIS: the preferred location of the batch plant with regard to the predicted effects on terrestrial vegetation or wetland is written in Section 4.3.1.2; mitigation measures for dust and noise are outlined in Section 9.2.3 of the EIS and in the follow-up monitoring plans; predicted residual effects on the aquatic and terrestrial environments from potential NPD Closure Project emissions are summarized in Section 9.4.3.3 and 9.6.3.3, respectively. In response to concerns about the cement to be used during NPD Closure Project activities, the EIS has been revised to include a comprehensive discussion of natural analogues (EIS Section 4.1.2), including cement, and their relevance to the project. At their request, CNL has provided the AOO with a copy of the follow-up monitoring plans as monitoring plans for the NPD Closure Project are expected to address many of the AOO's concerns related to mitigation measures to prevent the exceedance of contaminants in the environment as a result of NPD Closure Project activities.

The AOO also shared comments on the draft follow-up monitoring plans in 2020 July, which CNL will consider for the final plans.

The AOO also provided specific technical comments on NPD's DRLs in 2020 July, with a focus on ensuring that the critical receptor group used in the development of DRLs accurately reflects the Algonquin lifestyle. This concern is outside of the scope of the project. There will be no long-term effluent monitoring at NPD that will use the DRLs. Doses to receptors during the post-institutional controls phase are assessed in the PostSA TSD. The PostSA TSD also assesses dose to an Indigenous receptor group. The assessment demonstrates that the impact on the public, Indigenous peoples and the environment is negligible.

As of 2023 July, CNL understands that this concern is ongoing from the AOO perspective with resolution progressing through the implementation of agreed commitment AOO-7 – Details of the Batch Plant. The details of this commitment are included in Section 4.4.1.5 below.

Valued Components

Throughout engagement activities, their comments on the 2017 draft EIS, the AKLUS report, and direct correspondence, including a letter in 2020 July identifying several specific VCs, the AOO indicated interest in what environmental VCs were described in the EA for the NPD Closure Project.

To address this, CNL incorporated the AOO's preliminary feedback to reflect the Algonquin VCs of cultural significance (e.g., wildlife habitat, vegetation, cultural sites, water travel routes, and hunting, harvesting and fishing areas) into Section 6.3.2, including Table 6.3-1 and Table 6.3-2 of the revised draft EIS. Some AOO VCs had not been previously included in the EIS while others were represented by other species that were already evaluated as VCs in the EIS. Tables 6.3-1 and 6.3-2 of the EIS highlight how VCs identified by AOO are represented by the species that are evaluated in the EIS.

Late in 2022, the AOO working group identified that a simplified table incorporating all VCs from the AOO AKLUS mapping their inclusion in CNL's EIS was needed to assist AOO members confirming that all their identified VCs are considered in CNL's assessment. CNL agreed to create a VC summary table to better explain how AOO identified VCs are included, assessed, protected and that protection verified through CNL's proposed project. CNL and AOO agreed together on the layout and type of information to be included early in 2023 and in 2023 June CNL shared the complete VC summary table with the AOO.

As of 2023 July, CNL understands that this concern is ongoing from the AOO perspective with resolution progressing through the implementation of agreed commitments AOO-6 – Valued Components and AOO-10 - Ongoing Collaboration. The details of these commitments are included in Section 4.4.1.5 below.

Summary

At present, this summary of interests and concerns is a consolidation of all the interests and concerns the AOO have brought forward on the NPD Closure Project. While CNL recognizes the AOO has concerns related to end state and future use of the lands, economic development and monitoring, CNL notes that aspects of these concerns go beyond the scope of this project. CNL will continue to document and share with the CNSC in CNL's subsequent IER any additional feedback provided by the AOO relative to end state and future use of the lands, economic development and monitoring.

The project-specific concerns raised by the AOO are considered in the context of the EIS. AOO and CNL have agreed to a set of commitments to address areas of outstanding concern. These commitments are summarized in Section 4.4.1.4. The list of commitments will be included in CNL's commitment report which will accompany the submission of the final EIS. CNL will continue to respond to questions and concerns from the AOO, and refine commitments, through its ongoing engagement efforts.

4.4.1.4 Verification

The AOO have provided several key inputs, identifying interests and concerns related to the NPD Closure Project including: comments on the Project Description (2016 June), comments on the 2017 draft EIS (2018 February), technical reviews on the Environmental Site Assessment and follow-up monitoring plans (2020 July), the AOO's AKLUS (2020 December) and feedback

on VCs (within the EIS review, AKLUS and in 2020 July correspondence). To confirm CNL has adequately captured the AOO's interests and concerns, position and knowledge, the AOO and CNL underwent a verification process where CNL provided key documentation to the AOO for their review and feedback. Through this process, the AOO has reviewed and provided feedback on their Table of Interests and Concerns, list of VCs, the draft follow-up monitoring plans and the Environmental Site Assessment. While not all the AOO's concerns have been mitigated by this process to date, CNL has made every effort to verify that the AOO's position, interests and concerns were adequately characterized. CNL continues to work with the AOO to address their concerns through ongoing discussions. In 2021 June, CNL shared the first draft of the *Table of Interests and Concerns* with the AOO asking for verification that CNL had accurately represented the AOO's list of interests and concerns and that, "where possible" verify that how CNL was addressing the interest or concern was adequate.

The AOO shared comments on the *Table of Interests and Concerns* in 2021 November. Later in 2021 November, the AOO and CNL met to review the AOO's comments on the Table of Interests and Concerns. At the meeting, CNL agreed to make the suggested revisions and to provide back to AOO the version of the revised Table of Interests and Concerns that would be included in the 2021 December revised draft EIS.

The AOO confirmed that they had received the updated table, that incorporated the AOO's revisions from 2021 November and acknowledged that CNL would be including this 2021 December 07, revised version of the table in the 2021 December EIS submission. The AOO also confirmed that there is a jointly developed path forward outlining the next steps for CNL and AOO to work together to address the AOO's interests and concerns. Based on 2022 January CNSC feedback, CNL revised the AOO Table of Interests and Concerns. CNL developed a simplified Table of Interests and Concerns (Table J-4 in Appendix J), and a table which maps how this simplified table relates to detailed input and feedback from the AOO (Table J-3 in Appendix J). The repackaged tables shared with AOO in 2022 April. The AOO confirmed in 2022 May, that the table was consistent with the Table the AOO reviewed in 2021 December. Due to the importance of the summary *Table of Interests and Concerns* and the AOO's input on verifying its completeness and accuracy, CNL shared the most updated version of this table 2023 May. CNL noted the updates to the *Table of Interests and Concerns*, primarily related to the recent progress made discussing outstanding issues. Specifically, CNL had made updates to its response to the interest / concern and the status of the concern. The AOO confirmed receipt on 2023 May 18, and in 2023 July, AOO and CNL held a working-level meeting to review and revise together the status of each interest and concern and next steps. Updated tables were shared back to AOO in 2023 July. For transparency, the 2021 December version of the Table of Interests and Concerns has been retained in IER Appendix J.2

The Summary of AOO Key Interests and Concerns are the result of collaborative development through the AOO / CNL Working Group, with validation of the status and next steps occurring at the AOO Working Group level through focused discussions in June and July of 2023 (See Section 4.4.1.4). Note that validation of the interests and concerns was already achieved with the AOO

in 2022 May. Regular ANR meetings have not been occurring since March of 2023 and therefore the updates have not been reviewed and vetted by the ANRs. As soon as regular ANR meetings resume, taking into consideration the priorities and availability of the ANRs, the AOO-CNL Working Group will bring this information to the ANR Table for validation.

4.4.1.5 Next Steps

CNL's commitments within the "Next Steps" column of the *Table of Interests and Concerns* in Appendix J, are reflective of the feedback CNL has received to date in the EA process from the AOO's technical review of the 2017 draft EIS, AOO's supplementary technical comments on socio-economics, environmental site assessment and derived release limits, AOO feedback on the draft follow-up monitoring plans, the AOO AKLUS as well as the AOO comments and recommendations which accompanied the AKLUS. The AOO-CNL working group have agreed on the following commitments:

- **AOO-1 – Socio-Economic Considerations, Monitoring and Mitigations**

Provide capacity to the AOO to undertake a socio-economic study with results captured in a subsequent revision of the Indigenous Engagement Report.

Study recommendations will be implemented in CNL's project plans after collaborative review by CNL and the AOO. CNL and AOO will identify opportunities to improve CNL's monitoring and mitigations to ensure traditional knowledge is incorporated and that interdependencies between ecological, socio-economic, community and cultural health are recognized.

- **AOO-2 – Restoration Planning**

CNL will collaborate with AOO to ensure that the site restoration plan incorporates in its design traditional values, habitat protection and replanting species of cultural significance (e.g., medicines) as appropriate.

- CNL to coordinate a tri-party discussion (AOO, AECL, and CNL) about future access to the NPD site including the exclusion zone (undisturbed forested lands that surround the facility).

- **AOO-3 – Cultural Protection**

CNL is committed to joint review by CNL, AOO and mutually respected 3rd party SMEs of company and project specific cultural protection procedures / activities with AOO against best practice and consideration of Indigenous Knowledge. If needed a project specific cultural protection plan is developed to address any gaps identified.

- **AOO-4 – Site Visit and Survey Work**

Provide an opportunity to and support pre-decommissioning site visit(s).

Provide capacity for a baseline plant inventory survey.

- **AOO-5 – Participation in monitoring and sharing of results**

CNL is committed to involve all interested Indigenous communities in the NPD Closure Project Follow-up Monitoring Program.

On an annual basis, CNL and AOO will review together environmental monitoring results from the NPD site. CNL can share results with the AOO annually through to the end of the Institutional control period.

- **AOO-6 – Valued Components**

CNL will continue to engage with the AOO on the topic of Valued Components (VCs) as long as there is interest from the AOO.

At the AOO's request, CNL has shared a VC mapping table that provides the intersection of VCs identified through the AOO AKLUS with the VC's used in CNL's assessment.

- **AOO-7 – Details of the Batch Plant**

CNL is committed to providing the construction details for the batch plant wash-out pit to the AOO once they are available and will review together with AOO to understand any concerns.

- **AOO-8 - Incorporation of AKLUS Results - COMPLETE**

CNL will incorporate results from the Algonquin Knowledge and Land Use Study (AKLUS) into the revised draft EIS.

- **AOO-9 – Economic Participation and Benefit**

CNL is committed to improved economic participation and benefits for Indigenous peoples from its projects. CNL recognizes that there is an opportunity to improve in this area. CNL will continue working with the AO to improve systems that support economic participation and benefits.

CNL will review together with AOO the scope and activities for the NPD project and share contracting and employment opportunities.

- **AOO-10 – Ongoing Collaboration**

CNL is committed to continuing the working group with AOO to promote continued open communication, information sharing and education including collaborating on the development of communications and engagement material for various audiences (e.g., AOO staff, ANRs and specific communities).

Beyond these commitments which are actioned in the work plan for the AOO-CNL working group, the following additional next steps have been agreed:

- CNL and AOO will review together the technical topic responses and identify any remaining gaps. Resolution of any gaps identified will be a topic of a dedicated discussion at the Working Group level.

- CNL and AOO are continuing the working group and it is understood that work progressed through the AOO-CNL working group may lead to refinements of commitments in the future.
- The working group will present new information to the ANRs when there is an opportunity to do so.
- CNL and AECL are willing to work with the AOO on an LTRA.

The status of “ongoing” is based on collaboration at the Working Group level that acknowledges the progress made so far and demonstrates an ongoing commitment to progress relationship-building between CNL and AOO through actionable commitments. It recognizes that resolution is progressing well and that concrete steps (a focused work plan developed collaboratively at the AOO/CNL Working Group) are in place to move the concern to fully resolved. The AOO-CNL Working Group want this to be recognized as a positive descriptor of status.

This IER, as a living document, will include any updates related to the progress of these next steps at the time of submission of the final EIS and prior to the Commission Hearing process.

4.4.2 Algonquins of Pikwàkanagàn First Nation

The Algonquins of Pikwàkanagàn First Nation’s (AOPFN or Pikwàkanagàn) primary residential reserve is located in the Ottawa Valley on the southeast shore of Golden Lake where it flows into the Bonnechere River, in Renfrew County, Ontario. Pikwàkanagàn has a total registered population of slightly under 3,000 with the majority living off-reserve. The reserve was established through a Crown patent in 1873 following several petitions from the community, formerly known as Golden Lake Indian Reserve No. 39. The Pikwàkanagàn have linguistic traditions in the Algonquin language. The First Nation is governed by an elected council comprised of a Chief and six Councilors. AOPFN is a sovereign entity that retains title to the land and resources and although the Algonquin Land Claim is currently being negotiated through the AOO, the AOPFN upholds the sacred responsibility to the land, is an independently governed, First Nation with Treaty and Aboriginal rights associated with that standing. A fuller description of the AOPFN can be found in Section 3.

CNL had been engaging with the AOO until 2020, when AOPFN identified that the proper channel for engagement by CNL on the NPD Closure Project was through the AOPFN Consultation Coordinator, and AOPFN needed to be engaged as an independent First Nation for this and all other CNL related projects and activities. From then on, CNL engaged with AOPFN separately from the AOO to address the AOPFN request for deep and meaningful engagement with its members throughout the environmental assessment process.

4.4.2.1 Engagement

Table K.1 of Appendix K below includes a summary of key engagement activities that have occurred with AOPFN on the NPD Closure Project as of 2024 March. CNL has also provided a narrative summary of engagement with AOPFN.

Relationship-building and development of agreements

The AOPFN were introduced to the proposed project prior to the submission of the Project Description for the NPD Closure Project in December 2015, when CNL hosted the AOPFN to the CRL site. This meeting included a tour and a presentation featuring the NPD Closure Project.

In July 2016, CNL sent the AOPFN a letter to formally introduce the proposed NPD Closure Project, which included a request for community input on any potential adverse impacts from project activities. This was followed by a second letter in November 2016 which inquired about AOPFN asserted rights and traditional activities. The AOPFN sent a letter to CNL in 2017 January acknowledging receipt of letters and advised CNL of the AOPFN's negotiations with the federal and provincial government on the settlement of their land claim. The AOPFN's letter also indicated an interest in meeting later in 2017 and that the AOPFN is opposed to projects in their territory that could be detrimental to their lands and resources. CNL followed-up on the AOPFN meeting request from the 2017 January letter and were informed in June 2017 that the AOPFN did not want to meet at this time and that ANRs were included in AOO engagement activities. In 2017 June, AOPFN ANRs visited the NPD site.

In 2017 November, CNL shared the draft EIS, as well as the IER TSD, and invited the AOPFN to participate in the public and Indigenous EA comment period and community input and feedback on the draft EIS and IER TSD. The AOPFN did not submit comments on the 2017 draft EIS through the EA process and CNL did not receive any feedback from the AOPFN on the IER TSD at that time.

Throughout 2018 and 2019, AOPFN ANRs continued to be included in AOO engagement activities. As well, the representative from AOPFN with the seat on the CNL ESC received regular updates on the project through the ESC.

It came to CNL's attention, through the engagement that occurred in 2020, that while the AOPFN had received information on the project prior to 2020, AOPFN did not have a full understanding of the processes in the EA or resources and capacity needed to provide responses and / or comments.

In 2020 March, CNL received a letter from the AOPFN inviting CNL to provide a project overview/update at a community meeting in 2020 April. This meeting was postponed one week later due to the COVID-19 pandemic. After receiving the 2020 March letter, discussions commenced between AOPFN and CNL on the AOPFN's interest in both the NSDF Project and the NPD Closure Project, and in the AOPFN's interest in direct engagement with CNL, not through the AOO. The AOPFN indicated an interest in providing comments on the revised draft EIS for the NPD Closure Project and requested this document in addition to a number of key technical support documents, which CNL provided.

In 2020 May, CNL sent a letter to the AOPFN following up on recent communications and made inquiries for AOPFN specific information.

CNL initiated discussions with the AOPFN on establishing a specific contribution agreement to support AOPFN's participation in the EA process for both the NSDF Project and the NPD Closure Project. Contribution agreement meetings started in 2020 June and the contribution agreement was signed in 2020 September. The contribution agreement included funding for Traditional Knowledge studies, specifically an AOPFN AKLUS Report, a Diet and Harvest Study and a Culture and Rights Study, as well as support for meetings / discussions on the comments received on the revised draft EIS and engagement activities leading up to the hearing on the project. Engagement was enabled through the creation of a Working Group with representatives of the AOPFN and CNL, to discuss and work on areas of interest and through meetings with the Algonquin Advisory Committee (AAC), which is made up of AOPFN community members.

CNL continued to keep AOPFN updated about the EA process at meetings, through emails and by letters. A 2022 November letter provided an update on the NPD Closure Project and included an updated engagement status section to reflect next steps discussed at the 2022 October Working Group meeting. AOPFN replied to the letter by identifying an updated draft list of priorities for engagement with AOPFN for the NPD Closure Project.

In 2022, CNL, AECL and AOPFN began to negotiate a LTRA. The LTRA would encompass all aspects of the relationship between the parties, including, without limitation, engagement efforts on the NPD Closure Project. The LTRA was signed in 2023, and includes, without limitation, as matters of mutual interest, (1) logistical support for the development of an AOPFN guardian program to enable stewardship and monitoring at and in the vicinity of the AECL sites and (2) risk communication re: the health of country foods, medicines and waters at, and in the vicinity of, AECL sites in the territory that AOPFN asserts unceded traditional territory and (3) opportunities for meaningful engagement to recognize, characterize and as necessary accommodate for potential historic harms. The LTRA is intended to address concerns and interests that are at a corporate level or are geographically broader than the NPD Closure Project.

In 2023 May, AOPFN Knowledge Keepers completed the fourth seasonal inventory visit (spring) at the NPD site. The previous inventory dates include 2022 August (summer), 2022 October (fall) and 2023 March (winter). The purpose of these field visits was to allow AOPFN to identify cultural and environmental values that are present at the NPD site prior to authorization to proceed by the CNSC for the NPD site closure. CNL staff assisted with environmental data collection, supported species identification, and answered questions regarding the NPD Closure Project and biodiversity monitoring as requested. CNL received the AOPFN's NPD Seasonal Surveys Implications Letter and the four (4) associated seasonal survey reports at the end of 2023 May. Using the findings and recommendations from AOPFN's site-wide inventory, CNL looks forward to working with AOPFN to ensure that mitigations are in place to protect terrestrial and aquatic biota that are important to AOPFN.

Working group and Algonquin Advisory Committee (AAC) meetings

From 2020 September through to 2024 March, the Working Group met frequently, engaging on specific focused topics related to the participation of the AOPFN in the project and broader LTRA discussions, including discussions on community feedback through studies, the incorporation of AKLUS Diet and Harvest Study and Culture and Rights Study information into the EIS, the AOPFN's interests and concerns in the project, as well as the development of commitments. The AOPFN AAC, which is comprised of AOPFN community members, also met with CNL on the NPD Closure Project three times. Meetings topics were determined by the AOPFN and focused on the following: a general project overview, interests and concerns and alternatives. During the summer of 2022 CNL and AOPFN updated the master engagement schedule, which outlines the proposed topics for Working Group meetings. In 2022 December CNL welcomed AOPFN Working Group members for a tour of the NPD facility. The tour was an opportunity for deeper engagement between the NPD project team and Working Group members. CNL takes direction from AOPFN on the topics of priority for discussion and as of June 2023, have a standing monthly Working Group meeting to continue engagement.

Comments on the Revised Draft EIS

In 2020 November, CNL responded to each of the AOPFN comments on the 2020 revised draft EIS. After this, in 2020 November and December, CNL and AOPFN had two Working Group meetings to discuss the AOPFN comments in detail to ensure CNL's understanding and adequacy of responses. In 2020 December, following the second Working Group meeting on the NPD Closure Project comments, AOPFN provided responses in writing to CNL's dispositions of the AOPFN comments on the 2020 revised draft EIS. CNL sent updated responses addressing the feedback in 2022 December. CNL indicated what changes were made to the EIS as a result of the feedback. AOPFN sent additional feedback on the CNL responses in 2023 April. Work continues between CNL and the AOPFN to address some outstanding questions, ensure the Table of Interests and Concerns encompasses remaining concerns from AOPFN and finalize commitments using the recent feedback provided by AOPFN.

Algonquin Knowledge and Land Use Study

In 2020 October, CNL received the AOPFN's report on the AKLUS which included general mitigation and accommodation measures to apply to the NPD Closure Project in response to study participant concerns. CNL has worked to incorporate information from the AKLUS into this revision of the EIS. In 2021 August, the AOPFN provided a review of Sections 8.9 and 9.9, which CNL used for additional improvement of these sections and the AOPFN provided a review of this revised section again in 2021 October. In 2023 February, CNL responded to the AOPFN's implications and recommendations from the AKLUS, Culture and Rights Study, and Diet and Harvest Study, which the AOPFN shared in 2021 August. CNL shared how the information and Traditional Knowledge shared by AOPFN through the studies has been integrated into the EIS. The studies and ongoing meetings with AOPFN Working Group members has deepened CNL's understanding of the AOPFN's unique community values and views on the NPD facility and closure project and its potential impacts on traditional land and resource use and, Algonquin

rights, as well as health and well-being.

Commitments

In 2021 May, CNL provided a preliminary table of commitments to the AOPFN made through engagements and comment responses for the NPD Closure Project. The AOPFN provided feedback on these commitments in 2021 August, and in 2021 September CNL shared updated draft commitments based on AOPFN feedback. It should be noted that AOPFN is seeking commitments that will apply to whatever final decommissioning plan is adopted; not specifically for the currently proposed in-situ proposal. The AOPFN and CNL met in 2021 October and November to continue discussions on the commitments related to the NPD Closure Project. The AOPFN and CNL continued to meet throughout 2022 and 2023 to finalize commitments. During the meetings held in 2022 October and December on commitments, there was discussion about what commitments will remain project-specific and what commitments could be addressed with the signing of a LTRA. CNL worked to incorporate AOPFN feedback into the language of the commitments. At the 2022 December Working Group meeting, AOPFN specifically requested feedback on what CNL is ready to commit to and what commitments might be better suited to the LTRA discussion. CNL sent an update draft commitments list to AOPFN for review in 2022 December. The 2023 February and May Working Group meetings both included continued discussion of commitments for the NPD Closure Project. In 2023 July, CNL and AOPFN agreed on commitments that are covered by the LTRA.

Through 2023 CNL and AOPFN continued to revise the commitments list. In 2024 January AOPFN informed CNL that AOPFN would not be providing further comments on the commitments list. AOPFN and CNL note that there are elements of the table that the parties do not agree on. AOPFN and CNL have agreed on next steps, commitments and ongoing engagement and discussion to move toward resolution.

Summary of Interests and Concerns

In 2021 June, CNL shared the *Table of Interests and Concerns* with the AOPFN. The AOPFN shared their written feedback on *Table of Interests and Concerns* in early August and CNL provided an updated *Table of Interests and Concerns* in late 2021 August. The AOPFN provided further review of the tables in 2021, which was incorporated into the summary table. In 2022 January, the CNSC informed CNL that the 2021 December EIS submission was incomplete. The CNSC staff directed CNL to revise the *Tables of Interests and Concerns* for clarity. CNL developed a simplified *Table of Interests and Concerns* (Table C-6 in Appendix C.2 of the EIS), and a table which maps how this simplified table relates to detailed input and feedback from the AOPFN (Table C-5 in Appendix C.2 of the EIS). The new table was shared with the AOPFN in 2022 April to confirm that the new table retained the AOPFN's interests and concerns. AOPFN shared back preliminary edits to the new table in late 2022 June but indicated that they would prefer to review the table closer to submission once it has been updated to capture ongoing engagement progress. CNL and AOPFN continued to discuss the table and its contents at the working group meetings.

Due to the importance of the summary table of interests and concerns and the AOPFN's input on verifying its completeness and accuracy, CNL shared the most updated version of this table with the AOPFN in 2023 May. CNL noted the updates to the *Table of Interests and Concerns*, specifically CNL's response to the interest/concern and the status of the concern. At the end of 2023 June, AOPFN provided feedback to CNL that several of their interests were inaccurately portrayed and that they wished to identify clearly what aspects of the interests and concerns remain outstanding. CNL has incorporated this feedback and returned an updated table to AOPFN in 2023 July, for validation. In 2024 January AOPFN informed CNL that AOPFN would not be providing further comments on the public facing *Table of Interests and Concerns* for the filing of the revised draft EIS. AOPFN and CNL note that there are elements of the table that the parties do not agree on. This *Table of Interests and Concerns* is inclusive of all interests identified by AOPFN current to 2024 June.

Additional Indigenous Studies

As a part of the contribution agreement with the AOPFN, which was developed in 2020, the AOPFN agreed to complete two additional studies, beyond the AKLUS, to help grow understanding of the AOPFN's rights, interests and concerns related to the NPD Closure Project. Early in 2021 August, the AOPFN provided the Diet and Harvest and Culture and Rights Study Reports as well as a letter outlining the implications of these studies. CNL is working with the AOPFN to ensure the information from these two studies is incorporated into the EIS. CNL and the AOPFN intend to continue to discuss the incorporation of this information for the final EIS submission package.

4.4.2.2 Feedback

The AOPFN shared feedback through comments on the 2020 revised draft EIS in 2020 July (and responses to subsequent disposition comments from CNL), as well as via the AOPFN AKLUS report on the NPD Closure Project, the Diet and Harvest Study, the Culture and Rights Study, a summary letter of implications from the three studies and during engagement meetings and correspondence throughout 2020 and 2021. Additionally, interests are derived from the AOPFN AMA, 2022 and 2023 Site Inventory visits, and regular engagement activities throughout 2022 and 2023. Note that most of the feedback from the AOPFN was brought forward from 2020 onwards as it was in the first part of that year that the AOPFN indicated a requirement to be directly engaged by CNL on the NPD Closure Project, as AOPFN is an independently governed First Nation, distinct from the AOO.

The interests and concerns from the AOPFN are briefly identified below, and then detailed in the Summary Discussion of Interests and Concerns – Section 4.4.2.3 below and the *Tables of Interests and Concerns* (Table K.2 of Appendix K).

Accidents and Malfunctions. AOPFN raised concerns about how accidents, malfunctions, natural disasters and effects of the environment, including climate change, on the NPD facility in the project case are considered and accounted for in the CNL assessment.

Alternatives. AOPFN raised several concerns with the Alternatives Assessment process, including but not limited to the lack of consultation on the assessment methodology, assessment criteria, and criteria weightings and the lack of participation of the AOPFN in the assessment. AOPFN also raised concerns about the in-situ disposal concept, including a lack of siting study, the reversibility of the in-situ disposal technique, consistency of in-situ disposal with international best practice, emphasis of financial factors in determining preferred alternative and the effectiveness of retrofitting the current facility as opposed to constructing a purpose-built facility. The AOPFN alternative means assessment identified full removal as the preferred option and ISD as the least preferred strategy for decommissioning the NPD facility. A summary of AOPFN's perspective on the Alternative Means is captured in Section 4.2.4.7 of the EIS.

Archaeology and Cultural Heritage. AOPFN identified the potential for deposited artefacts in the area of the NPD property related to pre-contact transportation corridors and highlighted the cultural value and significance of such artefacts. AOPFN also raised concerns regarding the impact of the project on the ability to culturally reconnect in the future to the NPD site.

Baseline Characterization. AOPFN raised questions about the baseline characterization of the project, the technical suitability of the site and in particular the absence of on-the-ground data collection by traditional knowledge holders, and lack of baseline data for species in the aquatic and terrestrial environments. AOPFN also disagrees with the use of the current baseline conditions and would prefer the project be assessed against a 'pre-NPD' site condition.

Engagement. AOPFN raised some concerns about the engagement and consultation process, including the need for more collaborative engagement and two-way dialogue. The AOPFN also expressed interest in developing a LTRA with CNL.

EA Process and Methodology. AOPFN raised some concerns about EA methodology and process issues such as: significance determination, cumulative effects, use of CEAA 2012, and AOPFN participation in the assessment noting that the findings of the EIS in relation to certain VCs (especially traditional land and resource use, but also culture and Indigenous health) do not correlate to the findings of the three AOPFN studies.

End State, Site Restoration and Future Use of the Land. AOPFN raised questions about the closure end state of the lands and restoration plans and an expectation to be engaged in co-development of any such plans. AOPFN was also interested in the project timeframe (length of institutional controls) and the long-term liability of the site beyond decommissioning.

Environmental Effects and Mitigation Measures. AOPFN expressed concerns about invasive species management specifically how invasive species are managed if they are accidentally introduced or are already present at the site.

Free, Prior and Informed Consent (FPIC). AOPFN expressed concerns about whether CNL and AECL will respect the AOPFN's right to Free, Prior and Informed Consent (FPIC) in relation to the development of a permanent hazardous waste disposal facility at the NPD site.

Impacts on Rights. AOPFN raised a concern about potential Impacts on Rights with the results of the three AOPFN studies indicating a measurable impact on the long-term ability to harvest in the NPD area and an underestimation of the project's impacts on traditional land and resource use.

Indigenous Health. AOPFN raised some concerns on the scope of the health assessment not including consideration of Indigenous determinants of health. AOPFN is concerned that in relation to human health, CNL has adopted a relatively narrow perspective on human health that is focused on biophysical impacts to human health, with little or no emphasis on other factors that influence Indigenous population health. This is particularly concerning to AOPFN because of the fear, stigma, and alienation felt by AOPFN members associated with the nuclear industry in general. This distrust may prevent or limit future exercising of Aboriginal and treaty rights by AOPFN members and will cause an impact to the well-being of AOPFN.

Long-term Safety. AOPFN raised concern about the about long-term site integrity of the NPD site.

Monitoring. AOPFN identified their expectation for involvement in future monitoring. AOPFN is seeking a co-development role in identifying indicators, thresholds, and responses for terrestrial wildlife, fish and fish habitat, traditional land and resource use, and water quality. AOPFN is also concerned that follow-up monitoring lacks a health component that would evaluate aspects of TLRU, culture and Indigenous health / well-being.

National Policy. AOPFN is concerned that the government of Canada does not yet have a modern nuclear waste management policy in place and that a lack of coordinated planning in past to develop permanent facilities has resulted in a proposed facility in AOPFN territory that it has not consented to.

Protection of Flora and Fauna. AOPFN raised several biological concerns related to the protection of flora and fauna as part of its review of the revised draft EIS. These included concerns on: road mortality impacts, and impacts to Species at Risk and their habitat.

Protection of the Ottawa River. AOPFN raised concerns related to the protection of the Ottawa River as part of its review of the revised draft EIS. These included concerns on: impacts to the riparian ecosystem, fish and fish habitat, species at risk and the Kichi-Sibi.

Socio-Economic. AOPFN raised concerns on the narrow spectrum of socio-economic issues discussed in the EIS.

Technical. AOPFN raised a number of technical concerns as part of its review of the revised draft EIS. These included concerns about dust and effluent discharges to the aquatic environment.

Traditional Knowledge, Land and Resource Use and Cultural Impacts. The AOPFN identified the need for traditional knowledge to be incorporated into the EIS and have raised concerns that CNL's estimation of no residual adverse effects on Indigenous land and resource use and culture does not correlate to the findings of the three AOPFN studies or inputs from the AOPFN Advisory Committee. Also, AOPFN is concerned that the traditional users themselves were not included in the effects assessment. Further, the AOPFN is interested in the preservation of and mitigation of impacts on cultural resources. AOPFN has also flagged that the study areas selected for traditional use VCs by CNL in the EIS differ from the study areas used by AOPFN in the AKLUS.

Valued Components (VCs). AOPFN expressed concerns that VCs identified by AOPFN knowledge keepers are not assessed in the EIS.

4.4.2.3 Summary Discussion of Interests and Concerns

This Summary Discussion of interests and concerns is taken from the Table of Interests and Concerns (Table K-3 of Appendix K) and is CNL's understanding based on written submissions (to CNL) and oral discussions with the AOPFN. CNL has made its best efforts to document the position the AOPFN has taken on each interest or concern while acknowledging that the AOPFN may articulate the perspective somewhat differently.

The key interests and concerns discussed in this Section were derived from various engagements with the AOPFN (Table K-1 of Appendix K) as described in Section 4.4.2.1 above.

Accidents and Malfunctions

In their comments on the 2020 revised draft EIS, at the AAC meeting in 2021 July, and in their letter outlining the implications of the AOPFN studies, AOPFN raised concerns about how accidents, malfunctions, natural disasters and effects of the environment, including climate change, on the NPD facility are considered and accounted for.

The natural disasters which the NPD site may experience are discussed in Section 8.12. The potential effects from accidents and malfunctions are considered in Section 9.12 of the EIS, and the effects of the environment on the project is covered in Section 9.14. Additional details and a range of scenarios that encompass the potential impacts from accidents and malfunctions are examined in the DecomSA and PostSA TSDs. AOPFN has indicated that this issue remains outstanding, and the parties have identified a path forward for further discussion. A meeting in 2021 October between CNL and the AOPFN AAC provided an opportunity for CNL to hear directly from AOPFN members questions and concerns on the topic of "what-if" scenarios. CNL was also able to provide an overview of the TSDs noted above and the safety assessments and

range of scenarios considered to evaluate the NPD facility under accident, malfunction and “what-if” scenarios.

CNL also notes that the NPD site has an Emergency Procedure that will remain in place and be updated as required throughout the Decommissioning Execution and Institutional Control phases of the project. This procedure includes actions of specific staff / roles in the event of a wide range of emergency conditions including fires, floods, hazardous spills, loss of power, earthquakes, and tornados. Following any of these emergency events, as soon as it is safe for staff to do so, site and facility condition will be evaluated, and any necessary actions will be taken to make repairs. The NPD Emergency Plan is developed and maintained in accordance with CNL’s company-wide Emergency Preparedness Program that has been accepted to meet the CNSC’s requirements (under RegDoc 2.10.1 - Nuclear Emergency Preparedness and Response).

CNL understands that this concern is outstanding from AOPFN’s perspective. The AOPFN is concerned that the proposed closure of the facility (grout, cap etc.) will make it very difficult to access the facility in the future to intervene with remedial action if the facility does not perform as expected. CNL’s technical assessment shows that accidents and natural hazards which could affect the facility will not result in undue effects on people and the environment. Further alignment on this concern is unlikely, however, CNL has made commitments that can potentially build confidence and trust in CNL’s assessment. Next steps that the AOPFN and CNL have agreed upon to address outstanding concerns are described in Section 4.4.2.5 below.

Alternative Means

In their comments on the 2020 revised draft EIS, the AOPFN expressed that they were not adequately engaged for the Alternative Means Assessment and provided extensive feedback about the in-situ disposal method for decommissioning the NPD facility. In their EIS review, the AOPFN identified the following concerns with the alternative means process and in-situ disposal concept:

- The need for a detailed quantitative assessment of each alternative against the ALARA principle;
- A lack of consultation on the design of the alternatives assessment methodology;
- No participation of AOPFN in the assessment;
- No opportunity for AOPFN to engage on the criteria and weightings used in the assessment and concerns about specific criteria weightings, which do not align with AOPFN values;
- The need for a robust environmental effects assessment for each alternative;
- A lack of evidence supporting significant incremental risks related to off-site disposal;
- An AOPFN request for a multi-party reconsideration of alternatives;

- Lack of a siting study that demonstrates the site is technically superior and publicly acceptable;
- The lack of evidence that AOPFN is a willing host for a permanent hazardous waste disposal facility;
- The reversibility of the in-situ disposal technique and mitigation;
- Lack of consistency of in-situ disposal with international best practice and IAEA guidance;
- The length of the Institutional Control period and the reduction in confidence over time that monitoring will continue to be rigorous and adaptive management responses implemented;
- The design life of the disposal facility in relation to the hazard duration of the waste; and
- The effectiveness of retrofitting the current NPD facility as opposed to constructing a purpose-built facility.

CNL responded to the AOPFN comments and AOPFN provided feedback on these dispositions in writing in 2020 December. In their dispositions, CNL referenced Section 3.2 of the 2020 revised draft EIS which explains how the in-situ disposal method is appropriate for the decommissioning of the NPD Facility and will safely isolate the contaminated systems and components in the below-grade structure (grout-filled). The EIS describes where CNL considered national and international standards and guidelines in its assessment of the in-situ disposal method as a feasible alternative to safely and securely decommission the NPD facility.

In their feedback and during two meetings, the AOPFN indicated that they do not accept CNL's disposition to address this concern. Further AOPFN has provided evidence in the Diet and Harvest Study, based on a survey of 228 AOPFN families that in-situ disposal is the least preferred of the four technically and economically feasible alternative means to decommission the facility. AOPFN has recommended to CNL that further actions are required to revise the section of the EIS where the Alternative Means Assessment information is located, including a meaningful effort to integrate AOPFN perspectives from the three studies and through the AAC, regarding in-situ disposal and other alternative means. AOPFN has also highlighted that the proposed in-situ disposal will constrain future uses of the site and that in-situ disposal has high potential to both perpetuate and exacerbate existing fears and stigma associated with the NPD site.

As identified in the *Table of Interests and Concerns*, in 2021 September, CNL met with the AOPFN AAC to provide more detail and an opportunity to ask questions on the alternatives considered by the project, and about in-situ disposal. The AAC appreciated the opportunity to learn more about CNL's alternative means assessment approach to the NPD Closure Project. AOPFN has recommended to CNL that further actions are required to revise the section of the

EIS where the Alternative Means Assessment information is located, including a meaningful effort to integrate AOPFN perspectives from the three studies and through the AAC, regarding in-situ disposal and other alternative means. CNL agreed to fund an AOPFN Alternative Means Assessment (AMA). CNL received the AOPFN AMA 2022 April. The AOPFN AMA included community perspectives on different alternative means to decommission the site. The AOPFN presented the findings from the AOPFN AMA at the 2022 September Working Group meeting. AOPFN shared the study methodology, preference findings, AOPFN conclusions and recommendations. AOPFN again stated their preference for full removal. CNL appreciated the opportunity for conversation around the key findings of the AOPFN AMA and at the 2022 December Working Group meeting CNL and AOPFN discussed the incorporation of the AOPFN AMA into the revised draft EIS. CNL and AOPFN agreed to update EIS Section 4.2.4.6 and include the full AOPFN AMA as an appendix. CNL drafted the updated section and shared with the AOPFN for review 2023 February. In early 2023 April AOPFN provided feedback and CNL sent back a revised version which AOPFN accepted 2023 May. AOPFN expressed disappointment in CNL's responses and encourage CNL to commit to meaningful action to address the recommendations.

CNL's technical assessment shows that the in-situ design is appropriate for the hazardous timeframe of the contaminants and is consistent with national and international standards. As directed by the CNSC, the EA process for the NPD Closure Project, including the assessment of alternatives to conduct the project, has been conducted in compliance with CEAA (CEAA 2012). Further, CNL has included the AOPFN AMA results within the EIS.

As of 2024 March, CNL understands that this concern is outstanding from AOPFN's perspective. AOPFN is concerned that the hazard will outlive the design life of the strategy and that contamination will be dispersed. AOPFN has identified that the willing host principle has not been followed for this permanent radioactive waste disposal facility. Further AOPFN remains concerned that doses from in situ disposal are not ALARA and that occupational risks and financial considerations have been weighted too heavily in CNL's assessment. AOPFN has also indicated a desire for a multi-party forum for selection and evaluation of alternatives. Further alignment on this concern is not possible however through continued engagement at the Working Group and with the AAC, CNL hopes that the parties are able to find common ground on this topic.

Archaeology and Cultural Heritage

Within the findings of the AOPFN AKLUS and Culture and Rights Studies, the AOPFN highlights the significant cultural and historical importance of the Kichi-Sibi (Ottawa River) and concerns about impacts to current and future values and use of the Kichi-Sibi (Ottawa River). The AOPFN AKLUS also highlights the potential for deposited artefacts in the area of the NPD property related to pre-contact transportation corridors. These archaeological sites and artefacts have deep cultural value and significance to the AOPFN. The archaeological assessment is included in Section 8.11.4 of this EIS along with proposed mitigation measures that will be employed should undocumented archaeological resources be discovered during the project

(Section 7.1.3.2). Based on the study results, CNL has also expanded its description of cultural aspects within Section 6 of this IER. AOPFN is also seeking commitment from CNL to develop a chance find procedure to protect and preserve any artefacts. CNL and AOPFN will work together to develop specific project and corporate commitments that address archaeology and cultural heritage sites and CNL will seek verification that any outstanding concerns specific to the NPD Closure Project has been addressed. As of 2024 January, CNL understands that this concern is partially resolved from AOPFN's perspective.

CNL has committed to support development of a Cultural Protection and Commemoration Plan in relation to the NPD site and to involve AOPFN in any future archaeological programs at or around the NPD site. Further CNL has committed to work jointly with AOPFN to develop an NPD site specific chance find procedure and TLRU discovery plan. CNL Commitments are summarized in Section 4.4.2.5.

Baseline Characterization

In their comments on the 2020 draft EIS, the AOPFN indicated an interest in the baseline characterization of environmental receptors at the NPD Closure Project site; specifically, the AOPFN were concerned about the presence, abundance, and potential breeding / nesting areas of benthic invertebrates and fish tissue, and other species. AOPFN also expressed concern that CNL did not conduct a comprehensive siting study for the proposed waste disposal facility. In order to address these concerns, CNL shared the results of baseline surveys of benthic invertebrates and fish habitat; which inform the follow-up monitoring plans for the NPD Closure Project. CNL also shared additional information about the geologic characterization that has been completed.

In 2020 November, CNL provided draft dispositions to the AOPFN's comments on baseline characterization. The AOPFN provided feedback on these dispositions in writing and during two meetings in 2020 December. In their feedback, the AOPFN indicated that they do not accept CNL's disposition regarding this concern, flagging in particular the lack of Algonquin Knowledge in the baseline characterization work to date and the lack of a comprehensive exercise to determine the suitability of the site to host a disposal facility. Through the contribution agreement, AOPFN and CNL have worked together to conduct site-wide Algonquin Knowledge Inventories at the NPD site in 2022 and 2023. AOPFN members generously shared their time and interest in biodiversity, and in turn CNL was able to share information on the nuclear industry and environmental monitoring. The time spent together in the field has proven to be very valuable to improve the relationship as well as to increase the available biodiversity data at the NPD site. Using the findings and recommendations from AOPFN's site-wide inventory CNL looks forward to working with AOPFN to ensure that mitigations are in place to protect terrestrial and aquatic biota that are important to AOPFN.

Through the completion of AOPFN's studies, they have indicated that they wish to see the project evaluated against a pre-NPD baseline and not the current baseline conditions at the site. CNL acknowledges that AOPFN disagrees with the use of the current baseline in its

assessment of impacts on Traditional Land and Resource Use. In its assessment, CNL concludes that no adverse residual effects on traditional land and resource use are expected. CNL maintains the view that past disturbances, i.e., those that occurred as part of the construction of the NPD facility, are not in scope. CNL notes that the proposed NPD Closure Project will improve the long-term environmental conditions and safety of the NPD site and surroundings, which will be confirmed by Indigenous-led monitoring programs. The finding of CNL and AOPFN with respect to potential effects on traditional land and resource use, differ.

CNL understands that the AOPFN's concern about the lack of a siting study remains outstanding and further alignment on this concern is unlikely. With respect to incorporation of Algonquin Knowledge into the baseline, the 4-season inventory for the area of the site potentially affected by the project has been completed. Using the findings and recommendations from AOPFN's site-wide inventory CNL looks forward to working with AOPFN to ensure that mitigations are in place to protect terrestrial and aquatic biota that are important to AOPFN. AOPFN is also seeking a more comprehensive inventory covering the entire NPD property. In response and to continue addressing AOPFN's concerns on this topic CNL has committed to supporting the AOPFN Guardian Program at the NPD site, supporting an AOPFN-led site inventory for the entire NPD property, and co-development of additional mitigation measures to include within the NPD Closure Project Environmental Protection Plan to ensure that items of value to AOPFN are protected. A more comprehensive lists of agreed commitments can be found in Section 4.4.2.5.

Engagement

Since its introduction of the NPD Closure Project, CNL has sought feedback from AOPFN about their traditional uses, rights, practices, and interests as the NPD Closure Project progresses through the EA. Prior to 2020, CNL understood that the AOPFN were being engaged through representation as a member of the AOO. However, in early 2020, the AOPFN requested to continue engagements independent from the AOO regarding the NPD Closure Project. In 2020 September, a contribution agreement between the AOPFN and CNL was signed which will enable AOPFN to continue participating in the environmental assessment process for the NPD Closure Project. After reviewing CNL's dispositions to AOPFN's comments regarding consultation, engagement, and communications, AOPFN provided feedback in writing and during two meetings in 2020 December. Through the Working Group, CNL continues to revise these dispositions and facilitate an ongoing open dialogue with the AOPFN.

Many of AOPFN's concerns regarding consultation are related to broader topics such as regulatory controls and federal requirements. During engagements activities, CNL understood that these concerns will need to be addressed beyond the NPD Closure Project. The LTRA addresses the AOPFN's interests in consultation, engagement, economic, future land uses, and environmental and cultural heritage stewardship and monitoring, among other things. The LTRA is intended to address CNL-wide concerns and interests of AOPFN at all CNL sites. Indigenous engagement related to broader CNL operations and other projects will be the subject of ongoing engagement activities facilitated by CNL.

AOPFN has identified that there are only some mechanisms from the proposed LTRA which are applicable to NPD (i.e., the Guardian Program and Risk Communication Program). AOPFN has indicated that further collaborative assessment and negotiation of a project-specific agreement will be required for NPD as part of a consent seeking process between the parties, at the end of which AOPFN may or may not provide its free, prior and informed consent to the proposed in-situ project at NPD.

CNL has taken meaningful interim measures to improve its engagement with AOPFN. CNL has developed a deeper understanding of AOPFN's concerns related to the NPD Closure Project. We are committed to strengthening our relationship and continuing the journey forward, well beyond the project end date.

Through planned Working Group meetings, CNL will continue to discuss any concerns by the AOPFN specifically related to the NPD Closure Project. Section 4.4.2.5 below outlines next steps agreed upon between the AOPFN and CNL to continue to address outstanding interests.

EA Process and Methodology

In their comments on the 2020 draft EIS, the AOPFN expressed a concern regarding the methods used during the EA process, such as significance determination and cumulative effects. AOPFN prefers an assessment approach that is different than the CEAA (2012) method. CNL responded to these concerns by summarizing the cumulative effects assessment methodology used in the EIS which is required CEAA (2012).

In their 2020 December feedback, the AOPFN indicated that CNL's disposition to comments related to significance determination and cumulative effects were inadequate. Subsequently, the AOPFN shared the findings and implications of three studies – the AKLUS, Diet and Harvest Study and Culture and Rights Study. The AOPFN studies suggest there are residual adverse effects potential across a larger number of VCs, including Indigenous land and resource use. CNL and AOPFN met and agreed to collaborate to incorporate Pikwàkanagàn views within the EIS. This was an opportunity for AOPFN to directly integrate a summary of its differing perspective on impacts on traditional land and resource use (Section 9.9) and overall assessment findings (Section 11.1), into the revised draft EIS.

Through the Working Group meetings, CNL will continue discussions with AOPFN to determine how to adequately address outstanding concerns, including through forward commitments for involvement in monitoring, and to seek verification that this concern has been addressed. CNL understands that this concern is outstanding from AOPFN's perspective. AOPFN remains concerned that the project is evaluated against the current baseline site conditions and does not consider the damage caused by AECL's historic siting and operation of the site. AOPFN remains concerned that CNL has chosen to disregard the new IAA 2019 legislation, instead opting for the less rigorous expectations of CEAA 2012. CNL continues under CEAA, 2012 as per the direction from CNSC (2019) as discussed in Section 3.5 of the EIS. AOPFN remains

concerned that their involvement in the assessment has been from the outside looking in and that AOPFN perspectives have had little to no influence on CNL's assessment findings. Further alignment on this concern is unlikely however CNL is committed to continue engagement and establish commitments that will enhance confidence and trust in CNL's assessment. Next steps that the AOPFN and CNL have agreed upon to address outstanding concerns are described in Section 4.4.2.5 below.

End State, Site Restoration and Future Use of the Land

In their comments on the 2020 draft EIS, the AOPFN expressed interest in end state, site restoration, and future land use planning including a co-development role in end state planning and a concern related to the long-term liability of the site beyond decommissioning. CNL explained that Section 4.3.1.9 of the EIS includes the general plans for restoration and end state with respect to the NPD Closure Project. These concerns were also addressed during discussions between AOPFN and CNL at two meetings in 2020. CNL has committed to sharing the draft site restoration plan with the AOPFN once it is complete and AOPFN has identified their desire to be directly involved from the earliest stages in co-development of restoration plans.

Future land use and land transfer are discussion topics that require the participation of AECL as the owner of the NPD site. The AOPFN has voiced their concern that this EA is proposing a specific use of the land that may curtail the possibility of future use of portions of the NPD site and that the ability to use the land in the future is central to AOPFN's rights, culture and Indigenous land use. While future land use is linked to the NPD Closure Project, it is not a requirement of the EA that the future land use be determined at this time.

This concern remains outstanding with AOPFN seeking end state planning commitments that reflect AOPFN's expectation for collaborative governance and stewardship at the site. CNL has committed to seeking input from the AOPFN on the proposed ISD project end state, including AOPFN input on lands restoration of the disturbed areas but understands that AOPFN would like a more substantial role in end-state planning. CNL will continue discussions with the AOPFN to determine how to adequately address outstanding concerns and to seek verification that this concern has been addressed.

Environmental Effects and Mitigation Measures

AOPFN is unclear how invasive species will be managed at the NPD site if introduced by vectors other than heavy equipment (e.g., by smaller vehicles, hand-held equipment, or people). It is also unclear what measures will be implemented to manage invasive species, should they be accidentally introduced or already present at the site.

In response to the AOPFN's questions on how invasive species (non-native plants, animals, aquatic life and micro-organisms that, when introduced outside of their natural environment, out-compete native species) will be managed at the NPD site, the CNL standard Management of Land, Habitat and Wildlife (900-509200-STD-006) will be followed. CNL recognizes that when invasive species become established in a new habitat, they can disrupt the existing balance of

the ecosystem. In some cases, the new species takes over, causing radical and irreversible changes to its new environment.

Aquatic invasive species are managed through prohibitions on import, transport, possession and / or release of aquatic invasive species as per the Aquatic Invasive Species Regulations. Activities conducted on different water bodies shall take into consideration the potential to spread aquatic invasive species.

Other methods used by CNL to minimize and manage the risks of invasive species spread and protect our Canadian ecosystems can be found through the Canadian Food Inspection Agency (CFIA) as per the Plant Protection Act. CNL is open to working collaboratively with the AOPFN to develop proposed mitigation measures to eliminate, reduce or control possible effects from invasive species.

This concern remains outstanding for AOPFN. CNL has committed to co-developing with the AOPFN additional mitigation measures to include within the NPD Closure Project Environmental Protection Plan to ensure that items of value to AOPFN are protected. CNL will continue discussions with the AOPFN to determine how to adequately address outstanding concerns and to seek verification that this concern has been addressed.

Free, Prior and Informed Consent (FPIC)

The AOPFN expressed concerns about whether CNL and AECL will respect the AOPFN's right to FPIC in relation to the development of a permanent hazardous waste disposal facility at the NPD site. The AOPFN has identified that it expects CNL and AECL to respect the AOPFN's right to be a Willing Host for any transition of this site from a nuclear research reactor site to a permanent hazardous waste disposal facility, and to respect the AOPFN's right to FPIC to any such proposal, as per Articles 29.2 of the United Nations' Declaration on the Rights of Indigenous Peoples (UNDRIP).

CNL is committed to work towards consensus and consent, with an understanding that UNDRIP does not necessitate a veto in decision-making. As an initial next step CNL has committed to responding to each of the AOPFN Principles and Requirements related to Nuclear Sector Projects as outlined in Appendix 3 of the 2021 August Implications Letter to discuss how the proposed NPD Closure Project can satisfy or meet the intent of these principles / requirements, including through Project commitments as appropriate. CNL understands that this concern is outstanding from AOPFN's perspective as CNL has not committed to respect AOPFN's consent decision in relation to the NPD Project decommissioning AOPFN has indicated that further collaborative assessment and negotiation of a project-specific agreement will be required for NPD as part of a consent seeking process between the parties, at the end of which AOPFN may or may not provide its free, prior and informed consent to the proposed in-situ project at NPD. CNL has indicated its openness to begin discussing a project-specific agreement for NPD.

Impacts on Rights

In their comments on the 2020 draft EIS, in the results of the Culture and Rights Study and through engagement activities, the AOPFN expressed concerns that the development of the

NPD Closure Project will adversely impact their asserted Indigenous rights. In its disposition to AOPFN's comments, CNL recognized (Table 6.2-1 in the EIS) that the NPD site is located within the AOPFN's traditional territory. However, the NPD EIS does not predict any adverse residual effects to Indigenous land and resource use (Section 9.9.3.5) because access to the NPD site boundaries is currently restricted from the public. In their feedback to this disposition, the AOPFN communicated that they did not accept this response and have noted both:

- that federal guidance on rights impact assessment holds that the proper way to characterize impacts on rights is to examine impacts not against a current, "damaged" baseline, but against a time when the right was reasonably practicable in the affected area; and
- that the technology chosen for decommissioning will have impacts on the future accessibility (and willingness to access) the site and to harvest resources at the site and in the surrounding area, for AOPFN members, which has implications for future rights practicability.

In addition, the AOPFN has noted that the EIS findings in relation to Indigenous land and resource use are not echoed in the findings of AOPFN's three studies, nor has the effects characterization in the revised EIS section on Indigenous land and resource use materially changed despite this new evidence being provided by the Indigenous peoples themselves.

The AOPFN shared the results and implications of the Culture and Rights Study in 2021 July. The study finds that AOPFN culture and means of livelihood have been disrupted over time as a result of development throughout the Algonquin Settlement Area, impacting members' ability to exercise Aboriginal rights and interests. It finds that, within the Site and Local Study Areas for the NPD Closure Project, AOPFN rights have been substantially infringed upon due to lack of access, fear and stigma associated with Canada expropriating the site for a nuclear research facility in the 1960s. The study also finds that NPD Closure Project interactions could impact AOPFN harvesting and cultural continuity rights in the NPD site area due to permanent changes to the future condition of the land and resources by creation of an in-situ disposal facility, which will be reclassified as a permanent hazardous waste disposal facility. The AOPFN study finds that there are measurable impacts on long-term ability to harvest in the NPD area will result from the project as proposed. AOPFN is concerned that CNL has underestimated the project's impacts on traditional land and resource use, as well as culture and heritage resources, which are closely linked to impacts on AOPFN rights. The assessment by CNL considers the potential for biophysical interactions and impacts from the proposed project as measured against the current baseline conditions. CNL has not conducted an assessment of impacts on rights but has provided evidence in the EIS to support the conduct of a rights impact assessment by the Crown for this environmental assessment. CNL values the information provided by AOPFN in the studies and through other means of engagement, and while the views on assessment methodology differ, CNL has enabled the view of AOPFN to be clearly presented in this document. Any observations and experiences that AOPFN considers in their

evaluation of impacts to rights will be taken into consideration by the Crown rights impact process.

CNL understands that this concern is outstanding from AOPFN's perspective as the EIS findings in relation to traditional land and resource use (which are closely related to impacts on rights) do not correlate to those from AOPFN's studies." with " CNL understands that this concern is outstanding from AOPFN's perspective as the EIS findings in relation to traditional land and resource use (which are closely related to impacts on rights) do not correlate to those from AOPFN's studies, and the related concerns that: a. AOPFN was not directly involved in the effects characterization or significance estimation process, and b. CNL has not provided evidence that its consultants working on effects characterization or significance estimation for traditional land and resource use, Indigenous culture, and Indigenous health and well-being, have expertise on these topics. AOPFN and CNL disagree on the assessment methodology, the assessment of impacts to TLRU and on the preferred decommissioning alternative. Through continued engagement at the Working Group CNL hopes that the parties are able to find common ground on this topic.

CNL will continue to engage with the AOPFN to develop actions to address concerns which arise from AOPFN's studies while CNL defers to the results of the joint AOPFN-CNRC rights impact assessment for a conclusion on whether Aboriginal or Treaty rights are impacted by the project. The AOPFN's Culture and Rights Study is an important contribution of technical data and Indigenous knowledge that augments the overall body of information of interest and concerns that AOPFN has expressed through engagement. From the results of the Culture and Rights Study, CNL also recognizes that many concerns related to Indigenous rights will need to be addressed beyond the NPD Closure Project and may be addressed under the LTRA.

Through planned Working Group meetings, CNL will continue to discuss any concerns by the AOPFN specifically related to the NPD Closure Project. CNL will maintain open dialogue with the AOPFN to better communicate how their observations and experiences, interests and concerns have been considered in the EIS for the NPD Closure Project. CNL will seek verification that this concern has been addressed through ongoing engagements.

Indigenous Health

In their comments on the 2020 draft EIS and through engagement activities, the AOPFN identified concerns related to the impacts on Indigenous health as a result of the NPD Closure Project and the AOPFN requested support for a Diet and Harvest Study. CNL assessed the potential effects on Indigenous health from consumption of local food using a predictive model to estimate radiological dose exposure as summarized in the Post Closure Safety Assessment. A self-sufficient group was chosen as the model receptors; this group was assumed to be adults and children who obtain all of their food through hunting and gathering using the area surrounding the disposal site, including the Ottawa River. It is assumed that this self-sufficient group would have elevated consumption of fish and wild game compared to a local or urban population. The resulting predicted radiological dose to this group is well below the public dose

limit; the EIS does not predict any adverse residual effects to human, including Indigenous, health (Section 9.8.3.5 and 9.10.3.5 of the EIS). The AOPFN expressed that they disagreed with CNL's assessment on the basis that there are other determinants of health that are important to the AOPFN including the avoidance of consuming traditional foods and lack of meaningful access to portions of AOPFN territory. AOPFN indicated that the EIS does not cover these Indigenous determinants of health or how the project may impact on them.

Through the contribution agreement signed in 2020 September, CNL committed to funding a Diet and Harvest Study to validate the assumptions used in the 2020 revised draft EIS model which assessed the impacts of the NPD Closure Project on a self-sufficient Indigenous receptor. The Diet and Harvest Study was provided to CNL by AOPFN in the summer of 2021. It provides important information to evaluate the extent to which NPD Closure Project activities may impact Indigenous health. Previously, a lifestyle survey conducted by CNL was used to determine the residual effects of the NPD Closure Project on Indigenous health, but because the survey did not adequately represent the values and practices of Indigenous peoples, all reference to the lifestyle survey has been removed from the revised draft EIS. CNL is committed to continue discussion with AOPFN regarding impacts on Indigenous determinants of health and to update the final EIS and / or subsequent IER based on these engagements.

The perceptions and willingness to consume traditional foods can partially be addressed by an Indigenous-driven risk communication strategy for the NPD Closure Project which CNL has committed to support. CNL acknowledges the AOPFN have identified the key role of the country foods monitoring program in mitigating the concerns of the AOPFN. The country foods monitoring is not specific to the NPD Closure Project and is related to CNL's overall operations in the region, but AOPFN has indicated that it needs to be applied specifically to the NPD site given concerns about radioactive risks associated with country foods and waters specific to the NPD site. As attested by the outcome of previous engagements, CNL recognizes that these concerns will need to be addressed beyond the NPD Closure Project and may be addressed under the LTRA.

Through planned Working Group meetings, CNL will continue to discuss any concerns by the AOPFN specifically related to the NPD Closure Project including incorporation of Diet and Harvest Study results as they relate to overall community wellness.

CNL understands that this concern is outstanding from AOPFN's perspective, because to date, CNL has not revised its assessment of Indigenous human health in relation to the NPD Closure Project to adopt a more holistic evaluation of human health. CNL is committed to working with AOPFN to incorporate Harvest and Diet Study Results as they relate to Indigenous health and overall community wellness in a subsequent revision of the IER TSD. Through continued engagement at the Working Group CNL hopes that the parties are able to find common ground on this topic. CNL wishes to continue discussions with AOPFN to better understand the community's perspective and values and any fears, or concerns associated with the NPD site

and traditional use near the site. Next steps between AOPFN and CNL to continue to address outstanding concerns are described in Section 4.4.2.5 below.

Long-term Safety

Within the AKLUS report, AOPFN members identified concerns about long-term site integrity and monitoring, including the need for monitoring based on Algonquin principles. In their response to address this concern, CNL explained that the EIS assesses the probabilities and potential impacts to site integrity from natural hazards, flooding, seismic activity, and extreme temperature changes (in Sections 8.12 and 9.14 of the EIS) and that monitoring will continue for as long as necessary to verify the results of the assessment in the EIS.

CNL understands that this concern is outstanding from AOPFN's perspective, as the duration of the hazard exceeds the length of the Institutional Controls phase. CNL's technical assessment shows that there are no long-term effects resulting from the NPD Closure Project. CNL is committed to collaborative development of risk-informed communication materials for the NPD Closure Project for AOPFN community members and application of the AOPFN Algonquin Food Program and Risk Communication Program at the NPD Site. Further CNL is committed to support the AOPFN with NPD Closure Project and NPD site-specific Guardian monitoring activities, incorporating traditional knowledge and AOPFN VCs. CNL welcomes recommendations for other monitoring / mitigation activities that should be integrated into the existing program to ensure that environmental and cultural components of value to AOPFN are protected. CNL Commitments are summarized in Section 4.4.2.5.

Monitoring

In their comments on the 2020 draft EIS and through engagement activities, the AOPFN expressed interest in becoming involved in environmental monitoring at NPD and to be involved in co-development of the NPD Closure Project Follow-up Monitoring Plan and overall site Environmental Protection Program. CNL encourages the involvement by all Indigenous Nations, communities, and organizations in its monitoring programs and have offered to have the AOPFN visit the site to observe the current monitoring program.

In 2020 November, CNL provided draft dispositions to all the AOPFN comments, including those on the environmental monitoring. The AOPFN provided feedback on these dispositions in 2020 December and two meetings to discuss responses were held in 2020. In their 2020 December feedback, the AOPFN indicated that CNL's dispositions to address the AOPFN's concern over environmental monitoring were partially adequate.

In 2022 October, AOPFN provided CNL technical and Algonquin Knowledge comments on the NPD EAFMPs. AOPFN shared that the plans were well-organized and comprehensive. AOPFN suggested the addition of an Executive Summary for each of the plans and including any additional information noting that the plans were drafted in 2018. The AOPFN noted that because the plans were drafted prior to the commitment from CNL to incorporate Algonquin Knowledge into project monitoring there is an expectation that the plans are updated. AOPFN

provided copies of their comments on the NSDF EAFMP from 2021 October and additional comments to be reviewed and incorporated where possible into the NPD plans. AOPFN requested that CNL provide feedback on the technical comments and review the comments made on the NSDF EAFMPs. NPD EAFMPs were discussed at the 2022 December Working Group, where CNL stressed that the plans did not need to be finalized with the revised draft EIS submission and that the opportunity to incorporate the comments and Algonquin Knowledge from the NSDF plans was still the path forward. CNL is aware that AOPFN's preference is for more progress to be made on the EAFMPs prior to the submission of EIS.

Some of the aspects of environmental monitoring and the Guardian Program are broad and will need to be addressed beyond the NPD Closure Project and may be addressed under the LTRA. CNL is committed to support the AOPFN with NPD Closure Project and NPD site-specific Guardian monitoring activities, incorporating traditional knowledge and AOPFN VCs. CNL welcomes recommendations for other monitoring / mitigation activities that should be integrated into CNL's existing program to ensure that environmental and cultural components of value to AOPFN are protected. CNL is committed to engaging with the AOPFN in the NPD Closure Project EA Follow-up Program development. CNL recognizes that these plans would benefit from incorporation of Indigenous knowledge and welcomes AOPFN comments, and other Indigenous Nations, communities and organizations.

CNL understands that this concern is outstanding from AOPFN's perspective until such time as there is a dedicated Indigenous-led, Indigenous Knowledge driven component integrated into the site monitoring at NPD. CNL will continue discussions with AOPFN, through the Working Group to determine how to integrate Indigenous knowledge in the monitoring plans for the NPD site and to seek verification that this concern has been addressed. Next steps that the AOPFN and CNL have agreed upon to continue to address outstanding concerns are described in Section 4.4.2.5 below.

National Policy

In their feedback to CNL in 2023 April, AOPFN expressed concerned that the Government of Canada does not yet have a modern nuclear waste management policy in place and that a lack of coordinated planning in past to develop permanent facilities has resulted in a proposed facility in AOPFN territory that it has not consented to. CNL has responded that this topic is generally beyond the scope of the NPD Closure Project.

It is AECL's responsibility to manage their historic nuclear obligations now and not leave it for future generations, therefore the decision was made by AECL to complete the environmental remediation of the NPD site in a timely manner. CNL executes AECL's work under the GoCo agreements. The proposal to create a disposal facility on the NPD reactor site through in-situ disposal has been chosen as a safe and immediate decommissioning option for the NPD reactor with respect to the environment, workers and the public. It is important to highlight that this closure will reduce historic nuclear liabilities for Canada and, at the same time, reduce the

footprint of the NPD site.

Although this concern is out of scope of the project, the Government of Canada released Canada's Policy for Radioactive Waste Management and Decommissioning in late 2023.

Protection of Flora and Fauna

In their comments on the 2020 draft EIS and through the results of the AKLUS study, AOPFN highlighted biological concerns including: impacts to the riparian ecosystem, road mortality impacts, fish, fish habitat, species at risk and the Kichi-Sìbì (Ottawa River). Collectively, mitigation measures for the protection of biological interests, specifically species at risk, are outlined in Sections 9.6.3.2 (Terrestrial Environment). CNL also has an Ecological Risk Assessment (EcoRA) TSD where potential impacts to biota, including those in the Kichi-Sìbì (Ottawa River), from chemical and radiological releases during all phases of the project is assessed. The EcoRA found that no potential exposure-related effects to aquatic biota are expected during the Decommissioning Execution phase. The EcoRA also determined that no adverse residual effects to aquatic biota are anticipated during the Institutional Controls or Post-Institutional Controls phases. The AOPFN has identified that this issue is partially resolved and that more Algonquin Knowledge of species and habitat needs to be gathered and integrated. Through the contribution agreement, AOPFN and CNL have worked together to conduct site-wide Algonquin Knowledge Seasonal Inventories at the NPD site in 2022 and 2023. AOPFN members generously shared their time and interest in biodiversity, and in turn CNL was able to share information on the nuclear industry and environmental monitoring. The time spent together in the field has proven to be very valuable to improve the relationship as well as to increase the available biodiversity data at the NPD site.

CNL understands that this concern is partially resolved from AOPFN's perspective. AOPFN is seeking a dedicated Indigenous-led Indigenous Knowledge component integrated into the site monitoring at NPD. The participation of AOPFN in monitoring work for the NPD Closure Project ensures consideration of Indigenous knowledge, collaboration, mutual respect, ongoing participation and relationship building for the future. CNL and the AOPFN are continuing engagement through the framework of the contribution agreement. Using the findings and recommendations from AOPFN's site-wide inventory, CNL commits to work with AOPFN to develop specific project and corporate commitments that consider AOPFN valued species and components and mitigations to ensure AOPFN valued species are protected. CNL will seek verification that this concern has been addressed through ongoing engagements. Section 4.4.2.5 below outlines further next steps agreed upon between the AOPFN and CNL to continue to address outstanding interests.

Protection of the Ottawa River

Throughout engagement with CNL, and in their comments on the 2020 draft EIS and the results of the AKLUS report, the AOPFN expressed that the protection of the Kichi-Sìbì (Ottawa River) and the riparian ecosystem is of high priority. The AOPFN have consistently voiced their

concern over the proximity of the NPD disposal site to the Kichi-Sibì (Ottawa River) and the risk of release of radiological and other hazardous wastes into the river through surface water discharge.

CNL's commitment to protecting the Kichi-Sibì (Ottawa River) is reflected in its in-design mitigation measures to contain and isolate NPD's waste inventory (Section 4.1) and the NPD EIS does not predict any adverse residual effects on the surface water environment encompassing the Kichi-Sibì (Ottawa River) (Section 9.3.3.5). CNL also clarified that the NPD Closure project decommissioning activities won't impact the currently disturbed riparian area. For this reason, no impact assessment has been conducted for this habitat.

To effectively address this concern, CNL is engaging with AOPFN community members and the AOPFN staff and their consultants regarding the results of the NPD EIS with respect to the protection of the Kichi-Sibì. CNL has provided information on in-design mitigation measures that will ensure discharges do not cause adverse environmental effects to the Kichi-Sibì (Ottawa River). Based on AOPFN feedback, CNL has updated and expanded mitigation measures for the protection of surface water (Section 9.3.3.2 in the EIS).

CNL understands that this concern is outstanding from AOPFN's perspective until such time as there is a dedicated Indigenous-led, Indigenous Knowledge driven component integrated into the site monitoring at NPD. Further, AOPFN would also like to see re-establishment of a more natural riparian habitat along the shore near the facility as part of site restoration activities. CNL and the AOPFN are continuing engagement through the framework of the contribution agreement. CNL will continue discussions on the implementation of the Guardian Program at the NPD site. Next steps to address interests and concerns related to the protection of the Kichi-Sibì are found in Section 6.2.4.2.5 below.

Socio-Economic

In their comments on the 2020 revised draft EIS and through engagement activities, the AOPFN expressed that they would like to see broader socio-economic interests that focus on Indigenous values discussed in the EIS. In the 2020 November response to this concern, CNL provided dispositions to AOPFN comments related to socio-economic indicators which were derived from secondary census data as discussed in the EIS. However, CNL recognizes that all Indigenous Nations, communities, and organizations may define socio-economic wellbeing in ways that cannot be adequately captured by census data. To address this concern, CNL discussed its dispositions to AOPFN's comments during two meetings in 2020; in their 2020 December response to CNL's dispositions, the AOPFN indicated that this concern has not been adequately addressed, and no direct substantive discussions on this topic have occurred as of 2021 November.

CNL understands that this concern is outstanding from AOPFN's perspective.

The contribution agreement signed in 2020 September enabled the establishment of an AOPFN Community Advisory Committee which has the potential to facilitate primary collection of socio-economic data specific to the AOPFN. In tandem with the anticipated data from this Committee, the LTRA addresses Indigenous-specific socio-economic data as impacted by CNL operations. Through planned Working Group meetings, CNL will continue to discuss any concerns by the AOPFN specifically related to the NPD Closure Project. Through the Working Group and ongoing engagement with AOPFN, CNL will maintain open dialogue to discuss this and other concerns and to seek verification that dispositions specific to the NPD Closure Project are adequate.

Next steps that the AOPFN and CNL have agreed upon to continue to address outstanding concerns are described in Section 4.4.2.5 below.

Technical

In their comments on the 2020 draft EIS and through engagement activities, the AOPFN requested further clarification to understand technical aspects of the NPD Closure Project EA such as atmospheric dust emissions, and effluent discharges to the aquatic environment as assessed for NPD Closure Project. In 2020 November, CNL provided written dispositions in response to specific questions, many of which were related to the conclusions in the 2020 draft EIS. Mitigation measures to control dust emissions are summarized in Section 9.2.3; the potential effects to aquatic biota from expected emissions during all phases of the NPD Closure Project are summarized in Section 9.4.3. The AOPFN provided written feedback on these dispositions in 2020 December and verbal feedback during two meetings in 2020. AOPFN accepted CNL's response regarding dust emissions during NPD Closure Project activities and indicated that they would need to review additional supporting documents (i.e., the PostSA) to better understand potential effluent discharges to the aquatic environment. CNL and the AOPFN are continuing engagement through the framework of the contribution agreement. CNL will continue discussions on the implementation of the Guardian Program at the NPD site.

Traditional Land and Resource Use and Cultural Impacts

In their 2020 July comments on the 2020 draft EIS, the AOPFN have indicated an interest in a number of topics related to traditional knowledge, land and resource use, and cultural impacts from the NPD Closure Project, as well as concern that the traditional land and resource use study areas in the EIS differ from the study areas used by the AOPFN in their AKLUS, Diet and Harvest Study and Culture and Rights Study. It is AOPFN's position that by choosing to maintain the generic areas for the Local Study Area and Regional Study Area for their assessment of impacts to traditional land and resource use, as compared to the much larger areas used in the three AOPFN studies, CNL is ignoring Algonquin Knowledge in this area. AOPFN notes that this highlights a continued lack of understanding, by CNL, of the impact zone on traditional land use at and surrounding the NPD site. According to AOPFN members, NPD Closure Project interactions could impact AOPFN harvesting and traditional use rights in the study area by

exacerbating concerns about contamination of water, fish, wildlife, and medicines in proximity to the project.

Within the scope of the EIS, CNL assumed that traditional uses occur near the NPD site, whether on the Kichi-Sibi (Ottawa River), on accessible private lands outside the restricted / fenced area, and / or on provincial Crown land outside the restricted / fenced area. The Local and Regional Study Area boundaries were established based on the premise that they would include the areas within the range of potential effects from the NPD Closure Project. CNL recognized that different all Indigenous Nations, communities, and organizations might establish different study area boundaries based on their own particular interests, effects considerations and other factors. CNL anticipated that the study areas were likely going to be different than what was defined in the EIS and considers that this does not present an issue provided that all Indigenous Nations, communities, and organizations' traditional knowledge studies had study areas that were larger than what was being proposed in the EIS. The rationale for this being that this would ensure traditional uses were collected and described for at least the areas within the CNL defined potential range of effects.

The EIS concludes that the NPD Closure Project is not expected to affect traditional land and resource use. In fact, it may improve traditional land and resource use through improved relationship, risk-informed communications, input into the project and reconnection to the land through monitoring activities. CNL recognizes that the AOPFN disagrees with this conclusion, in part because of the AOPFN's observations of safety and quality of experience on the land and associated perception of risk (e.g., fears of contamination of land and water receptors), a concern strongly voiced by the AOPFN during engagement with CNL. As well as in the three AOPFN studies. Additionally, the AOPFN expressed that these observations and perceptions may result in the community's continued alienation from their traditional lands into the far future. While CNL provided dispositions based on the results of the environmental assessment for the NPD Closure Project and data from the EcoRA, the AOPFN requested that CNL commit to a focused workshop to better understand AOPFN's observations and beliefs and to work to mitigate concerns about safety, quality of experience on the land, and contamination risks.

In 2021 July, the AOPFN provided a combined summary of the results and implications of the AOPFN AKLUS, Diet and Harvest Study, and Culture and Rights Study. The AOPFN studies find that there are measurable impacts on long-term ability to harvest in the NPD area will result from the project as proposed. AOPFN is concerned that CNL has underestimated the project's impacts on traditional land and resource use, as well as culture and heritage resources, and by extension has underestimated impacts on AOPFN rights. The strictly biophysical effects considered by CNL do not encompass the observations and experiences that AOPFN considers in its assessment. AOPFN also provided comments on the traditional land and resource use baseline and effects section of the 2020 revised draft EIS for the NPD Closure Project. Using this feedback, CNL has made additional improvements to Section 8.9 and 9.9 to include content from the 2021 Harvest and Diet and Culture and Rights studies and sought feedback from AOPFN on this new content.

The issue is outstanding from AOPFN's perspective, given the very different findings and study area boundaries of its three studies in comparison to the revised draft EIS. CNL will continue to engage with the AOPFN to ensure CNL commitments will clearly and appropriately address potential impacts to AOPFN traditional land and resource use with respect to the NPD Closure Project. Many concerns will need to be addressed beyond the NPD Closure Project and may be addressed under the LTRA.

Through planned Working Group meetings, CNL will maintain open dialogue with the AOPFN to better communicate how their observations and experiences, interests and concerns have been considered in the EIS for the NPD Closure Project. CNL will seek verification that this concern has been addressed through ongoing engagements. CNL and AOPFN have also agreed that it is important to continue to identify proactive additional commitments through the remainder of the EA process and will use the Working Group for this purpose.

Valued Components (VCs)

Throughout engagement activities, direct correspondence, in their comments on the 2020 draft EIS, and the results of their studies AOPFN indicated interest in the environmental VCs that were incorporated in the EA for the NPD Closure Project. CNL incorporated AOPFN feedback on VCs into Section 6.3.2, including Table 6.3-1 and Table 6.3-4 of the revised draft EIS. Some AOPFN VCs were not previously included in the EIS while others were represented by species that were already evaluated as VCs in the EIS. Tables 6.3-1 and 6.3-4 of the EIS highlight how VCs identified by AOPFN are represented and evaluated in the EIS. Follow-up monitoring of environmental pathways (air, water, groundwater) will ensure that VCs are protected.

Through the contribution agreement, AOPFN and CNL have worked together to conduct site-wide Algonquin Knowledge Seasonal Inventories at the NPD site in 2022 and 2023. AOPFN members generously shared their time and interest in biodiversity, and in turn CNL was able to share information on the nuclear industry and environmental monitoring. The time spent together in the field has proven to be very valuable to improve the relationship as well as to increase the available biodiversity data at the NPD site.

CNL understands that this concern is outstanding from AOPFN's perspective, with specific issues raised in the AOPFN-developed Section 6.3.2.1 of the revised draft EIS.

AOPFN disagrees with using one species to represent another (or several others) and have identified here the importance of establishing both an Indigenous baseline and Indigenous Knowledge monitoring system. As noted in the Table of Interests and Concerns, CNL has committed to supporting AOPFN-led site inventory work to develop an Algonquin Knowledge baseline for the entire NPD site. Where AOPFN identifies important resources that could be impacted by the project, CNL is committed to evaluate and implement additional mitigation measures if necessary.

Summary

At present, this summary of interests and concerns is a consolidation of all the interests and concerns the AOPFN have brought forward on the NPD Closure Project.

The project-specific concerns raised by the AOPFN are considered in the context of the EIS. CNL will continue to respond to questions and concerns from the AOPFN through its ongoing engagement with both the AOPFN Working Group and AAC. CNL will seek to understand those concerns in the context of the EIS and the NPD Closure Project. CNL and AOPFN have already agreed to several commitments related to the NPD Closure Project which are highlighted above and are also included in the Next Steps column of the *Table of Interests and Concerns* (Appendix K, Table K-3) and will continue to work closely to resolve outstanding concerns.

4.4.2.4 Verification

The AOPFN have provided several key inputs since 2020, identifying interests and concerns related to the NPD Closure Project, through: comments on the 2020 revised draft EIS, feedback on VCs, the AOPFN's AKLUS Report (2020 October), the AOPFN AMA (2022 April) and two additional studies (in 2021 August): the Diet and Harvest Study and the Culture and Rights Study. To confirm CNL has adequately captured the AOPFN's interests and concerns, position and knowledge, the AOPFN and CNL underwent a verification process where CNL provided key documentation to the AOPFN for their review and feedback. Through this process, the AOPFN has reviewed and provided feedback on their Table of Interests and Concerns, list of VCs, the IER and Sections 6.0, 8.9 and 9.9 of the draft EIS. While not all the AOPFN's concerns have been mitigated by this process to date, CNL has made every effort to verify that the AOPFN's position, interests and concerns were adequately characterized. CNL continues to work with the AOPFN to address their concerns through ongoing discussions. And, as stated above, the AOPFN and CNL continue to work towards having a long-term relationship agreement in place in the near term.

The AOPFN have been engaging closely with CNL on both the NPD Closure Project and the NSDF Project in 2021. As such, the AOPFN were anticipating that CNL would provide the key interests and concerns and requested this in 2021 June.

In 2021 June, CNL shared the *Table of Interests and Concerns* with the AOPFN asking for verification that CNL had accurately represented the AOPFN's list of interests and concerns and that, "where possible" verify that how CNL was addressing the interest or concern was adequate.

In 2021 August, the AOPFN provided initial feedback on the *Table of Interests and Concerns*. CNL revised the *Table of Interests and Concerns* and shared the revised Table back to the AOPFN at the end of 2021 August.

The AOPFN shared further comments on the Table in early 2021 September, and CNL provided a revised table incorporating these edits late in September. The AOPFN shared additional

comments on the *Table of Interests and Concerns* in early 2021 October, and CNL shared a revised Table back a few days later. The AOPFN and CNL met in late 2021 October, and discussed the next steps needed for CNL to be able to submit a version of the revised draft EIS that accurately reflected the AOPFN perspective – including an up-to-date version of the *Table of Interests and Concerns*.

After the meeting, in 2021 October, CNL shared the plan for resubmission that the AOPFN and CNL had discussed and requested any written complimentary materials from the AOPFN by the end of 2021 November, including written verification of the *Table of Interests and Concerns*.

In early 2021 November, CNL shared several draft EIS sections, as well as the most recent revision of the *Table of Interests and Concerns*. In 2021 November, the AOPFN shared back these sections with the inclusion of AOPFN text in specific subsections reserved for the AOPFN perspective as well as edits to the *Table of Interests and Concerns* with the understanding that this version would be included in the 2021 December EIS submission. Therefore, the revised *Table of Interests and Concerns* provided by AOPFN in late November and included in the 2021 December EIS was verified.

In 2022 January, the CNSC informed CNL that the 2021 December EIS submission was incomplete. The CNSC staff directed CNL to revise the *Tables of Interests and Concerns* for clarity. CNL developed a simplified *Table of Interests and Concerns* (Table K-3 in Appendix K), and a table which maps how this simplified table relates to detailed input and feedback from the AOPFN (Table K-2 in Appendix K). The new table was shared with the AOPFN in 2022 April, asking that the AOPFN verify that the new table retained the AOPFN's interests and concerns. CNL received feedback on the revised table in 2022 June, AOPFN noted that it could not endorse this table as adequate for resubmission purposes until such time as column 2, in particular, is revised. AOPFN stated that column two did not accurately reflect the concerns and that CNL had mis-classified the status of some of the issues. CNL requested a sub-Working Group meeting with the AOPFN to review the purpose of the updated table and a meeting was held in 2022 July to discuss the required updates. CNL and AOPFN agreed to re-visit the discussion about the proposed edits to the table at a future date, closer to submission. Due to the importance of the summary *Table of Interests and Concerns* and the AOPFN's input on verifying its completeness and accuracy, CNL shared the most updated version of this table 2023 May. CNL noted the updates to the *Table of Interests and Concerns*, primarily related to the recent progress made discussing outstanding issues. Specifically, CNL had made updates to its response to the interest / concern and the status of the concern. The AOPFN confirmed receipt in 2023 May and provided feedback in 2023 June. CNL has incorporated feedback and shared a revised table to AOPFN in 2023 July for verification. During the remainder of 2023 CNL and AOPFN continued to revise the Tables. 2023 December, CNL sent an updated Summary of AOPFN Key Interests and Concerns and the Commitments working tables along with forward facing list for the EIS. Both documents had been updated with edits suggested by AOPFN in writing and at the 2023 November, meeting. At the end of 2024 January, AOPFN confirmed that

AOPFN was not going to provide further comments on the tables at this time. AOPFN noted that there were remaining elements that the parties do not agree on.

4.4.2.5 Next Steps

CNL's commitments within the "Next Steps" column of the *Table of Interests and Concerns* in Table K-3 of Appendix K and highlighted in Section 4.4.2.3, are reflective of the feedback CNL has received to date in the EA process from the AOPFN's technical review of the 2020 draft EIS, key areas of interest and concern highlighted during Working Group discussions and by the AAC, the AOPFN studies (AKLUS, Diet and Harvest, Culture and Rights) and their implications. CNL acknowledges that several areas of interest and concern for AOPFN are still unresolved and that for some concerns alignment will not be achieved. CNL has and will provide additional information and work closely with AOPFN to address the concerns. The IER, as a living document, will include any updates related to the progress of these next steps at the time of submission of the final EIS and prior to the Commission Hearing process.

In response to AOPFN concerns, should the proposed NPD Closure Project proceed, CNL commits to implement the commitments described below. CNL and AOPFN have also agreed that it is important to continue to identify proactive additional commitments through the remainder of the EA process. The Working Group between CNL and AOPFN will be used as a forum to continue to explore required commitments should the NPD Closure Project proceed.

AOPFN-1. CNL is committed to continuing a contribution agreement, or equivalent, for 10 years (2023-2033).

CNL is committed to providing the funding to continue the Working Group and AOPFN Advisory Committee (AAC) for 10 years (2023-2033), or, until a site-wide arrangement takes over.

AOPFN-2. CNL is supportive of, and will assist with, the logistics and funding for location-specific commemoration and/or cultural recognition activities by AOPFN for the NPD Site (which includes collaborative development and implementation of an NPD Cultural Protection and Commemoration Plan) covering a 10-year period (2023-2033).

The CRL site access protocol will also allow access to the NPD site (individuals who have clearance at CRL will also have clearance at NPD). This access will facilitate NPD Closure Project Commitments.

AOPFN-3. CNL is committed to the collaborative development of risk-informed communication materials for the NPD Closure Project for AOPFN community members. Topics to include in communication materials are: history of the site, project information, and potential risks from decommissioning options and potential health risks of using the area for hunting / fishing / harvesting, as well as results of monitoring activities. Development and implementation of NPD-specific communication materials will continue for 10 years (2023-2033) to help build confidence in project performance.

CNL will support application of the AOPFN Algonquin Foods Program at NPD for a 10-year period (2023-2033).

AOPFN-4. CNL is committed to developing with AOPFN, a meaningful role for AOPFN in monitoring for the NPD Closure Project. CNL will support Indigenous knowledge monitoring for the Project over a 10-year period (2023-2033) to help build confidence in project performance.

CNL is committed to support AOPFN's desired involvement in NPD Closure Project monitoring and NPD site-specific AOPFN-led Guardian monitoring activities, incorporating traditional knowledge and AOPFN valued components.

CNL will utilize the EAFMP and the AOPFN-led Guardian Program in the characterization of potential impacts on AOPFN traditional land and resource use in proximity to the NPD Closure Project. Appropriate adaptive management measures will be co-developed between AOPFN and CNL based on monitoring results, if greater than expected impacts occur.

CNL will share its plans for ecological data collection with AOPFN on an annual basis for the next 10 years (2023-2033) and will facilitate AOPFN participation in activities of interest to AOPFN.

CNL will include AOPFN Algonquin Knowledge, collected independently by AOPFN Guardians in the terrestrial, riparian and aquatic environments, in future ecological data collection programs at the NPD site.

AOPFN-5. CNL supported an NPD Site "Inventory" data collection period, where AOPFN Guardians and Traditional Knowledge holders conducted a survey of the NPD site for wildlife and plant habitat, and areas of potential cultural importance. Four seasonal visits were completed in 2022-2023 and AOPFN has shared its findings.

CNL is open to providing AOPFN with an opportunity to conduct harvesting of resources from the NPD site if desired by AOPFN members.

CNL commits to support and fund further AOPFN-led site inventory work covering the whole NPD site in 2024 and 2025 in order to develop an Algonquin Knowledge baseline for the site.

Where AOPFN identifies important resources that could be impacted by the NPD Closure Project, CNL is committed to work with AOPFN to evaluate and implement additional mitigation measures if necessary. CNL expects that this activity may be informed by the 2022/23 site inventory work.

AOPFN-6. CNL is committed to achieving understanding and support from AOPFN as part of the NPD Closure Project engagement. Where there are differences of opinion or concerns that need to be addressed, CNL is willing to explore mitigation measures and formulate commitments with the AOPFN with the intention of trying to remove or lessen the concern.

AOPFN-7. CNL to utilize the AKLUS results in the characterization of potential impacts on AOPFN traditional land and resource use in proximity to the NPD Closure Project. Appropriate adaptive management measures will be co-developed between AOPFN and CNL based on monitoring results if greater than expected impacts occur.

Through the NPD Closure Project funding, CNL will provide capacity for two updates to the AKLUS – the first update will occur three years after Project approval (which aligns closely with

end of decommissioning execution activities) and the second update will occur five years after the first update, to show any potential changes since site closure.

AOPFN-8. CNL is committed to engaging with AOPFN in the NPD Closure Project EAFMP development. CNL recognizes that our follow-up monitoring plans would benefit from incorporation of Indigenous knowledge and welcomes AOPFN comments on the plans. The scope of the EAFMP monitoring, as per regulatory requirements, must remain the as validation of project performance. CNL can provide AOPFN with a co-development role in identifying adaptive management triggers/thresholds and responses in relation to valued components related to AOPFN rights and interests, to be built into the EAFMP.

CNL will utilize the EAFMP and the AOPFN-led Guardian Program in the characterization of potential impacts on AOPFN traditional land and resource use in proximity to the NPD Closure Project. Appropriate adaptive management measures will be co-developed between AOPFN and CNL based on monitoring results, if greater than expected impacts occur.

AOPFN-9. CNL commits to sharing the contracting plan for the NPD Closure Project with AOPFN. CNL commits to sharing employment opportunities with the AOPFN Working Group to determine and identify how to best encourage inclusion of AOPFN members in the execution of the NPD Closure Project work.

AOPFN-10. CNL will involve AOPFN in any future archaeological programs at or around the NPD site. CNL will implement the following existing project planning, monitoring and management at the NPD site (developed under the NSDF Project):

- Chance Find Procedure;
- Traditional Land and Resource Use Discovery Plan; and
- Eagle Feather Protocol

AOPFN-11. CNL, AECL and AOPFN can explore opportunities for increased access to the existing NPD site following decommissioning.

CNL will consider offsets at off-site locations brought forward by AOPFN, which are commensurate with the wildlife habitat impacts associated with the NPD Closure Project.

AOPFN-12. CNL will seek AOPFN's input on aspects of value to the community that need to be considered during decommissioning. CNL is committed to co-developing with the AOPFN additional mitigation measures to include within the NPD Closure Project Environmental Protection Plan to ensure that items of value to AOPFN are protected. This activity to be completed during the project planning phase.

AOPFN-13. CNL is committed to seeking input from AOPFN on the proposed in-situ disposal project end state, including AOPFN input on lands restoration of the disturbed areas during NPD site restoration and end state planning.

AOPFN-14. CNL is committed to having all NPD Project staff and contractors attend AOPFN's Cultural Awareness Training.

AOPFN-15. CNL supported an AOPFN AMA, completed in 2022 April. CNL committed to including AOPFN AMA findings directly within the EIS along with the full AOPFN AMA as an appendix. AOPFN has reviewed the AMA section and provided feedback.

Specific next steps that will be initiated prior to the issuance of the final EIS include:

- AOPFN and CNL will continue to meet in relation to monitoring, mitigation and other interests and concerns. If impacts are determined in the CNSC rights assessment, then accommodations will be negotiated;
- AOPFN and CNL will jointly review the draft EA Follow-up Plan and make efforts to integrate AOPFN and Indigenous Knowledge into the plan;
- AOPFN and CNL will continue to discuss the implementation of the Guardian program at the NPD site;
- AOPFN and CNL will continue discussions on the potential impacts on traditional land and resource use, Indigenous culture, and Indigenous health;
- AOPFN and CNL will collaborate on planning site restoration activities.

4.4.3 Métis Nation of Ontario (MNO)

The MNO was formed in 1993 to represent communities and individuals recognized by the Métis Nation within Ontario and works to represent the rights, interests and collective aspirations of Métis people and communities throughout the province. The MNO identifies a registry of over 20,000 Métis citizens (MNO 2020). Members of the MNO Mattawa / Lake Nipissing Métis Traditional Territory Consultation Committee and MNO Lands, Resources and Consultation Branch have participated in CNL's Indigenous Engagement Program for the project. A fuller description of the MNO can be found in Chapter 3 of the IER.

The MNO and CNL have signed a MOU for the NSDF Project and NPD Closure Project that has supported the MNO enhanced participation in the NPD Closure Project. The MOU is between CNL and the MNO, more specifically the Mattawa / Lake Nipissing Traditional Territory Consultation Committee, which includes the Sudbury Métis Council, the North Bay Métis Council and the Mattawa Métis Council which represent the regional rights-bearing Métis community. A representative of the MNO has been a member of CNL's ESC since 2012 March.

The summarized objectives of the MOU include: to establish, in relation to the projects, a mutually beneficial, cooperative, productive and ongoing working relationship; provide a process for CNL to engage with the local and regional Métis communities, address any potential effects and discuss necessary mitigation measures; enhance the ability of the MNO to participate in the environmental assessment processes for the NPD Closure Project. The MOU also indicates the intention of both parties to pursue a longer-term relationship between CNL and the MNO.

CNL has provided funding to the MNO to assist them in enhanced engagement, specific funding for technical studies, VC workshop, and funds to allow staff to co-ordinate activities and work with CNL. The MNO have focused their technical reviews on three specific topics: follow-up monitoring, hydrogeology and archaeology. The MNO also carried out a comprehensive traditional knowledge and land study funded jointly by the CNSC and CNL.

4.4.3.1 Engagement

Table L-1 of Appendix L includes a complete list of engagement activities that have occurred with MNO on the NPD Closure Project. CNL has also provided a narrative summary of engagement with MNO.

Relationship-building and agreements

CNL first reached out directly to the MNO in 2016 June to hold a teleconference with MNO representatives to introduce the proposed NPD Closure Project and enable preliminary discussion.

CNL followed up to this meeting with a letter in 2016 July. This letter included a request for community input on any potential adverse impacts from project activities.

Later in 2016 July, the MNO and CNL held a meeting share an overview with a wider group of MNO representatives. After these initial contacts, there was some follow-up, including a letter sent from CNL to the MNO in 2016 December, which made inquiries about MNO asserted rights and traditional land and resource use activities.

In the fall of 2017, the MNO and CNL corresponded several times and held a meeting in Sudbury in September. The MNO hosted this meeting where CNL shared information on environmental monitoring, environmental assessments, a project overview, and the EA process. In late 2017, CNL shared the draft EIS and the IER. CNL invited MNO participation in the public comment period for the draft EIS and requested community input and feedback for incorporation into the project. The MNO reviewed the draft EIS and submitted comments to the CNSC. CNL provided a number of technical documents to support their review.

MNO and CNL met in 2018 March and focused on the development of an MOU to create a framework for relationship building between CNL and the MNO. This MOU set the platform for MNO, AECL and CNL to enter into discussions on an LRTA. LTRA meetings continue with signing estimated in 2021. Another aspect of particular importance relating to the MOU was the CNL's provision of partial capacity to undertake a TKLUS. This was jointly funded by CNL and the CNSC. Information sharing occurred in follow-up to the 2018 March meeting. Further correspondence between the MNO and CNL occurred in 2018 culminating in a meeting and site visit in 2018 June and the signing of the MOU in 2018 December.

The MNO and CNL met again in North Bay for a two-part meeting in late 2019. The first part involved discussions with the MNO Mattawa / Lake Nipissing Traditional Territory Consultation Committee Councilors. In the evening, a community information session for MNO citizens was held. This information session included a presentation by project representatives and the opportunity for questioning.

The MNO and CNL met in early 2021 October to extend the current MOU, supporting the MNO's continued participation and engagement on the NPD Closure Project. As well, meetings aimed at developing an LTRA between CNL, the MNO and AECL, to cover all CNL's activities and operations in the region, are ongoing.

Traditional Knowledge and Land Use Study, Valued Components and technical reviews

In 2019 January, the MNO provided a hydrogeological and archaeological technical review to the project. And in 2019 February, the MNO shared the TKLUS, which gave insight into the traditional land and resource use of the MNO citizens in the region. CNL has incorporated information from this TKLUS into the revised draft EIS. Following the receipt of the TKLUS, in 2019 April, CNL and the MNO held a VC workshop which has also helped inform this EIS. In 2020 May, CNL shared the revised draft EIS, which had been submitted to the CNSC in 2020 March with the MNO and inquired if there was further information from the MNO to be incorporated. In 2021 May, CNL shared the sections of the EIS that had been updated to incorporate the conclusions and interpretations in the MNO TKLUS and outcomes of the VC workshop. In 2021 August, CNL shared the VC list and drafts of Sections 8.9 and 9.9 of the EIS intended for the fall 2021 revised draft EIS submission to the CNSC, seeking to verify with the MNO that CNL had accurately and adequately incorporated the TKLUS information.

Comments on the draft EIS and comments on the draft follow-up monitoring plans

In 2019 April, CNL provided initial responses to the MNO comments on the draft EIS. Later that same month, the MNO and CNL met to discuss these dispositions to the comments on the draft EIS. That fall, in October of 2019, the MNO provided further comments to the NPD Closure Project, on the previously provided drafts of the follow-up monitoring plans.

In 2019 November, the MNO sent a formal letter detailing the MNO response to CNL's draft dispositions of the MNO comments on the 2017 draft EIS. This included verification on whether the MNO accepted CNL's dispositions or whether they required further information.

In the spring of 2020, following the submission of the revised EIS to the CNSC, CNL shared the 2020 March revised draft EIS and an updated IER with the MNO.

CNL provided a complete set of dispositions to the MNO comments on the draft EIS, incorporating previous dialogue and feedback over the course of the past two years, in September of 2020.

In 2020 October, the MNO requested meetings specifically related to monitoring and follow-up monitoring for the NPD Closure Project and the NSDF Project. In 2020 November, representatives of CNL and the MNO Regional Consultation Committee met virtually to discuss the current and proposed follow-up monitoring program for the NPD Closure Project. In advance of the November meeting, CNL shared draft dispositions to the MNO's comments on the draft follow-up monitoring plans. The MNO and CNL also discussed what MNO involvement in monitoring with respect to the NPD Closure Project might look like. The MNO and CNL, including staff from CNL's Environmental Protection Program, held a meeting in 2021 February. CNL and the MNO discussed CNL's current monitoring program and where the MNO could be involved in the future with respect to the NPD Closure Project. In 2021 August following a discussion on commitments, MNO confirmed their acceptance of CNL's responses to all EIS comments.

Commitments

In 2021 April, CNL followed up with MNO on their review of CNL's dispositions and provided a preliminary table of commitments to MNO made through engagements and comment responses for the NPD Closure Project. The MNO shared further feedback on the development of commitments, through their comments on the *Table of Interests and Concerns* in 2021 July. 2022 October CNL provided MNO an update on the Project and suggested commitments be established to ensure that all interests and concerns are addressed and tracked to resolution. CNL sent an updated draft set of commitments for review. CNL and the MNO met to discuss the draft commitments 2022 November, the meeting resulted in the MNO accepting the commitment list as final.

Summary Table of Interests and Concerns

CNL shared the Table of Interests and Concerns (Table L-3 of Appendix L) with the MNO. The MNO shared written comments on the summary table and met with CNL in 2021 July to share feedback verbally on the summary table, including how the interests and concerns identified could be addressed with additional commitments. In August, CNL shared back the updated summary table of interests and concerns incorporating the July feedback seeking verification that the feedback was adequately incorporated. CNL has since followed up with the MNO in August and September seeking verification that the summary table represents the MNO's interests and concerns. CNL indicated that the intention was to submit the revised EIS in the fall of 2021 and any additional input on the content for this submission would be required in a timely manner. The MNO indicated that with the establishment of several commitments via the LTRA that concerns were resolved and that they had no further comments on the topics within the Table of Interests and Concerns. In 2022 January, the CNSC informed CNL that the 2021 December EIS submission was incomplete. The CNSC staff directed CNL to revise the *Tables of Interests and Concerns* for clarity. CNL revised the MNO's *Table of Interests and Concerns* and shared the new table with the MNO in 2022 April asking that the MNO verify that the new table

retained the MNO's interests and concerns. In 2022 June, the MNO confirmed that they had reviewed the table, and it was aligned with the earlier table, which had been verified.

4.4.3.2 Feedback

The MNO and CNL have had extensive engagement on the NPD Closure Project, which has led to the development of the interests and concerns topics. The MNO submitted formal comments on the 2017 EIS to the CNSC and shared these with CNL. Beyond those interests and concerns raised through formal EA process, the MNO also brought forward a number of interests and concerns through direct engagement with CNL. This included interests and concerns identified in the MNO TKLUS, correspondence and discussion (including workshops on VCs), comments provided on technical documents (including the three draft follow-up monitoring plans, the hydrogeological report and archaeological assessment) and through discussion during meetings.

The interests and concerns from the MNO are briefly identified below, and described in detail in Section 4.4.3.3 Summary Discussion of Interests and Concerns and the *Tables of Interests and Concerns* in Table L-3 of Appendix L.

Accidents & Malfunctions. The MNO expressed concern about the potential accidents and malfunctions (including traffic accidents) related to the proposed project.

Alternatives. The MNO expressed concerns about the alternatives assessment and their involvement in it, as well as the suitability of in-situ disposal.

Archaeology and Cultural Heritage. The MNO expressed an interest in archaeology and cultural sites. The MNO consultant provided supplemental review comments in 2019 January, one focused on the archaeological potential of the site.

Atmospheric Environment. The MNO expressed concerns about the baseline data used to develop spatial boundaries for the atmospheric environment, and about stack releases.

Baseline Characterization. The MNO expressed concerns about the inclusion of Métis-specific socioeconomic data and effects, historic soil contamination, current contamination in the Kichi-Sibi (Ottawa River), geological and hydrogeological site characterization, and MNO involvement in baseline data collection.

Engagement. Early in the engagement process the MNO expressed concern about lack of capacity to be involved in the NPD Closure Project. Both the MNO and CNL have indicated an interest in developing a longer-term relationship. The MNO requested that CNL use the language "Métis Nation" instead of "Métis community", as "community" minimizes the political structure and organization of the MNO.

EA Process and Methodology. The MNO reviewed the 2017 draft EIS and raised questions about EA methodology. The topics of interest included: assessment of residual effects and

cumulative effects.

Environmental Effects and Mitigation Measures. The MNO reviewed the 2017 draft EIS and expressed some concerns with the environmental effects description, proposed mitigation and monitoring, and inclusion of the impact of negative perceptions from Métis citizens.

Indigenous Health. Initially, the MNO in their review of the 2017 draft EIS and verbally in sessions raised concerns about the human health assessment and more specifically about whether consumption of country foods was considered the lifestyle survey was comparable to Métis levels of food consumption.

Métis Rights and Interests and Traditional Uses. The MNO expressed concern about the assessment of impacts to Métis Rights and Interests and requested capacity assistance to more deeply understand the potential impact of the project on Métis Rights and Interests including traditional uses.

Monitoring:

- **Input to and Future Involvement in Monitoring and Protection at NPD.** The MNO has expressed interest in better understanding the environmental program and monitoring at the NPD site and more generally.
- **EA Follow-up Monitoring.** The MNO reviewed the 2017 draft EIS and provided specific comments on follow-up monitoring. The MNO also submitted separate technical comments following their review of the draft Follow-up Monitoring Plans.

Socio-Economics. The MNO reviewed the 2017 draft EIS and provided comments related to socio-economics.

Technical. In their review of the 2017 draft EIS, the MNO provided specific technical comments on: the local study area, the institutional control phase, changes to the project and benefits of those changes, and understanding impacts of groundwater on the facility.

Traditional Land and Resource Use and Cultural Impacts. The MNO identified the need and requested funding for a TKLUS. The MNO also raised a number of concerns related to traditional land and resource use and cultural impacts in their formal comments on the 2017 draft EIS.

Valued Components (VCs). The MNO expressed concern about incorporation of its interests into VCs for the NPD Closure Project as part of their comments on the 2017 EIS.

4.4.3.3 Summary Discussion of Interests and Concerns

The key interests and concerns discussed in this section were derived from various engagements with the MNO (Table L-1 of Appendix L) as described in Section 4.4.3.1 above.

Accidents and Malfunctions

In their review of the 2017 draft EIS, the MNO voiced concerns about potential accidents and malfunctions related to the proposed project (including off-site transportation), and expressed the need for a procedure to be in place to notify and provide information to MNO citizens in the event of an accident or malfunction.

To address this concern, CNL has responded in writing to the MNO's comments, explaining where and how such events have been assessed. CNL dispositions referenced Section 9.12 of the EIS where potential effects from accidents and malfunctions are discussed and CNL provided clarification of on-site transportation activities and considerations from the MTO review of the project for off-site transportation impacts.

The NPD site has an Emergency Procedure that will remain in place and be updated as required throughout the Decommissioning Execution and Institutional Controls phases of this project. This procedure focuses on the prevention, mitigation of, preparedness for, response to, and recovery from a wide range of abnormal and emergency conditions including fires, floods, hazardous spills, loss of power, earthquakes, and tornados. The Emergency Procedure also defines the actions of specific staff / roles in such events. Following any of these emergency events, as soon as it is safe for staff to do so, site and facility condition will be evaluated, and any necessary actions will be taken to make repairs. The NPD Emergency Plan is developed and maintained in accordance with CNL's company-wide Emergency Preparedness Program that has been accepted to meet the CNSC's requirements (under REGDOC-2.10.1 – Nuclear Emergency Preparedness and Response).

CNL may activate its own local Emergency Information Centre to disseminate information to the public. In the event a site emergency occurs and escalates leading to potential off site consequences, a Municipal Emergency Information Centre (MEIC) will be established by the municipality to provide emergency communications for the media and the public. This process will be followed for the NPD Project.

Further, throughout all project phases (Decommissioning Execution, Institutional Controls and Post-institutional Controls) CNL has assessed the probabilities and potential impacts of flooding, seismic activity, above-ground natural hazards and extreme temperature change, and has concluded that these events will have no undue effects on people or the environment around the site.

This concern has been resolved with MNO acknowledgement and acceptance of CNL's response on this topic in 2021 August.

Alternatives

In their review of the 2017 draft EIS, the MNO expressed interest in the alternative means to carry out the project. Specifically, the MNO were concerned that they had no opportunity to provide input into the four proposed alternatives of the preferred in-situ disposal approach. In order to explain the in-situ disposal method as a technically feasible alternative, CNL provided the MNO with the Alternative Means Assessment TSD. In response to this concern, CNL added some quantitative assessment of alternatives to the Alternative Means TSD such as the addition of a projected radiological dose and Industrial Safety risk to workers for each option. CNL also incorporated additional information from the Alternative Means TSD directly into the revised draft EIS (Section 4.2) to provide greater clarity on how the alternative means was completed and what the results mean. As discussed above, CNL has shared the 2020 revised draft EIS with the MNO, as well as draft responses to the MNO's comments on the 2017 draft EIS. Alternative means was also the topic of many in-person meetings, enabling CNL to address ongoing concerns about the topic.

Following their review of CNL's dispositions to their concerns about alternative means, the MNO communicated that they would not be providing any additional feedback to CNL's responses to the 2017 draft EIS comments. CNL has committed to developing an LTRA with the MNO which will address their ongoing access to their traditional lands where the NPD site is located. Additionally, CNL is committed to continuing engagements with the MNO to enable collaborative work related to environmental monitoring, education, economic inclusion, and support for cultural activities.

This concern has been resolved with MNO acknowledgement and acceptance of CNL's response on this topic in 2021 August.

Archaeology

During direct engagement about the NPD Closure Project, the MNO expressed interest in archaeology and cultural sites which CNL directly impact or occupy. In their review of the 2017 draft EIS, the MNO raised concerns about the lack of Métis history in the archeological study for the NPD site. CNL provides a summary of the archaeological assessment for NPD in Section 8.11.4 of the EIS and a description of Indigenous Cultural Resources and Ceremonies is provided in Section 6.1.2.2.10 of this IER. The MNO's concerns are also addressed by the implementation by CNL to suspend decommissioning activities if undocumented archaeological resources are discovered. CNL and the MNO discussed specific concerns related to archaeology during several meetings in 2016 and 2018.

In 2019 November, the MNO responded to CNL's 2019 April dispositions to their concerns and indicated that they fully accept CNL's responses to their specific questions. In 2020 May, CNL shared the updated sections of the EIS which have been revised to incorporate the results of the MNO TKLUS. In 2021 August, the MNO confirmed that they had no additional feedback

regarding Archaeology at the NPD Site. CNL is committed to developing an LTRA with the MNO which will ensure any emerging concerns from the MNO regarding archaeological artefacts will be addressed throughout the closure of the NPD site.

Atmospheric Environment

In its comments on the 2017 draft EIS, the MNO expressed concerns that the study area boundaries are limited and may not extend to far enough to encompass the area where intangible aspects of Métis way-of-life may be affected and where there is Métis citizens perceive there may be impacts from the project. The MNO also expressed concern about increases in C-14 releases from the stack in recent years.

CNL provided draft dispositions to the MNO's comments on the atmospheric environment, including clarification about the off-site locations used to characterize the baseline conditions of the atmospheric environment. With respect to the effects on Métis perception or intangible aspects of Métis way-of-life, CNL is eager to learn more and discuss how these effects may be minimized, for example through participation in air monitoring activities.

In their review of CNL's dispositions in 2021 July, the MNO confirmed that they will not be providing any additional feedback regarding the atmospheric environment aspects of the EIS; they expect that their concerns related to this topic will be addressed through an acceptable LTRA.

Baseline Characterization

In their comments on the 2020 draft EIS, the MNO expressed concerns about the inclusion of Métis-specific socioeconomic data and effects, historic soil contamination, current contamination in the Kichi-Sibi (Ottawa River), geological and hydrogeological site characterization, and MNO involvement in baseline data collection.

In response to feedback from MNO on the baseline conditions of the aquatic environment at NPD, CNL collected sediment samples during a baseline characterization survey in the summer of 2020. These samples were analyzed for chemical and radiological contaminants of concern as well as benthic macroinvertebrates. Drone surveys were also performed to assess the baseline conditions of surrounding fish habitat. These surveys inform the follow-up monitoring plans for the NPD Closure Project.

CNL provided draft dispositions to the MNO's comments on baseline characterization, and provided additional detail on the definition of site baseline conditions especially for the atmospheric and aquatic environments. The MNO confirmed that they had no additional feedback concerning some aspects of this topic. CNL considers other aspects of this topic have been substantially addressed, and that any outstanding aspects will be addressed through commitments made as part of the development of an LTRA with the MNO.

Engagement

Since being informed of the NPD Closure Project Description, the MNO have expressed an ongoing interest in meaningful engagement with CNL and participation in the EA process. Since the 2016 submission of the Project Description, CNL has regularly invited the MNO to its public engagement activities: these included project updates, information sessions, site tours, and meetings where participants are given the opportunity to voice their concerns and ask CNL subject matter experts about the details of the proposed NPD Closure Project. Through an MOU signed in 2018 December, CNL provided funding to enable the MNO to continue engaging with CNL throughout the NPD Closure Project regulatory review process. The MOU has enabled the MNO to assess the potential impact of the NPD Closure Project on their traditional rights and values; through the MNO, CNL supported the completion of an MNO TKLUS which the MNO shared with CNL in 2019 February and which CNL incorporated in the revision of the NPD EIS. Section 4.4.3.1 and Table L-1 of Appendix L summarize the engagements between CNL and the MNO along with capacity assistance to enable the MNO to continue assessing the NPD Closure Project impacts on their community.

In 2021 August, the MNO confirmed that they had no additional feedback concerning this topic. However, because many of the MNO's concerns are broad and not specific to the NPD Closure Project, CNL has commenced the development of an LTRA with the MNO to enable ongoing meaningful engagement beyond the NPD Closure Project. The agreement will also address any emerging concerns that MNO may have beyond the project's regulatory review.

EA Process and Methodology

In their comments on the 2017 draft EIS, the MNO voiced concerns regarding the residual effects of the NPD Closure Project on environmental components. Additionally, the MNO were concerned about cumulative effects, should the NPD Closure Project proceed. In addition to direct engagement activities (e.g., meetings, site tours), CNL addressed these concerns in a written disposition shared with the MNO in 2019 April. In its disposition, CNL addressed specific comments from the MNO regarding the vulnerability of the environment to potential project effects. CNL referenced Section 9.1.2.1 and 9.1.2.2 in the EIS where identification and assessment of residual effects for the NPD Closure Project are summarized; Section 9.13 of the EIS discusses the process of evaluating cumulative effects as a result of the NPD Closure Project; and the DecomSA and PostSA TSDs. More recently in 2020 September, CNL proposed a dedicated meeting with the MNO wherein effects on environmental receptors and mitigation measures could be discussed.

In 2021 August, the MNO confirmed that they had no additional feedback concerning the EA Process and Methodology and that they expect concerns related to this topic will be addressed through an acceptable LTRA.

Environmental Effects and Mitigations

In their review of the 2017 draft EIS, the MNO expressed interest in the environmental effects of the NPD Closure Project and the mitigation measures that are proposed in the NPD EIS. In addition to direct engagement activities (e.g., meetings, site tours), CNL addressed these concerns in a written disposition submitted to the MNO in 2019 April. In its disposition, CNL addressed specific comments from the MNO regarding the vulnerability of the environment to potential project effects.

CNL has indicated that it is willing to involve all Indigenous Nations, communities, and organizations in its monitoring programs; the proposed follow-up monitoring for the NPD site is described in Section 12 of the EIS. In 2020 November, CNL followed up with the MNO in a presentation focusing on the draft follow-up monitoring plans for the NPD Closure which included descriptions of the mitigation measures which will ensure residual effects are minimized during NPD Closure activities. A second meeting in 2021 February facilitated further discussion regarding MNO's involvement in long-term monitoring at NPD.

As an outcome of CNL engagement with the MNO, a preliminary discussion has been established between the MNO, CNL, and AECL to develop an LTRA which will provide capacity for direct engagement with environmental monitoring at the NPD site. In 2021 July, the MNO confirmed that they had no additional feedback regarding CNL's dispositions to their comments on this topic. CNL will maintain open dialogue with the MNO through the development of the LTRA. The agreement will also address any emerging concerns that MNO may have beyond the project's regulatory review.

Indigenous Health

During previous engagement and as part of their review of the 2017 draft EIS, the MNO expressed concerns that their traditional food consumption levels are not reflected accurately in the human health assessment for the NPD site. The MNO voiced that they wanted to be directly involved in the scoping and execution of future lifestyle surveys to ensure adequate MNO representation. Additionally, the MNO requested that there be a separate consideration of Indigenous Health in the NPD EIS. In addition to direct engagement activities (e.g., meetings, site tours), CNL addressed these concerns in a written disposition submitted to the MNO in 2019 April. CNL also explained that the PostSA TSD includes a self-sufficient receptor group; this receptor hypothesizes an Indigenous community with adults and children which use the area surrounding the disposal site, including the Kichi-Sibi (Ottawa River), for hunting and gathering. Individuals in this community are assumed to obtain all of their food through hunting and gathering in the area. It is assumed that this receptor group would have increased consumption of fish and wild game. The predicted radiological dose to this group is well below the public dose limit. Overall, the EIS does not predict any adverse residual effects to human health or Indigenous health (Sections 9.8.3.5 and 9.10.3.5 of the EIS and Section 7.2.4 of this IER).

In order to enable ongoing meaningful engagement with the MNO, CNL provided support through an MOU with the MNO. Through the MOU, the MNO completed a TKLUS; the MNO shared with CNL in 2019 April, and which contained information that CNL incorporated into the revised draft EIS.

In their verification of CNL's disposition regarding this topic of concern, the MNO voiced that they partially accept CNL's responses provided that they can review the final EIS and ensure the results of their TKLUS are adequately incorporated. In 2021 August, the MNO confirmed that they had no additional feedback concerning this topic. Because many of the MNO's concerns are broad and not specific to the NPD Closure Project (for instance, future traditional lifestyles surveys would be relevant to all CNL sites and projects in the region), CNL has commenced the development of an LTRA with the MNO to enable ongoing meaningful engagement beyond the NPD Closure Project.

As part of the MNO's review of the EIS an interest to participate in future diet and harvest studies conducted by CNL was expressed. As committed to, CNL informed the MNO about the opportunity to participate in a diet and harvest study to support the update of derived release limits for airborne and liquid emissions at the Chalk River Laboratories Site. Of particular interest for CNL are the diets and harvesting activities of Metis living in communities closest to the CRL Site. The MNO hosted a community information session 2022 October, the session gave citizens the opportunity to participate in a survey to ensure that the environmental models developed by CNL at the Chalk River Laboratories adequately consider the diet and harvest patterns of Métis citizens. CNL shared the results of the study 2023 April.

Métis Rights and Interests and Traditional Uses

In their review of the 2017 draft EIS, the MNO expressed interest in the inclusion of Métis rights into the EA process. As such, to document Métis rights, interests, and traditional uses, the MNO requested capacity to better understand the potential impact of the NPD Closure Project. In addition to direct engagement activities (e.g., meetings, site tours), CNL addressed these concerns in a written disposition submitted to the MNO in 2019 April. In their written response, CNL explains that the MNO, MNO North Bay, MNO Mattawa Métis, and MNO Sudbury are included via the Mattawa / Lake Nipissing Traditional Territory Consultation Committee in Table 4-1.

To enable ongoing meaningful engagement with the MNO, CNL supported participation through a MOU with the MNO. Through the MOU, the MNO completed a TKLUS; the MNO shared the report with CNL in 2019 April and which contained information that CNL incorporated into the revised draft EIS.

In their disposition to the MNO, CNL expressed its opinion that the NPD Closure Project will not impact MNO rights as its activities will not affect off-site traditional land use. While the EIS does not predict any adverse residual effects on the traditional land and resource use

(Section 9.10.3.3), the MNO remain concerned that perceptions about the NPD site will lead to avoidance by its citizens which can impact their traditional use and harvesting rights. Because this is a broad concern and not specific to the NPD Closure Project, CNL has commenced the development of an LTRA with the MNO to enable ongoing meaningful engagement beyond the NPD Closure Project. The agreement will also address any emerging concerns that MNO may have beyond the project's regulatory review.

Monitoring

In their review of the 2017 draft EIS, the MNO expressed interest in better understanding the environmental protection program and long-term monitoring at the NPD site; the MNO also expressed interest in the follow-up monitoring for the NPD Closure Project. In addition to direct engagement activities (e.g., meetings focusing on environmental monitoring in 2017 and 2020), CNL addressed these concerns in a written disposition submitted to the MNO in 2019 April. In their written response, CNL references the effluent verification, environment, and groundwater monitoring plans for the NPD Closure Project that are detailed in Section 12 of the EIS. During meetings wherein environmental monitoring for the NPD Closure Project were discussed, SMEs directly addressed specific questions and concerns from MNO members about environmental receptors. Critically, CNL provided the MNO with the draft follow-up monitoring plans for the NPD Closure Project to invite feedback and enable the consideration and inclusion of MNO values and interests. CNL expressed its interest in involving all Indigenous Nations, communities, and organizations in its environmental monitoring programs, this includes the NPD Closure Project.

As an outcome of CNL engagement with the MNO, a preliminary discussion has been established between the MNO, CNL, and AECL to develop an LTRA which will provide capacity for direct involvement in environmental monitoring and related activities at the NPD site. In their review of CNL's dispositions in 2021 July, the MNO confirmed that they will not be providing any additional feedback about this topic; they expect that their concerns related to environmental monitoring will be addressed through an acceptable LTRA. The agreement will also address any emerging concerns that MNO may have beyond the project's regulatory review.

Socioeconomics

In their review of the 2017 draft EIS, the MNO expressed interest in the inclusion of further information on socioeconomics for all Indigenous Nations, communities, and organizations. In addition to direct engagement activities (e.g., ongoing discussions), CNL addressed these concerns in a written disposition submitted to the MNO in 2019 April. In their written response, CNL referenced that Section 9.10.1.2 of the EIS has been revised to describe how Indigenous socio-economic values interact with NPD Closure Project activities; this section also discusses mitigation measures designed to ensure Indigenous socio-economic receptors are not adversely impacted by NPD Closure activities.

In their disposition, CNL reiterated that the EIS does not predict any adverse residual effects on the Indigenous socioeconomic and health (Section 9.10.1.4 and 9.10.2.4 of the EIS). CNL has considered Indigenous consumption of country foods under Human Health (Section 8.8 and 9.8 of the EIS) and CNL has prepared a stand-alone section on Indigenous Health (Section 8.10.2 and 9.10.2 of the EIS).

In their review of CNL's dispositions in 2021 July, the MNO confirmed that they will not be providing any additional feedback regarding socio-economic interests; they expect that their concerns related to environmental monitoring will be addressed through an acceptable LTRA.

Technical Aspects of the Environmental Assessment

In their review of the 2017 draft EIS, the MNO requested further clarification in order to understand technical aspects of the NPD Closure Project EA such as the study areas, the institutional control period, changes to the project and the benefits of these changes and understanding impacts of groundwater on the facility. Since 2019 April, the MNO and CNL have been sharing comments and dispositions back and forth to work towards addressing different concerns related to technical aspects of the EA. In the dispositions to MNO's comments CNL provided: an explanation of how the local study area for the project was selected, clarification that the institutional control period will last a minimum of 100 years, clarification of the PostSA findings related to how groundwater will impact the facility in the long-term and has revised the EIS to reflect how Indigenous feedback has resulted in changes made to the project.

CNL is committed to improved economic participation and benefits for Indigenous peoples from its projects. In response to Call to Action #92 in the Truth and Reconciliation report to actively promote economic opportunity for Indigenous Businesses, CNL has developed an Indigenous Relations Procurement Strategy (IRPS). Atomic Energy of Canada Limited (AECL), the federal Crown Corporation that provides oversight of CNL, has reviewed, and endorsed the strategy. CNL shared the Indigenous Relations Procurement (IRP) strategy with the MNO in 2023 March. To ensure that CNL can begin to take a more active role in stimulating the Indigenous business sector in the future, the strategy became effective as of 2023 April, and includes targets for 2023/2024. CNL recognizes that there will be ongoing opportunities to enhance its approach to reflect feedback from all Indigenous Nations, communities, and organizations. In their review of CNL's dispositions in 2021 July, the MNO confirmed that they will not be providing any additional feedback regarding technical aspects of the EIS; they expect that their concerns related to this topic will be addressed through an acceptable LTRA.

Traditional Land and Resource Use and Cultural Impacts

During direct engagement and in their review of the 2017 draft EIS, the MNO identified the need to understand the impact of the NPD Closure Project on Métis traditional land uses and way of life; the MNO therefore requested funding for a TKLUS to inform their interpretation of the effects of the NPD Closure Project. In 2019 February, the MNO shared the TKLUS with

CNL; the results from the MNO TKLUS have been incorporated into the revision of the NPD EIS (Section 8.9). In addition to direct engagement activities (e.g., ongoing discussions), CNL has been addressing these concerns through continued submission of written dispositions to the MNO beginning in 2019 April. In these responses, CNL discussed traditional land use and way of life as it relates to the NPD site, traditional food consumption levels, and negative perceptions associated with the use of the NPD site throughout the post-closure phase. CNL reiterated that the EIS predicts no residual effects on traditional land and resource use (Section 9.9.4), Indigenous Health (Section 8.8), and Indigenous consumption of country foods (Section 9.8).

In their review of CNL's dispositions in 2021 July, the MNO confirmed that they will not be providing any additional feedback regarding traditional land use and cultural impacts of the NPD Closure Project; they expect that their concerns related to this topic will be addressed through an acceptable LTRA. CNL is committed to enabling the MNO to be directly involved in CNL monitoring programs (see "Environmental Monitoring" section above). CNL will maintain collaborations with the MNO to be inclusive of MNO values and building trust in land use.

Valued Components (VCs)

During direct engagement and in their review of the 2017 draft EIS, the MNO expressed concerns about the selection of VCs in the NPD Closure Project environmental assessment; specifically, they were concerned that the VCs are not representative of Métis interests. As they detailed in the TKLUS report, the MNO were concerned about the selection of habitat for wildlife (specifically for moose, partridge, grouse, rabbit, deer, duck, and goose), areas of vegetation (oak, ground hemlock, berries), and small and large game harvesting areas. The MNO were also seeking appropriate representation of Métis cultural practice sites, trapping areas, fish harvesting areas, and harvesting areas for other natural materials. To address these concerns, CNL provided funding through a MOU with the MNO. The MOU, allowed for the inclusion of an evaluation of the VCs by the MNO that was appended to the TKLUS report. The MNO shared their completed TKLUS report with CNL in 2019 April and which contained information that CNL incorporated into the 2020 revised draft EIS. In addition to direct engagement activities (e.g., meetings, community information session), CNL has been addressing these concerns through continued submission of written dispositions to the MNO beginning in 2019 April. In these responses, CNL discussed that some Indigenous-specific VC are represented by species that were already evaluated in the EIS; Tables 5-1 (C) and 5-3 of this IER highlight how VCs identified by MNO have been evaluated by representative species. Sections 6 and 7.1 have been revised to include expanded descriptions of tradition uses and new VCs that were added and evaluated based on feedback from the MNO. Mitigation measures which are proposed to minimize impacts to these VCs are described in Section 7.1.3.2 of this IER.

In 2021 August, the MNO verified that they had no additional feedback regarding the VCs selected for the NPD Closure Project EIS; they expect that their concerns related to this topic will be addressed through an acceptable LTRA.

Summary

At present, this summary of interests and concerns is a consolidation of all the interests and concerns the MNO have brought forward on the NPD Closure Project. While CNL recognizes the MNO's concern on aspects of monitoring and a long-term relationship, CNL notes that these concerns go beyond the scope of this Project. CNL will continue to document and share with the CNSC in CNL's subsequent IER any additional feedback provided by the MNO relative to aspects of monitoring and a long-term relationship.

The project-specific concerns raised by the MNO are considered in the context of the EIS. CNL has shared with the MNO a preliminary table of commitments that reflect the measures proposed by CNL to address the concerns raised to date by the MNO. CNL will continue to respond to questions and concerns from the MNO through its ongoing engagement efforts. CNL will seek to understand those concerns in the context of the EIS and the NPD Closure Project and commits to continue to work together with the MNO to receive their feedback on the project.

4.4.3.4 Verification

The MNO have provided several key inputs identifying interests and concerns related to the NPD Closure Project including comments on the 2017 draft EIS, technical reviews on the draft follow-up monitoring plans, feedback on VCs and the MNO's TKLUS Report. To confirm CNL has adequately captured the MNO's interests and concerns, position and knowledge, the MNO and CNL underwent a verification process where CNL provided key documentation to the MNO for their review and feedback. Through this process, the MNO has reviewed and provided feedback on their *Table of Interests and Concerns*, list of VCs and the draft follow-up monitoring plans. While not all the MNO's concerns have been mitigated by this process to date, CNL has made every effort to verify that the MNO's position, interests and concerns were adequately characterized. CNL continues to work with the MNO to address their concerns through ongoing discussions. And, as stated above, the MNO and CNL continue to work towards having a long-term relationship agreement in place in the near term.

In 2021 June, CNL shared the *Table of Interests and Concerns* with the MNO asking for verification that CNL had accurately represented the MNO's list of interests and concerns and that, "where possible" verify that how CNL was addressing the interest or concern was adequate.

The MNO followed in 2021 July, with several comments on the *Table of Interests and Concerns*. At a meeting in July, the MNO shared verbally that they did not have further comments on *Table of Interests and Concerns* or any additional review to share with CNL on CNL's dispositions to the MNO's comments on the 2017 draft EIS.

CNL shared back the revised *Table of Interests and Concerns* in early 2021 August, and followed up on receiving written confirmation that the revised Table was accurate at the end of the month.

In 2021 September, CNL and MNO representatives spoke on the telephone and discussed the MNO providing a written confirmation in response to the revised *Table of Interests and Concerns*. This was followed by an email to summarize the conversation and provide a rough timeline for when CNL planned to submit the revised draft EIS.

CNL followed up in 2021 October, confirming that CNL would need any additional information or feedback by 2021 November, for it be included in the 2021 revised draft EIS submission and that it was CNL's understanding that the MNO had verbally verified the *Table of Interests and Concerns* at the 2021 July meeting.

The MNO also met with CNL in early 2021 December, and confirmed understanding that CNL was submitting the revised draft EIS for the NPD Closure Project in 2021 December. During this phone call, the MNO representative also confirmed there was a verbal acceptance from the MNO on the NPD issues and concerns provided to the MNO in July and August.

In 2022 January, the CNSC informed CNL that the 2021 December EIS submission was incomplete. The CNSC staff directed CNL to revise the *Tables of Interests and Concerns* for clarity.

CNL developed a simplified *Table of Interests and Concerns* (Table L-3 in Appendix L), and a table which maps how this simplified table relates to detailed input and feedback from the MNO (Table L-2 in Appendix L). The new "repackaged" interests and concerns table was shared with the MNO in 2022 April, asking that the MNO verify that the new table retained the MNO's interests and concerns. In 2022 June the MNO confirmed that they had reviewed the table and were satisfied that the repackaged table was aligned with the earlier table, which they had verified.

4.4.3.5 Next Steps

CNL's commitments within the "Next Steps" column of the *Table of Interests and Concerns* in Appendix L, are reflective of the feedback CNL has received to date in the EA process from the MNO's technical review of the 2017 draft EIS, MNO's supplementary technical comments on hydrogeology and archaeology, MNO feedback on the draft follow-up monitoring plans, and the MNO TKLUS – as well as the direct feedback shared by the MNO on the *Table of Interests and Concerns*.

CNL recognizes that MNO involvement in follow-up monitoring activities is a key area of ongoing interest.

MNO and CNL, along with AECL, will continue to engage towards developing a long-term relationship agreement, more broadly related to CNL's activities and operations in the region.

4.4.4 Algonquin Anishinabeg Nation Tribal Council (AANTC)

The Algonquin Anishinabeg Nation, also referred to as the Algonquins of Western Quebec, or Algonquin Anishinabeg Nation Tribal Council (AANTC) was voluntarily established in 1992. Its purpose was to provide representation in land claim development and negotiation for member nations. Traditional territories claimed include the Kichi-Sibi (Ottawa River) valley. At its inception, it comprised five member nations: Kebaowek (formerly known as Eagle Village) First Nation, Lac Simon First Nation, Abitibiwinni First Nation, Kitigan Zibi Anishinabeg First Nation, and Long Point First Nation (Winneway). Later, two other communities joined the AANTC. A fuller description of the AANTC can be found in Chapter 3 of the IER.

4.4.4.1 Engagement

Table M-1 of Appendix M includes a complete list of engagement activities that have occurred with AANTC on the NPD Closure Project. CNL has also provided a narrative summary of engagement with AANTC.

Relationship-building

In 2016 July, CNL sent the AANTC a letter to introduce the proposed NPD Closure Project that included a request for community input on any potential adverse impacts from project activities followed by a second letter in 2016 November, which inquired about AANTC asserted rights and traditional activities. CNL did not receive a response at this time from the AANTC.

In 2017 April, the AANTC leadership and CNL met to discuss CNL projects, specifically the NPD Closure Project and the NSDF Project. In 2017 November, CNL shared the draft EIS and the Indigenous Engagement Report. CNL invited AANTC participation in the public comment period for the draft EIS and requested community input and feedback for incorporation into the project.

In late 2017 the AANTC reached out to CNL indicating interest in reviewing the draft EIS, supporting materials and submitting comments to the CNSC. CNL shared the requested documents and hosted a meeting and site visit for representatives of the AANTC, including their technical consultant, in 2018 January.

In 2021, as a result of engagement on the NSDF Project CNL was made aware that Kebaowek First Nation and the Kitigan Zibi Anishinabeg First Nation were not getting the direct engagement with their individual Nations through the AANTC. As a result, CNL reiterated the offer to establish an agreement to ensure each Nation had the capacity to participate in the environmental assessment for the NPD Closure Project.

Comments on the draft EIS and concerns with effluent

Following the meeting and site visit to NPD in 2018, CNL shared a number of further documents requested by the AANTC. The AANTC submitted comments on the draft EIS to the CNSC and in 2018 February, as result of this review, the AANTC Grand Chief wrote a letter to the CEO of CNL, copying the CNSC, requesting that specific effluent releases from the NPD site cease. The practice was ceased and now water collected in facility sumps is sent to the Waste Treatment Centre at CRL for treatment. The last release of liquid from sumps in the NPD facility to the Kichi-Sibi (Ottawa River) occurred in 2017.

In 2020 May, CNL shared the 2020 March revised draft EIS with the AANTC requesting any additional feedback from the AANTC that may have been missing from the submission.

In 2020 June, the AANTC requested a hard copy of the 2020 March revised draft EIS that had been sent earlier and indicated that they would be responding to the 2020 March revised draft EIS with comments.

CNL shared an updated and complete set of responses to the AANTC comments on the 2017 draft EIS in 2020 September, which was followed by the French translation of these comments and dispositions in early 2020 October. In late October of 2020 the consultant for the AANTC reached out to CNL with several follow-up questions. CNL and the AANTC's consultant corresponded back and forth over several weeks in late 2020 to clarify the CNL dispositions to the AANTC comments.

CNL followed up with the AANTC again to see if there was additional feedback on CNL's dispositions in 2021 April.

Other engagement

Throughout 2018, 2019, 2020, 2021, 2022 and 2023 the AANTC received invitations to all engagement activities and attended a breakfast briefing in 2019 April. At that time, a tentative meeting date of 2019 May between CNL and the AANTC was discussed. In preparation for the meeting CNL sent the draft dispositions to the formal EIS comments submitted by the AANTC for review prior to meeting. The AANTC did not commit to a meeting date. In late 2019 CNL provided further requested documents on the NPD Closure Project to the AANTC.

Early in 2020, the AANTC requested an update on the project and timeline for the NPD Closure Project EA, which CNL provided. In the spring of 2020, CNL shared the 2020 March revised draft EIS, which had been submitted to the CNSC, as well as the updated Indigenous Engagement Report.

As the NPD progressed through the EA process CNL continued to share information with the AANTC. This includes updates in the fall of 2022, winter and spring of 2023. CNL did not receive responses from the AANTC.

Letters to the Prime Minister and Natural Resources Canada

In May of 2020, the AANTC and KFN submitted a joint letter to the Prime Minister outlining issues and concerns that included the NPD Closure Project, copying CNL: [Letter from AANTC August 26 2020](#). In 2020 August, the AANTC and KFN submitted a second letter to the Minister of Natural Resources outlining similar concerns: Letter from AANTC 2020 August 26. In 2020 September, the AANTC informed CNL that they would not be willing to meet again until the latest letter sent to the Minister receives a response and requests are met. In 2020 November, the Minister of Natural Resources responded to the AANTC and KFN acknowledging the Chalk River Environmental Assessment projects: [Letter from Minister November 5 2020](#). Also in November 2020, the CNSC responded to the AANTC and KFN: [Letter from CNSC November 25 2020](#). In 2021 January, KFN and AANTC submitted a third letter to the Minister of Natural Resources indicating the need to meet to discuss Indigenous consultation and engagement for the Chalk River nuclear assessment projects. In 2021 May, the AANTC and KFN sent a letter to the Minister of Natural Resources reiterating these concerns. While many of these concerns are related to the Government of Canada, CNL is interested in meaningful engagement with the AANTC and KFN on the NPD Closure Project.

Discussions on an agreement

CNL initiated discussions with the AANTC in late May to establish a contribution agreement to ensure support of the AANTC's participation in the environmental assessment process. The initial contribution agreement meeting with the AANTC was in 2020 June. CNL attempted to coordinate a second meeting on establishing a contribution agreement over the summer of 2020 and in 2020 August the AANTC informed CNL that they would not engaging with CNL until there was a response from the Minister of Natural Resources to earlier correspondence, which began in May of 2020. CNL has not heard back directly from AANTC representatives in response to CNL's ongoing correspondence to the AANTC since then.

Commitments

In 2021 April, CNL followed up with AANTC on their review of CNL's dispositions, provided a project status update and a preliminary table of commitments to AANTC made through engagements and comment responses for the NPD Closure Project. Later in the month, the AANTC, along with KFN, responded by letter to CNL on this list of commitments, indicating that this was not acceptable to them, and that proper engagement was requested. On 2021 April 30, CNL responded by letter to the AANTC and KFN indicating interest in meeting to discuss a mutually acceptable list of commitments. 2022 October CNL sent a letter to the AANTC providing a project update and the engagement status with the AANTC. CNL stated it is

committed to incorporating the AANTC's interests and concerns into the EIS. CNL outlined the proposed next steps, including a site visit and establishing commitments to ensure that all interests and concerns are addressed and tracked to resolution. CNL offered to discuss capacity and establish commitments before 2022 December. CNL did not receive a response from the AANTC.

Summary table of interests and concerns

In 2021 June CNL shared a draft summary of interests and concerns for the AANTC and is seeking to verify this summary with the AANTC. CNL followed up with the AANTC three times in July and August on the *Tables of Interests and Concerns*, and expressed interest in continuing with contribution agreement discussions to support AANTC participation in the EA. In January 2022, the CNSC informed CNL that the 2021 December EIS submission was incomplete. The CNSC staff directed CNL to revise the *Tables of Interests and Concerns* for clarity. CNL developed a simplified *Table of Interests and Concerns* (Appendix M.3), and a table which maps how this simplified table relates to detailed input and feedback from the AANTC (Appendix M.2). The new table was shared with the AANTC in 2022 April requesting that the AANTC verify that the new table retained the AANTC's interests and concerns. CNL followed up in 2022 May and 2022 June offering funding to support the review. In June, CNL requested that the AANTC respond before the end of the month on whether the AANTC was interested in reviewing the revised table.

Due to the importance of the summary table of interests and concerns and the AANTC's input on verifying its completeness and accuracy, CNL shared the most updated version of this table 2023 May. CNL requested a response on the table.

4.4.4.2 Feedback

The AANTC and CNL have been engaging on the NPD Closure Project since 2017, which have led to the development of the interests and concerns topics. The AANTC submitted formal comments on the 2017 EIS to the CNSC and shared these with CNL. The AANTC reiterated these interests and concerns that were brought up in the formal EA process and also brought forward additional interests and concerns through direct engagement with CNL. This included interests and concerns identified through correspondence and discussion during meetings, for instance, the need for French language communications.

The interests and concerns from the AANTC are briefly identified below and then detailed in the Summary Discussion of Interests and Concerns – Section 4.4.5.3 and the *Tables of Interests and Concerns* in Table M-3 of Appendix M:

Alternatives. The AANTC expressed concern that the alternative means assessment does not provide sufficient detail, or assess all potential effects.

Baseline Characterization. The AANTC raised concerns about the geological and hydrogeological characterization of the site, including bedrock flow system; and, groundwater and surface water quality.

Engagement. The AANTC identified the importance of meaningful Indigenous participation. The AANTC also indicated a need for capacity to support their technical review of the EIS.

EA Process and Methodology. The AANTC questioned the continued use of CEAA 2012 for the NPD Closure Project rather than the new *Impact Assessment Act*.

EIS - Official Languages. The AANTC requested that the EIS be available in both English and French.

Monitoring. The AANTC raised several concerns about the future monitoring of the NPD site. The AANTC has expressed that CNL should monitor for as long as is necessary to ensure protection of the environment. The AANTC has indicated that they would like to be informed of monitoring program results, and have them reviewed by independent researchers. The AANTC expressed concerns about lack of detail in the groundwater and surface water quality monitoring programs.

Technical. The AANTC expressed general concern about the project moving too fast, and concerns about the potential effects to groundwater and surface water quality.

4.4.4.3 Summary Discussion of Interests and Concerns

The key interests and concerns discussed in this Section were derived from various engagements with the AANTC (Table M-1 in Appendix M) as described in Section 4.4.4.1 above.

Alternative Means

In their review of the 2017 draft EIS, the AANTC expressed interest in alternative means to carry out the NPD Closure Project. In 2017 December, the Alternative Means TSD was shared with the AANTC along with all other NPD TSDs to support the AANTC's review of the 2017 draft EIS. The AANTC was of the opinion that the alternative means assessment needed to be expanded and rewritten to better articulate the relative advantages and disadvantages of each alternative.

To address this concern, CNL revised the Alternative Means TSD and added a quantitative assessment of alternatives such as a projected radiological dose and Industrial Safety risk to workers for each option. The results of this additional assessment were incorporated into Section 4.2 of the EIS to support the results and clearly describe the implications of the alternatives assessment. CNL will maintain open dialogue with the AANTC to address this and emerging technical concerns; similarly, CNL will continue to seek verification that its dispositions adequately address all AANTC concerns specifically related to the NPD Closure Project.

Baseline Characterization

In the AANTC's comments on the 2017 draft EIS, concerns with the geological and hydrogeological characterization of the site were raised. Specifically, the AANTC were concerned about the NPD bedrock flow system and groundwater and surface water quality. In response to AANTC's concerns, CNL completed additional geoscientific characterization and updated its geosynthesis report in 2019 May and 2020 September (Section 8.5). Additionally, the groundwater flow modelling used to define future hydrogeological conditions was updated to support the Post-closure Safety Analysis. CNL provided the geosynthesis and groundwater modelling technical supporting documents to the AANTC in 2017 December. CNL also held a meeting with the AANTC at the NPD site in 2018 January to provide an overview and opportunity to discuss interests and concerns around the NPD Closure Project.

To address AANTC's concerns about the assessments of the geological and hydrological environments, CNL provided technical supporting documents, including the 2020 draft EIS, to support direct dispositions to comments in 2020 November. Since its dispositions, CNL has not received any new feedback from the AANTC regarding baseline characterization for the NPD Closure Project. Through planned Working Group meetings, CNL will continue to engage with the AANTC to discuss any outstanding concerns about the NPD Closure Project.

Engagement

Since its early engagement regarding the NPD Closure Project, the AANTC has consistently sought meaningful Indigenous participation and adequate Crown consultation in environmental assessments for designated Projects. This concern was directly raised with the Minister of Natural Resources. While CNL has hosted several engagements with the AANTC (several meetings including a site visit in 2016 and 2018), the AANTC's concerns were very broad and cannot be completely addressed by the NPD Closure Project. Although CNL attempted further correspondence with the AANTC between July and August 2020, in 2020 September, the AANTC informed CNL that they would not be willing to meet again until the latest letter sent to the Minister received a response and requests are met. In April and August 2021, CNL attempted to reach out to the AANTC to restart discussions around the development of a contribution agreement; as of 2021 November 30, CNL has not heard further interest from the AANTC in the development of an agreement.

As communicated by AANTC during engagement activities, CNL recognizes that securing AANTC's capacity to conduct a technical review of the NPD EIS is very important. In 2020 June, CNL met with AANTC to discuss an agreement or work plan to provide support for a technical review of the EIS through a contribution agreement. CNL has since followed up with the AANTC regarding this initiative; however, CNL has not received further comments from the AANTC regarding this interest. CNL will continue to follow-up with the AANTC on provision of capacity to support ongoing involvement in the EA process. CNL will also ensure engagement activities are undertaken in English and French.

Within its role as a Project proponent, CNL will continue to follow up with the AANTC on interests to address any concerns specific to the NPD Closure Project.

EA Process and Methodology

The AANTC directly corresponded with the Minister of Natural Resources to express their concern that the NPD Closure Project EA should be subject to the *Impact Assessment Act (IAA)* instead of *CEAA, 2012*. While the topic of regulatory requirements for an EA process is broad and not specific to the NPD Closure Project, CNL recognizes the importance of addressing this concern. The NPD EIS was revised to include a reference to the *IAA* transitional provisions for continuing the NPD Closure Project EA under *CEAA, 2012* given that commenced under *CEAA, 2012* before the *IAA* was legislated in 2019 (Section 3.5 of the EIS).

Through future engagements, CNL will continue to follow up with the AANTC and seek to address any emerging concerns regarding the EA process for NPD.

EIS Official Languages

In 2017, the AANTC requested that the EIS be published in French. CNL responded to this request and provided both the 2017 draft EIS and the 2020 revised draft EIS in French for public review. The final EIS, federal and provincial comments, and public comments that were made in French along with their subsequent responses will be made available in both official languages, as outlined in Appendix A to the CNL-CNSC Administrative Protocol for the Nuclear Power Demonstration Closure Project (Step 18). Following the immediate transition from in-person meetings to remote engagements, CNL has hosted quarterly (and later, bi-monthly) webinars in English and French; questions and answers at the end of each webinar were also spoken in both English and French. CNL has also offered simultaneous interpretation to accommodate meetings with the AANTC. Written dispositions addressing AANTC comments were provided in both English and French. All engagements with the AANTC will be offered in both official languages.

Monitoring

Throughout previous engagement activities and during their review of the 2017 draft EIS, the AANTC has consistently expressed the importance of protecting the environment against hazardous impacts as a result of the NPD Closure Project activities. The AANTC communicated their concern for future monitoring of the NPD site, seeking assurance that CNL will monitor for as long as is required. In response to these concerns, CNL shared the draft follow-up monitoring plans with the AANTC in 2019 December. CNL has also facilitated webinars which focus on monitoring activities proposed for the NPD. In its disposition, CNL communicated that the EIS describes, at a high level, the follow-up monitoring plans for the project and elaborates on the three programs, in particular: Effluent Verification Monitoring, Environmental Monitoring, and Groundwater Monitoring (Section 12). CNL has indicated it is willing to involve the AANTC in monitoring activities for the NPD Closure Project. CNL also discussed in its disposition to the AANTC that the Institutional Control period, which will be in place for at least 100 years

(Section 5.2.1.2 of the EIS), will include regulatory oversight of the NPD site. This includes appropriate environmental monitoring for as long as necessary to ensure the grouted facility performs as expected and human health and the environment remain protected.

The AANTC also expressed interest in obtaining the follow-up monitoring results and conducting independent review. CNL has provided an explanation of how the results will be made available to Indigenous groups and the public, as well as being submitted to the Canadian Nuclear Safety Commission (as the Responsible Authority).

CNL is committed to continuing engagements with the AANTC regarding the follow-up monitoring for the NPD Closure Project. Workshops will be offered to address any outstanding questions and seek feedback about monitoring from the AANTC perspective. Additionally, CNL continue to follow up with the AANTC to discuss how they can be involved with monitoring programs at NPD and to seek verification that all concerns have been adequately addressed.

Technical

In their comments on the 2017 draft EIS, the AANTC expressed technical concerns about the NPD, including concerns about potential impacts on groundwater and surface water quality. The AANTC also expressed an interest in understanding the decision-making behind the project timelines.

In response to the AANTC's technical concerns, CNL explained the assessments of impacts on surface water and groundwater quality that have been carried out. The NPD EIS does not predict any adverse residual effects resulting from NPD closure activities to surface water (Section 9.3.3.3) and aquatic (9.4.3.3) environments. In 2018, in response to concerns initially raised by the AANTC, CNL ceased the practice of discharging liquid effluent from the facility sumps to the Kichi-Sibi (Ottawa River). Effluent which is collected in the facility sumps at NPD is now transported to the Waste Treatment Centre at the CRL site. Section 9.3.3.2 of the revised draft EIS discusses the mitigation measures that will be implemented during the NPD Closure Project to ensure the protection of the surface water environment (e.g., any liquids generated will be managed as a non-routine discharge, meaning that the liquid will be sampled and managed appropriately depending on the analysis results). Furthermore, Section 9.4.3.2 describes how the aquatic environment is similarly protected by the mitigations employed to protect other environmental components (surface water, atmospheric, and geological and hydrogeological). As mentioned, the 2020 revised draft EIS (in digital and hard copy) was provided to the AANTC and CNL understood that the AANTC was reviewing the updated document from correspondence in 2020 July.

CNL also responded to the AANTC's concerns about project timeline, explaining the roles of CNL and the regulatory authority (the Canadian Nuclear Safety Commission) and how the timeline allows for participation and input from Indigenous groups.

In its revision of the NPD draft EIS, CNL considered and incorporated the concerns from the AANTC related to technical aspects of the EA. Through ongoing engagements, CNL will maintain open dialogue with the AANTC to continue receiving feedback and to seek verification that all concerns have been addressed adequately.

Summary

At present, this summary of interests and concerns is a consolidation of all the interests and concerns the AANTC have brought forward on the NPD Closure Project. The project-specific concerns raised by the AANTC are considered in the context of the EIS. CNL has shared with the AANTC a preliminary table of commitments that reflect the measures proposed by CNL to address the concerns raised to date by the AANTC. CNL will continue to respond to questions and concerns from the AANTC through its ongoing engagement efforts. CNL seeks to understand the AANTC's interest and concerns in the context of this EIS and the NPD Closure Project and commits to working together with the AANTC to receive their feedback on the project.

4.4.4.4 Verification

The AANTC have provided several key inputs, identifying interests and concerns related to the NPD Closure Project including comments on the 2017 draft EIS, which detail a hydrogeological review, and correspondence. To confirm CNL has adequately captured the AANTC's interests and concerns, position and knowledge, CNL provided key documentation to the AANTC for their review and feedback. To date, CNL has made every effort to verify that the AANTC's position, interests, and concerns were adequately characterized. CNL continues to reach out to the AANTC.

In 2021 June, CNL shared the *Table of Interests and Concerns* with the AANTC asking for verification that CNL had accurately represented the AANTC's list of interests and concerns and that, "where possible" verify that how CNL was addressing the interest or concern was adequate.

CNL followed up with the AANTC on the *Table of Interests and Concerns* three times in 2021 July. In 2021 August, CNL shared a letter with the AANTC in response to joint KFN/AANTC correspondence, following up on the *Table of Interests and Concerns* and requesting feedback on this Table for inclusion in the revised draft EIS submission by the end of 2021 August.

CNL followed up in 2021 October, confirming that CNL would need any additional information or feedback by 2021 November, for it be included in the 2021 revised draft EIS submission. Despite multiple attempts by CNL through the summer and fall of 2021, as of 2021 November, the AANTC did not respond to verify the *Table of Interests and Concerns*.

In 2022 January, the CNSC informed CNL that the 2021 December EIS submission was incomplete. The CNSC staff directed CNL to revise the Tables of Interests and Concerns for

clarity. CNL developed a simplified Table of Interests and Concerns (Table M-3 in Appendix M), and a table which maps how this simplified table relates to detailed input and feedback from the AANTC (Table M-2 in Appendix M). The new table was shared with the AANTC in 2022 April with a request that the AANTC verify that the new table retained the AANTC's interests and concerns. CNL followed up in 2022 May and June, offering funding to support the review. In 2022 June, CNL requested that the AANTC respond before the end of the month on whether the AANTC was interested in reviewing the revised table. CNL has received no response from the AANTC to these communications.

Due to the importance of the summary *Table of Interests and Concerns* and the AANTC's input on verifying its completeness and accuracy, CNL shared the most updated version of this table 2023 May. CNL requested that the AANTC confirm the table was complete and accurate by 2023 June 20. CNL followed up with the AANTC on multiple occasions, most recently 2023 July. CNL has reached out to the AANTC more than ten times in 2022 and 2023 and has received no response.

4.4.4.5 Next Steps

CNL's commitments within the "Next Steps" column of the *Table of Interests and Concerns* in Appendix M, are reflective of the feedback CNL has received to date in the EA process from the AANTC's technical review of the 2017 draft EIS. CNL will continue to follow up with the AANTC. Should the AANTC bring forward any new concerns or interests through this ongoing engagement or regulatory proceeding, CNL will seek to understand those concerns in the context of the EIS and the project and commits to working together to receive the AANTC's feedback on the project.

4.4.5 Kebaowek First Nation

KFN is one of the eleven currently federally recognized Algonquin communities within the Algonquin Nation. Nine are located in Québec and two in Ontario. Algonquin rights and title extend to lands on both sides of the Ottawa River, lands that British colonial law has placed within the boundaries of either the province of Ontario or Québec. On 2013 January 23, KFN, along with WLFN and TFN jointly released a Statement of Asserted Rights which summarizes the Aboriginal rights, including title, which the three First Nations assert and provides detailed evidence to substantiate it. Copies of the SAR, maps and background documentation were transmitted to the Governments of Canada, Quebec and Ontario in January 2013. KFN have not relinquished Aboriginal rights over lands that straddle the Kichi-Sibì (Ottawa River) basin on both sides of the Quebec-Ontario boundary. The reserve is situated on the shore of Lake Kipawa to the northeast of Témiscaming, Quebec and as well the community has a membership office in Mattawa ON. KFN has a membership of over 1,100 individuals living on and off the Reserve and in both Quebec and Ontario. While the Reserve is in Quebec most members speak English on a daily basis with only 2% being fluent in French. The median age for the population on the Reserve was reported as 45.7 (KFN 2023).

4.4.5.1 Engagement

Table O-1 of Appendix O includes a summary of key engagement activities that have occurred with KFN on the NPD Closure Project. A complete list of engagement activities can be found in Appendix O (Table O-1) of the IER TSD. Below is a narrative summary of CNL's engagement activities with KFN which cover the time period from 2016 to 2024 June 01. CNL includes engagement beyond the cut-off date used in other places within this EIS in order to capture receiving KFN's preliminary EIS review comments.

Initial information sharing

In 2016 July, CNL sent KFN a letter to introduce the proposed NPD Closure Project, which included a request for community input on any potential adverse impacts from project activities followed by a second letter in 2016 November which inquired about KFN asserted rights and traditional activities. At that time, CNL did not receive a response from the KFN.

CNL met with KFN through a wider meeting with the AANTC in 2017 April to discuss CNL projects, including the NPD Closure Project and to gain feedback from AANTC leadership. In 2017 November, CNL shared the draft EIS and the Indigenous Engagement Report. CNL invited AANTC participation in the public comment period for the draft EIS and requested community input and feedback for incorporation into the project. KFN did not submit comments on the 2017 draft EIS or share any feedback on the project directly with CNL.

In the spring of 2020, CNL shared the 2020 March revised draft EIS, which had been submitted to the CNSC, as well as the latest revision of the IER with KFN and encouraged community input for the final revision. On 2020 June 17, CNL met with the AANTC and KFN for a contribution agreement discussion on the NSDF and NPD projects.

In 2021 September, KFN identified that the proper channel of engagement on the NPD Project was through the First Nation's consultation department. KFN expressed the need to be engaged as a First Nation, independent from the AANTC, regarding CNL related projects and activities.

In the summer of 2022, KFN extended an invitation to CNL and AECL leadership to join KFN's Chief and other members at Fitzpatrick Island, an island that is of cultural significance for the Algonquin Nations. This first leadership meeting was a valuable learning opportunity for CNL as well as an occasion to strengthen the relationship by visiting an Indigenous Protected Conservation Area (IPCA). Commitments were made to work together to decrease gaps in views and create common understanding. The KFN Chief also extended an invitation for CNL and AECL leaders to KFN.

KFN leadership attended CNL's 2022 August Open House, which provided an opportunity to learn more about CNL's organization and operations.

CNL's President and CEO and AECL's President and CEO among others, attended a leadership meeting in community with KFN's Chief and Council, and other representatives and members of the community in 2022 December.

In 2023 April CNL welcomed KFN members to the NPD site for a tour. Throughout the day CNL answered questions from KFN. The areas of interest were monitoring, operational history, site geology and the similarities between the NPD and WR-1 Projects. KFN had a tour of the NPD facility and walked to the river with CNL staff. The relationship between CNL and KFN was impacted when members from the tour received positive notifications for radioactive contamination. Readings were taken which confirmed that the levels recorded had descended at a rate which was indicative of the presence of the radioactive by-products (or progeny) of radon gas. CNL and KFN discussed the implications the day of the tour and again at the 2023 May Working Group meeting. KFN informed CNL that members were upset by the incident and that this event would impact KFN's interest in visiting CNL sites in the future. KFN reported the tour and the events to the CNSC. In efforts to better the relationship and continue working together, CNL and KFN agreed to develop a visitor protocol together. Starting in 2023 the NPD Closure Project has been included as a standing agenda item at the Monthly Working Group meeting.

Letters to the Prime Minister, Natural Resources Canada and the CNSC

In 2020 May, the AANTC and KFN submitted a joint letter to the Prime Minister outlining procedural consultation interests and concerns that included the NPD Closure Project, copying CNL: [Letter from AANTC May 14 2020](#). In 2020 August, the AANTC and KFN submitted a second letter to the Minister of Natural Resources outlining similar concerns: [Letter from AANTC August 26 2020](#). In 2020 September, the AANTC informed CNL that they would not be willing to meet again until the latest letter sent to the Minister receives a response and requests are met. In 2020 November, the Minister of Natural Resources responded to the AANTC and KFN acknowledging the Chalk River Environmental Assessment projects: [Letter from Minister November 5 2020](#). Also in 2020 November, the CNSC responded to the AANTC and KFN: [Letter from CNSC November 25 2020](#). In 2021 January, KFN and AANTC submitted a third letter to the Minister of Natural Resources indicating the need to meet to discuss Indigenous consultation and engagement for the Chalk River nuclear assessment projects. While many of these concerns are related to the Government of Canada, CNL has continued to pursue meaningful engagement with KFN on the NPD Closure Project.

Commitments

In 2021 April, CNL provided a letter with a project update and a preliminary table of commitments to KFN, which was determined through correspondence and meetings on the NPD Closure Project and the NSDF Project. Later in the month, KFN and the AANTC responded by letter to CNL on this list of commitments, indicating that this was not acceptable to them, and that proper engagement was requested. CNL responded by letter to the AANTC and KFN indicating interest in meeting to discuss a mutually acceptable list of commitments. CNL followed up with a call and discussed the letter with KFN's consultation coordinator, reiterating CNL's interest in meeting.

In 2023 March, CNL shared the draft commitment list. KFN provided feedback in 2023 June, which CNL has used to revise the draft commitment list which will accompany this EIS submission.

Summary of Interests and Concerns

In 2021 June CNL shared a draft summary of interests and concerns for the KFN on the NPD Closure Project, seeking to verify this summary with the KFN. CNL followed up with KFN in July and KFN responded by letter in late July indicating specific interests and concerns and an additional interest in moving forward with a letter of intent (LOI) and towards a framework agreement.

In 2022 January, the CNSC informed CNL that the 2021 December EIS submission was incomplete. The CNSC staff directed CNL to revise the *Tables of Interests and Concerns* for clarity.

CNL shared KFN's *Table of Interests and Concerns* in 2022 April asking that the KFN verify that KFN's interests and concerns are accurately characterized. At KFN's request, CNL shared the 2021 revised draft EIS, to support KFN's review of the table. In 2022 June, KFN provided revisions to ensure that KFN's interests and concerns were correctly represented. Later the same month, CNL shared back the revised table to confirm how CNL had adequately incorporated KFN's feedback.

In 2023 March, CNL indicated interest in validating KFN's interests and concerns. CNL sent KFN the proposed and requested commitments between KFN and CNL for the NPD Closure Project. KFN responded early in 2023 April sharing their comments on the *Table of Interests and Concerns* that CNL had previously addressed and shared with KFN in 2022 June. KFN expressed interest in an NPD specific meeting. CNL reminded KFN that KFN feedback had been incorporated into the Table of Interest and Concerns, which CNL re-shared with KFN in 2022 July. KFN and CNL met in 2023 April to discuss the Table of Interest and Concerns and other project aspects. CNL also invited KFN to participate in an NPD site tour on 2023 April 26, and the 2023 May Chimney Swift Count Night, offering a dedicated viewing night to KFN.

During the 2023 April meeting, KFN and CNL were not able to walk through the full Table of Interests and Concerns. Due to the importance of the summary table of interests and concerns and KFN's input on verifying its completeness and accuracy, CNL share the most updated version of this table in 2023 May. CNL received comments from KFN on the Table of Interests and Concerns in 2023 June. CNL incorporated the feedback and shared the updated Table with KFN in July 2023. KFN accepted the updates to the table in 2023 July.

In late 2023 August, CNL received indication from the CNSC on KFN's desire to provide a full technical review the EIS. In response, CNL deferred the draft EIS submission and focused engagements with KFN on enabling a fulsome review of the EIS. In email correspondence to KFN, CNL expressed its commitment to incorporating KFN's interests and concerns into the EIS, as KFN input is essential to the EA process. At the September 2023 Monthly Working Group meeting, CNL and KFN discussed KFN's desire to conduct a full NPD EIS review, and CNL offered capacity support. Following the meeting, CNL provided KFN with a LOI for NPD, as well as the NPD EIS. In 2023 October, the Monthly Working Group met to discuss content and language for the LOI, and CNL asked for an update from KFN on a timeline for KFN's review of the EIS. Further discussion on the LOI is incorporated in the next subsection.

In 2024 January, KFN updated CNL that KFN was still working to prepare a workplan and budget for activities that KFN may identify related to the NPD Closure Project. CNL followed up with KFN in February 2024 to request that KFN provide CNL with a timeline for review of the NPD EIS. CNL asked KFN that the NPD project-specific agreement and associated engagement schedule and initial EIS review be completed by 2024 March 15, for inclusion in the revised draft EIS submission. In 2024 February, an in-person meeting was held with KFN to discuss KFN's NPD workplan and budget and amendment to the consultation framework agreement to include work on the NPD EIS. During the meeting, KFN provided the draft workplan to CNL. CNL discussed with KFN that KFN's review of the EIS is the last piece needed for the NPD EIS submission, and KFN indicated that their technical reviewer is on standby. CNL and KFN agreed to include forward looking language in the EIS to reflect future work together on the NPD Closure Project.

In 2024 March, CNL provided KFN with NPD documents and WR-1 related information to assist in KFN's technical review. CNL followed-up with KFN in 2024 March, to confirm that KFN received the email from CNL. CNL sent the PostSA TSD 3rd Iteration, Chimney Swift Studies Technical Supporting Document, Comment Table on the Draft EIS for the Nuclear Power Demonstration Closure Project, Federal and Provincial Technical Review with Quebec Comments – Revision 2 (2021 December) and the Alternative Means Presentation. CNL also re-shared with KFN the work plan and budget (including proposed timelines for deliverables) as requested by KFN.

At the 2024 April, Monthly Working Group meeting CNL requested KFN's timeline for review of the EIS. KFN noted that due to resourcing that more time would be needed. CNL requested KFN provide an updated timeline for this review. CNL follow-up via email requested an updated timeline from KFN.

At the 2024 May Monthly Working Group meeting KFN shared an update on the review of the revised draft EIS, indicating it would take 12-14 months to complete the studies. KFN's legal counsel shared that in April KFN had sent a letter to the CNSC seeking a Procedural Order. During the discussion it became clear that KFN was misinformed, thinking that CNL was submitting the final EIS rather than the revised draft EIS. The KFN technical consultant indicated that a review of the revised draft was underway and that CNL could expect a list of information requests (IRs). CNL confirmed that they were ready to receive the IRs. KFN noted the review being completed was a desktop review by technical experts, not the community led studies as noted in the Framework Agreement. Following the meeting, KFN shared a copy of the letter to the CNSC with CNL. CNL sent a reply to the letter on 2024 May 13. CNL's response confirmed and reiterated the status of the project within the EA process and the expected timeline to submit the final EIS to the CNSC. CNL confirmed it would be beneficial to have KFN's studies incorporated within the draft EIS.

In 2024 May, a technical consultant, KFN's technical consultant, sent CNL a list of 61 Information Requests and initial comments on the revised draft EIS. KFN also offered a meeting to discuss. The IRs were broken down by topic areas, which CNL used to revise KFN's interest and concerns on the project. CNL updated the KFN *Table of Interest and Concerns* and sent it to

KFN in 2024 June, to validate that the updates properly reflected the interests and concerns of the community to date.

In 2024 June, CNL received feedback from KFN on KFN's Table of Interests and Concerns, and mapping table, as well as a cover letter from the KFN's Chief. KFN highlighted that it is too early in the review process to determine whether the topics identified will constitute specific issues of concern for KFN. KFN clarified that the information request topic areas should be understood as indicating identified areas in which more information and data is required. KFN requested edits to the Table of Interests and Concerns, and mapping table, to reflect this important distinction which CNL has incorporated. KFN has requested further technical information from CNL to complete their assessments and there are several queries to which CNL will need to provide a response. KFN has also flagged the need to complete studies. CNL will respond to KFN's information request queries, and this is expected to generate further discussions. CNL has captured KFN's feedback as part of next steps to support continued relationship building between CNL and KFN. CNL and KFN continue to work together to ensure all of KFN's interests and concerns are captured.

Contribution Agreement, Letter of Intent and Framework Agreement

CNL initiated discussions with KFN and the AANTC in late 2020 May to establish a contribution agreement to support participation in the EA process. The initial contribution agreement meeting with the AANTC was in 2020 June and included attendance by KFN. At this meeting, KFN raised interest in possibly having a direct contribution agreement between KFN and CNL, as well.

CNL attempted to coordinate a second meeting on establishing a contribution agreement with KFN and the AANTC over the summer of 2020 and in 2020 August the AANTC informed CNL that they would not be engage with CNL until there was a procedural consultation response from the Minister of Natural Resource to earlier correspondence, which began in May of 2020 as described above.

CNL responded to KFN and the AANTC in 2021 August and indicated interest in moving forward with an LOI to start to address the interests and concerns. KFN provided a draft LOI in 2021 September, which CNL revised and shared back to KFN in 2021 October. KFN and CNL met in 2021 December to discuss next steps on finalizing the LOI and a formal path forward on engagement related to CNL's environmental assessments in the region. In 2022 January, KFN and CNL signed the LOI and in 2022 March, KFN and CNL began meeting on a monthly basis to progress towards a framework agreement covering KFN-CNL engagement on CNL projects and activities at a company-wide level.

In 2022 May, KFN shared the initial draft of a proposed Framework Agreement.

At the Monthly Working Group meeting in 2022 June, AECL, CNL and KFN were able to discuss and set a path forward for negotiating and executing a Framework Agreement that: (i) acknowledges that KFN enjoys and asserts constitutionally protected Indigenous rights and title, among other things, to on Algonquin Nation traditional territory, (ii) acknowledges that the parties wish to build a strong, constructive, cooperative, mutually respectful and beneficial

relationship, (iii) acknowledges and creates a process that respects and provides for the participation of KFN in CNL's projects; and (iv) provides for the process and means for KFN's consultation and engagement, as applicable, in respect of CNL's projects where the duty to consult must be fulfilled. Framework Agreement negotiations continued at the October, November and 2022 December Monthly Working meetings. CNL was extremely pleased to be able to meet with KFN's Chief, and representatives of AECL in 2023 January to sign and formally execute the Consultation and Engagement Framework Agreement.

In 2023 December, CNL followed up with KFN to determine KFN's capacity to work with CNL to review the NPD materials. As both CNL and KFN continued to work on agreement for LOI language as discussed earlier, CNL noted the existing Framework Agreement in place between KFN, AECL and CNL could be utilized as a mechanism to enable KFN's review of the NPD EIS. KFN indicated to CNL that KFN was focused on other CNL designated projects however the NPD Closure Project continued to be a recurring agenda item for the Monthly Working Group meetings. KFN confirmed they will proceed with the funding schedules for the NPD project under the existing Framework Agreement and a meeting was held in 2024 January to discuss the specifics of the amendment. Following the meeting, CNL provided a draft amendment to the Framework Agreement to incorporate a new schedule in the agreement, which will provide the work plan and budget for the NPD Closure Project as a project-specific agreement.

On 2024 February 26, at an in-person meeting KFN provided CNL KFN's Draft NPD work plan and budget. CNL also shared material that will assist in KFN's technical review including; Federal and Provincial Comments on the draft EIS for NPD (2018 February), Comment Table on the Draft Environmental Impact Statement for the Nuclear Power Demonstration Closure Project, Federal and Provincial Technical Review with Quebec Comments – Revision 2 (2021 December), CNSC completeness check of 2021 Dec EIS submission (2022 January), a presentation on alternative means, the Chimney Swift Studies Technical Supporting Document, PostSA TSD 3rd Iteration, and directed KFN to specific areas of interest in the EIS.

In 2024 March, CNL provided KFN with the draft amendment to the Framework Agreement, which was updated based on the written draft workplan and budget for the NPD project that KFN shared with CNL.

Through the spring of 2024 CNL followed up with KFN seeking an update on the timeline for finalizing the amendment to the Framework Agreement. CNL requested the updated amendment to the Framework Agreement be sent back to CNL to reflect the revised timeline for KFN to complete the EIS review.

In 2024 June, KFN shared with CNL a draft of the amendment to the Framework Agreement. CNL provided the revised draft back to KFN later that month. The amendment to the Framework Agreement was executed by the parties and came into effect as of 2024 July.

CNL will continue to work with KFN to amend the Consultation and Engagement Framework Agreement.

4.4.5.2 Feedback

Through discussions with KFN in 2020 and correspondence from KFN to government officials and agencies (Prime Minister, Minister of Natural Resources and the CNSC), CNL identified a number of KFN's initial interests and concerns on the project. Through continuing engagement with KFN, CNL has updated the concerns using the IRs provided by KFN in 2024 May as part of KFN's technical review of the NPD Closure Project revised draft EIS. CNL recognizes that KFN's review and assessment of the draft EIS remains underway, and therefore, the interests and concerns of KFN as described in this document may change once the review and studies are completed and such changes will be captured in the final EIS.

The interests and concerns from KFN are briefly identified below and then detailed in the Summary Discussion of Interests and Concerns – Section 4.4.6.3 and the *Tables of Interests and Concerns* in Table O-3 of Appendix O. CNL has tried to accurately portray the interests and concerns of KFN, however it is understood the KFN may articulate these concerns differently. KFN's specific concerns and interests related to the NPD Closure Project are detailed below:

Alternatives. KFN identified the importance of Indigenous participation in the assessment of alternatives for the NPD Closure Project, including understanding more fully NPD's financial guarantee. KFN has also inquired about CNL's approach to applying relevant IAEA standards.

Baseline Characterization. KFN expressed concern about the long-term impacts of the NPD Closure Project specifically that CNL must have a thorough understanding of the baseline geological conditions to understand how the site will evolve in the future.

Engagement. KFN identified the importance of meaningful Indigenous participation, and funding for participation, in the EA for the NPD Closure Project, and that consultation and / or accommodation occurs with rights holders.

EA Process and Methodology. KFN expressed concern regarding the continued use of *CEAA*, 2012 for the NPD Closure Project, as opposed to the new *Impact Assessment Act*. KFN is also inquiring about CNL's assessment of cumulative effects, including CNL's assertion that only a high-level assessment is required due to its assertions of no residual effects associated with its preferred option for the NPD Closure Project.

End State, Site Restoration and Future Use of the Land. KFN is inquiring about plans for managing the on-site landfills for all project alternatives.

Environmental Effects and Mitigation Measures. KFN expressed interest in providing input on mitigation measures. The Kichi-Sibi and aquatic species are of particular importance to KFN. KFN would also like additional information on plans, protocols, or strategies for Indigenous engagement/ consultation on potential impacts to the aquatic environment.

Free Prior and Informed Consent. KFN is seeking incorporation and advancement of the United Nations' Declaration on the Rights of Indigenous Peoples (UNDRIP) including the principle of

Free Prior and Informed Consent (FPIC) prior to proceeding with the proposed ISD Project.

Indigenous Health. KFN is interested in how Indigenous receptors have been defined in CNL's assessment and how CNL meets the requirements under CSA N288.1.

Inventory. KFN is seeking further information about the nuclear waste that may remain on site and the radiological inventory of the proposed NPD disposal facility.

Long-term Safety. It is important to the KFN that concept of in-situ disposal is technically suitable. KFN is interested in seeing examples of in-situ disposal used elsewhere and the performance of this concept. KFN wants confidence in the performance of the facility over the long-term to protect humans and the environment. KFN is also seeking more information about how CNL determines whether or to what extent environmental events may affect the long-term safety of the facility.

Monitoring. KFN is interested to understand CNL's past environmental performance at the NPD site via access to environmental monitoring plans and data. KFN wishes to ensure the environment has not been impacted by past operations. KFN is also interested in understanding plans for future monitoring at the NPD site to ensure the environment around the site is protected.

Protection of Flora and Fauna. KFN is inquiring about the potential impacts to Chimney Swifts from remedial and closure activities for the NPD ventilation stack. KFN is also inquiring about a lack of engagement / consultation during the SAR permitting process.

Protection of the Kichi-Sibi (Ottawa River). KFN expressed concern about watershed sustainability. KFN is inquiring about contamination releases to surface water during proposed decommissioning activities on the NPD site.

Radiological Risk. KFN has indicated that members were concerned about visiting CNL sites.

Technical. It is important for KFN to understand CNL's plans for the proposed batch mixing plant to ensure that potential effects on the aquatic environment are properly assessed.

Traditional Land and Resource Use and Cultural Impacts. KFN expressed that KFN's community-specific knowledge should be collected and incorporated into the EIS.

Valued Components. KFN is interested in the identification, selection, and assessment of "candidate species" (i.e., VCs).

4.4.5.3 Summary Discussion of Interests and Concerns

The key interests and concerns discussed in this Section were derived from various engagements with KFN, the details of which are recorded in Table O-1 of Appendix O and described in Section 4.4.5.1 above.

Alternatives

In 2022 June, KFN provided feedback to CNL on the interests and concerns recorded for their community. Kebaowek identified the need to collaborate on alternative project options and technologies taking into account land use, social, and cultural impacts. KFN also expressed concerns that, internationally, the practice of in-situ decommissioning is only permitted in the case of an emergency or accident, which does not apply in the case of the NPD Closure Project.

CNL understands KFN is interested in the detailed cost breakdown for each alternative option for NPD. KFN understands that the current proposal for decommissioning the NPD site would replace the preliminary decommissioning plans that informed the basis for the NPD's financial guarantee. KFN is seeking more information on CNL's consideration and application of IAEA standards for decommissioning and their application to the in-situ option.

CNL agrees that protection of future land users is an important concern and has addressed this subject. CNL has assessed the in-situ disposal alternative for the NPD site, and the EIS shows that such a disposal is safe for human health and the environment in the short term and long term. When conducting the alternative means assessment, CNL followed the regulatory framework laid out in the Canadian Environmental Assessment Agency (CEAA) Operational Policy Statement: Addressing "Purpose of" and "Alternative Means" under the Canadian Environmental Assessment Act, 2012 (CEAA 2012) for the evaluation of alternatives. Based on its consideration of national and international standards and guidelines, CNL continues to believe that the NPD facility has characteristics that support in-situ disposal.

CNL is committed to meeting with KFN to hear community perspectives on alternatives.

Baseline Characterization

During a site visit in 2023 April, KFN asked several questions about the site geology and CNL's investigations into the integrity of the bedrock. CNL summarized verbally some of the geologic and site investigation undertaken to support the project and as a follow-up CNL shared the Geosynthesis report.

In 2018/2019 CNL undertook a geoscientific fieldwork campaign to sample and characterize the bedrock around the NPD facility. The fieldwork included coring of 10 boreholes to a depth of 50 metres into bedrock and several overburden boreholes, with installation of wells for sampling and hydraulic property determinations. The Geoscientific Characterization Report was used to revise the Geosynthesis report and the various models (i.e., Groundwater Model, Resaturation Model). The results of these reports were incorporated into the Post closure Safety Assessment, enabling CNL to assess potential effects to valued components (VC) in the aquatic and terrestrial ecosystems. The additional field investigations and updated models support the conclusion that the NPD Closure Project is protective of human health and the environment.

CNL is committed to meeting with KFN to continue discussions on the baseline characterization of the site if further discussion is desired by KFN.

End State, Site Restoration and Future Use of the Land

CNL understands KFN is looking for additional information on the two legacy landfills on the NPD site including management of the land area and continuation of monitoring, if required. Closure plans for the on-site landfills are important to KFN because they want to ensure that the environment around the site of the NPD Closure Project is protected.

Through future engagements, CNL will continue to follow up with the KFN to address any emerging concerns regarding site restoration and end-state planning for the NPD site.

Engagement

In their letter to the Minister of Natural Resources, in partnership with the AANTC, KFN impressed the importance of meaningful Indigenous participation and consultation regarding the EA of the NPD Closure Project. KFN took issue that CNL has established project “Relationship Agreements” with umbrella organizations. As described previously, CNL, AECL and KFN have entered into a Framework Agreement, which provides for engagement directly between the parties on the NPD Closure Project as well as capacity funding to support KFN’s participation in the EA process. As the engagement has deepened, KFN have now requested an opportunity to review existing studies and NPD Closure Project EIS as discussed above.

EA Process and Methodology

KFN, in partnership with the AANTC, directly corresponded with the Minister of Natural Resources to express their concern that the NPD Closure Project EA should be subject to the Impact Assessment Act (IAA) instead of CEAA, 2012. While the topic of regulatory requirements for an EA process is broad and not specific to the NPD Closure Project, KFN’s comments were directed at the regulatory regime under which the NPD Closure Project should be assessed. CNL recognizes the importance of addressing this concern. Therefore, the NPD EIS was revised to include a reference to the IAA transitional provisions for continuing the NPD Closure Project EA under CEAA, 2012 given that it was commenced under CEAA, 2012 before the IAA came into force in 2019 (Section 3.5 of the EIS). CNL understands that KFN is also inquiring about CNL’s assessment of cumulative effects, including CNL’s assertion that only a high-level assessment is required due to its assertions of no residual effects associated with its preferred option for the NPD Closure Project. Therefore, KFN is interested in obtaining more information on work that CNL has done on the identification, assessment, and analysis of potential cumulative effects.

Through future engagements, CNL will continue to follow up with the KFN to address any emerging concerns regarding the EA process for the NPD Closure Project.

Environmental Effects and Mitigation Measures

KFN provided feedback to CNL on the interests and concerns recorded for their community. KFN expressed concern that appropriate measures are not being taken to prevent or mitigate any negative impacts of proposed studies, developments, or monitoring. This evaluation should properly consider the importance of balancing interrelationships among cultural, environmental, and social elements, including Trauma Informed Impact Assessment. CNL understands that KFN would like additional information on plans, protocols, or strategies for Indigenous engagement / consultation on potential impacts to the aquatic environment. The Kichi-Sibi (Ottawa River) and aquatic species are of particular importance to KFN.

For VCs for environmental components, it was determined that no adverse residual effects are expected to occur from the NPD Closure Project: the proposed mitigation measures are expected to eliminate, reduce or control possible effects, resulting in no or negligible effects. CNL is continuing its efforts to address concerns related to potential effects, mitigation measures and monitoring by offering an opportunity to all Indigenous Nations, communities, and organizations to be involved in monitoring activities that will confirm the conclusions of the EIS. An Indigenous-driven monitoring program can help build confidence that the decommissioning strategy and mitigation measures are effective.

Free, Prior, and Informed Consent (FPIC)

KFN provided feedback to CNL on the interests and concerns recorded for their community. Kebaowek is seeking to incorporate UN guiding Principles for Human Rights and Business and United Nations' Declaration on the Rights of Indigenous Peoples (UNDRIP). Additionally, KFN highlights that the IAA works to advance UNDRIP, endorsed and enacted by the Government of Canada, including FPIC. KFN has identified a pilot Impact Assessment for the Temiskaming Dam Replacement Project under CEAA, 2012 that takes into consideration historic rights and UNDRIP. It is the position of KFN that their consent is required for the creation of a permanent hazardous waste disposal facility in its traditional territory, per Section 29.2 of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).

CNL will work with KFN towards achievement of that principle to the extent possible. CNL is committed to ensuring meaningful participation of Indigenous peoples in decisions that affect their nations, communities and territories. CNL is committed to work towards consensus and consent, with an understanding that UNDRIP does not necessitate a veto in decision-making.

Indigenous Health

CNL understands that KFN is looking for additional information on the methodology for conducting the Indigenous health assessment, including receptors, and diet. Specifically, KFN is looking for additional information on the definitions for "Indigenous People" and "Indigenous Worker" which are identified as specific receptors for calculating exposure to potential health

risks. KFN is concerned that the assessment meet dose calculation requirements from CSA N288.1.

CNL acknowledges KFN's concerns about the methodology used to assess Indigenous health effects from the NPD Closure Project. A potential Exposure Group consisting of a family of self-sufficient Indigenous receptors was included in the PostSA. The exposure profile in the post closure period was developed based on a traditional Indigenous lifestyle pre-European contact [84]. This lifestyle results in a more cautious dose estimate than that based on current-day lifestyle, where some food is store-bought. CNL maintains that human health has been conservatively assessed for Indigenous Nations, communities, and organizations within the EIS and looks forward to discussing this topic further with KFN.

Inventory

CNL understands that KFN is seeking further information about the nuclear waste / contamination that is expected to be present at the NPD site, and requests more information on the radiological inventory (quantities and radioactivity) of the proposed NPD disposal facility.

Based on the facility's low radionuclide inventory and the design life of the multiple barrier system, coupled with the consideration of national and international standards and guidelines, CNL continues to believe that the NPD facility has characteristics that support in-situ disposal.

CNL is committed to ongoing engagement with KFN to gain a greater understanding of their concerns about the long-term safety of nuclear waste.

Long-term Safety

KFN identified the need to incorporate long-term nuclear waste effect-related concerns into the evaluation of the NPD Closure Project. This evaluation to properly account for cultural, environmental, and social concerns and interests of the community, including gender-based analysis. CNL understands that KFN is inquiring on the comparative studies and assessments for in-situ disposal used by CNL, the significant differences in surface ecology and climate at NPD, as well as impacts to subsurface conditions and behavior at less than 5m depth. KFN is interested in examples of in-situ disposal used elsewhere and the performance of this concept to evaluate the long-term integrity of the site. This includes more information on the comparison of the NPD plan with anthropogenic analogues, as well as social or cultural comparisons for in-situ disposal (which may include fear or stigma associated with the radiological legacy of a site).

KFN is also seeking more information about how CNL determines whether or to what extent environmental events may affect the long-term safety of the facility. This includes gaining a greater understanding of how the effects of extreme weather, seismic events, climate change

including storm projections and severe forest fires are considered in the NPD Closure Project's assessment. KFN wants confidence in the performance of the facility over the long-term to protect humans and the environment.

CNL has assessed the long-term effects of the in-situ disposal facility, and the resulting EIS shows that such disposal is safe for human health and the environment in the short term and long term. Design features of the current NPD facility make it conducive to disposing of the material in place. CNL includes an Indigenous receptor group in its assessment of long-term safety. The predicted peak dose to an Indigenous receptor is 0.0004 mSv/yr which is 500 times less than the dose criterion. The analysis demonstrates that the impact on Indigenous peoples and the environment is negligible. The proposed project involves a long-term solution to ensure the waste that currently resides at the NPD site is effectively contained and isolated from the environment, ensuring public safety. This solution has the potential to result in additional lands being freed up for traditional harvest or other uses by Indigenous peoples or the public.

CNL is committed to ongoing engagement with Kebaowek First Nation to understand more fully their concerns about the long-term safety of nuclear waste.

Monitoring

KFN is interested to understand CNL's past environmental performance at the NPD site. KFN wishes to ensure the environment has not been impacted by past operations. CNL understands that KFN is concerned that there is no publicly accessible Environmental Risk Assessment (ERA) or other publicly accessible source of monitoring data or monitoring plan descriptions for the NPD Closure Project. KFN is also interested in the proposed EA follow-up monitoring plans for NPD including information on monitoring pathways, locations, and frequencies, since it is important to KFN that CNL is regularly monitoring the environment around the NPD site. CNL shared a link to the annual summary of environmental performance as a follow-up to the 2023 April site visit and would be happy to share other historic monitoring data as requested by KFN. CNL conducts a rigorous monitoring program and is committed to ensuring that the environment around the NPD site, including the Kichi-Sibì (Ottawa River), is protected. The results demonstrate that the public and the environment around the NPD site continue to be protected.

In addition to the CNL monitoring program, the CNSC leads an Independent Environmental Monitoring Program (IEMP) designed to verify that the public and the environment around licensed nuclear facilities are protected. As part of its IEMP, the CNSC samples and analyzes surface water upstream and downstream of the NPD site (including sampling for non-radiological parameters). The CNSC IEMP results confirm that the public and the environment around the NPD site are protected and that there are no expected health impacts.

CNL is committed to ongoing engagement with Kebaowek First Nation to understand more fully their concerns about environmental monitoring activities at the NPD site.

Protection of Flora and Fauna

CNL understands that KFN is inquiring about the potential impacts to Chimney Swifts from remedial and closure activities for the NPD ventilation stack. KFN is interested in current contaminant levels present in the stack, specifically frequency of stack monitoring, sampling methodologies, and disaggregated monitoring results. KFN is also inquiring about a lack of engagement / consultation during the SAR permitting process. Specifically, KFN is seeking information on actions taken and status of CNL's plans, protocols, or strategies for Indigenous engagement / consultation for species at risk.

CNL understands that ensuring that lands on and in the vicinity of the NPD site are responsibly managed and monitored is an area of concern for KFN. CNL is committed to the protection of species at risk and has and will apply for any necessary permits from ECCC for the protection of biota and SAR and looks forward to continuing discussions on this topic with KFN.

Protection of the Kichi-Sibi (Ottawa River)

KFN identified the need to incorporate watershed sustainability concerns into the evaluation of the NPD Closure Project to properly account for cultural, environmental, and social concerns and interests of the community, including gender-based analysis. CNL understands that KFN is inquiring about contamination releases to surface water during proposed decommissioning activities on the NPD site. KFN is interested in both historic liquid effluent discharge practices for the NPD facility sumps to the Ottawa River, as well as the current process involved in transferring the wastewater to the CRL site. This includes additional potential sources or pathways of liquid emissions from the NPD site during proposed decommissioning: the two tile drainage systems on site; stormwater channels (surface ditches); an equipment washout pit, and potential wastewater generated by the proposed grout mixing plant for the NPD decommissioning activities. It is unclear to KFN from the EIS how all these potential sources of water contamination will be addressed in proposed decommissioning activities. Further, KFN is also interested in any studies, assessments, or documents specifically relating to whether expected releases to surface water may require a Fisheries Act authorization. As stewards of the lands and waters, it is important to KFN that the Ottawa River is protected.

The potential for contamination to reach the Kichi-Sibi (Ottawa River) is assessed in the EIS and is supported by long term modelling and detailed groundwater modelling. The EIS predicts no effects to surface water (including the Ottawa River), and follow-up monitoring will be implemented to confirm these predictions.

CNL is committed to the protection of the Kichi-Sibi (Ottawa River) and looks forward to continuing discussions on this topic with KFN.

Radiological Risk

KFN expressed concerns regarding radiological risk, how radiological risks are communicated and the use of plain language with respect to visits at the NPD site. During a visit to the NPD site in 2023 April, members from the tour received positive notifications for radioactive contamination. Readings were taken which confirmed that the levels recorded had descended at a rate which was indicative of the presence of the radioactive by-products (or progeny) of radon gas. Even after discussions and reassurance from CNL Radiation Protection Staff several visitors remained very unsettled by the event and were concerned about radiation risk and exposure.

CNL does recognize its obligation to continue to work with Indigenous Nations, communities and organizations in addressing such concerns. In efforts to better the relationship, allow KFN members to be better informed before visiting site and continue working together, CNL and KFN agreed to develop a visitor protocol together.

CNL notes that this concern is not specific to the NPD Project but is broader to the CNL sites and possibly the nuclear industry. However, CNL is committed to continue work with KFN on how to communicate radiological risk with its members going forward and to provide educational sessions for the community, if desired.

Technical

CNL understands that it is important for KFN to understand CNL's plans for the proposed batch mixing plant to ensure that potential effects on the aquatic environment are properly assessed. This includes additional information on the water source, volume, or intake rate required for the grout mixing plant.

CNL acknowledges that KFN is interested in the final plans for the batch mixing plant and will provide these details to KFN to review together once available to understand any concerns.

Traditional Land and Resource Use and Cultural Impacts

KFN is seeking recognition and support of an Algonquin community-led assessment. KFN identified that traditional knowledge needed to be properly incorporated and considered by the project. KFN also identified their capacity to carry out independent studies as part of environmental, social, and cultural impact-assessment processes, with due regard to ownership of and the need for the protection and safeguarding of traditional knowledge. KFN is seeking to collaborate with CNL on appropriate land use, social, and cultural impact study methodologies with suitable timeframes to implement studies.

CNL agrees that KFN-specific information and traditional knowledge from the KFN and other Indigenous Nations should be integrated into the EIS. Prior to the 2022 June feedback, CNL sent

two letters asking specific questions of KFN to align with the requirements of CEAA, 2012 Section 5(1)(c), including questions related to traditional activities and sites of ceremonial significance near the NPD Closure Project. The EIS and supporting studies have assumed that traditional uses do occur adjacent to the NPD site, whether on the Kichi-Sibì (Ottawa River) or outside the restricted / fenced area. CNL has also assumed that in the future there is an interest to re-establish traditional use activities on the NPD site.

Valued Components

CNL understands that KFN is interested in the identification, selection, and assessment of “candidate species” (i.e., VCs). Specifically, KFN is looking for the frequency and duration of any field studies to confirm the selection of VCs, and any further assessments relating to CNL’s application of an “ecosystem approach” to the identification and representativeness of VCs for the project.

CNL looks forward to further discussions with KFN to ensure that VCs of importance to KFN are appropriately represented in the EIS.

Summary

At present, this summary of interests and concerns is a consolidation of all the interests and concerns the KFN have brought forward on the NPD Closure Project. The project-specific concerns raised by the KFN are considered in the context of the EIS. While CNL recognizes the KFN’s concerns regarding the EA process, CNL notes that the concerns raised relative to the EA process are beyond the scope of the project. CNL will continue to document and share with the CNSC in CNL’s subsequent IER any additional feedback provided by the KFN relative to the EA process.

CNL will continue to respond to questions and concerns from KFN through its ongoing efforts to engage with KFN. CNL will seek to understand those concerns in the context of the EIS and the NPD Closure Project and commits to continue to work together with KFN to receive their feedback on the project.

4.4.5.4 Verification

KFN has provided key input, identifying interests and concerns related to the NPD Closure Project in the form of correspondence with CNL, including revisions to the *Table of Interests and Concerns*, or correspondence that CNL was copied on.

To confirm CNL has adequately captured KFN’s interests and concerns, position and knowledge, the KFN and CNL underwent a verification process where CNL provided key documentation to KFN for their review and feedback. Through this process, KFN has reviewed and provided feedback on their *Table of Interests and Concerns*. While not all KFN’s concerns have been mitigated by this process to date, CNL has made every effort to verify that KFN’s position,

interests and concerns were adequately characterized. CNL continues to work with KFN to address their concerns through ongoing discussions.

In 2021 June, CNL shared the *Table of Interests and Concerns* with KFN asking for verification that CNL had accurately represented the KFN's list of interests and concerns and that, "where possible" verify that how CNL was addressing the interest or concern was adequate.

KFN responded to CNL with a letter in 2021 July, restating interests and concerns and indicating interest in an LOI. CNL responded to this correspondence in 2021 August, following up on the *Table of Interests and Concerns* and requesting feedback on this Table for inclusion in the revised draft EIS submission by 2021 August, as well as indicating interest in an LOI with KFN.

KFN shared a draft of an LOI with CNL in 2021 September, that would formalize engagement with CNL on the NPD Closure Project and other CNL activities. CNL responded with a revised draft of the LOI and indicated an interest on meeting to further discuss engagement on 2021 October 20.

CNL followed up later in 2021 October, with several proposed meeting dates and confirming that CNL would need any additional information by 2021 November, for it to be included in the 2021 revised draft EIS submission. CNL and KFN did meet in December to discuss the draft LOI and relationship building next steps. Despite multiple attempts by CNL through the summer and fall of 2021, KFN has been focused on other priorities with CNL and did not respond at that time to verify the *Table of Interests and Concerns*.

In 2022 January, the CNSC informed CNL that the 2021 December EIS submission was incomplete. The CNSC staff directed CNL to revise the *Tables of Interests and Concerns* for clarity. CNL developed a simplified *Table of Interests and Concerns* (Table O-3 in Appendix O), and a table which maps how this simplified table relates to detailed input and feedback from the KFN (Table O-2 in Appendix O).

In early 2022 April, CNL shared the KFN's *Table of Interests and Concerns* asking that the KFN verify that KFN's interests and concerns are accurately characterized. In 2022 June, KFN provided revisions to ensure that KFN's interests and concerns were correctly represented. CNL shared back the revised table in 2022 July to confirm how CNL had incorporated KFN's feedback. CNL and KFN looked at this table again together in April of 2023. Due to the importance of the summary *Table of Interests and Concerns* and KFN's input on verifying its completeness and accuracy, CNL shared the most updated version of this table 2023 May. CNL requested that KFN confirm the table was complete and accurate by 2023 June. CNL continued to follow up with KFN and received comments on the table 2023 June. CNL sent back an updated table in 2023 July, which KFN confirmed receipt of.

KFN provided a list of information requests and initial feedback on the EIS review in 2024 May. The information requests were organized into topic areas, which is helped in CNL's efforts to document KFN's interests and concerns for the project. CNL shared an updated Table of

Interests and Concerns to KFN for verification in 2024 June and will share comprehensive responses to the KFN information requests over the summer of 2024.

CNL received feedback from KFN on KFN's Table of Interests and Concerns, and mapping table, in late 2024 June. KFN clarified that the information request topic areas should be understood as indicating identified areas in which more information and data is required. CNL incorporated KFN's feedback on KFN's Table of Interests and Concerns received in 2024 June.

4.4.5.5 Next Steps

CNL has used the feedback and IRs shared by KFN to update the interests and concerns for KFN, as well as to update the record of topics that require additional information for KFN to adequately assess the project. CNL has also incorporated KFN feedback and knowledge shared through other submissions related to CNL's designated projects into the EIS. CNL shared and re-shared materials to support KFN's review of the NPD EIS. As part of next steps, KFN has requested further technical information from CNL to complete their assessments and there are a number of queries to which CNL will need to provide a response. KFN has also flagged the need to complete studies. CNL will respond to KFN's IR queries, and this is expected to generate further discussions. As part of KFN's requests, CNL compiled and shared with KFN the requested supplemental references.

CNL will continue to work with KFN through the Framework Agreement to support direct and meaningful engagement for the NPD Closure Project, including, without limitation, the performance of Indigenous led studies. Should the KFN bring forward any new concerns or interests through this ongoing engagement and associated regulatory proceeding, CNL will seek to understand any interests and concerns in the context of the EIS and the project.

4.4.6 Kitigan Zibi Anishinabeg First Nation

The Kitigan Zibi Anishinabeg (KZA), also known also as the River Desert Band or Maniwaki is one of the nine currently federally recognized Algonquin communities in Quebec. The community resides on reserve lands which were established in 1853. The main Reserve is situated to the south-west of the borders of Maniwaki in the Outaouais region of Quebec, on the west bank of the Gatineau River. According to KZA, as of 2023 March, the First Nation had a population of 3,912 members of which 2,228 members live off reserve, a large number of whom live and / or work in Ontario. KZA has a rich history and archaeological evidence indicates that the area has been inhabited for at least 6,000 years. The Algonquin Anishinabeg people have lived in the region for generations and have maintained a strong connection to the land and its natural resources (KZA, 2023). KZA presented a comprehensive land claim in 1989 to the federal Crown.

A fuller description of the KZA can be found in Chapter 3.

4.4.6.1 KZA Engagement

Table N-1 of Appendix N includes complete list of engagement activities that have occurred with KZA on the NPD Closure Project. CNL has also provided a narrative summary of engagement with KZA.

Comments on the Project Description

In 2016 July, CNL sent KZA a letter to introduce the proposed NPD Closure Project, which included a request for community input on any potential adverse impacts from project activities followed by a second letter in 2016 November which inquired about KZA asserted rights and traditional activities. KZA provided comments on the Project Description for the NPD Closure Project to the CNSC through the formal environmental assessment process. Over the summer and fall of 2016, CNL had phone calls and email correspondence with KZA representatives, including the sharing of some general project information with KZA.

Meeting at the NPD site

CNL met with the AANTC, including KZA and KFN, in 2017 April to discuss the NPD Closure Project and gain feedback from AANTC leadership. In 2017 May, CNL met with KZA Council in Maniwaki, Quebec to discuss the NPD Closure Project and the comments submitted on the Project Description. Following this meeting, CNL hosted KZA environmental staff for a CRL and NPD site visit in 2017 July, which included a tour of the proposed NPD site and an opportunity to provide feedback on the project, which included feedback on species at risk.

Ongoing information sharing

In late 2017, CNL shared the draft EIS and the IER. CNL invited KZA participation in the public comment period for the draft EIS and requested community input and feedback for incorporation into the project. KZA did not submit comments on the draft EIS to the CNSC and CNL did not receive any feedback from KZA on the draft EIS.

In the spring of 2020, CNL shared the 2020 March revised draft EIS, which had been submitted to the CNSC, as well as the latest revision of the IER with KZA, requesting community input for the final revision.

In 2021 October, the KZA identified that the proper channel of engagement on the NPD Closure Project was through the First Nation's consultation department, a position that they were in the process of filling. The KZA expressed the need to be engaged as a First Nation, independent from the AANTC regarding CNL-related projects and activities. The KZA representatives had a number of questions on the NPD Closure Project related to the radiological waste inventory at the NPD site and the interests and concerns about the project raised by other all Indigenous Nations, communities, and organizations. KZA also requested baseline environmental information for the NPD site. CNL followed-up with KZA providing a draft of this document's Appendix C, where the records of engagement and Tables of Interests and Concerns are found, six documents containing baseline environmental information, and further information on the radiological waste inventory. KZA also indicated an interest in viewing an example of a contribution agreement, which CNL agreed to share.

In 2021 November, representatives from KZA met with CNL representatives for an overview of the NPD Closure Project and the NSDF project. The representatives had several questions about the NPD Closure Project related to waste inventory at NPD. CNL responded to these questions with further information in 2021 December.

In 2023 February, KZA participated in the NPD webinar. The webinar topic was *Changes to the EIS Resulting from Feedback*.

In May 2024, KZA community members, including high school students and elders, came to the CRL site to access the Point au Baptême beach. KZA requested access to conduct a water ceremony. KZA welcomed CNL, AECL and CNSC staff to participate in the ceremony. During the afternoon, KZA community members shared feelings with CNL about projects, including the NPD project. CNL listened to all views and enjoyed the day with KZA at the beach and having lunch together.

Contribution Agreement

CNL initiated discussions with the AANTC in 2020 May to establish a contribution agreement to support the AANTC's participation in the EA process. The AANTC indicated in 2020 June that KZA would also be involved in contribution agreement discussions. CNL attempted to coordinate a meeting to establish a contribution agreement over the summer of 2020 and in 2020 August the AANTC informed CNL that they would not engage further with CNL until there was a response from the Minister of Natural Resources to earlier correspondence.

In 2021 November, representatives from KZA met with CNL for an overview of the NPD Closure Project and the NSDF project. KZA requested a template for a contribution agreement. CNL sent this following the meeting. CNL and KZA met in 2022 October to discuss suggestions from CNL on how to improve the relationship between the two parties and the development of a long-term framework agreement. Following the meeting CNL re-shared an agreement template.

At a meeting in 2023 December, KZA shared that based on the community engagement sessions held and the feedback provided by members, KZA is not looking to establish a project specific contribution agreement with CNL at this time. CNL continues to offer support for KZA's participation in the EA process.

Commitments

In 2021 April, CNL provided a project status update and a preliminary table of commitments to KZA made through engagements and comment responses for the NPD Closure Project.

In 2022 October, CNL provided a project update and the engagement status with KZA. CNL outlined the proposed next steps, including offering capacity through a contribution agreement

and establishing commitments to ensure that all interests and concerns are addressed and tracked to resolution. CNL sent an updated draft set of commitments for KZA's review. CNL did not receive a response from KZA.

In 2023 January, CNL provided a project update. CNL proposed the next steps would be to continue working together to ensure the KZA interests and concerns are reflected in the EIS by CNL.

Comments on the draft EIS

In 2023 September, CNL received feedback from the CNSC on KZA's desire to provide a full review of the NPD EIS. In response, CNL deferred the draft EIS submission and focused engagements with KZA on enabling a fulsome review of the EIS, as desired by KZA.

KZA shared that they had held a community meeting on 2023 November 22, to discuss CNL and the NPD Closure Project, among other topics. In 2023 December, KZA sent CNL written preliminary comments on the revised draft EIS for the NPD Closure Project. The feedback included areas of concern and interest expressed by the community members during the community meeting held in 2023 November, as well as a technical review of the EIS (the EIS was sent to KZA for review in 2023 September). CNL and KZA met on 2023 December 20, to discuss and review the feedback provided.

In 2024 January, CNL shared with KZA the updated the *Table of Interest and Concerns* and Mapping Table based on the written preliminary feedback received on the EIS. In its correspondence back to KZA, CNL noted the work being done to incorporate KZA feedback and knowledge that has been shared through other submissions related to CNL projects.

CNL acknowledged the feedback from the meeting held in 2023 December that KZA was interested in focusing its attention on the EA process and working with the CNSC over the next while, and therefore would have limited additional feedback on NPD Closure Project at this time. CNL offered to remain available to discuss the NPD Closure Project at any time.

2024 March 20, CNL and KZA met to discuss the updates to the Interest and Concerns and Sections 8.9 and 6.2.4.7 of the EIS. CNL noted the changes that were made based on the community feedback and information KZA provided during the NSDF engagement. CNL requested KZA's review of the EIS sections to ensure that all concerns and interests have been captured appropriately. KZA expressed that CNL incorporating direct language had accurately captured KZA's opinions. No further feedback from KZA on the draft EIS is expected.

Summary table of interests and concerns

In 2021 June CNL shared a draft summary of interests and concerns for the KZA and heard back in July that KZA would be responding to the letter that enclosed the summary *Table of Interests*

and Concerns. CNL followed up five times between 2021 July and 2021 September. KZA did not provide feedback on the table in 2021.

In 2022 January, the CNSC informed CNL that the 2021 December EIS submission was incomplete. The CNSC staff directed CNL to revise the *Tables of Interests and Concerns* for clarity. CNL revised KZA's Table of Interests and Concerns and shared the new table with KZA in 2022 April asking that KZA verify that the new table retained KZA's interests and concerns. In 2022 May, KZA reviewed the table and provided comments to CNL. In 2022 June, CNL shared back the revised table to confirm how CNL had incorporated KZA's feedback.

CNL took note of the feedback provided by KZA FN during the NSDF hearings and subsequent Procedural Direction. As a result, CNL has proactively added additional areas of interest to the *Tables of Interests and Concerns*. Topics include:

- Consultation process and the need for capacity building;
- Potential impacts on the KZA's Aboriginal and treaty rights;
- Proximity of projects to the Kichi-Sibi (Ottawa River) and drinking water quality;
- Cumulative effects of all activities at and in near proximity to the CRL site;
- Continued application of *CEAA, 2012* rather than the *IAA, 2019*;
- Transparency, specifically related to environmental concerns and their mitigation; and
- Long-term Site integrity.

Due to the importance of the summary *Tables of Interests and Concerns* and KZA's input on verifying its completeness and accuracy, CNL shared updated versions of the *Tables of Interests and Concerns* and Mapping Table with KZA in 2024 January. CNL and KZA met in March 2024, to review the tables together and ensure KZA interests and concerns have been captured appropriately. KZA expressed that CNL incorporating direct language had accurately captured KZA's opinions.

4.4.6.2 Feedback

KZA has provided feedback formally, through their comments shared with the CNSC on the 2016 Project Description, and directly to CNL via engagement activities. CNL has tried to accurately portray the interests and concerns of KZA however it is understood the KZA may articulate these concerns differently. KZA's specific concerns and interests related to the NPD Closure Project are detailed below.

The interests and concerns from the KZA are briefly identified below and then detailed in the Summary Discussion of Interests and Concerns – Section 4.4.6.3 and the *Tables of Interests and Concerns* in Table N-3 of Appendix N.

Accidents and Malfunctions. KZA expressed concern about proximity of the disposal facility to the Kichi-Sibi (Ottawa River) and potential effects of malfunctions, accidents and deterioration

of the disposal facility over time.

Alternatives. KZA is concerned about the technical suitability of the in-situ disposal concept and further is concerned that the long-term risks of the alternatives have not been adequately considered. KZA also has concerns about the process used to assess alternative means for the project. It is the position of KZA that all materials and contaminants present at the NPD site should be removed and permanently stored in a deep geological repository off-site.

Archaeology and Cultural Heritage. KFN has expressed interest in the archaeological studies for the NPD site.

Engagement. Representatives from KZA have posed general questions about the NPD Closure Project. Some of the questions related to the radiological waste inventory and the layout of the facility. KZA has also indicated that it is important for meaningful Indigenous participation and adequate Crown consultation to occur for the NPD Closure Project and the NSDF Project environmental assessments.

EA Process and Methodology. KZA expressed concern on continued use of CEAA, 2012 rather than the more recent Impact Assessment Act. It is important to KZA that the NPD Closure Project Environmental Assessment is carried out using up-to-date legislation. There is concern that the current framework used to assess the NPD Closure Project is colonial in context and fails to acknowledge Anishinabe laws and governance systems. KZA is also interested in cumulative effects and overall protection of the Kichi-Sibi (Ottawa River) and land at and in the vicinity of CNL sites and wants to be involved in the assessment of impacts. Further, KZA is concerned about access to, and use of, Indigenous knowledge for the project, specifically in KZA's view, CNL's failure to observe KZA knowledge in favour of more limited CNL studies which cannot be fully relied upon to protect the land. It is important to KZA that KZA available information is acknowledged and incorporated into the EA.

End State, Site Restoration and Future Use of the Land. It is important to KZA that it receives reassurance that the area will move towards renaturalization and healing over time through involvement in site restoration planning. This will enable future use of the land by KZA.

Free, Prior and Informed Consent (FPIC). It is important to KZA that CNL work to secure its free, prior and informed consent through meaningful engagement.

Impacts on Rights. KZA expressed general concern and interest related to Indigenous rights and traditional territory.

Inventory. KZA is concerned about the nuclear waste that will remain on site specifically the radiological content (inventory).

Long-term Safety. It is important to KZA that there is confidence in the performance of the facility over the long-term and that there are barriers in place to protect the environment. It is also the view of KZA that there is a significant gap in research on the unique pathways for exposure to contaminants for Anishinabe people that needs to be addressed through the EA.

Monitoring. KZA is interested in the monitoring locations and is concerned that mitigation measures can be effectively implemented in the case that groundwater contamination occurs. KZA is interested in being involved in a monitoring strategy to provide assurance to KZA members that CNL is regularly monitoring the environment around the NPD site.

Protection of Flora and Fauna. KZA expressed specific concerns about the potential negative impact of the project on biota, especially species at risk such as chimney swifts. KZA representatives also identified the potential for monarch butterfly habitat (milkweed) during a site visit.

Protection of the Ottawa River. KZA expressed concern about the potential impacts of the project on the health of the Kichi-Sìbì (Ottawa River).

Socio-economic. A KZA representative expressed some interest in contracting opportunities with CNL.

Traditional Land and Resource Use and Cultural Impacts. KZA is concerned that the EIS neglects to acknowledge CNL's responsibility in creating and perpetuating avoidance of the area by KZA members.

4.4.6.3 Summary Discussion of Interests and Concerns

The key interests and concerns discussed in this Section were derived from various engagements with KZA, the details of which are recorded in N.1 of Appendix N and described in Section 4.4.6.1 above.

Accidents and Malfunctions

Through comments to the NSDF Project, CNL understands that it is important to the KZA that there are no health or environmental impacts from the disposal facility in the long term because of the project's proximity to the Kichi-Sìbì, which has great importance to the KZA. KFN is also concerned and potential malfunctions, accidents and deterioration of the disposal facility over time. Section 8.12 of the EIS discusses the natural disasters to which NPD may be exposed. Section 9.14 of the EIS discusses the potential effects on the project of climate change, forest fires, floods, earthquakes, severe weather such as tornados, lightning strikes, ice storms, and changes to the Kichi-Sìbì (Ottawa River). Additional details and a range of scenarios that encompass the potential impacts from extreme weather and natural hazards are examined in the Decommissioning Safety Assessment and the PostSA TSD.

CNL's Emergency Procedure for the NPD site includes actions for specific staff roles in the event of a wide range of emergency conditions including fires, floods, and hazardous spills, loss of power, earthquakes, and tornados. This procedure was developed and is updated in accordance with CNL's company-wide Emergency Preparedness Program, which has been accepted by the CNSC and meets the requirements of REGDOC 2.10.1 Nuclear Emergency Preparedness and Response. It will remain in place and be updated as required throughout the Decommissioning Execution and Institutional Control Phases of this project.

CNL has assessed the probabilities and potential impacts of flooding, seismic activity, above-ground natural hazards and extreme temperature change through all project phases (decommissioning, institutional control and post-institutional control), and has concluded that these events will have no undue effects on people or the environment around the site. CNL models several scenarios in its PostSA TSD which consider how accidents and natural hazards could affect the facility. These scenarios are called disruptive events. One such case models severe erosion (flood) while another case models extreme degradation of the facility (the concrete structure and the grout). In both cases, the predicted doses to receptors are still well below the dose criterion of 0.25 mSv/yr; 0.009 mSv/yr and 0.0009 mSv/yr, respectively.

CNL is open to increased engagement, education and participatory involvement in monitoring activities at the site to help alleviate any concerns. CNL will continue to follow up with KFN to address any emerging concerns about this topic.

Alternatives

KZA has expressed concern about the societal and ethical choice of in-situ decommissioning, in particular, about the future impacts to all Indigenous Nations, communities, and organizations. Further KZA has expressed interest that the NPD Closure Project selected alternative of ISD be compared against international best practices. KZA is also concerned that the evaluation of alternatives did not include a thorough risk assessment, considering worst-case scenarios, emergency protocols and remediation measures. Further, it is important to KZA that the process of assessing and accepting alternative means includes KZA, particularly the importance that KZA places on long-term risk when evaluating the alternative means. KZA highlights that joint assessment of alternatives is considered best practice and are commonly implemented for projects that are of high concern to Indigenous peoples. It is the position of KZA that all materials and contaminants present at the NPD site should be removed and permanently stored in a deep geological repository off-site.

CNL believes that the risks associated with in-situ disposal are lower than other options. In-situ disposal is a well-known technique used since the 1960's at many nuclear sites worldwide. Sites contaminated with toxic and hazardous wastes are also remediated using this technique. This approach requires the project to apply for a license as a disposal facility, and hence the facility must also meet the regulations for a disposal facility.

In the case of the NPD reactor, the decommissioning strategy is to incorporate the reactor into

a new disposal facility, which is in accordance with the IAEA definition of decommissioning, IAEA Safety Glossary (IAEA 2019). This strategy also meets the Canadian regulatory requirements, particularly the requirements of Section 5.1 of REGDOC-2.11.2, Decommissioning.

The NPD reactor has a low inventory. Tritium is the major radionuclide and will decay to low levels during the Institutional Control period. The longer-lived Intermediate Level Waste (ILW) consists of small quantities of low energy beta emitters. The beta emitters have low radiotoxicity and do not generate heat. These are activation products inside the metal of the calandria in the reactor vault. The reactor vault is reinforced concrete with walls 3 m thick located around 10 m below grade in bedrock. The location of the reactor vault isolates the wastes making it hard to access. These are all features that are consistent with IAEA Safety Standard SSR-5, Disposal of Radioactive Waste, regarding cavern or vault disposal for ILW.

CNL has written a report summarizing facilities worldwide that use in-situ disposal. The report is not limited to nuclear reactors or processing facilities, and includes mines and hazardous waste sites. The report also describes what each of the facilities have in common, why in-situ disposal is the preferred approach and how it applies to NPD.

CNL has assessed the probabilities and potential impacts of flooding, seismic activity, above ground natural hazards and extreme temperature change through all project phases (Decommissioning Execution, Institutional Controls and Post-institutional Controls), and has concluded that these events will have no undue effects on people or the environment around the site. CNL models several scenarios in its PostSA TSD which considers how accidents and natural hazards could affect the facility. These scenarios are called disruptive events. One such case models severe erosion (flood) while another models extreme degradation of the facility (the concrete structure and the grout). In both cases, the predicted doses to receptors are still well below the dose criterion.

When conducting the alternative means assessment, CNL followed the regulatory framework laid out in the Canadian Environmental Assessment Agency (CEAA) Operational Policy Statement: Addressing “Purpose of” and “Alternative Means” under the Canadian Environmental Assessment Act, 2012 (CEAA 2015) for the evaluation of alternatives. The level of analysis conducted for each alternative is consistent with the CEAA requirements.

CNL's technical assessment shows that the in-situ design is appropriate for the hazardous timeframe of the contaminants and is consistent with national and international standards. CNL understands that this concern is outstanding from KZA's perspective based on KZA feedback in 2023 July. Through continued engagement at the Working Group, CNL hopes that the parties are able to find common ground on this topic.

Archaeology and Cultural Heritage

In 2017 July, KZA staff, which included technical and environmental experts, toured the NPD site. CNL's biologist was on hand to discuss ecological and archaeological studies. KZAKFN had the opportunity to ask questions or offer feedback on the project, including feedback on species at risk. All questions were addressed verbally at the tour.

CNL's archaeology consultant determined that there was no archaeological potential for the site study area (where project activities will take place), because that area has already been completely disturbed during site construction. However, in response to concerns expressed by all Indigenous Nations, communities, and organizations, CNL did conduct a Stage 1 archaeological assessment of the remainder of the NPD site. No further archaeological work is planned for NPD.

In 2022 May, KZA requested a discussion related to archaeological studies of the NPD site. CNL shared the results of the archaeological assessment with KZA and would be pleased to provide a summary and overview presentation on the archaeological work conducted on the site.

Engagement

CNL has responded to all questions, comments, and information requests to date. This includes responding to questions posed by KZA in 2021 November related to radiological waste inventory and to interests and concerns raised by other Indigenous Nations, communities, and organizations. KZA also requested and received from CNL a package of baseline environmental information and an example contribution agreement (see details under Protection of the Ottawa River, below). CNL will continue to follow up with the KZA to address any emerging concerns related to this topic.

CNL has reached out to KZA on an ongoing basis since the beginning of the project and has met with KZA in 2017 and in 2021. At the meeting with KZA in 2021 November CNL expressed interest in entering an agreement to provide capacity funding to enable participation in the environmental assessment process.

EA Process and Methodology

KZA expressed concern on continued use of *CEAA*, 2012 rather than the more recent *IAA*. While the topic of regulatory requirements for an EA process is broad and not specific to the NPD Closure Project, KZA's comments were directed at the regulatory regime under which the NPD Closure Project should be assessed. CNL recognizes the importance of addressing this concern. Therefore, the NPD EIS was revised to include a reference to the *IAA* transitional provisions for continuing the NPD Closure Project EA under *CEAA*, 2012 given that it was commenced under *CEAA*, 2012 before the *IAA* came into force in 2019 (Section 3.5 of the EIS).

Through comments and engagement on the NSDF project, CNL has heard that KZA is also concerned about cumulative effects and is interested in the overall protection of the Kichi-Sibi

(Ottawa River) and land at, and in the vicinity of, CNL sites, not just the impacts of a single project. KZA is also concerned that the methodology used for conducting the effects assessment is based on a limited methodology which restricts exploration of impact to KZA. CNL acknowledges KZA's concern about the effects on the Kichi-Sibi (Ottawa River) and land at, and in the vicinity of the NPD site from various activities in the past, present and future. The methodology used in the EIS for assessing the significance of residual effects for the NPD Closure Project is an established methodology that was used in the Environmental Assessment for the Darlington New Nuclear Project, which currently has an approved License to Prepare Site. The criteria for the evaluation of significance are from the CNSC REGDOC 2.9.1(2020), Environmental Protection: Environmental Principles, Assessments and Protection Measures. As discussed in the EIS and outlined in the CEAA technical guidance Assessing Cumulative Environmental Effects under the *Canadian Environmental Assessment Act*, 2012 (2018), a cumulative effects assessment is only required to be undertaken for residual effects of the project. Section 9.13 of the EIS describes the process for evaluating cumulative effects and presents CNL's assessment of cumulative effects for the NPD Closure Project.

KZA is also interested in data sovereignty and in conducting its own environmental and impact assessment, inventories and monitoring studies. CNL acknowledges that KZA is interested in conducting its own environmental assessment, inventories and monitoring studies. The EIS and supporting studies have assumed that traditional uses do occur adjacent to the NPD site, whether on the Kichi-Sibi (Ottawa River) or outside the restricted/fenced area. CNL has also assumed that there will be future interest in re-establishing traditional use activities on the NPD site. CNL has determined that there are no adverse impacts on Traditional Land and Resource Use resulting from the NPD Closure Project.

CNL will continue to follow up with KZA to address any emerging concerns about this topic.

End State, Site Restoration and Future Use of the Land

It is important to KZA that it receives reassurance that the area will move towards renaturalization and healing over time through involvement in site restoration planning. This will enable future use of the land by KZA. KZA affirms that the NPD site should be remediated before being returned to the care of Indigenous peoples who have always been responsible for these lands and waters.

CNL acknowledges KZA's desire for the NPD site to move towards renaturalization and healing. CNL has used the terms renaturalize/renaturalization to mean: return to natural. As much of the site is forested, disturbed areas outside the final licensed area will be left to return to natural via natural succession. Renaturalization will have a positive impact on terrestrial biodiversity because vegetation will provide habitat for nests and dens, cover for animals as they roam, and will promote movement of animals by increasing connectivity (reducing habitat fragmentation).

The landowner, AECL will consider input from Indigenous Nations, such as KZA, regarding future end state and land use. The potential land options will not be fully determined until the NPD Closure Project EA and license amendment process proceeds further. In the meantime, CNL is preparing a plan for site restoration after decommissioning is complete, which CNL is committed to sharing with KZA for feedback and input.

Free, Prior and Informed Consent

In 2023 July, KZA highlighted that with respect to KZA prior and informed consent, KZA expects effective information sharing with CNL. KZA has indicated that all relevant information should be shared to KZA in a clear, transparent and understandable way and in a timely manner. KZA needs sufficient time to review and comment on this information and that information should be “word-count effective” (focusing on the main information / fact, without diluting it through a lot of general text).

CNL acknowledges that it is understood by KZA that an Indigenous community’s consent is required for the creation of a permanent hazardous waste disposal facility in its traditional territory, per Section 29.2 of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). CNL will work with KZA towards the achievement of that principle to the extent possible. CNL is committed to ensuring meaningful participation of Indigenous peoples in decisions that affect their nations, communities and territories.

CNL understands that UN guiding principles for human rights and UNDRIP are areas of importance for KZA. CNL remains committed to seeking common ground with KZA in the interest of moving closer towards consent. Through continued engagement at the Working Group CNL hopes that the parties are able to find common ground on this topic.

Impacts on Rights

In their comments on the 2016 Project Description, KZA first expressed their interest in representing Indigenous rights in the environmental assessment of the NPD Closure Project. Two letters were sent in 2016 (as part of CNL’s introduction of the NPD Closure Project proposal) and one in 2020 seeking to generate feedback on and inquire about traditional land use, Indigenous rights and other interests in the project. CNL met with KZA in 2017 May to present Project updates; the discussion included how CNL can incorporate Indigenous rights in its development of the NPD Closure Project. CNL also met with KZA in 2021 and expressed interest in entering an agreement to provide capacity funding to enable KZA participation in the environmental assessment process.

While the EIS (Table 6.2-1) recognizes that the NPD site is located within traditional territory for which KZA and the AANTC asserts rights, CNL continues to reach out to KZA and the AANTC and coordinate a meeting to discuss any outstanding or emerging issues where Indigenous Rights may play a role.

Inventory

In 2023 July, KZA expressed concern about the nuclear waste on site, including legacy waste, and radiological content (inventory) of the proposed NPD disposal facility. CNL agrees that protection of future land users is an important concern and has addressed this subject. CNL has assessed the suitability of in-situ disposal for the NPD site, and the EIS shows that such a disposal is safe for human health and the environment in the short term and long term.

The NPD reactor has a low radionuclide inventory. Tritium is the major radionuclide and will decay to low levels during the Institutional Control period (~100 years). The proposed waste disposal facility barriers have a design life consistent with that timeframe. The longer-lived ILW consists of small quantities of low energy beta emitters. The beta emitters have low radiotoxicity. The main barrier to containing the radioactivity on long timescales is that 83% of the initial inventory (mostly activation products) is embedded within steels and zircaloy which corrode very slowly, particularly in an alkaline environment. The metals used in the reactor vault are corrosion-resistant alloys, with stainless steel taking approximately 30,000 years to fully corrode and zircaloy up to 300,000 years to fully corrode. The low corrosion rates allow the radioactivity to decay before it is released into the reactor vault. Once in the reactor vault the radioactive contaminants sorb onto the grout which further delays its diffusion out of the facility.

CNL's technical assessment shows that the in-situ design is appropriate for the hazardous timeframe of the contaminants and is consistent with national and international standards. CNL understands that this concern is outstanding from KZA's perspective based on feedback in 2023 July. Through engagement, CNL hopes that the parties are able to find common ground on this topic, including the development of commitments to build confidence and trust in the in-situ disposal concept.

Long-term Safety

Through comments and engagement related to the NSDF project, CNL understand that it is important to KZA that there is confidence in the performance of the facility over the long-term and that there are barriers in place to protect the environment.

CNL has assessed the probabilities and potential impacts of flooding, seismic activity, above-ground natural hazards and extreme temperature change on the integrity of the grouted facility and concluded that these events will have no undue short-term or long-term effects on people or the environment around the site. The PostSA TSD demonstrates that beyond the Institutional Controls period, under all scenarios, the impact on the public, Indigenous and the environment is negligible.

To verify that the engineered barriers as a whole are performing as expected / designed, CNL will monitor groundwater. Groundwater wells will be located between the NPD facility and the

Kichi-Sìbì (Ottawa River) to monitor groundwater quality after it interacts with the facility and before it reaches the Kichi-Sìbì (Ottawa River). CNL will conduct monitoring for as long as necessary to verify the results of the assessment in the EIS.

During the review of the EIS, KZA identified other aspects of interest regarding long-term safety, therefore in October and 2023 November, CNL provided a presentation and written materials to KZA with additional information on the contaminants involved in the NPD Closure Project, specifically:

- main contaminants of concern;
- half-life and LLW / HLW categorization;
- threshold limits and how they are established;
- lifespan of the grout / concrete structure;
- effects of the contaminants at higher levels on the environment and human health;
- the mobility of the contaminants (how they move within the environment and how they affect the things around them);
- overview of the various proposed protection measures (the role of grout and other barriers).
- how in-situ disposal compares with Deep Underground Repositories; and
- what route the contaminants would travel (even if they are at 'acceptable levels') after the concrete / grout decays.

As part of long-term safety, the unique pathways for potential contamination exposure must be considered. It is the view of KZA that there is a significant gap in research on the unique pathways for exposure to contaminants for Anishinabe people that needs to be addressed through the EA. CNL agrees that traditional activities and resource use are important to integrate into the EIS with consideration of potential unique pathways of exposure for materials harvested or gathered in the area.

In the third iteration of the PostSA issued in 2020 March, CNL included a Potential Exposure Group consisting of a family of self-sufficient Indigenous receptors in the NPD Area. The exposure profile in the postclosure period was developed based on a traditional Indigenous lifestyle pre-European contact [84]. This lifestyle results in a more cautious dose estimate than that based on current-day lifestyle, where some food is store-bought and likely not from the contaminated area.

The predicted peak dose to an Indigenous receptor (from the 3rd iteration PostSA) is 0.0004 mSv/yr, which is 500 times less than the dose criterion. The analysis demonstrates that the impact on the public, Indigenous peoples and the environment is negligible under all scenarios.

Through use of a Diet and Harvest Study prepared by a local Indigenous Nation, CNL has

updated the exposures to an Indigenous receptor within its PostSA. This receptor already included pathways to wild foods harvested from the area but now also considers exposure through traditional use of materials harvested or gathered from the area. The new pathways include inhalation of smoke from burning medicinal plants and rubbing of plants into the skin.

CNL is committed to further engagement with KZA to obtain a greater understanding of their concerns about the long-term safety of nuclear waste. CNL will continue to follow up with KZA to address any emerging concerns about this topic.

Monitoring

In 2023 July, KZA identified that it expects monitoring to occur both at the NPD site and offsite. This monitoring should check all waters (groundwater and surface water) coming into or leaving the NPD site. This water should be monitored to ensure it remains uncontaminated with particular attention given to water flowing to the Kichi-Sibi (Ottawa River). KZA is concerned that any contaminated water be isolated from the water network and remediated. CNL is equally concerned that the Kichi-Sibi (Ottawa River) remains protected. KZA is interested in being involved in a monitoring strategy to provide assurance to KZA members that CNL is regularly monitoring the environment around CNL sites.

The potential for contamination to reach the Kichi-Sibi (Ottawa River) is assessed in the EIS, and is supported by long term modelling and detailed groundwater modelling. The EIS predicts no effects to surface water (including the Kichi-Sibi (Ottawa River)).

CNL has added information to the EIS about the washout pit and historic water discharges from the wells area sump. Monitoring results capture the effects of historic activities.

Groundwater modelling was conducted for the NPD site. The PostSA TSD incorporates the results of groundwater modelling and, where necessary, uses conservative assumptions, (e.g., the tile drains remain functional and serve as a faster pathway to the Kichi-Sibi (Ottawa River)), and considers the tile drains to have failed (so that the facility resaturates more quickly). The PostSA TSD concludes that no residual effects are expected from potential contaminant migration in groundwater.

In addition, monitoring of the environment will be undertaken to verify the EIS predictions of no significant adverse effect and to confirm that mitigation measures are effective.

Groundwater wells will be located between the NPD facility and the Kichi-Sibi (Ottawa River) to monitor groundwater quality after it interacts with the facility and before it reaches the Kichi-Sibi (Ottawa River). CNL will conduct monitoring for as long as necessary to verify the results of the assessment in the EIS.

Through engagement, CNL is open and willing to collaboratively discuss the list of mitigation measures proposed for the NPD Closure Project as well as KZA's interests in water monitoring and mitigation efforts. CNL understands that this concern is outstanding from KZA's

perspective. CNL is committed to involving Indigenous Nations, such as KZA, in its monitoring programs, and is open and willing to explore options for KZA's desired involvement in monitoring at the NPD site. CNL believes that a dedicated Indigenous-led, Indigenous Knowledge driven component integrated into the site monitoring at NPD can help build confidence and trust in CNL's assessment.

Protection of Flora and Fauna

KZA is concerned about potential negative effects on biota such as the chimney swift and monarch butterfly. Site tours and a follow-up meeting were organized to help inform KZA's understanding of the NPD site and to address further feedback.

As a result of feedback from Indigenous Nations, communities and organizations, in particular KZA staff observations of milkweed, the monarch butterfly was added as a VC in the terrestrial environment assessment of the 2017 draft NPD EIS (Section 6.3.2 of the EIS). Potential environmental effects on habitat are considered along with mitigation measures in Section 9.6.3.2 of the EIS. Section 9.6.3.2 in the EIS describes the mitigation measures that will be implemented during NPD Closure Project activities to ensure effects on chimney swifts are minimized. CNL has also applied for a permit under the *Species at Risk Act* in order to undertake project activities which may affect chimney swifts.

In response to increased interest in the chimney swift beginning in 2019, CNL invited Indigenous Nations, communities and organizations to participate in the annual National Chimney Swift Roost Counts at the NPD site; the Swift counts demonstrate how the ventilation stack at NPD is used as a roosting site. CNL will continue to follow up with KZA to address any emerging concerns about this topic.

Protection of the Ottawa River

In their comments on the 2016 Project Description, KZA first expressed their interest in the protection of the hydrological environment (waterways) around the NPD Closure Project; specifically, they were concerned about radiological contamination in the Kichi-Sibi (Ottawa River). Through various engagement activities, CNL has shared the results of its hydrological and hydrogeological environment assessments which describe how the NPD Closure Project mitigation measures will be protective of the Kichi-Sibi (Ottawa River) during NPD Closure Project activities. During the 2017 May meeting with KZA, NPD Closure Project experts were able to discuss and address the specific concerns of KZA representatives; CNL presented the environmental monitoring methods at NPD which will verify that mitigation measures effectively maintain that concentrations of contaminants in surface water and groundwater will meet federal and provincial safety standards for the protection of humans and wildlife (Section 4.1 and Section 9.3.3.2 of the EIS). In 2017 July, KZA participated in an NPD site tour where ecological and archaeological studies at the NPD site were discussed. During these meetings, KZA representatives had opportunities to ask technical questions related to environmental mitigation measures employed at the NPD site. In 2021 October, KZA's new

point of contact connected with CNL and coordinated a meeting where the representatives had a number of questions on the NPD Closure Project related to the radiological waste inventory at the NPD site and the interests and concerns about the project raised by other Indigenous Nations, communities, and organizations. KZA also requested baseline environmental information for the NPD site. CNL followed-up with KZA providing a draft of this document's Appendix C, where the records of engagement and *Tables of Interests and Concerns* are found, six documents containing baseline environmental information, and further information on the radiological waste inventory. CNL will continue to follow up with the KZA to address any emerging concerns related to this topic.

Socio-economic

KZA expressed an interest in general contracting or employment opportunities. While this is a broader topic of concern and is not specific to the EA of the NPD Closure Project, CNL has provided information about procurement and available job postings on the CNL website. CNL will maintain open dialogue with the KZA to address outstanding concerns specific to the NPD Closure Project.

CNL is committed to improved economic outcomes and benefits for Indigenous peoples from its projects. CNL has acknowledged this gap and is working to develop a company-wide Indigenous Procurement Strategy, as well as a Reconciliation Action Plan, which includes a commitment to advance economic reconciliation.

Traditional Land and Resource Use and Cultural Impacts

KZA is concerned that the EIS neglects to acknowledge CNL's responsibility in creating and perpetuating avoidance of the area by KZA members. KZA notes that there is a lack of desire to hunt and fish near the site and reluctance to gather plants that were grown in soils ravaged by radioactive contamination. The idea that KZA must hunt, fish, and gather at the site to validate KZA claims to the right to co-manage and protect it is a shortfall in the understanding of KZA culture and values.

CNL acknowledges KZA's concerns about the safety of the NPD site and the potential impacts on the rights of the KZA and other Indigenous Nations, communities, and organizations to practice traditional activities around the NPD site. CNL has assessed potential effects related to dust and noise nuisance, loss of connection, safety of harvesting and consuming local foods, and changes to access and identified no significant adverse effects. To instil confidence in the EIS findings and the effectiveness of the follow-up monitoring, CNL will involve the KZA and other Indigenous Nations, communities, and organizations in the monitoring program, if desired, which aims to confirm the predictions of the EIS.

CNL notes that the final end-state is the only time when changes to access will occur; the final end-state of the NPD site will be an improvement from current conditions.

The PostSA TSD addresses the potential for concerns about loss of connection to land and water, and about food safety. The PostSA and EIS (and other supporting studies) have demonstrated that, there are no concerns about the accessibility or safety of the NPD site in the long term based on several different future use scenarios, including self-sufficient Indigenous receptors. The proposed activities will result in an enhancement of current conditions at the NPD site and will improve the ability to practice traditional activities in the area surrounding the NPD site. These findings, which will be confirmed by monitoring, may reduce concerns about loss of connection to land and water, and about food safety.

Summary

At present, this summary of interests and concerns is a consolidation of all the interests and concerns the KZA have brought forward on the NPD Closure Project. While CNL recognizes the KZA's concern on aspects of protection of the environment and employment, contracting and other economic interests, CNL notes that these interests go beyond the scope of this Project. CNL will continue to document and share with the CNSC in CNL's subsequent IER any additional feedback provided by the KZA relative to aspects of protection of the environment and employment, contracting and other economic interests.

The project-specific concerns raised by the KZA are considered in the context of the EIS. As noted above, CNL has shared with the KZA a preliminary table of commitments that reflect the measures proposed by CNL to address the concerns raised to date by the KZA. CNL will continue to respond to questions and concerns from the KZA through its ongoing engagement. CNL will seek to understand those concerns in the context of the EIS and the NPD Closure Project and commits to work together with KZA regarding the project.

4.4.6.4 Verification

KZA have provided several key inputs, identifying interests and concerns related to the NPD Closure Project, including comments on the Project Description, meetings and correspondence. To confirm CNL has adequately captured KZA's interests and concerns, position and knowledge, KZA and CNL underwent a verification process where CNL provided key documentation to KZA for their review and feedback. Through this process, KZA has reviewed and provided feedback on their Table of Interests and Concerns. While not all KZA's concerns have been mitigated by this process to date, CNL has made every effort to verify that KZA's position, interests and concerns were adequately characterized. CNL continues to work with KZA to address their concerns through ongoing discussions.

In 2021 June, CNL shared the *Table of Interests and Concerns* with KZA asking for verification that CNL had accurately represented KZA's list of interests and concerns and that, "where possible" verify that how CNL was addressing the interest or concern was adequate.

CNL followed up with KZA on the *Table of Interests and Concerns* twice in the beginning of 2021 July. KZA responded later in the month indicating that a response to the 2021 June letter was forthcoming. In 2021 August, CNL followed up on the *Table of Interests and Concerns*

requesting feedback on this Table for inclusion in the revised draft EIS submission by the end of 2021 August. CNL followed up again with a new contact with KZA in 2021 September. In 2021 October, KZA responded to CNL's correspondence with interest in coordinating a meeting.

In 2021 October, CNL followed up, confirming a meeting time and confirming that CNL would need any additional information or feedback by 2021 November, for it to be included in the 2021 revised draft EIS submission.

KZA and CNL met on 2021 November 17. On November 22, CNL followed up sharing information that addressed questions from KZA and reiterated that CNL would need any additional information by 2021 November, for it to be included in the 2021 revised draft EIS submission. KZA did not provide direct feedback to verify the *Table of Interests and Concerns* that CNL shared in 2021 June.

In 2022 January, the CNSC informed CNL that the 2021 December EIS submission was incomplete. The CNSC staff directed CNL to revise the *Tables of Interests and Concerns* for clarity. CNL developed a simplified *Table of Interests and Concerns* (Table N-3 in Appendix N), and a table which maps how this simplified table relates to detailed input and feedback from the KZA (Table N-2 in Appendix N). The new table was shared with KZA in 2022 April, with a request that KZA verify that the new table retained KZA's interests and concerns. KZA responded in 2022 April, that KZA would review the *Table of Interests and Concerns*. In 2022 May, KZA shared their review of the table. CNL shared back the revised table in 2022 June, to confirm how CNL had incorporated KZA's feedback. Following engagements in 2022 between KZA and the NSDF project, CNL updated the *Table of Interests and Concerns* to include broader topics which apply to the NPD Closure Project as well. Due to the importance of the summary *Table of Interests and Concerns* and KZAs input on verifying its completeness and accuracy, CNL shared the most updated version of this table 2023 May. CNL requested that KZA confirm the table was complete and accurate by 2023 June. CNL heard from KZA in late June that they wished to review the *Table of Interests and Concerns* at the July monthly Working Group meeting but that this would be a preliminary discussion and that more time and discussion will be needed to fully review the table and verify its completeness and accuracy.

CNL and KZA FN met in 2023 July to discuss the updated NPD *Table of Interests and Concerns and mapping table*. Following the meeting, which focused mainly on the NSDF project, CNL sent a simplified list of interest and concerns following the meeting. The simplified list captured information from direct feedback from KZA early in the environmental assessment (2017), communications with other parties (e.g., NRCAN), and more recent comments to the NSDF project which are relevant to NPD. CNL requested KZA FN review the material to ensure we have captured the concerns accurately and would appreciate if KZA could identify anything that might be missing by 2023 July.

KZA shared preliminary comments back to CNL on the Table of Interests and Concerns in 2023 July. CNL used this feedback to update the Interests and Concerns and Mapping tables, which CNL re-shared with KZA in 2023 August. The updates included adding some new interests and concerns to the list – for example – alternative means, inventory, and monitoring, and adding the detail and context behind key concerns within the mapping table.

In 2023 September, CNL received feedback from the CNSC on KZA's desire to provide a full review of the NPD EIS. In response, CNL deferred the draft EIS submission and focused engagements with KZA on enabling a fulsome review of the EIS, as desired by KZA. CNL sent written responses to KZA on the questions that KZA shared during the review of the Interests and Concerns list (received July) in 2023 September, as well as Section 6 of the EIS, Table C-16 KZA Record of engagement, Table C-17 Mapping of key interests and concerns to detailed input from KZA, and Table C-18 (of the EIS).

In 2023 September, the KZA Natural Resource and Wildlife office held an open community engagement session where, among updates on other on-going projects on KZA unceded territory, a high-level overview of the NPD Closure Project and a brief explanation of the current stage of the EIS were provided. During a meeting with KZA and AECL in 2023 October, CNL received a summary of the areas of interest from KZA community members to address. The 2023 October meeting included an update on the NPD funding agreement (EIS review), presentation on the NPD Closure Project (based on KZA request), and an update from KZA on the EIS review. CNL provided a presentation and answered questions on the following areas of interest and concern for KZA:

- Specifics of the potential contaminants involved in the NPD project including;
- main contaminants of concern;
- half-life and LLW / HLW categorization;
- threshold limits and how they are established;
- lifespan of the grout / concrete structure;
- effects of the contaminants at higher levels on the environment and human health;
- the mobility of the contaminants (how they move within the environment and how they affect the things around them);
- overview of the various proposed protection measures (is it just being filled in with grout or are there prior waste treatment operations that take place, are there other barriers in place?);
- Explanation of how this type of in-situ disposal (given the location and depth of much of the NPD infrastructure into the bedrock) compares with Deep Underground Repositories; and
- What route would the contaminants (even if they are at 'acceptable levels') travel after the concrete / grout decays.

A meeting held in 2023 November, focused specifically on the NPD Interest and Concerns Table where KZA provided verbal feedback on the table. Following the meeting, CNL shared technical supporting documents with KZA including the NPD Stage 1 Archeological Assessment, CNSC Independent Environmental Monitoring Program Information and Environmental Monitoring Program map of sampling locations in the regional study area.

Email correspondence in 2023 November, from CNL to KZA noted that CNL had used the feedback from the 2023 November meeting on the Interest and Concerns Table and made further additions. CNL attached the tracked changes files (CNL also included the Mapping Table (Table C-17) which works together with the Interests and Concerns Table (Table C-18) to paint a fuller picture of KZA concerns while Table C-18 focuses on CNL's response to the concern.

At the end of 2024 January, CNL shared the updated Interests and Concerns and Mapping Tables. CNL updated the tables based on the feedback from KZA's preliminary EIS review, community information sessions, and the additional comments provided at the 2023 December 20, meeting. KZA reviewed updates for accuracy early in 2024. At the 2024 March monthly meeting CNL and KZA discussed the updates made to the updated Interests and Concerns and EIS Sections.

The Summary of KZA Key interests and concerns has been developed at the Working Group level based on community feedback. This information has not been reviewed or vetted by KZA leadership. KZA and CNL remain committed to working respectfully and collaboratively at the Working Group level and will seek opportunities to present this information to leadership.

4.4.6.5 Next Steps

Through KZA's written preliminary comments on the EIS, received by CNL in 2023 December, CNL has used the feedback shared by KZA to update the interests and concerns for KZA. CNL re-shared the interests and concerns tables with KZA and have discussed with KZA within the Working Group to ensure and awaits confirmation that KZA's interests and concerns have been captured appropriately. The Summary of KZA key interests and concerns has been developed at the Working Group level based on community feedback. CNL has also incorporated KZA feedback and knowledge shared through other submissions related to CNL projects into the EIS.

The KZA community consultation information has been shared with KZA leadership. This information has not been reviewed or vetted by KZA leadership, however KZA representation in the Working Group have confirmed that KZA has fully participated in pre-consultation efforts to the best of KZA's availability.

4.4.7 Williams Treaties First Nations

The WTFN are the Chippewas of Beausoleil, Georgina Island and Rama, and the Mississaugas of Alderville, Curve Lake, Hiawatha and Scugog Island. These seven First Nations are signatories to various 18th and 19th century treaties that covered lands in different parts of south-central Ontario. In 1923, the Chippewas and Mississaugas signed the Williams Treaties, which included one large tract of land between Lake Huron and the Kichi-Sibi (Ottawa River) bounded on the north by the Mattawa River-Lake Nipissing and French Line and on the south by earlier concluded treaties. A fuller description of the WTFN communities can be found in Chapter 3 of the IER.

4.4.7.1 WTFN Process Coordinator Engagement

Table P-1 of Appendix P below includes a complete list of engagement activities that have occurred with the WTFN Process Coordinator on the NPD Closure Project.

In 2016 July, CNL sent each of the WTFN communities a letter to introduce the proposed NPD Closure Project that included a request for community input on any potential adverse impacts from project activities followed by a second letter in 2016 November, which inquired about each community's asserted rights and traditional activities. CNL received responses from some of the individual communities, including Curve Lake First Nation and Chippewas of Rama.

Based on an email from the Chippewas of Rama First Nation advising CNL that the 2016 November CNL letter was sent to the WTFN Process Coordinator for review, CNL sent email correspondence in late 2016 and early 2017 to the Process Coordinator to inquire about whether the WTFN (collectively) were interested in engaging with CNL on the NPD Closure Project. CNL did not receive a response.

In 2017, CNL did have engagement with Curve Lake First Nation, in particular, Curve Lake requested archaeological information, and CNL provided the archaeological assessment in response.

In late 2017, CNL shared the draft EIS and IER TSD with all the WTFN communities and invited the WTFN communities to participate in the public and Indigenous environmental assessment comment period. None of the communities submitted comments to the CNSC on the draft EIS and CNL did not receive any feedback from any WTFN communities on the report or draft EIS.

In 2020 February, CNL once again reached out to the WTFN Process Coordinator to inquire about whether the WTFN as a whole were interested in engaging with CNL on the NPD Closure Project. CNL did not receive a response. As of 2020 March, CNL was informed that all engagement activities should be done through each community consultation coordinator / liaison, rather than the WTFN Process Coordinator.

In November of 2023, CNL and the WTFN communities agreed to transition away from monthly meetings and to move to quarterly meetings and information sharing about project updates, milestones and / or news in between meetings as needed.

The following sections described the engagement with each individual community in the WTFN.

4.4.8 Alderville First Nation

4.4.8.1 Engagement

Table Q-1 of Appendix Q includes a complete list of engagement activities that have occurred with Alderville First Nation on the NPD Closure Project. CNL has also provided a narrative summary of engagement with Alderville First Nation.

Information sharing

In 2016 July, CNL sent Alderville First Nation a letter to introduce the proposed NPD Closure Project, which included a request for community input on any potential adverse impacts from project activities followed by a second letter in 2016 November which inquired about Alderville First Nation's asserted rights and traditional activities. CNL did not receive a response from Alderville First Nation.

In late 2017, CNL shared the draft EIS and the Indigenous Engagement Report with Alderville First Nation. CNL encouraged participation in the public comment period for the draft EIS and requested community input and feedback for incorporation into the project. Alderville First Nation did not submit comments on the draft EIS to the CNSC and CNL did not receive any feedback from Alderville First Nation on this report.

In early 2022, Alderville First Nation began to attend the Williams Treaties First Nations monthly meetings coordinated between Curve Lake First Nation and CNL and open to all.

In 2022 October, CNL met virtually with Alderville First Nation to provide them with an update on the NPD project and to discuss the planned NPD/CRL site tour. Alderville did not attend the site tour.

Engagement with all the Williams Treaties First Nations

In 2020 May, CNL shared a version of the revised draft EIS, which had been submitted to the CNSC, as well as the updated IER and inquired on any Alderville First Nation specific information. Later that month, in follow up to a webinar requested on the NSDF Project, the CNL held a webinar on the NPD Closure Project for the WTFN in 2020 May. Alderville First Nation participated in this webinar and had two specific questions related to the ventilation stack at NPD and the Chimney Swift population. Other follow-up from the webinar, which was distributed to all participants, included the annual compliance and monitoring reports for three previous years and the archaeological assessment for the NPD site.

In late 2020, CNL and Curve Lake First Nation began discussions on the development of a contribution agreement. As a part of these discussions Curve Lake coordinated a recurring monthly meeting between all of the WTFN and CNL as a touch point on the various CNL projects and activities of interest to the WTFN communities. The first monthly meeting was in 2021 March and invitations were sent in 2021 February to all WTFN community representatives. After each meeting every community representative receives a copy of the content discussed at the meeting and CNL responds to questions and comments on the content. To date, there have been 16 monthly meetings with the WTFN, three of which the Alderville First Nation Consultation Coordinator has been able to attend. All of these have included an update on the NPD Closure Project including an overview of the project, the draft follow-up monitoring plans for the NPD Closure Project, the interests and concerns of Hiawatha

FN and Curve Lake First Nation, the CNL Indigenous Relations Procurement Strategy, and the Curve Lake First Nation review of the NPD Closure Project's draft EIS and CNL's responses to this review. CNL has not heard any specific concerns or interests through this engagement.

Commitments

In 2021 April, CNL provided a project status update and a preliminary table of commitments to Alderville First Nation, which CNL had developed through engagement on the NPD Closure Project.

In 2022 October, CNL sent a letter addressed to Alderville First Nation providing a project update and the engagement status. CNL stated it is committed to incorporating Alderville First Nation interests and concerns into the EIS. CNL proposed next steps, including a site visit and establishing commitments to ensure that all interests and concerns are addressed and tracked to resolution. CNL sent an updated draft set of commitments for Alderville First Nation's review. CNL offered to discuss capacity and establish commitments before 2022 December. CNL requested that Alderville First Nation respond confirming their agreement to proceed with the engagement activities, or modified engagement activities. CNL did not receive a response.

In 2023 January, CNL informed Alderville First Nation of the decision to postpone the submission of the NPD Closure Project's draft EIS until 2023 May to allow for additional Indigenous input.

Summary table of interests and concerns

In 2021 June, CNL shared a draft summary of interests and concerns for Alderville First Nation seeking to verify this summary with Alderville First Nation.

The representative from Alderville First Nation was unable to attend the WTFN monthly meetings in the summer of 2021. However, Curve Lake First Nation and Hiawatha FN did indicate at the 2021 June meeting that the Mississauga nations (including Alderville First Nation) would have internal discussions on interests and concerns with respect to the NPD Closure Project. CNL followed up with Alderville in August. Alderville First Nation did not verify the *Tables of Interests and Concerns* prior to the 2021 December EIS submission.

In 2022 January, the CNSC informed CNL that the 2021 December EIS submission was incomplete. The CNSC staff directed CNL to revise the *Tables of Interests and Concerns* for clarity. CNL developed a simplified *Table of Interests and Concerns* (Table Q-3 in Appendix Q), and a table which maps how this simplified table relates to detailed input and feedback from the WTFN (Table Q-2 in Appendix Q). The new table was shared with Alderville First Nation in 2022 April requesting that Alderville First Nation verify that the new table retained Alderville First Nation's interests and concerns. In 2022 June, Curve Lake First Nation reviewed the table and provided comments to CNL on behalf of three WTFN communities: Curve Lake First Nation, Alderville First Nation and Hiawatha FN. This was agreed to by Alderville First Nation in an email

in 2022 April. In 2022 June, CNL shared back the revised tables to confirm how CNL had incorporated all three WTFN communities' feedback.

4.4.8.2 Feedback

Alderville First Nation has not submitted any written comments on the NPD Closure Project Description or the EIS. However, based on verbal comments during engagement in 2020 (specifically the 2020 May webinar), CNL has noted the community's interest in the Chimney Swift.

4.4.8.3 Summary Decision of Interests and Concerns

The key interests and concerns discussed in this Section were derived from various engagements with Alderville First Nation, the details of which are recorded in Table C-20 of Appendix C.5 as described in Section 4.4.8.1 above.

Protection of Flora and Fauna

During the 2020 May NPD Closure Project update webinar that focused on, among other topics, Species at Risk and VCs, Alderville First Nation along with fellow WTFN members expressed interest in the maintenance of the ventilation stack (i.e., the height of the stack) at the NPD site as a long-term roosting habitat for the chimney swift. Alderville First Nation also inquired about mitigation measures which are designed to be protective of the species; Section 9.6.3.2 in the EIS describes the mitigation measures that will be implemented during NPD closure activities to ensure effects on chimney swifts are minimized. CNL has also applied for a permit under the *Species at Risk Act (SARA)* through the ECCC in order to undertake project activities which may affect chimney swifts.

In addition to responses to specific questions, CNL provided the Chimney Swift TSD and thermal imaging videos from a Chimney Swift roosting event. In response to increased interest in the chimney swift beginning in 2019, CNL invited Indigenous Nations, communities, and organizations to participate in the annual National Chimney Swift Roost Counts at the NPD site; the Swift counts demonstrate how the ventilation stack at NPD is used as a roosting site. The 'Swift count nights' transitioned a virtual event as a result of public health restrictions due to the COVID-19 pandemic in 2020. CNL will continue to follow up with Alderville First Nation and facilitate open dialogue to address any emerging concerns about this topic.

Summary

At present, the summary of interests and concerns is a consolidation of all the interests and concerns the Alderville First Nation have brought forward on the NPD Closure Project as understood by CNL. The project-specific concern (on the Chimney Swifts) raised by Alderville First Nation is considered in the context of the EIS. As noted above, CNL has shared with Alderville First Nation a preliminary table of commitments that reflect the measures proposed by CNL to address the concern raised to date by Alderville First Nation. CNL will continue to

respond to questions and concerns from Alderville First Nation through its ongoing engagement efforts. CNL will seek to understand those concerns in the context of the EIS and the NPD Closure Project and commits continue to work together with Alderville First Nation to receive their feedback on the project.

4.4.8.4 Verification

Alderville First Nation have provided key input, identifying several interests and concerns related to the NPD Closure Project through feedback at meetings. To confirm CNL has adequately captured Alderville First Nation's interests and concerns, position and knowledge, Alderville First Nation and CNL underwent a verification process where CNL provided key documentation to Alderville First Nation for their review and feedback. Through this process, Alderville First Nation has reviewed and provided feedback on their *Table of Interests and Concerns*. While not all Alderville First Nation's concerns have been mitigated by this process to date, CNL has made every effort to verify that Alderville First Nation's position, interests and concerns were adequately characterized. CNL continues to work with Alderville First Nation to address their concerns through ongoing discussions.

On 2021 June 21, CNL shared the *Table of Interests and Concerns* with Alderville First Nation asking for verification that CNL had accurately represented Alderville First Nation's list of interests and concerns and that, "where possible" verify that how CNL was addressing the interest or concern was adequate.

CNL followed up with Alderville First Nation on the *Table of Interests and Concerns* on 2021 July 05, and again on August 17 requesting feedback on this Table for inclusion in the revised draft EIS submission by 2021 August 31.

CNL followed up on 2021 October 21, confirming that CNL would need any additional information or feedback by 2021 November 26, for it to be included in the 2021 revised draft EIS submission. Despite multiple attempts by CNL through the summer and fall of 2021, as of 2021 November 30, Alderville First Nation did not respond to verify the *Table of Interests and Concerns* that was enclosed in the 2021 EIS submission.

In 2022 January, the CNSC informed CNL that the 2021 December EIS submission was incomplete. The CNSC staff directed CNL to revise the *Tables of Interests and Concerns* for clarity. CNL developed a simplified *Table of Interests and Concerns* (Table Q-3 in Appendix Q), and a table which maps how this simplified table relates to detailed input and feedback from the WTFN (Table Q-2 in Appendix Q). The new table was shared with Alderville First Nation on 2022 April 26, along with a request that Alderville First Nation verify that the new table retained Alderville First Nation's interests and concerns.

On 2022 April 27, Alderville First Nation responded in agreement to Curve Lake First Nation's 2022 March 08, offer to provide a review for three of the WTFN communities (Hiawatha FN, Curve Lake First Nation and Alderville First Nation). On 2023 May 17, Curve Lake First Nation

shared their initial feedback on the table. Curve Lake First Nation and CNL met on 2023 June 17, to incorporate this feedback and on 2023 June 27, Curve Lake First Nation shared back their review for Alderville First Nation, Curve Lake First Nation and Hiawatha FN.

4.4.8.5 Next Steps

CNL will continue to share Project information with the Alderville First Nation. Should Alderville First Nation bring forward any new concerns or interests through this ongoing engagement or regulatory proceeding, CNL will seek to understand those concerns in the context of the EIS and the project and commits to continue to work together with Alderville First Nation to receive their feedback on the project.

4.4.9 Curve Lake First Nation

4.4.9.1 Engagement

Table U-1 of Appendix U below includes a complete list of engagement activities that have occurred with Curve Lake First Nation on the NPD Closure Project. CNL has also provided a narrative summary of engagement with Curve Lake First Nation.

Comments on the Project Description

Curve Lake First Nation submitted comments on the project description for the NPD Closure Project in June of 2016. In 2016 July, CNL sent the Curve Lake First Nation a letter to introduce the proposed NPD Closure Project, which included a request for community input on any potential adverse impacts from project activities followed by a second letter in 2016 November which inquired about Curve Lake First Nation's asserted rights and traditional activities. Curve Lake responded with an interest in the NPD Closure Project and particularly in the archaeological assessment. CNL formally responded to this interest in 2017 and shared the archaeological assessment with Curve Lake First Nation, once it was completed, in early 2017.

Information-sharing

In late 2017, CNL shared the draft EIS and the IER TSD with Curve Lake First Nation. CNL encouraged participation in the public comment period for the draft EIS and requested community input and feedback for incorporation into the project. Curve Lake First Nation did not submit comments on the draft EIS to the CNSC and CNL did not receive any feedback from Curve Lake First Nation on this report.

Engagement with all the Williams Treaties First Nations

In 2020 May, CNL shared the 2020 March revised draft EIS, which had been submitted to the CNSC, as well as the updated IER and inquired on any Curve Lake First Nation specific information. Later that month, in follow up to a webinar requested on the NSDF Project, CNL held a webinar on the NPD Closure Project for the WTFN on 2020 May 19. Curve Lake First Nation participated in this webinar and had a number of specific questions related to chimney swifts, end state, engagement, site ownership and purpose of the disposal facility. CNL

responded to all these questions. Other follow-up from the webinar, which was distributed to all participants, included the annual compliance and monitoring reports for three previous years and the archaeological assessment for the NPD site.

In 2020 November, Curve Lake First Nation and CNL representatives met to discuss developing a contribution agreement. Discussions evolved to determine what this would entail and what engagement activities would come out of such an agreement. In early 2021, as a part of these discussions, Curve Lake First Nation coordinated a recurring monthly meeting between all the WTFN and CNL as a touch point on the various CNL projects and activities of interest to the WTFN communities. The first monthly meeting was in 2021 March and invitations were sent in 2021 February to all WTFN community representatives, after confirming the timing and format with Curve Lake First Nation.

Discussions at these meetings have included a deeper dive into topics that have been of interest to Curve Lake First Nation, including SARs, which was touched on as a part of the biodiversity-focused meeting in 2021 May. The meetings have focused on aspects of the NPD Closure Project, including: an overview of the project, the draft follow-up monitoring program for the NPD Closure Project, the interests and concerns of Hiawatha FN and Curve Lake First Nation, the Curve Lake First Nation review of the NPD Closure Project's draft EIS and CNL's responses to this review and the CNL Indigenous Relations Procurement Strategy.

In 2022 October, CNL welcomed WTFN communities, Curve Lake First Nation, Hiawatha FN, Scugog Island FN, and the Chippewas of Rama FN to a site tour of the NPD facility as part of a two-day visit of the Chalk River Laboratories site and area visit. The day include a smudging ceremony by the Kichi-Sibì (Ottawa River) and relationship building including answering questions from the WTFN communities.

Commitments

In 2021 April, CNL provided a preliminary table of commitments to Curve Lake First Nation made through engagements and comment responses for the NPD Closure Project. In 2022 October, CNL sent a letter addressed to Curve Lake First Nation providing a project update and the engagement status. CNL stated it is committed to incorporating Curve Lake's interests and concerns into the EIS. CNL proposed next steps, including establishing commitments to ensure that all interests and concerns are addressed and tracked to resolution. CNL sent an updated draft set of commitments for Curve Lake First Nation's review. CNL requested that Curve Lake First Nation respond confirming their agreement to proceed with the engagement activities, or modified engagement activities.

In 2023 March, CNL shared the proposed Curve Lake First Nation and Hiawatha FN NPD table of commitments that addressed the comments from Curve Lake First Nation's feedback and added a proposed timeline column to the commitments table. Curve Lake verified the accuracy of the table 2023 June 27.

Summary of Interests and Concerns

In 2021 June, CNL shared a draft summary of interests and concerns for Curve Lake First Nation. In response to this letter, Curve Lake First Nation decided that the interests and concerns of the WTFN would be a focus topic for the July monthly meeting. During the July monthly meeting CNL, Curve Lake First Nation and Hiawatha FN discussed additional interests to be incorporated in the *Table of Interests and Concerns* and CNL shared back an updated table in August 2021. CNL followed up again in September 2021 to confirm that Curve Lake interests and concerns brought forward to date were accurately captured.

In 2022 January, the CNSC informed CNL that the 2021 December EIS submission was incomplete. The CNSC staff directed CNL to revise the *Tables of Interests and Concerns* for clarity. CNL developed a simplified *Table of Interests and Concerns* (Table U-3 in Appendix U), and a table which maps how this simplified table relates to detailed input and feedback from the WTFN (Table U-2 in Appendix U). The new table was shared with Curve Lake First Nation in 2022 April requesting that Curve Lake First Nation verify that the new table retained Curve Lake First Nation's interests and concerns. In 2022 June, Curve Lake First Nation reviewed the table and provided comments to CNL on behalf of three WTFN communities: Curve Lake First Nation, Alderville First Nation and Hiawatha FN.

Since 2022, Curve Lake First Nation and CNL have continued to make positive steps forward and have completed some of the next steps that were identified together. Due to the importance of the summary *Table of Interests and Concerns* and the Curve Lake's input on verifying its completeness and accuracy, CNL shared the most updated version of this table 2023 May. CNL noted the updates to the *Table of Interests and Concerns*, primarily related to the recent progress made on next steps. Specifically, CNL had made updates to its response to the interest / concern and the status of the concern. Curve Lake confirmed the table was complete and accurate in 2023 June.

Review of the Revised Draft EIS

In 2021 July, Curve Lake First Nation shared their review of the revised draft EIS for the NPD Closure Project. CNL provided dispositions in late August. Curve Lake First Nation decided that the review and CNL's responses should be the focus topic for the September monthly meeting. This meeting was an open discussion between Curve Lake First Nation, Hiawatha FN and CNL on each finding and CNL's response.

Contribution Agreement

In late 2020, Curve Lake First Nation expressed interest in entering into an agreement with CNL, which included interest in support for involvement with the NPD Closure Project. Discussions on the contribution agreement continued throughout 2021 and a number of activities described in the contribution agreement began, including the monthly meeting. The agreement was entered into in November 2021 and remains in effect.

4.4.9.2 Feedback

Curve Lake First Nation submitted comments on the Project Description and reviewed the 2020 March revised draft EIS. In addition, Curve Lake First Nation has raised several interests through engagements with CNL.

The interests and concerns from the Curve Lake First Nation are briefly identified below and then detailed in the Summary Discussion of Interests and Concerns – Section 4.4.9.3 and the *Tables of Interests and Concerns* in Table U-3 of Appendix U.

Aquatic Environment. As a finding from their review of the revised draft EIS, Curve Lake highlighted that wetlands are sacred to the Curve Lake First Nation and requested additional information on the benthic invertebrate community.

Archaeology and Cultural Heritage. Based on a formal review and comment of the 2016 Project Description, Curve Lake First Nation requested the archaeological assessment.

Baseline Characterization. Curve Lake First Nation expressed the importance of understanding baseline tritium levels in the Kichi-Sibi (Ottawa River), and in soil and vegetation.

Engagement. Curve Lake First Nation and CNL have been in discussions about providing resources for their enhanced involvement in CNL projects. As part of the monthly information sharing meetings, Curve Lake First Nation and other WTFNs have indicated a desire for more holistic engagement with CNL that goes beyond individual projects. Also, based on review of the revised draft EIS, Curve Lake First Nation noted several instances of colonial language in the EIS.

EA Process and Methodology. Based on review of the revised draft EIS, Curve Lake First Nation requested more detailed explanation of several categories of VCs.

End State, Site Restoration, and Future Use of the Land. Based on review of the revised draft EIS, Curve Lake First Nation highlighted that Indigenous communities should have the opportunity to provide input to the final site restoration plan.

Protection of Flora and Fauna. Following a webinar held for the WTFN, Curve Lake First Nation raised specific questions on a number of items including Chimney Swifts.

Protection of the Ottawa River. Through engagement, CNL understands that protection of the environment, specifically the Kichi-Sibi (Ottawa River), is important to Curve Lake First Nation.

Socio-economic. Based on review of the revised draft EIS, Curve Lake First Nation highlighted effects of colonialism that are reflected in the socioeconomic data.

4.4.9.3 Summary Discussion of Interests and Concerns

The key interests and concerns discussed in this Section were derived from various engagements with Curve Lake First Nation, the details of which are recorded in Table U-1 of Appendix U and described in Section 4.4.9.1 above.

Aquatic Environment

Curve Lake First Nation expressed that wetlands are sacred to the WTFN and expressed concern that they are not assessed in greater detail within the EIS. Further, Curve Lake First Nation was seeking additional information about the benthic invertebrate community and whether a detailed survey of mussels was included in the benthic study.

CNL responded to Curve Lake First Nation to explain the reason why the aquatic environment in the wetlands was not assessed in greater detail is because no project activities will take place on the wetlands, and the groundwater source of the wetlands is not affected at all by groundwater from the NPD site. Groundwater on the NPD site flows towards the Kichi-Sìbì (Ottawa River), so groundwater that interacts with the NPD facility flows away from the wetland, towards the Kichi-Sìbì (Ottawa River). Extensive groundwater monitoring between the facility and the river is planned to enable confirmation of the EIS prediction of little impact to groundwater. CNL has offered to review the groundwater monitoring plans with CLFN and hear feedback.

After completion of the version of the EIS reviewed by Curve Lake First Nation, CNL completed a comprehensive survey of sediment, fish habitat and benthic invertebrates in the Kichi-Sìbì (Ottawa River) upstream, adjacent to and downstream of the NPD property. In response to CLFN interest CNL has shared the study report which contains details about the study design, benthic invertebrate classification and description of the benthic invertebrate community (BIC) composition. If monitoring of the Kichi-Sìbì (Ottawa River) benthic invertebrate community is required in the future, this study can be repeated and metrics compared. The hickorynut mussel was not subject to a targeted survey, but given the healthy state of sediment and benthic biota and no in-water work planned for the project, no adverse effects to freshwater mussels resulting from the NPD Closure Project are anticipated. CNL revised Section 6.3.2 (VCs Identified by Indigenous Peoples / Communities) of the EIS as part of the fall 2021 submission to include better explanation of where and how VCs identified by Indigenous Nations, communities, and organizations are included and assessed.

Archaeological and Cultural Heritage

Curve Lake First Nation expressed their interest in any archaeological work conducted at the NPD site. In response, CNL provided Curve Lake with a copy of the Archaeological Assessment report. CNL did not receive comments regarding archaeology at NPD until the 2020 May webinar when Curve Lake First Nation again requested the Archaeological Assessment report. A summary of the Archaeological Assessment is also included in Section 8.11.4 of the EIS along

with a description of Indigenous Cultural Resources and Ceremonies in Section 6. Furthermore, Section 7.1.3.2 in the EIS describes proposed mitigation measures that will be employed if undocumented archaeological resources are discovered during NPD Closure Project activities.

CNL has not received feedback regarding archaeological concerns from Curve Lake First Nation. CNL will continue to work with Curve Lake First Nation on any emerging concerns or interests related to archaeology.

Baseline Characterization

Curve Lake First Nation expressed concern about the tritium levels in the Kichi-Sibì (Ottawa River), including soil and vegetation, specifically what portion of tritium comes from natural sources versus anthropogenic sources. Baseline conditions for surface water quality (including the Kichi-Sibì (Ottawa River)) are found in Section 8.3.4 of the EIS. Curve Lake First Nation and CNL will continue sharing information about tritium levels in the Kichi-Sibì (Ottawa River) and the local environment, including soil and vegetation to support an improved understanding of natural and anthropogenic sources of tritium, including historic anthropogenic sources.

Engagement

Curve Lake First Nation expressed interest in greater involvement in the EA process for the NPD Closure Project. In late 2020, Curve Lake First Nation and CNL initiated discussions to establish a contribution agreement to support involvement in CNL's Environmental Remediation Projects, including NPD. This contribution agreement was signed in 2021 November.

During monthly meetings in 2021 September, 2022 February, and 2022 March, Curve Lake First Nation indicated an interest in broader engagement with CNL as a whole and earlier involvement with planning for activities and projects at CNL. CNL is committed to open, transparent and continuing engagement with Curve Lake First Nation. CNL has expanded its engagement with Curve Lake First Nation through monthly meetings that are focused on topics chosen by the WTFN community representatives.

Curve Lake First Nation highlighted several instances of colonial language and concern about the priority of Indigenous engagement considering its placement within the EIS (i.e., following public engagement). In response, CNL has updated the language within the EIS to emphasize the importance and priority of Indigenous engagement including reordering the EIS table of contents to have the Indigenous Engagement section moved forward.

At the end of 2022 October CNL was invited to visit Curve Lake First Nation. CNL's visit to the community was a day of listening and experiencing the cultural values of the community; CNL visited and observed the historic and sacred Petroglyphs site, shared in a smudging ceremony, and heard from Elders within the community. The group congregated at the Curve Lake Community Centre and met with the Chief and council. The afternoon followed with informal

conversations and perspective-sharing. Later in October the WTFN communities were invited to tour the NPD facility as part of a two-day visit to the Chalk River Laboratories site and area. Representatives from CNL, Curve Lake First Nation, Hiawatha FN, Scugog Island, Chippewas of Rama First Nation and AECL took part in a tour and site walk. The day include a smudging ceremony by the Kichi-Sibi (Ottawa River) and relationship building.

EA Process and Methodology

Curve Lake First Nation requested additional detail on several species assessed or not directly assessed within the EIS. Specifically, Curve Lake First Nation was interested in Fungi, Benthic invertebrates and mussels. CNL has responded with an explanation of the process to assess exposure-related effects using broad categories when scientific parameters are not available for individual species. CNL has shared the Ecological Risk Assessment Technical Supporting Document where the details of the ecological effects assessment can be found. Further, CNL has revised EIS Section 6.3.2 (VCs Identified by Indigenous peoples / Communities) of the EIS to include better explanation of where and how VCs identified by Indigenous Nations, communities and organizations are included and assessed.

End State, Site Restoration and Future Use of the Land

Curve Lake First Nation indicated that the discussion of final site restoration in the EIS gives the impression that Indigenous input will not be considered. In response, CNL clarified that the EIS does confirm that AECL will consider input from Indigenous peoples regarding future land use. Future land use and land transfer are beyond the scope of the EA for the NPD Closure Project. CNL recognizes that the importance of this matter to Curve Lake First Nation, and therefore CNL has committed to sharing the draft site restoration plan with Curve Lake First Nation. CNL will seek feedback from Curve Lake First Nation on the draft plan.

Protection of Flora and Fauna

Curve Lake First Nation expressed interest in the protection of SAR at the NPD site. CNL received questions from Curve Lake First Nation regarding the chimney swift as a vulnerable SAR. Section 9.6.3.2 in the EIS describes the mitigation measures that will be implemented during NPD closure activities to ensure effects on chimney swifts are minimized. CNL has also applied for a permit under the *Species at Risk Act* to undertake project activities which may affect chimney swifts. In addition to responses to these questions, CNL provided the Chimney Swift TSD. In response to increased interest in the chimney swift beginning in 2019, CNL invited Indigenous Nations, communities and organizations to participate in the annual National Chimney Swift Roost Counts at the NPD site; the Swift counts demonstrate how the ventilation stack at NPD is used as a roosting site. The 'Swift count nights' transitioned a virtual event as a result of public health restrictions due to the COVID-19 pandemic in 2020. CNL will continue to follow up with Curve Lake First Nation to address any emerging concerns with respect to this topic.

Protection of the Kichi-Sibi (Ottawa River)

Curve Lake First Nation expressed that they deem the protection of the Kichi-Sibi (Ottawa River) to be critical. As part of the 2020 May webinar, CNL discussed the results of the surface water environment assessment for the NPD Closure Project. Following the webinar, Curve Lake First Nation provided a list of inquiries related to the topics discussed during the webinar. Many of Curve Lake First Nation's concerns regarding the Kichi-Sibi (Ottawa River) are discussed in the EIS. In the dispositions to Curve Lake First Nation, CNL noted that Section 4.1 of this EIS describes the in-design features that isolate and contain the waste inventory within the NPD facility; Section 9.3.3 describes the mitigation measures – such as surface water management systems – that will be implemented for the protection of surface water receptors.

CNL will continue to engage with Curve Lake First Nation and facilitate open dialogue to address emerging concerns about this topic.

Socio-Economic

Curve Lake First Nation highlighted that challenges experienced by their sister community are the direct result of the effects of colonialism and the *Indian Act*. CNL had prepared an Indigenous Socio-economic section for the EIS in response to feedback from other communities on the 2017 draft EIS. In preparing this new section CNL included standard aspects that typically comprise more detailed socio-economic profiles aligning with the information presented in Section 8.11 of the EIS (socio-economic). CNL has been engaging directly with the community mentioned by Curve Lake First Nation on the NPD Closure Project and a number of broader issues. CNL will continue to engage with Curve Lake First Nation and facilitate open dialogue to address concerns about this topic.

Summary

The project-specific concerns raised by Curve Lake First Nation are considered in the context of the EIS. As noted above, CNL has shared with Curve Lake First Nation a preliminary table of commitments that reflect the measures proposed by CNL to address the concerns raised to date by the Curve Lake First Nation. CNL will continue to respond to questions and concerns from Curve Lake First Nation through its ongoing engagement efforts. CNL will seek to understand those concerns in the context of the EIS and the NPD Closure Project and commits to work together with Curve Lake First Nation regarding their feedback on the project.

4.4.9.4 Verification

Curve Lake First Nation have provided many key inputs, identifying several interests and concerns related to the NPD Closure Project including a review of the 2020 revised draft EIS, feedback at meetings and through correspondence. To confirm CNL has adequately captured Curve Lake First Nation's interests and concerns, position and knowledge, Curve Lake First Nation and CNL underwent a verification process where CNL provided key documentation to

Curve Lake First Nation for their review and feedback. Through this process, Curve Lake First Nation has reviewed and provided feedback on their *Table of Interests and Concerns*. While not all of Curve Lake First Nation's concerns have been mitigated by this process to date, CNL has made every effort to verify that Curve Lake First Nation's position, interests and concerns were adequately characterized. CNL continues to work with Curve Lake First Nation to address their concerns through ongoing discussions.

In 2021 June, CNL shared the *Table of Interests and Concerns* with Curve Lake First Nation asking for verification that CNL had accurately represented Curve Lake First Nation's list of interests and concerns and that, "where possible" verify that how CNL was addressing the interest or concern was adequate.

At the July monthly meeting between the WTFN and CNL, there was a focussed discussion where Curve Lake First Nation and Hiawatha FN shared feedback on their *Tables of Interests and Concerns*. Note that regular monthly meetings open to all the WTFN were coordinated through Curve Lake First Nation's contribution agreement with CNL.

CNL modified Curve Lake First Nation's *Table of Interests and Concerns* based on the feedback heard at the 2021 July meeting and shared back a revised Table in 2021 August.

In 2021 September, CNL followed up with Curve Lake First Nation on the revised *Table of Interests and Concerns*.

CNL followed up in 2021 October, stating that CNL understood that Curve Lake First Nation agreed with the interests and concerns CNL had recorded to date and that the revised *Table of Interests and Concerns* (as shared in 2021 September) would be included in the 2021 December draft EIS for the NPD Closure Project.

In 2022 January, the CNSC informed CNL that the 2021 December EIS submission was incomplete. The CNSC staff directed CNL to revise the *Tables of Interests and Concerns* for clarity. CNL developed a simplified Table of Interests and Concerns (Table U-3 in Appendix U), and a table which maps how this simplified table relates to detailed input and feedback from the WTFN (Table U-2 in Appendix U). The new table was shared with Curve Lake First Nation in 2022 April, with a request that Curve Lake First Nation verify that the new table retained Curve Lake First Nation's interests and concerns.

In March, Curve Lake offered to provide a review for three of the WTFN communities (Hiawatha FN, Curve Lake First Nation and Alderville First Nation). In 2022 May, Curve Lake First Nation shared their initial feedback on the tables. Curve Lake First Nation and CNL met in 2022 June, to incorporate this feedback. Due to the importance of the summary *Table of Interests and Concerns* and Curve Lake's input on verifying its completeness and accuracy, CNL shared the most updated version of this table 2023 May. CNL noted the updates to the *Table of Interests and Concerns*, primarily related to the recent progress made on next steps. Specifically, CNL had

made updates to its response to the interest / concern and the status of the concern. Curve Lake confirmed receipt in 2023 May, and confirmed the table was complete and accurate in 2023 June.

4.4.9.5 Next Steps

CNL will continue to share Project information with Curve Lake First Nation and continue the scope outlined in the contribution agreement. Should Curve Lake First Nation bring forward any new concerns or interests through this ongoing engagement or regulatory proceeding, CNL will seek to understand those concerns in the context of the EIS and the project and commits work together with Curve Lake First Nation to address the concerns.

4.4.10 Hiawatha First Nation

4.4.10.1 Engagement

Table V-1 of Appendix V includes a complete list of engagement activities that have occurred with Hiawatha FN on the NPD Closure Project. CNL has also provided a narrative summary of engagement with Hiawatha First Nation.

Information-sharing

In 2016 July, CNL sent the Hiawatha FN a letter to introduce the proposed NPD Closure Project, which included a request for community input on any potential adverse impacts from project activities followed by a second letter in 2016 November which inquired about Hiawatha FN's asserted rights and traditional activities. Hiawatha FN responded with an interest in the NPD Closure Project and particularly in the archaeological assessment. CNL formally responded to this interest in 2017 and shared the archaeological assessment with Hiawatha FN, once it was completed, in early 2017.

In late 2017, CNL shared the draft EIS and the Indigenous Engagement Report with Hiawatha FN. CNL encouraged participation in the public comment period for the draft EIS and requested community input and feedback for incorporation into the project. Hiawatha FN did not submit comments on the draft EIS to the CNSC and CNL did not receive any feedback from Hiawatha FN on this report.

In early 2021, Hiawatha FN began to attend the Williams Treaties First Nations monthly meetings coordinated between Curve Lake First Nation and CNL and open to all.

In 2022 October, CNL was invited to visit Curve Lake First Nation. CNL's visit to the community was a day of listening and experiencing the cultural values of the community; CNL visited and observed the historic and sacred Petroglyphs site, shared in a smudging ceremony, and heard from Elders within the community. The group congregated at the Curve Lake Community Centre and met with the Chief and council and heard from Elders within the community. The

afternoon followed with informal conversations and perspective-sharing. We ended the day congregating near the water and walking along the boardwalk.

Contribution Agreement

In 2022 November, Hiawatha FN shared with CNL their interest in having a contribution agreement. Hiawatha First Nation noted that some of the activities in the agreements would overlap with the Curve Lake First Nation agreement, but that the funding would not.

In 2023 May, CNL shared the Draft Hiawatha First Nation contribution agreement with Hiawatha. CNL encouraged any feedback or comments. At the end of June CNL head that Hiawatha First Nation had no further comments. The Agreement was signed July of 2023.

Engagement with all the Williams Treaties First Nations

In 2020 May, CNL shared the 2020 March revised draft EIS, which had been submitted to the CNSC, as well as the updated IER and inquired on any Hiawatha FN specific information. Later that month, in follow up to a webinar requested on the NSDF Project, CNL held a webinar on the NPD Closure Project for the WTFN in 2020 May. Hiawatha FN participated in this webinar and had specific questions related to the ventilation stack at NPD and monitoring. CNL responded to these questions by providing the requested details on the stack and three previous annual compliance and monitoring reports. Other follow-up from the webinar, which was distributed to all participants, included the Chimney Swift TSD, the Ecological Land Classification TSD and the archaeological assessment for the NPD site.

In late 2020, CNL and Curve Lake First Nation began discussions on the development of a contribution agreement. As a part of these discussions Curve Lake First Nation coordinated a recurring monthly meeting between all the WTFN and CNL as a touch point on the various CNL projects and activities of interest to the WTFN communities. The first monthly meeting was in 2021 March and invitations were sent in 2021 February to all WTFN community representatives. After each meeting every community representative receives a copy of the content discussed at the meeting and CNL welcomes questions and comments on the content. Hiawatha FN have attended all 16 of the monthly meetings held to date. All of these have included an update on the NPD Closure Project, topics include an overview of the project, the draft follow-up monitoring plans for the NPD Closure Project, the interests and concerns of Hiawatha FN and Curve Lake First Nation, the CNL Indigenous Relations Procurement Strategy, and the Curve Lake First Nation review of the NPD Closure Project's draft EIS and CNL's responses to this review.

In 2022 October, CNL welcomed WTFN communities, Curve Lake First Nation, Hiawatha FN, Scugog Island FN, and the Chippewas of Rama FN to a site tour of the NPD facility as part of a two-day visit of the Chalk River Laboratories site and area visit. The day include a smudging

ceremony by the Kichi-Sibi (Ottawa River) and relationship building including answering questions from the WTFN communities.

Commitments

In 2021 April, CNL provided a preliminary table of commitments to Hiawatha FN made through engagements and comment responses for the NPD Closure Project. In 2022 October, CNL sent a letter addressed to Hiawatha FN providing a project update and the engagement status with Hiawatha FN. CNL stated it is committed to incorporating Hiawatha's interests and concerns into the EIS. CNL proposed next steps, including establishing commitments to ensure that all interests and concerns are addressed and tracked to resolution. CNL sent an updated draft set of commitments for Hiawatha FN's review. CNL offered to discuss capacity through amending the contribution agreement. CNL requested that HFN respond confirming their agreement to proceed with the engagement activities, or modified engagement activities.

In 2023 January, HFN shared their review of the updated table of commitments. Noting that a timeline is needed to demonstrate CNL's commitment to engagement. In 2023 March, CNL shared the proposed Curve Lake First Nation and Hiawatha FN NPD commitments table that addressed the comments from Hiawatha FN's feedback and added a proposed timeline column to the commitments table.

Summary of Interests and Concerns

In 2021 June CNL shared a draft summary of interests and concerns for Hiawatha FN. In response to this letter, it was decided that the interests and concerns of the WTFN would be a focus topic for the July monthly meeting. During the July monthly meeting CNL, Curve Lake and Hiawatha discussed additional interests to be incorporated in their respective *Table of Interests and Concerns*. CNL shared an updated table with Hiawatha FN on August 26. CNL followed up again on September 13 to confirm that Hiawatha FN interests and concerns brought forward to date have been accurately captured.

In 2022 January, the CNSC informed CNL that the 2021 December EIS submission was incomplete. The CNSC staff directed CNL to revise the *Tables of Interests and Concerns* for clarity. CNL revised Hiawatha FN's *Table of Interests and Concerns* and shared the new table with Hiawatha FN in 2022 April asking that Hiawatha FN verify that the new table retained Curve Lake Hiawatha FN's interests and concerns. In 2022 June, Curve Lake First Nation reviewed the table and provided comments to CNL on behalf of three WTFN communities: Curve Lake First Nation, Alderville First Nation and Hiawatha FN (Hiawatha verbally agreed to Curve Lake First Nation providing this review). In 2022 May Curve Lake First Nation provided initial feedback on the tables and in 2022 June, Curve Lake and CNL met to incorporate this feedback. Curve Lake First Nation shared their final revisions in 2022 June and CNL shared back the revised tables to confirm how CNL had incorporated all three WTFN communities' feedback.

In 2023 January, CNL informed Hiawatha FN of the decision to postpone the submission of the NPD Closure Project's draft EIS until 2023 May to allow for additional Indigenous input.

Due to the importance of the summary table of interests and concerns and Hiawatha FN's input on verifying its completeness and accuracy, CNL share the most updated version of this table 2023 May. HFN provided CNL feedback on the table and verified the table was complete and accurate on 2023 June 22.

4.4.10.2 Feedback

Hiawatha FN has not submitted any written comments on the NPD Closure Project Description or EIS. Based on verbal comments during engagement throughout 2020 and 2021, CNL has noted a general interest in Environmental Protection. Hiawatha also indicated in 2021 July that their interests aligned with many of the interests raised by Curve Lake.

The interests and concerns from Hiawatha FN are briefly identified below and then detailed in the Summary Discussion of Interests and Concerns – Section 4.4.10.3 and the *Table of Interests and Concerns* in Table V-3 of Appendix V.

Aquatic Environment. At the 2021 July monthly meeting with WTFN, Hiawatha FN concurred with the interests highlighted by Curve Lake that wetlands are sacred to the WTFN.

Engagement. As part of the monthly information sharing meetings, Hiawatha FN and other WTFNs have indicated a desire for more holistic engagement with CNL that goes beyond individual projects. Also, at the 2021 July monthly meeting with WTFN, Hiawatha FN concurred with the feedback provided by Curve Lake First Nation noting several instances of colonial language in the EIS.

EA Process and Methodology. At the 2021 July monthly meeting with WTFN, Hiawatha FN concurred with the feedback provided by Curve Lake requesting more detailed explanation of several categories of VCs.

End State, Site Restoration and Future Use of the Land. At the 2024 July monthly meeting with WTFN, Hiawatha FN concurred with the feedback provided by Curve Lake First Nation highlighting that Indigenous Nations, communities, and organizations should have the opportunity to provide input to the final site restoration plan.

Monitoring. Hiawatha First Nation expressed interest in the monitoring plans for the NPD site.

Protection of Flora and Fauna. The Hiawatha FN Lands and Resources staff had particular interest around the ventilation stack and monitoring at the NPD site.

Socio-economics. At the 2021 July monthly meeting with WTFN, Hiawatha FN concurred with the feedback provided by Curve Lake of the effects of colonialism that are reflected in the socioeconomic data.

4.4.10.3 Summary Discussion of Interests and Concerns

The key interests and concerns discussed in this Section were derived from various engagements with Hiawatha FN, the details of which are recorded in Table V-1 of Appendix V as discussed in Section 4.4.10.1 above.

Aquatic Environment

During the 2021 July monthly WTFN meeting, Hiawatha FN expressed that wetlands are sacred to the WTFN and expressed concern that they are not assessed in greater detail within the EIS.

CNL responded to Hiawatha FN to explain the reason why the aquatic environment in the wetlands was not assessed in greater detail is because no project activities will take place on the wetlands, and the groundwater source of the wetlands is not affected at all by groundwater from the NPD site. Groundwater on the NPD site flows towards the Ottawa River, so groundwater that interacts with the NPD facility flows away from the wetland, towards the Kichi-Sibi (Ottawa River). Extensive groundwater monitoring between the facility and the river is planned to enable confirmation of the EIS prediction of little impact to groundwater. CNL has offered to review the groundwater monitoring plans with Hiawatha FN and hear feedback.

Recently, CNL completed a comprehensive survey of sediment, fish habitat and benthic invertebrates in the Kichi-Sibi (Ottawa River) upstream, adjacent to and downstream of the NPD property. In response to Hiawatha FN interest CNL has shared the study report which contains details about the study design, benthic invertebrate classification and description of the benthic invertebrate community (BIC) composition. If monitoring of the Kichi-Sibi (Ottawa River) benthic invertebrate community is required in the future, this study can be repeated and metrics compared. The hickorynut mussel was not subject to a targeted survey, but given the healthy state of sediment and benthic biota and no in-water work planned for the project, no adverse effects to freshwater mussels resulting from the NPD Closure Project are anticipated. CNL is revising Section 6.3.2 (VCs Identified by Indigenous Peoples / Communities) of the EIS as part of the 2021 September submission to include better explanation of where and how VCs identified by Indigenous Nations, communities, and organizations are included and assessed.

EA Process and Methodology

During the 2021 July monthly WTFN meeting, Hiawatha FN requested additional detail on several species assessed or not directly assessed within the EIS. The reiterated the interest expressed by Curve Lake in fungi, benthic invertebrates and mussels. CNL has responded with an explanation of the process to assess exposure-related effects using broad categories when scientific parameters are not available for individual species. CNL has shared the EcoRA TSD

where the details of the ecological effects assessment can be found. Further, CNL is revising Section 6.3.2 (VCs Identified by Indigenous Peoples / Communities) of the EIS as part of the 2021 September submission to include better explanation of where and how VCs identified by Indigenous Nations, communities, and organizations are included and assessed.

Engagement

During monthly meetings in 2021 September and 2022 February, Hiawatha First Nation indicated an interest in broader engagement with CNL as a whole and earlier involvement with planning for activities and projects at CNL. CNL is committed to open, transparent and continuing engagement with Hiawatha FN. CNL has expanded its engagement with Hiawatha FN through monthly meetings that are focused on topics chosen by the WTFN community representatives.

Also, in their review of the NPD Closure Project revised draft EIS Curve Lake First Nation highlighted several instances of colonial language and concern about the priority of Indigenous engagement considering its placement within the EIS (i.e., following public engagement). At the 2021 July monthly meeting, Hiawatha FN concurred that this was an interest in Hiawatha FN as well. In response, CNL has updated language within the EIS to emphasize the importance and priority of Indigenous engagement including reordering the EIS table of contents to have the Indigenous Engagement section moved forward.

End State, Final Site Restoration and Future Use of the Land

In their review of the NPD Closure Project revised draft EIS, Curve Lake First Nation indicated that the discussion of final site restoration in the EIS gives the impression that Indigenous input will not be considered. In response, CNL clarified that the EIS does confirm that AECL will consider input from Indigenous peoples for site restoration activities. At the 2024 July monthly meeting, Hiawatha FN concurred that this was an interest for Hiawatha FN as well. In general, future land use and land transfer are beyond the scope of the Environmental Assessment for the NPD Closure Project. Instead, these topics need to be discussed as part with the participation of AECL as the owner of the NPD site. CNL will share the draft site restoration plan with Hiawatha FN once it is complete.

Protection of Flora and Fauna

During the 2020 May NPD Closure Project update webinar, Hiawatha FN representatives expressed interest in environmental protection surrounding the ventilation stack at the NPD site – their greatest concern being the assurance that the chimney swift will be able to safely use the stack as a critical roosting habitat. Hiawatha FN also expressed concern over the environmental monitoring that will be conducted with NPD Closure activities. Following the webinar, CNL responded to questions from Hiawatha FN representatives regarding annual compliance monitoring and the ventilation stack; CNL also provided three annual compliance

monitoring reports (ACMR) and the Chimney Swift TSD to support its dispositions to these questions. Other members of the WTFN also expressed similar concerns.

In response to increased interest in the chimney swift beginning in 2019, CNL invited Indigenous Nations, communities, and organizations to participate in the annual National Chimney Swift Roost Counts at the NPD site; the Swift counts demonstrate how the ventilation stack at NPD is used as a roosting site. The 'Swift count nights' transitioned a virtual event as a result of public health restrictions due to the COVID-19 pandemic in 2020. CNL will continue to engage with Hiawatha FN and facilitate open dialogue to address emerging concerns about this topic.

Monitoring

During the 2020 May NPD Closure Project update webinar, Hiawatha FN representatives expressed concern over the environmental monitoring that will be conducted with NPD Closure activities. Following the webinar, CNL responded to questions from Hiawatha FN representatives regarding annual compliance monitoring; CNL also provided three annual compliance monitoring reports (ACMR). Other members of the WTFN also expressed similar concerns.

CNL is seeking to incorporate input from Indigenous Nations, communities, and organizations, the public and stakeholders before finalizing the EA Follow-up Program. CNL will continue to engage with Hiawatha and facilitate open dialogue to address emerging concerns about this topic.

Socio-economic

During the 2021 July monthly WTFN meeting, Hiawatha FN reinforced the findings of Curve Lake First Nation that challenges experienced by their sister community are the direct result of the effects of colonialism and the Indian Act. CNL had prepared an Indigenous Socio-economic section for the EIS in response to feedback from other communities on the 2017 draft EIS. In preparing this new section CNL included standard aspects that typically comprise more detailed socio-economic profiles aligning with the information presented in Section 8.10.1 of the EIS (socio-economic). CNL has been engaging directly with AOPFN (the community flagged by CLFN) on the NPD Closure Project and a number of broader issues. The AOPFN have also reviewed and provided comments on the draft EIS for the NPD Closure Project. The AOPFN and CNL are continuing to discuss and work through the AOPFN's interests, comments and concerns with respect to the project.

Summary

At present, this summary of interests and concerns is a consolidation of all the interests and concerns the Hiawatha FN have brought forward on the NPD Closure Project. The project-specific concern, on environmental protection, raised by Hiawatha FN is considered in

the context of the EIS. As noted above, CNL has shared with Hiawatha FN a preliminary table of commitments that reflect the measures proposed by CNL to address the concerns raised to date by Hiawatha FN. CNL will continue to respond to questions and concerns from Hiawatha FN through its ongoing engagement efforts. CNL will seek to understand those concerns in the context of the EIS and the NPD Closure Project and commits to continue to work together with Hiawatha FN to receive their feedback on the project.

4.4.10.4 Verification

Hiawatha FN have provided many key inputs, identifying several interests and concerns related to the NPD Closure Project through feedback at meetings. To confirm CNL has adequately captured Hiawatha FN's interests and concerns, position and knowledge, Hiawatha FN and CNL underwent a verification process where CNL provided key documentation to Hiawatha FN for their review and feedback. Through this process, Hiawatha FN has reviewed and provided feedback on their *Table of Interests and Concerns*. While not all of Hiawatha FN's concerns have been mitigated by this process to date, CNL has made every effort to verify that Hiawatha FN's position, interests and concerns were adequately characterized. CNL continues to work with Hiawatha FN to address their concerns through ongoing discussions.

In 2021 June, CNL shared the *Table of Interests and Concerns* with Hiawatha FN asking for verification that CNL had accurately represented Curve Lake First Nation's list of interests and concerns and that, "where possible" verify that how CNL was addressing the interest or concern was adequate.

At the July monthly meeting between the WTFN and CNL, there was a focussed discussion where Curve Lake First Nation and Hiawatha FN shared feedback on their *Tables of Interests and Concerns*. Note that regular monthly meetings open to all the WTFN were coordinated through Curve Lake First Nation's contribution agreement with CNL.

CNL modified Hiawatha FN's *Table of Interests and Concerns* based on the feedback heard in 2021 July and shared back a revised Table in 2021 August.

In 2021 September, CNL followed up with Hiawatha FN on the revised Table of Interests and Concerns. CNL followed up in 2021 October, stating that CNL understood that Hiawatha First Nation agreed with the interests and concerns CNL had recorded to date and that the revised Table of Interests and Concerns (as shared in 2021 September) would be included in the 2021 December draft EIS for the NPD Closure Project. In 2022 January, the CNSC informed CNL that the 2021 December EIS submission was incomplete. The CNSC staff directed CNL to revise the Tables of Interests and Concerns for clarity. CNL developed a simplified Table of Interests and Concerns (Table V-3 in Appendix V), and a table which maps how this simplified table relates to detailed input and feedback from the WTFN (Table V-2 in Appendix V). The new table was shared with Hiawatha FN in 2022 April, with a request that Hiawatha FN verify that the new table retained Alderville First Nation's interests and concerns.

In 2022 March, Curve Lake First Nation offered to provide a review for three of the WTFN communities (Hiawatha FN, Curve Lake First Nation and Alderville First Nation). Hiawatha FN agreed to this review process verbally. In 2022 May, Curve Lake First Nation shared their initial feedback on the table. Curve Lake First Nation and CNL met in 2022 June, to incorporate this feedback and later in June, Curve Lake First Nation shared back their review for Alderville First Nation, Curve Lake First Nation and Hiawatha FN. Due to the importance of the summary *Table of Interests and Concerns* and the Hiawatha's input on verifying its completeness and accuracy, CNL shared the most updated version of this table 2023 May. CNL noted the updates to the *Table of Interests and Concerns*, primarily related to the recent progress made on next steps. Specifically, CNL had made updates to its response to the interest / concern and the status of the concern. Hiawatha confirmed receipt in 2023 May, and confirmed the table was complete and accurate in 2023 June.

4.4.10.5 Next Steps

CNL will continue to share Project information with the Hiawatha FN. Should Hiawatha FN bring forward any new concerns or interests through this ongoing engagement or regulatory proceeding, CNL will seek to understand those concerns in the context of the EIS and the project and commits to continue to work together with Hiawatha FN to receive their feedback on the project.

4.4.11 Mississaugas of Scugog Island First Nation

4.4.11.1 Engagement

Table W-1 of Appendix W includes a complete list of engagement activities that have occurred with Mississaugas of Scugog Island FN on the NPD Closure Project. CNL has also provided a narrative summary of engagement with Mississaugas of Scugog Island FN.

Information-sharing

In 2016 July, CNL sent the Mississaugas of Scugog Island FN a letter to introduce the proposed NPD Closure Project, which included a request for community input on any potential adverse impacts from project activities followed by a second letter in 2016 November which inquired about Mississaugas of Scugog Island FN's asserted rights and traditional activities. CNL did not receive a response from Mississaugas of Scugog Island FN.

In late 2017, CNL shared the draft EIS and the Indigenous Engagement Report with Mississaugas of Scugog Island FN. CNL encouraged participation in the public comment period for the draft EIS and requested community input and feedback for incorporation into the project. Mississaugas of Scugog Island FN did not submit comments on the draft EIS to the CNSC and CNL did not receive any feedback from Mississaugas of Scugog Island FN on this report. In 2020 August, CNL met with Scugog Island FN to discuss CNL projects, including the NPD Closure Project.

In 2021, Scugog Island FN began to attend the Williams Treaties First Nations monthly meetings coordinated between Curve Lake First Nation and CNL and open to all.

Engagement with all the Williams Treaties First Nation

In 2020 May, CNL shared the 2020 March revised draft EIS, which had been submitted to the CNSC, as well as the updated IER and inquired on any Mississaugas of Scugog Island FN specific information. Later that month, in follow up to a webinar requested on the NSDF Project, CNL held a webinar on the NPD Closure Project for the WTFN on 2020 May 19. Mississaugas of Scugog Island FN did not participate in this webinar.

In late 2020, CNL and Curve Lake First Nation began discussions on the development of a contribution agreement. As a part of these discussions Curve Lake coordinated a recurring monthly meeting between all the WTFN and CNL as a touch point on the various CNL projects and activities of interest to the WTFN communities. The first monthly meeting was in 2021 March and invitations were sent in 2021 February to all WTFN community representatives, including the community consultation specialist with Scugog Island FN. After each meeting every community representative receives a copy of the content discussed at the meeting and CNL welcomes questions and comments on the content. Mississaugas of Scugog Island FN representatives have attended nine of the monthly meetings to date and CNL has not heard any specific concerns or interests through this engagement. All of these have included an update on the NPD Closure Project including an overview of the project, the draft follow-up monitoring plans for the NPD Closure Project, the interests and concerns of Hiawatha FN and Curve Lake First Nation, the CNL Indigenous Relations Procurement Strategy, and the Curve Lake First Nation review of the NPD Closure Project's draft EIS and CNL's responses to this review. CNL has not heard any specific concerns or interests through this engagement.

In 2022 October, CNL welcomed WTFN communities, Curve Lake First Nation, Hiawatha FN, Scugog Island FN, and the Chippewas of Rama FN to a site tour of the NPD facility as part of a two-day visit of the Chalk River Laboratories site and area visit. The day include a smudging ceremony by the Kichi-Sibi (Ottawa River) and relationship building including answering questions from the WTFN communities.

Commitments

In 2021 April, CNL provided a project status update and a preliminary table of commitments to the Scugog Island FN. In this letter, CNL requested any feedback on commitments by 2021 June 01.

In 2021 June, CNL followed up on the April letter with Scugog Island FN and has had no response from the community. To date, Scugog Island FN has not made CNL aware of specific concerns or interests related to this Project. CNL will continue to share Project information with Scugog Island FN. Should Scugog Island FN bring forward concerns or interests through this ongoing engagement or regulatory proceeding, CNL will seek to understand those concerns in

the context of the EIS and the project and commits to incorporating Scugog Island FN's feedback into the project.

In 2022 October, CNL sent a letter addressed to Scugog Island First Nation providing a project update and the engagement status with Scugog FN. CNL stated it is committed to incorporating Scugog's interests and concerns into the EIS. CNL provided an engagement status and next steps, including a site visit and establishing commitments to ensure that all interests and concerns are addressed and tracked to resolution. CNL sent an updated draft set of commitments for Scugog Island First Nation's review. CNL offered to discuss capacity and establish commitments before 2022 December. CNL requested that Scugog Island First Nation respond confirming their agreement to proceed with the engagement activities, or modified engagement activities.

In 2023 April, CNL shared suggested next steps for WTFN to finalize the commitments between CNL and the Mississauga's of Scugog Island FN to ensure that all interests and concerns are addressed and tracked to resolution. CNL encouraged feedback.

4.4.11.1 Feedback

The Scugog Island FN has not submitted any written comments on the NPD Closure Project Description or EIS and CNL has not heard any interests or concerns related to engagement on the NPD Closure Project from Scugog Island FN. CNL will continue to engage with the Scugog Island FN and follow up on any outstanding interests and concerns if any arise.

4.4.12 Chippewas of Rama First Nation

4.4.12.1 Engagement

Table T-1 of Appendix T includes a complete list of engagement activities that have occurred with Chippewas of Rama FN on the NPD Closure Project. CNL has also provided a narrative summary of engagement with Chippewas of Rama FN.

Information-sharing

In 2016 July, CNL sent the Chippewas of Rama FN a letter to introduce the proposed NPD Closure Project, which included a request for community input on any potential adverse impacts from project activities followed by a second letter in November 2016 which inquired about Chippewas of Rama First Nation's asserted rights and traditional activities. CNL did not receive a response from Chippewas of Rama First Nation.

In late 2017, CNL shared the draft EIS and the Indigenous Engagement Report with Chippewas of Rama First Nation. CNL encouraged participation in the public comment period for the draft EIS and requested community input and feedback for incorporation into the project. Chippewas of Rama FN did not submit comments on the draft EIS to the CNSC and CNL did not receive any feedback from Chippewas of Rama FN on this report.

In 2022 November, CNL met with Rama FN to discuss CNL EA projects, next steps for engagement and CNL corporate initiatives. The meeting provided CNL and Rama FN that opportunity to connect outside of the Williams Treaties First Nations monthly meetings.

In 2023 April, CNL and Rama met and CNL provided a project refresher and current status. This meeting was at the request of Rama and was in part to introduce the new consultation worker to the project.

Engagement with all the Williams Treaties First Nations

In 2020 May, CNL shared the 2020 March revised draft EIS, which had been submitted to the CNSC, as well as the updated IER and inquired on any Chippewas of Rama FN specific information. Later that month, in follow up to a webinar requested on the NSDF Project, CNL held a webinar on the NPD Closure Project for the WTFN in 2020 May. Chippewas of Rama FN did not participate in this webinar.

In late 2020, CNL and Curve Lake First Nation began discussions on the development of a contribution agreement. As a part of these discussions Curve Lake coordinated a recurring monthly meeting between all of the WTFN and CNL as a touch point on the various CNL projects and activities of interest to the WTFN communities. The first monthly meeting was in 2021 March and invitations were sent in 2021 February to all WTFN community representatives, including the community consultation coordinator with Rama FN. After each meeting every community representative receives a copy of the content discussed at the meeting and CNL welcomes questions and comments on the content. Rama FN have attended 6 of the 16 monthly meetings held to date. All of these have included an update on the NPD Closure Project including an overview of the project, the draft follow-up monitoring plans for the NPD Closure Project, the interests and concerns of Hiawatha FN and Curve Lake First Nation, the CNL Indigenous Relations Procurement Strategy, and the Curve Lake First Nation review of the NPD Closure Project's draft EIS and CNL's responses to this review.

In 2022 October, CNL welcomed WTFN communities, Curve Lake First Nation, Hiawatha FN, Scugog Island FN, and the Chippewas of Rama FN to a site tour of the NPD facility as part of a two-day visit of the Chalk River Laboratories site and area visit. The day include a smudging ceremony by the Kichi-Sibi (Ottawa River) and relationship building including answering questions from the WTFN communities.

Commitments

In 2021 April, CNL provided a project status update and a preliminary table of commitments to the Chippewas of Rama FN developed through engagements on the NPD Closure Project. In this letter, CNL requested any feedback on commitments by 2021 June.

In 2021 June, CNL followed up on the April letter with Rama FN and has had no response from the community. In 2022 October, CNL sent a letter addressed to Rama FN providing a project update and the engagement status with Rama FN. CNL stated it is committed to incorporating

Rama's interests and concerns into the EIS. CNL provided an engagement status and next steps, including a site visit and establishing commitments to ensure that all interests and concerns are addressed and tracked to resolution. CNL sent an updated draft set of commitments for Rama FN's review. CNL offered to discuss capacity and establish commitments before 2022 December. CNL requested that Rama FN respond confirming their agreement to proceed with the engagement activities, or modified engagement activities. Rama FN confirmed receipt of the letter and request a meeting with CNL. Both parties met in 2022 November and again in 2023 April. During the 2023 April meeting CNL and Rama FN reviewed the table of commitments and Rama FN indicated no other commitments were needed at this time.

Summary of Interests and Concerns

During the 2023 April meeting CNL and Rama FN discussed the importance of recoding interest and concerns from the community and the existing time in the EA process to properly document them.

Due to the importance of the summary table of interests and concerns and Rama FN's input on verifying its completeness and accuracy, CNL used the questions and concerns raised by Rama First Nation to document key interests and concerns. CNL sent the table in 2023 May, CNL requested a response on the table. CNL sent the table in 2023 May, CNL requested a response on the table. Rama First Nation provided CNL feedback on the table in 2023 May, which CNL addressed and sent an updated table in 2023 May. In 2023 June, Rama First Nation verified that the table was complete and accurate.

4.4.12.2 Feedback

Rama FN has not submitted any written comments on the NPD Closure Project Description or the EIS. However, based on verbal comments during a meeting in 2023 April, CNL has noted the community's interest in project alternatives, future use of the land and monitoring past and future.

CNL will continue to follow-up and engage with the Chippewas of Rama FN about any outstanding interests and concerns if any arise.

The interests and concerns from Chippewas of Rama FN are briefly identified below and then detailed in the Summary Discussion of Interests and Concerns – Section 4.4.12.3 and the *Tables of Interests and Concerns* in Table T-3 of Appendix T

Alternatives. During a discussion in 2023 April, Chippewas of Rama were interested in the range of alternatives considered, the overall suitability of the in-situ disposal concept and whether in-situ disposal is a proven technology.

End State, Site Restoration and Future Use of the Land. Chippewas of Rama FN is interested to know when the site will be safe for reuse.

Long-term Safety. Rama expressed concern about long-term integrity of the concrete cap and engineered cover.

Monitoring. Chippewas of Rama FN is interested to understand CNL's past environmental performance at the NPD site and has also expressed an interest in reviewing the follow up monitoring to ensure transparency and promote confidence in CNL's project performance.

4.4.12.3 Summary Discussion of Interests and Concerns

The key interests and concerns discussed in this Section were derived from recent engagements with Chippewas of Rama FN, the details of which are recorded in Table T-1 of Appendix T as discussed in Section 4.4.12.1 above.

Alternatives

Rama First Nation expressed concerned that CNL evaluate a range of options for the decommissioning of the NPD reactor. Rama First Nation was also concerned that solution designs allow for reversibility if improved waste disposal options become available in the future. Rama wants to ensure that changes can be made in the future to ensure the environment remains protected. CNL provided an overview of the alternatives and indicated that ISD is meant to be a permanent solution and that there is no intention to retrieve waste in the future. This response was provided verbally to Rama during a project update in 2023 April.

CNL has additionally responded that the waste at NPD has been there for over 55 years. CNL is reducing the waste liability by converting the waste into a form that provides safe, permanent waste disposal. CNL has assessed the suitability of ISD for NPD, and the EIS demonstrates that such disposal is safe for human health and the environment in the short term and long term. CNL has considered national and international standards and guidelines and believes that the NPD facility has characteristics that support ISD.

Rama First Nation was also interested in seeing examples of ISD used elsewhere and the performance of the technology. Rama wants confidence that this technology will protect humans and the environment. CNL has written a report that summarizes facilities worldwide that use In-situ Disposal. This report was shared with Rama First Nation as a follow-up to the 2023 April project update meeting. The report is not limited to nuclear reactors or processing facilities but includes mines and hazardous waste sites. The report also describes what each of the facilities have in common, why in-situ disposal is the preferred approach and how it applies to NPD. Sixteen projects are described, the majority of the examples are reactors, and all are permanent disposal solutions.

CNL believes that this concern has been addressed with the information shared to Rama First Nation and remains committed to ongoing engagement with Rama First Nation through the William's Treaty First Nations monthly update.

End State, Site Restoration and Future Use of the Land

Rama First Nation has highlighted the importance that the end state of the NPD site is safe for future land users and was interested to know when the site would be safe for reuse. CNL acknowledges Rama's interest in being able to reuse the site in the future and verbally summarized the range of scenarios considered and that the site is safe for a variety of uses following the Institutional Control period.

The PostSA TSD demonstrates that the impact beyond the Institutional Controls period on the public, Indigenous and the environment is negligible under all scenarios. CNL notes that the final end state is the only time when changes to access will occur; the final end state of the NPD site will be an improvement from current conditions. To instill confidence in the EIS findings and the effectiveness of the follow-up monitoring, CNL has committed to involve interested Indigenous Nations, communities, and organizations in the monitoring program, which aims to confirm the predictions of the EIS.

CNL believes that this concern has been addressed with the information shared to Rama First Nation and remains committed to ongoing engagement with Rama First Nation through the William's Treaty First Nations monthly update.

Monitoring

Rama is interested to understand CNL's past environmental performance at the NPD site. Rama wishes to ensure the environment has not been impacted by past operations. In response, CNL shared a link to the annual summary of environmental performance as a follow-up to the 2023 April project update meeting and can share other historic monitoring results as requested. CNL conducts a rigorous monitoring program and is committed to ensuring that the environment around the NPD site, including the Kichi-Sibi (Ottawa River), is protected. Results demonstrate that the public and the environment around the NPD site continues to be protected.

Rama also expressed interest in the project monitoring plans. CNL shared the draft monitoring plans with Rama First Nation as a follow-up to the 2023 April project update meeting.

The follow up monitoring program is described at a high level in Section 12 of the revised draft EIS with significant details developed compared to the 2017 draft EIS. These details come through the development of the 3 draft follow up monitoring plans for effluent, environment and groundwater.

CNL is seeking to incorporate input from Indigenous Nations, communities, and organizations, the public and stakeholders before finalizing the EA Follow-up Program. Further, CNL has indicated that it is willing to involve all Indigenous Nations, communities, and organizations in its monitoring programs. CNL will continue to engage with Rama First Nation and facilitate open dialogue to address emerging concerns about this topic.

Long-term Safety

Rama FN expressed interest in understanding more about the protective layers, concrete cap and engineered barrier, and how long it will take them to degrade. CNL provided a verbal response directly to Rama FN during a meeting that the engineered cover has a design life of 100 years. Following the meeting CNL shared additional details about the multiple barriers in place to contain the radioactivity.

The main features containing the radionuclides, are the thick concrete walls of the facility and the fact that the majority of the radioactivity is present within the matrix of steels and zircaloy that will corrode very slowly in the chemical environment of the decommissioned facility. The facility will also be filled with grout to prevent subsidence but also having the benefit of creating an alkaline environment reducing corrosion. In addition, a reinforced concrete cap will be placed over the Nuclear Area of the facility as a barrier following the completion of grouting. The concrete cap is designed to support the loads of the Engineered Barrier and its construction. A multi-layered engineered cover will be placed over the grouted facility, following placement of the concrete cap. The design life of the cap and cover system is 100 years. The Institutional Control Surveillance Plan has been developed to verify the integrity of accessible passive barriers and support structures, and to enable the prompt identification of conditions that may lead to a migration or release of radionuclides or other contaminants to the environment. CNL's technical assessment shows that there are no long-term effects resulting from the NPD Closure Project as shown through the use of multiple barriers and defence in depth.

CNL believes that this concern has been addressed with the information shared to Rama First Nation and remains committed to ongoing engagement with Rama First Nation through the William's Treaty First Nations monthly update.

4.4.12.4 Verification

Chippewas of Rama FN provided key input, identifying several interests and concerns related to the NPD Closure Project through feedback at meetings. To confirm CNL has adequately captured Chippewas of Rama FN's interests and concerns, position and knowledge, Chippewas of Rama FN and CNL underwent a verification process where CNL provided key documentation to Chippewas of Rama FN for their review and feedback. CNL has attempted to verify that Chippewas of Rama FN's position, interests and concerns were adequately characterized. CNL continues to work with Chippewas of Rama FN to address their concerns through ongoing discussions.

The summary *Table of Interests and Concerns* and the Chippewas of Rama First Nation's input on verifying its completeness and accuracy. CNL shared an initial draft of this table 2023 May seeking validation that the concerns and interests of Chippewas of Rama FN were accurately recorded. Chippewas of Rama FN confirmed receipt in 2023 May, and confirmed the table was complete and accurate in 2023 June.

4.4.12.5 Next Steps

CNL will continue to share Project information with the Chippewas of Rama FN. Should Chippewas of Rama FN bring forward any new concerns or interests through this ongoing engagement or regulatory proceeding, CNL will seek to understand those concerns in the context of the EIS and the project and commits to continue to work together with the Chippewas of Rama FN to receive their feedback on the project.

4.4.13 Chippewas of Georgina Island First Nation Engagement

4.4.13.1 Engagement

Table S-1 of Appendix S includes a complete list of engagement activities that have occurred with Georgina Island First Nation on the NPD Closure Project. CNL has also provided a narrative summary of engagement with Georgina Island FN.

Information-sharing

In 2016 July, CNL sent the Chippewas of Georgina Island FN a letter to introduce the proposed NPD Closure Project, which included a request for community input on any potential adverse impacts from project activities followed by a second letter in 2016 November which inquired about Chippewas of Georgina Island FN's asserted rights and traditional activities. CNL did not receive a response from Chippewas of Georgina Island FN.

In late 2017, CNL shared the draft EIS and the IER TSD with Chippewas of Georgina Island FN. CNL encouraged participation in the public comment period for the draft EIS and requested community input and feedback for incorporation into the project. Chippewas of Georgina Island FN did not submit comments on the draft EIS to the CNSC and CNL did not receive any feedback from Chippewas of Georgina Island FN on this report.

In early 2022, Georgina Island FN began to attend the Williams Treaties First Nations monthly meetings coordinated between Curve Lake First Nation and CNL and open to all.

Engagement with all the Williams Treaties First Nations

In 2020 May, CNL shared the 2020 March revised draft EIS, which had been submitted to the CNSC, as well as the updated IER and inquired on any Chippewas of Georgina Island First Nation specific information. Later that month, in follow up to a webinar requested on the NSDF Project, CNL held a webinar on the NPD Closure Project for the WTFN in 2020 May. Follow-up from the webinar, which was distributed to all participants, included information on the Chimney Swift population, the annual compliance and monitoring reports for three previous years and the archaeological assessment for the NPD site.

In late 2020, CNL and Curve Lake First Nation began discussions on the development of a contribution agreement. As a part of these discussions Curve Lake coordinated a recurring

monthly meeting between all the WTFN and CNL as a touch point on the various CNL projects and activities of interest to the WTFN communities. The first monthly meeting was in 2021 March and invitations were sent in 2021 February to all WTFN community representatives, including the consultation coordinator with Georgina Island FN. After each meeting every community representative receives a copy of the content discussed at the meeting and CNL welcomes questions and comments on the content. As of 2022 May, Georgina Island FN has had a representative at three of the 16 monthly meetings held to date and CNL has not heard any specific concerns or interests through this engagement. All of these have included an update on the NPD Closure Project including an overview of the project, the draft follow-up monitoring plans for the NPD Closure Project, the interests and concerns of Hiawatha FN and Curve Lake First Nation, the CNL Indigenous Relations Procurement Strategy, and the Curve Lake First Nation review of the NPD Closure Project's draft EIS and CNL's responses to this review. CNL has not heard any specific concerns or interests through this engagement.

Commitments

In 2021 April, CNL provided a project status update and a preliminary table of commitments to Georgina Island FN developed through engagements on the NPD Closure Project. In this letter, CNL requested any feedback on commitments by 2021 June 01.

In 2021 June, CNL followed up on the April letter with Georgina Island FN and has had no response from the community. To date, Georgina Island FN has not made CNL aware of specific concerns or interests related to this Project. CNL will continue to share information with Georgina Island FN. Should Georgina Island FN bring forward concerns or interests through this ongoing engagement or regulatory proceeding, CNL will seek to understand those concerns in the context of the EIS and the project and commits to incorporating Georgina Island FN's feedback into the project.

In 2022 October, CNL sent a letter addressed to Georgina Island First Nation providing a project update and the engagement status with Georgina Island FN. CNL stated it is committed to incorporating Georgina Island FN interests and concerns into the EIS. CNL provided an engagement status and next steps, including a site visit and establishing commitments to ensure that all interests and concerns are addressed and tracked to resolution. CNL sent an updated draft set of commitments for Georgina Island First Nation's review. CNL offered to discuss capacity and establish commitments before 2022 December. CNL requested that Georgina Island First Nation respond confirming their agreement to proceed with the engagement activities, or modified engagement activities.

In 2023 January, CNL informed Georgina Island FN of the decision to postpone the submission of the NPD Closure Project's draft EIS until 2023 May to allow for additional Indigenous input.

In 2023 April, CNL shared suggested next steps to finalize the commitments between CNL and Georgina Island FN to ensure that all interests and concerns are captured, addressed and

tracked to resolution. CNL encouraged feedback.

4.4.13.2 Feedback

Georgina Island FN has not submitted any written comments on the NPD Closure Project Description or EIS and CNL has not heard any interests or concerns related to engagement on the NPD Closure Project from Georgina Island FN. CNL will continue to follow-up and engage with the Georgina Island FN about any outstanding interests and concerns if any arise.

4.4.14 Beausoleil First Nation

4.4.14.1 Engagement

Table R-1 of Appendix R includes a complete list of engagement activities that have occurred with Beausoleil First Nation on the NPD Closure Project. CNL has also provided a narrative summary of engagement with Beausoleil First Nation.

Information-sharing

In 2016 July, CNL sent Beausoleil First Nation a letter to introduce the proposed NPD Closure Project, which included a request for community input on any potential adverse impacts from project activities followed by a second letter in 2016 November which inquired about Beausoleil First Nation's asserted rights and traditional activities. CNL did not receive a response from Beausoleil First Nation.

In late 2017, CNL shared the draft EIS and the Indigenous Engagement Report with Beausoleil First Nation. CNL encouraged participation in the public comment period for the draft EIS and requested community input and feedback for incorporation into the project. Beausoleil First Nation did not submit comments on the draft EIS to the CNSC and CNL did not receive any feedback from Beausoleil First Nation on this report.

In early 2022, Beausoleil First Nation began to attend the Williams Treaty First Nations monthly meetings coordinated between Curve Lake First Nation and CNL and open to all.

Engagement with all the Williams Treaties First Nations

In 2020 May, CNL shared the 2020 March revised draft EIS, which had been submitted to the CNSC, as well as the updated IER and inquired on any Beausoleil First Nation specific information. Later that month, in follow up to a webinar requested on the NSDF Project, CNL held a webinar on the NPD Closure Project for the WTFN on 2020 May 19. Beausoleil First Nation did not participate in this webinar.

In late 2020, CNL and Curve Lake First Nation began discussions on the development of a contribution agreement. As a part of these discussions Curve Lake coordinated a recurring monthly meeting between all of the WTFN and CNL as a touch point on the various CNL

projects and activities of interest to the WTFN communities. The first monthly meeting was in 2021 March and invitations were sent in 2021 February to all WTFN community representatives, including the consultation coordinator with Beausoleil First Nation. After each meeting every community representative receives a copy of the content discussed at the meeting and CNL welcomes questions and comments on the content. The Consultation Coordinator from Beausoleil First Nation has attended one (2021 August) of the 16 monthly meetings held to date. All of these have included an update on the NPD Closure Project including an overview of the project, the draft follow-up monitoring plans for the NPD Closure Project, the interests and concerns of Hiawatha FN and Curve Lake First Nation, the CNL Indigenous Relations Procurement Strategy, and the Curve Lake First Nation review of the NPD Closure Project's draft EIS and CNL's responses to this review. CNL has not heard any specific concerns or interests through this engagement.

Commitments

In 2021 April, CNL provided a project status update and a preliminary table of commitments to Beausoleil First Nation developed through engagements on the NPD Closure Project. In this letter, CNL requested any feedback on commitments by 2021 June 01.

In 2021 June, CNL followed up on the April letter with Beausoleil First Nation and has had no response from the community. To date, Beausoleil First Nation has not made CNL aware of specific concerns or interests related to this Project. CNL will continue to share information with Beausoleil First Nation. Should Beausoleil First Nation bring forward concerns or interests through this ongoing engagement or regulatory proceeding, CNL will seek to understand those concerns in the context of the EIS and the project and commits to continue to work together with Beausoleil First Nation to receive their feedback on the project.

In 2022 October, CNL sent a letter addressed to Beausoleil First Nation providing a project update and the engagement status with Georgina Island FN. CNL stated it is committed to incorporating Beausoleil First Nation interests and concerns into the EIS. CNL provided an engagement status and next steps, including a site visit and establishing commitments to ensure that all interests and concerns are addressed and tracked to resolution. CNL sent an updated draft set of commitments for Beausoleil First Nation's review. CNL offered to discuss capacity and establish commitments before 2022 December. CNL requested that Beausoleil First Nation respond confirming their agreement to proceed with the engagement activities, or modified engagement activities.

In 2023 January, CNL informed Beausoleil First Nation of the decision to postpone the submission of the NPD Closure Project's draft EIS until 2023 May to allow for additional Indigenous input.

In 2023 April, CNL shared suggested next steps to finalize the commitments between CNL and Beausoleil First Nation to ensure that all interests and concerns are captured, addressed and tracked to resolution. CNL encouraged feedback.

4.4.14.2 Feedback

Beausoleil First Nation has not submitted any written comments on the NPD Closure Project Description or EIS. CNL will continue to follow-up with the Beausoleil First Nation on any interests and concerns that may arise.

4.4.15 Algonquin Nation Secretariat Engagement

4.4.15.1 Engagement

Table Y-1 of Appendix Y includes a complete list of engagement activities that have occurred with the Algonquin Nation Secretariat (ANS) on the NPD Closure Project. CNL has also provided a narrative summary of engagement with Algonquin Nation Secretariat.

Information-sharing

In 2016 July, CNL sent the Algonquin Nation Secretariat a letter to introduce the proposed NPD Closure Project, which included a request for input on any potential adverse impacts from project activities might have to the Algonquin Nation Secretariat member communities followed by a second letter in 2016 November which inquired about asserted rights and traditional activities of the Algonquin Nation Secretariat member communities.

In late 2017, CNL shared the draft EIS and the Indigenous Engagement Report with Algonquin Nation Secretariat. CNL encouraged participation in the public comment period for the draft EIS and requested community input and feedback for incorporation into the project. Algonquin Nation Secretariat did not submit comments on the draft EIS to the CNSC and CNL did not receive any feedback from Algonquin Nation Secretariat on this report.

Throughout 2018, 2019, 2020, 2021, 2022 and 2023 the Algonquin Nation Secretariat received invitations to all engagement activities and have not attended any events to date.

In 2020 May, CNL shared the 2020 March revised draft EIS, which had been submitted to the CNSC, as well as the updated IER and inquired on Algonquin Nation Secretariat specific information.

Leading up to Part 2 of the CNSC hearing on CNL's NSDF project, two of the Algonquin Nation Secretariat First Nations, Wolf Lake First Nation (WLFN) and the Algonquins of Barriere Lake (ABL) First Nation, submitted interventions stating concern that the CNSC and CNL had not consulted or engaged with the Algonquin Nation Secretariat communities directly on the NSDF project.

In response to these interventions CNL has reached out by email and telephone to connect with all three Algonquin Nation Secretariat communities:

Algonquins of Barriere Lake (ABL)

CNL reached out to ABL by email in 2022 April and May, to inquire about how ABL would like to be engaged, who CNL should contact and when ABL could meet with CNL. CNL followed up with a voicemail in May, and reached out three times in 2022 June to the law firm representing ABL, seeking accurate contact information for the First Nation. In 2022 June, a consultant reached out on behalf of ABL, and CNL responded to the consultant reiterating an interest in meeting to discuss direct engagement.

In 2022 October, CNL sent a letter addressed to ABL providing a project update and the engagement status with the ABL. CNL stated it is committed to incorporating ABL's interests and concerns into the EIS. CNL offered to discuss capacity and ensure all interests and concerns are addressed and tracked establish commitments before 2022 December. CNL requested that ABL respond confirming their agreement to proceed.

Wolf Lake First Nation (WLFN)

In 2022 May, CNL reached out twice to WLFN by email, to inquire about how WLFN would like to be engaged, who CNL should contact and when WLFN could meet with CNL. CNL followed up with a phone call in 2022 May, during which a WLFN staff member spoke with the CNL representative and indicated that the Chief would be interested in meeting. CNL left a contact number and name but did not hear back. In 2022 June, CNL's Director of Indigenous Relations made several attempts to contact WLFN, including an email to WLFN's legal counsel and the WLFN Chief, and a phone call to WLFN. Later in June CNL received a letter from WLFN on the NSDF project, CNL's 2022 July response indicated CNL's interest in engaging with WLFN directly on all of CNL's EA projects, including the NPD Project. In 2022 August CNL and WLFN met in person to share information about the NSDF and NPD Project.

Timiskaming First Nation (TFN)

In 2022 June, CNL emailed TFN's Chief to inquire about how TFN would like to be engaged, who CNL should contact and when TFN could meet with CNL. In 2022 June, CNL followed up with an email to the General Director of TFN asking how to contact the Chief or another appropriate contact. CNL did not hear back from TFN.

In 2022 October, CNL sent a letter addressed to TFN providing a project update and the engagement status with TFN. CNL stated it is committed to incorporating TFN's interests and concerns into the EIS. CNL offered to discuss capacity and ensure all interests and concerns are addressed and tracked establish commitments before 2022 December. CNL requested that TFN respond confirming their agreement to proceed.

Invitation to All Three First Nations

In 2022 June, CNL's Director of Indigenous Relations reached out to all three First Nations with the following invitation for a joint meeting or individual meetings:

"We would like to meet with you to provide you and your communities with updates on each of the projects, the potential environmental effects and proposed mitigation and monitoring measures. We are interested in learning more about any asserted rights and interests communities may have, or activities your members might undertake in the local or regional areas in proximity to the projects. We are willing to provide capacity support for a meeting in North Bay, Ontario in July 2022, if your schedules allow. If your preference is to meet in one of your communities, we would welcome the invitation. Lastly, if schedules do not permit a joint meeting with all three First Nations and CNL, and/or your preference is to meet one-on-one, we are happy to accommodate that request as well."

In 2022 May Wolf Lake First Nation requested a meeting with CNL. That meeting eventually took place 2022 August, the ensuing engagement with Wolf Lake is covered in Section 6.2.4.17 below.

CNL continues to share updates about the NPD Closure Project and related activated with all of the AND communities.

Commitments

In 2021 April, CNL provided a project status update and a preliminary table of commitments to the Algonquin Nation Secretariat. In this letter, CNL requested any feedback on commitments by 2021 June.

In 2021 June, CNL followed up on the April letter with the Algonquin Nation Secretariat and has had no response from the Secretariat. To date, the Algonquin Nation Secretariat has not made CNL aware of specific concerns or interests related to this Project. CNL will continue to share Project information with the Algonquin Nation Secretariat. Should the Algonquin Nation Secretariat bring forward concerns or interests through this ongoing engagement or regulatory proceeding, CNL will seek to understand those concerns in the context of the EIS and the project and commits to continue to work together with the Algonquin Nation Secretariat to receive their feedback on the project.

4.4.15.2 Feedback

The Algonquin Nation Secretariat has not submitted any written comments on the NPD Closure Project Description or EIS and has not engaged with CNL or brought forward any interests or concerns to CNL.

4.4.16 Wolf Lake First Nation

4.4.16.1 Engagement

Table Z-1 of Appendix Z includes a summary of key engagement activities that have occurred with Wolf Lake First Nation (WLFN) on the NPD Closure Project. CNL has also provided a narrative summary of engagement with Wolf Lake First Nation.

Communications with Wolf Lake First Nation up until 2022 June were via the Algonquin Nation Secretariat (Section 4.4.15.1). In 2022 June, WLFN identified that the proper channel of engagement on the NPD Project was through the First Nation's legal counsel. WLFN expressed the need to be engaged as a First Nation, independent from the Algonquin Nation Secretariat, regarding CNL related projects and activities.

Information-sharing

In 2022 June, CNL received a letter from WLFN on the NSDF project, CNL's 2022 July response indicated CNL's interest in engaging with WLFN directly on all CNL's EA projects, including the NPD Project. In 2022 August CNL and WLFN met in person to share information about the NSDF and NPD Project.

In 2022 October, CNL sent a letter addressed to WLFN ABL providing a project update. CNL stated it is committed to incorporating WLFN's interests and concerns into the EIS. CNL offered to discuss capacity and WLFN's interest and desired involvement in the project. CNL requested that WLFN respond confirming their agreement to proceed. CNL shared a copy of a contribution agreement.

In 2022 November CNL received a request from WLFN to meet and develop a contribution agreement to fund the review both the technical requirements of the project and a review of the environmental assessment report. CNL and WLFN met 2022 December, the parties discussed capacity for technical review of the EIS. CNL shared technical supporting documents and documents listed on the IAA Registry to assist in WLFN's review.

During the month of 2022 December CNL and WLFN drafted a contribution agreement to facilitate WLFN's review of the NPD and NSDF EIS' and other technical supporting documents. The agreement was signed at the end of the month. WLFN sent CNL comments on the NPD Project revised draft EIS in 2023 March. In 2023 June, CNL sent WLFN responses to the comments and recommendations. CNL also shared a draft version of the WLFN Interests and Concerns Table (WLFN I&C) for WLFN verification. CNL continues to reach out to meet with WLFN.

Interests and Concerns

In 2023 June, CNL shared a draft summary of interests and concerns for WLFN. CNL drafted the summary based on the comments and recommendations made by WLFN when they completed their review of the revised draft EIS in 2023 March.

4.4.16.2 Feedback

Wolf Lake FN submitted comments on the NPD Closure Project Description and reviewed the 2021 December revised draft EIS.

The interests and concerns from the WLFN are briefly identified below and then detailed in the Summary Discussion of Interests and Concerns – Section 4.4.16.3 and the *Tables of Interests and Concerns* in Table Z-3 of Appendix Z.

Aquatic Environment. Wolf Lake FN has expressed the importance of wetlands. WLFN highlights that wetlands are significant in facilitating organic decay, filtration of water and contaminants and every effort should be made to not disturb them. Wetlands are connected to surface waters that are significant to WLFN, including the Kichi-Sibì (Ottawa River).

Baseline Characterization. Wolf Lake FN expressed the importance of understanding baseline conditions in the Kichi-Sibì (Ottawa River) and is concerned about contamination of the aquatic environment specifically radioactivity / bioaccumulation of radionuclides in fish and within the plant communities near the shore of the Kichi-Sibì (Ottawa River).

Engagement. Wolf Lake FN is concerned that the perspective of the Algonquin communities in Quebec is represented and is interested in developing a long-term relationship with CNL. WLFN is also looking for meaningful engagement on the NPD Project using best practices.

Environmental Effects and Mitigations. WLFN are interested in discussing accommodations and compensatory measures with CNL in the event that WLFN's valued components are found to be impacted by the proposed project.

Impacts to Rights. Wolf Lake FN expressed concerns about impacts to rights. Fish and wildlife represent the expression of WLFN's rights and their ability to exercise their Aboriginal right to hunt, fish, and trap. The ecosystem as a whole should be considered in making decisions that may potentially impact Aboriginal rights and lead to uncertainties and fear for using staple food sources.

Long-term Safety. WLFN is concerned about the long-term management and monitoring of legacy radioactive contamination sites such as NPD. WLFN is looking to ensure the vault safety and durability, as well as understand how the landscape will respond to external forces present a few thousand years after disposal.

Monitoring. WLFN are interested in being involved in follow up monitoring and sharing of reported results for the NPD Closure Project. Further, WLFN is interested in beginning an enhanced information sharing protocol to better understand the landscape from both world perspectives: "Western Science & Traditional Knowledge" to allow a more comprehensive baseline monitoring to take place for the NPD Closure Project. WLFN has requested to be included in a periodic review of the proposed project following the final closure as part of the long-term relationship building.

National Policy. WLFN are of the view that the Auditor General's nuclear waste management audit and NRC's policy modernization process should conclude before the NPD facility is decommissioned.

Protection of the Ottawa River. WLFN is concerned that radioactive waste not be present near the vicinity of water bodies, like the Kichi-Sibi (Ottawa River) and St. Lawrence River Basin.

Technical. Based on review of the revised draft EIS, WLFN requested additional information about the point source for contaminants in sediment. WLFN is also concerned about emissions to the atmospheric environment and transport of contaminants in groundwater.

Traditional Land and Resource Use and Cultural Impacts. WLFN is interested in documenting traditional knowledge, land use, occupancy, and values to demonstrate how the proposed project may impact WLFN's land use, occupancy, rights, traditional food harvesting, and citizens. They voiced concerns about safety of harvested and gathered foods, and the impact of perceived contamination in the Kichi-Sibi (Ottawa River) and the environment on the inherent and protected rights of WLFN citizens.

Valued Components. Wolf Lake FN has requested the opportunity to provide values identified by their community.

4.4.16.3 Summary Discussion of Interests and Concerns

The key interests and concerns discussed in this section were derived from comments on the 2021 draft EIS received from WLFN in 2023 March, the details of which are recorded in Table Z-1 of Appendix Z. The discussion in this summary is based on CNL's understanding of the interests and concerns, CNL offered several meetings to discuss CNL's understanding of the interests and concerns. CNL and WLFN were in the process of coordinating logistics for an in-person meeting in 2023 May, however that meeting has yet to take place. To incorporate Indigenous knowledge and values into the environmental assessment process, CNL has been reaching out to communities such as WLFN since 2017. Critically, CNL shared both the 2017 draft and 2021 revised draft EIS with WLFN, WLFN confirmed receipt 2022 December.

As a result of the comments received on the EIS CNL tabulated and shared a list of interests and concerns (Table Z-3 of Appendix Z) with WLFN to receive their feedback and seek verification

that all concerns have been captured and adequately addressed. The concerns communicated by WLFN to CNL are described below.

Aquatic Environment

In their comments on the draft EIS, received 2023 March, WLFN highlighted that the importance of wetlands cannot be overstated. They are significant in facilitating organic decay, filtration of water and contaminants and every effort should be made as to not disturb them. There are surface waters within their traditional territory that are significant to WLFN, including the Kichi-Sibì (Ottawa River). The water provides not only life, but the waterways were major transportation routes to visit family, access trade goods and resources.

In response CNL has communicated that the potential for contamination to reach the Kichi-Sibì (Ottawa River) is assessed in the EIS and is supported by detailed groundwater modelling and long-term performance modelling for the proposed disposal facility. The groundwater source of the wetlands is not affected at all by groundwater from the NPD facility. Groundwater on the NPD site flows towards the Kichi-Sibì (Ottawa River), so groundwater that interacts with the NPD facility flows away from the wetlands onsite, towards the Kichi-Sibì (Ottawa River). Section 4.1 of the EIS highlights the in-design mitigation measures that act to isolate and contain the waste inventory within the NPD Disposal Facility to ensure protection of the surrounding environment including the Kichi-Sibì (Ottawa River). Mitigation measures for the protection of surface water (Section 9.3.3.2) (including the Ottawa River) have been updated and expanded from the 2017 draft EIS. The EIS predicts no effects to surface water (including the Ottawa River).

To verify that the engineered barriers are performing as expected / designed, CNL will monitor groundwater. Groundwater wells will be located between the NPD facility and the Kichi-Sibì (Ottawa River) to monitor groundwater quality after it interacts with the facility and before it reaches the Kichi-Sibì (Ottawa River). CNL will conduct monitoring for as long as necessary to verify the results of the assessment in the EIS.

CNL is interested in engagement with WLFN to gain a greater understanding of their concerns about watershed sustainability related to the NPD Closure Project.

Baseline Characterization

In their comments on the draft EIS, received 2023 March, WLFN requested that CNL include fish tissue sampling within their monitoring programs. WLFN was concerned that proper baseline studies of contaminants in the Kichi-Sibì (Ottawa River) be completed. WLFN also recommended that CNL and WLFN build on an education and awareness strategy aimed at mutual understating of baseline values for radioactivity / bioaccumulation of radionuclides in fish, and within the plant communities in the near shore of the Kichi-Sibì (Ottawa River).

CNL's EIS indicates in Appendix B and Section 8.6 which species have been observed on the NPD site and historic environmental monitoring is summarized in the description of the existing environment (Section 8) of the EIS. Specifically, Sections 8.2 – Atmospheric Environment, 8.3 Surface Water Environment, 8.5.6 Groundwater Quality and 8.7 Ambient Radioactivity.

Species detected as part of baseline biodiversity surveys within a 200 m area beyond the perimeter of the project footprint have been included as Valued Components for the NPD Closure Project, and mitigation measures, including buffers, have been developed for protection.

To supplement baseline data, a study of sediment, benthic invertebrates and fish habitat features was undertaken upstream, adjacent to and downstream of the NPD site in 2020 and CNL is happy to provide this report to WLFN. The study determined that the Kichi-Sibi (Ottawa River) benthic invertebrate community near the NPD site is healthy and typical of what is observed in many large, soft-bottomed, relatively deep river systems. This study can be repeated when decommissioning is complete, to verify if the project has had an impact. CNL is planning to start regular monitoring of Kichi-Sibi (Ottawa River) water quality before the project begins. CNL is willing to discuss fish tissue sampling with WLFN, and review past studies of fish tissue in the NPD area.

The EIS predicts no adverse impacts from the project on the Kichi-Sibi (Ottawa River) shoreline or on any fish, wildlife or plants within the riparian and aquatic ecosystems. CNL is continuing its efforts to address these concerns by involving the Indigenous Nations, communities, and organizations and organizations in monitoring activities that will confirm the conclusions of the EIS. An Indigenous-driven monitoring program can help build confidence that the decommissioning strategy and mitigation measures are effective. The development of risk communication tools is also important to achieve a greater understanding of the NPD Closure Project.

CNL is interested in engagement with WLFN to gain a greater understanding of their concerns related to baseline characterization at the NPD site and ways in which WLFN and CNL can work together communicating this information.

Engagement

In their comments on the draft EIS, received 2023 March WLFN was concerned with CNL's statement that "the EIS assumes that Algonquin communities on the Quebec side of the river have a similar perspective". WLFN commits to building a longer-term relationship with CNL if capacity resources are available. This is an important matter to WLFN, its citizens and CNL as engagement continues to expand. WLFN also recommended CNL and WLFN continue to work on building a relationship founded on trust that ensures information, data, results, and findings are shared. Any anomalies or concerns can be discussed and remediated to ensure uncertainties are addressed.

CNL is committed to collaborative, two-way engagement with the WLFN on the NPD Closure Project in the means that WLFN would like to be engaged. CNL has much to learn and hopes to build trust and seek guidance from WLFN. Through meaningful engagement activities, CNL is happy to share information, data, results, and findings, as well as discuss and address issues and concerns with WLFN.

In 2022 December, WLFN requested to review the NPD EIS. In 2022 December a Capacity Funding Agreement was signed by WLFN and CNL to support WLFN's involvement in the environmental assessment process for the NPD Closure Project. In 2023 March, Wolf Lake provided their comments to CNL on the NPD EIS. An in-person discussion of WLFN recommendations is planned in community in 2023 June.

CNL has heard WLFN's request to establish a longer-term relationship. As a starting point, CNL is very interested in working together with WLFN to develop a work plan and capacity for NPD specific activities.

Environmental Effects and Mitigations

In their comments on the draft EIS, received 2023 March WLFN requested support and funding for WLFN to complete a land use and occupancy study that would include their value components identified and further protect traditional, cultural and heritage sites for future generations. It is understood there will be overlapping values with other First Nations, and this can be key to identifying the significant and true value of the value components in question. WLFN is also interested to understand how First Nations are accommodated if values are impacted.

CNL acknowledges WLFN's concerns about the potential impacts on the rights of the WLFN to practice traditional activities on, and in the vicinity of, the NPD site. AECL and CNL recognize that, while we don't have the full historical records, we know that the NPD site was very likely established without consulting Indigenous peoples. As the land owner for CNL managed sites, AECL is working to understand all of the considerations around the future of its sites, including considerations for Indigenous consultations through engagements with Indigenous peoples. While we can't change the past, we can look forward and work to establish positive and mutually beneficial relationship with the WLFN.

CNL stands by its conclusion that the project will not interfere with traditional activities or have a negative impact on the biological resources on which they are dependent. Ultimately, the decision of impacts to rights rests with the CNSC. If the CNSC finds any potential impacts to WLFN's Indigenous and / or treaty rights, CNL remains committed to understanding these rights and working collaboratively to ensure that they are appropriately mitigated to the greatest extent possible. CNL is very interested in working together with the WLFN to identify WLFN valued components and develop mitigation measures to address interests and concerns related to VCs.

Impacts to Rights

In their comments on the draft EIS, received 2023 March WLFN expressed concern that Fish and Wildlife do not recognize borders and migrate through the lands and waters owned by CNL, which represent the expression on WLFN's rights and their ability to exercise their Aboriginal right to hunt, fish, and trap. Traditional land use occurs on what are known by the federal and provincial governments as Crown Lands, or with permission, on privately owned land. The ecosystem as a whole should be considered in making decision that may potentially impact Aboriginal rights. Cumulative effects impact and impede on the exercising of rights by First Nations by affecting their staple food sources, following traditional teachings and leading to uncertainties, feeding fear- resulting in avoidance of the areas.

Further, WLFN recommended that CNL and WLFN work together on measures that ensure impacts are not infringing the rights of WLFN; and impacts are minimized and WLFN's interests accommodated. Measures are also required that consider cumulative impacts and ensure that they will not result in food security issues or concerns. Sufficient and continued resources are required to maintain a healthy way of life. There are concerns about contamination of the land, water, flora and fauna.

As part of CNL's engagement activities, we seek to understand the interests and concerns of Indigenous Nations and communities while building awareness and understanding of NPD Closure Project activities. CNL seeks to develop a mutual understanding of the perceived effects of NPD Closure Project activities on the environment and any potential negative impacts on Aboriginal and / or treaty rights. This includes, but is not limited to, rights to trap, hunt, fish, gather, or harvest as well as the continuation and uninterrupted access to cultural and spiritual activities on the lands and waters.

CNL acknowledges WLFN's concerns about assessment of impacts to rights and traditional land and resource use, driven by distrust in the safety of the land and water. CNL is open to increased engagement, education and participatory involvement in monitoring activities at its sites to address these concerns. The proposed NPD Closure Project has the potential to help reduce concerns of alienation and / or fears if they exist. The proposed project involves a long-term solution to ensure the waste that currently resides at the NPD site is effectively contained and isolated from the environment, ensuring public safety. This solution has the potential to result in additional lands being freed up for traditional harvest.

CNL conclusion is that the project will not interfere with traditional activities or have a negative impact on the biological resources on which they are dependent. Ultimately, the decision of impacts to rights rests with the CNSC. If the CNSC finds any potential impacts to WLFN's Indigenous and / or treaty rights, CNL remains committed to understanding these rights and working collaboratively to ensure that they are appropriately mitigated to the greatest extent possible.

Long-term Safety

In their comments on the draft EIS, received 2023 March, WLFN expressed concern about long-term vault safety and durability. The facility should have a post closure environmental safety case that includes a detailed analysis and modelling of a geological environment that contemplates significant, ongoing, projected changes. There also needs to be an assessment of the human health and environmental impacts. WLFN is also concerned that there are significant geological processes interacting with the surface environment and the potential waste site. It is critical to understand the disposal system in terms of both short and long-term performance. WLFN suggests that understanding landscape responses to external forces and further research is needed to have a detailed model of the first few thousand years after disposal. This is significant to the long-term management of legacy radioactive contamination sites.

In Section 8.5 of the EIS CNL presents the geological baseline data. Further Section 8.12 of the EIS discusses the relevant natural disasters to which NPD may be exposed and Section 9.14 discusses the potential effects on the project of climate change, forest fires, floods, earthquakes, severe weather such as tornados, lightning strikes, ice storms, and changes to the Kichi-Sibi (Ottawa River). Additional details and a range of scenarios that encompass the potential impacts from extreme weather and natural hazards are examined in the DecomSA TSD and the PostSA TSD. CNL is open and willing to discuss the geologic and site investigation undertaken to support the project during a dedicated meeting with WLFN. CNL has also offered to share the Geosynthesis report for the project.

CNL acknowledges WLFN's concerns about the long-term safety of the NPD site. CNL has assessed the probabilities and potential impacts of flooding, seismic activity, above-ground natural hazards and extreme temperature change through all project phases (decommissioning, institutional control and post-institutional control), and has concluded that these events will have no undue effects on people or the environment around the site.

CNL models several scenarios in its PostSA TSD which consider how accidents and natural hazards could affect the facility. These scenarios are called disruptive events. One such case models severe erosion (flood) while another models extreme degradation of the facility (the concrete structure and the grout). In both cases the predicted doses to receptors are still well below the dose criterion.

In 2018/19, CNL undertook a geoscientific fieldwork campaign to sample and characterize the bedrock around the NPD facility. The fieldwork included coring of 10 boreholes to a depth of 50 meters into bedrock and several overburden boreholes, with installation of wells for sampling and hydraulic property determinations. The Geoscientific Characterization Report was used to revise the Geosynthesis report and the various models (i.e., Groundwater Model, Resaturation Model). The results of these reports were incorporated into the Post closure Safety Assessment, enabling CNL to assess potential effects to valued components (VC) in the aquatic and terrestrial ecosystems. The additional field investigations and updated models support the

conclusion that the NPD Closure Project is protective of human health and the environment.

CNL is interested in engagement with WLFN to gain a deeper understanding of their concerns about geologic characterization of the site and long-term safety of the NPD Closure Project.

Monitoring

In their comments on the draft EIS, received 2023 March, WLFN highlighted that follow-up monitoring and sharing of reported results will be a key element in changing public perceptions. Uncertainties bring fear to people who are not aware or educated on this proposed project. WLFN also recommended that CNL and WLFN develop an enhanced information sharing protocol to better understand the landscape from both world perspectives: "Western Science & Traditional Knowledge". This would allow a more comprehensive baseline monitoring to take place for the NPD Closure Project. Further, WLFN requested to be included in the periodic review, every 5 years, following the final closure- as part of the long-term relationship building. WLFN's primary concern is that their traditional territory is not negatively impacted, and that they uphold their sacred responsibility to Mother Earth and her gifts, (the land, water, fish, wildlife, plants, trees), thus protecting the health and well-being of citizens and the environment that sustains them. The citizens of WLFN have a connection with all the Algonquin Nations in both Ontario and Quebec.

CNL acknowledges WLFN's concerns about the long-term safety of the NPD site and the potential impacts on the rights of the WLFN and other Indigenous Nations, communities, and organizations to practice traditional activities around the NPD site. The PostSA TSD demonstrates that the impact beyond the Institutional Controls period on the public, Indigenous and the environment is negligible under all scenarios. CNL is open and willing to have a dedicated discussion with WLFN on their desired level of involvement in monitoring. CNL is happy to share technical reports that are available for the project.

At the project level, follow-up monitoring for the NPD Closure Project will include monitoring of environmental components critical to WLFN such as monitoring of surface water, groundwater and air quality. CNL will conduct monitoring for as long as necessary to verify the results of the assessment in the EIS.

CNL is continuing its efforts to address these concerns by:

- (i) Involving Indigenous Nations and organizations, in monitoring activities that will confirm the conclusions of the EIS. An Indigenous-driven monitoring program can help to reduce fear or anxiety associated with traditional uses occurring adjacent to and near the AECL properties and build confidence that the decommissioning strategy and mitigation measures are effective.

- (ii) Developing an Indigenous-driven risk-informed communications program for the NPD Closure Project to promote understanding of the EIS results and to help alleviate the concerns related to negative perceptions and feelings of discomfort and concern.

CNL conducts a rigorous monitoring program and is committed to ensuring that the environment around the NPD site, including the Kichi-Sibì (Ottawa River), is protected. The results demonstrate that the public and the environment around the NPD site continues to be protected. CNL can share annual summary of environmental performance available on CNL's website and would be pleased to share any other historic monitoring data as requested by WLFN. CNL is open and willing to work together with WLFN to incorporate Traditional Knowledge into its Western Science practices.

In addition to the CNL monitoring program, the CNSC leads an Independent Environmental Monitoring Program (IEMP) designed to verify that the public and the environment around licensed nuclear facilities are protected. As part of its IEMP, the CNSC samples and analyzes surface water upstream and downstream of the NPD site (including sampling for non-radiological parameters). The CNSC IEMP results confirm that the public and the environment around the NPD site are protected and that there are no expected health impacts.

CNL is open to working with WLFN to ensure WLFN involvement in reviewing the follow-up monitoring plans, and recognizes how such a review can support long-term monitoring programs. Further CNL is willing to involve WLFN and other Indigenous Nations, communities, and organizations in the monitoring program, which will help ensure transparency and lend confidence to monitoring activities and results. The aim of monitoring activities are to confirm the accuracy of the EIS predictions around potential effects and develop mitigation measures as needed. CNL invites WLFN for further engagement with CNL on this topic.

National Policy

In their comments on the draft EIS, received 2023 March, WLFN requested that the Auditor General's nuclear waste management audit and NRC's policy modernization process should conclude before the NPD facility is decommissioned. Findings from the audit and hearings may help prevent the proposed project from causing undue financial and environmental impacts to the Kichi-Sibì (Ottawa River) and traditional territory of WLFN.

CNL has responded that this interest goes beyond the scope of the project. It is AECL's responsibility to manage their historic nuclear obligations now and not leave it for future generations, therefore the decision was made to complete the environmental remediation of the NPD site in a timely manner. The proposal to create a disposal facility on the NPD reactor site through in-situ decommissioning has been chosen as a safe and immediate decommissioning option for the NPD reactor with respect to the environment, workers and the public. It is important to highlight that this closure will reduce historic nuclear liabilities for Canada and, at the same time, reduce the footprint of the NPD site.

CNL is interested in engagement with WLFN to gain a deeper understanding of their concerns related to proceeding with in-situ disposal as the decommissioning strategy for the NPD Facility.

Protection of the Ottawa River

In their comments on the draft EIS, received 2023 March, WLFN requested that the principle of no radioactive waste near the vicinity of water bodies, like the Kichi-Sibì (Ottawa River) and St. Lawrence River Basin be followed.

CNL has assessed the potential for contamination to reach the Kichi-Sibì (Ottawa River) in the EIS supported by long term modelling and detailed groundwater modelling. The EIS predicts no effects to surface water (including the Ottawa River). Follow up monitoring will be implemented to confirm the predictions presented in the EIS. To verify that the engineered barriers as a whole are performing as expected / designed, CNL will monitor groundwater. Groundwater wells will be located between the NPD facility and the Kichi-Sibì (Ottawa River) in order to monitor groundwater quality after it interacts with the facility and before it reaches the Kichi-Sibì (Ottawa River).

CNL is open and willing to have a dedicated discussion with WLFN on its conclusion of no adverse impacts on the Kichi-Sibì (Ottawa River) and the monitoring that is planned to confirm this prediction.

Technical

In their comments on the draft EIS, received 2023 March, WLFN expressed areas of concern and interest related to technical topics. First, they expressed concern with the recorded high concentration levels of several metals found in the sediment samples. The EIS identifies these levels as baseline conditions however WLFN remains concerned that this contamination is occurring from the NPD site. WLFN wishes to better understand where CNL believes this contamination occurred from, as the sediment contamination exceedances must have a point source. Secondly, WLFN requested that reports from the air monitoring stations within the regional study area be shared with WLFN to demonstrate compliance with regulatory requirements and that there is no evidence of cumulative impacts that affects the traditional territory of WLFN. Finally, WLFN expressed concern about the transport of contaminants through groundwater and ultimately to the Kichi-Sibì (Ottawa River). WLFN highlighted, that in relation to the vault, there will be groundwater intrusion that will eventually saturate the grout and come in contact with contamination, and the dissolved contaminants will reach the Kichi-Sibì (Ottawa River). When the vault is completely saturated with groundwater, the infrastructure will be compromised and will transport contaminated groundwater to the Kichi-Sibì (Ottawa River). WLFN has identified that long-term exposure to contaminants is unacceptable even in small doses that do not exceed the acceptance criteria.

CNL conducts a rigorous monitoring program and is committed to ensuring that the

environment around the NPD site, including the Kichi-Sibi (Ottawa River), is protected. The results demonstrate that the public and the environment around the NPD site continues to be protected. In addition to the CNL monitoring program, the CNSC leads an Independent Environmental Monitoring Program (IEMP) designed to verify that the public and the environment around licensed nuclear facilities are protected. As part of its IEMP, the CNSC samples and analyzes surface water upstream and downstream of the NPD site (including sampling for non-radiological parameters). The CNSC IEMP results confirm that the public and the environment around the NPD site are protected and that there are no expected health impacts. CNL can share annual summary of environmental performance available on CNL's website and would be pleased to share any other historic monitoring data as requested by WLFN. However, CNL notes that impacts from past operations are out of scope of this environmental assessment.

The potential for contamination to reach the Kichi-Sibi (Ottawa River) is assessed in the EIS, and is supported by long term modelling and detailed groundwater modelling. The EIS predicts no effects to surface water (including the Ottawa River) and follow up monitoring will be implemented to confirm these predictions. To verify that the engineered barriers as a whole are performing as expected / designed, CNL will monitor groundwater. Groundwater wells will be located between the NPD facility and the Kichi-Sibi (Ottawa River) to monitor groundwater quality after it interacts with the facility and before it reaches the Kichi-Sibi (Ottawa River).

CNL is willing to involve WLFN and other Indigenous Nations, communities, and organizations in the monitoring program, which will help ensure transparency and lend confidence to monitoring activities and results. The aim of monitoring activities are to confirm the accuracy of the EIS predictions around potential effects and develop mitigation measures as needed. CNL invites WLFN for further engagement with CNL on this topic.

Traditional Land and Resource Use and Cultural Impacts

In their comments on the draft EIS, received 2023 March, WLFN expressed several concerns and has made several requests related to traditional land and resource use and cultural impacts. WLFN has recommended that CNL support WLFN in establishing a process that will document traditional knowledge, land use, occupancy, and values within a site radius to be determined by WLFN. WLFN citizens historically and currently continue to use the lands and waters around the proposed NPD Closure Project and other CNL sites. WLFN and CNL to collaborate and take an inventory of the areas of significance, use and occupancy, using a proximity of 50km. This study must be in line with data collected. Data sharing with and among First Nations in the future may be significant if rights are impacted by the project. Further, WLFN recommended that CNL support WLFN in completing a diet and harvesting study that will look at the importance of traditional food harvesting and the way of life from WLFN's perspective.

WLFN identified that perceived contamination plays a key role in the way First Nations practice

harvesting activities that can influence the safety and acceptability of the proposed project. WLFN is not certain that their traditional territory is protected from legacy, present and future contamination, which is impacting the way WLFN citizens are exercising their inherent and protected rights. Language used within the EIS does not make the First Nation confident that their traditional territory, and flora and fauna that is relied upon, is not going to be impacted. WLFN cannot positively support the project when statements like “reasonably achievable measures” or “prevent or minimize harm to workers, the public and the environment” are being stated in the reports. These statements assume that impact or influence, that will or may occur, is acceptable provided it is in small doses. Further, the NPD Closure project is significant to WLFN. The proposed project is located on federally owned lands situated on the Kichi-Sibi (Ottawa River). Directly North and East across the River is Quebec that consists of gently rolling hills interspaced with many small lakes. WLFN citizens in both Ontario and Quebec use these lands and waters, which have the potential to be impacted by the proposed project. This is especially challenging for WLFN, given negotiations for their reserve land base have yet to be resolved. Despite no resolution in the negotiations, Canada continues to decide on projects that have the potential to contaminate the traditional territory of WLFN. Such conduct is not supportive of reconciliation efforts being promoted by both Federal and Provincial governments.

WLFN has recommended that CNL share the results and findings and ensure that citizen uncertainties are addressed through education and awareness that continues from generation to generation for an anticipated 550-year project life span. Further, WLFN recommended that CNL and WLFN work collaboratively to avoid and mitigate impacts to value components identified by WLFN.

CNL recognizes Indigenous peoples as stewards of the land and CNL is working towards developing long-term meaningful relationships with each Nation that occupies and has traditional territories and modern-day interests near its operations. CNL recognizes that reconciliation is a process to attempt to bring together multiple perspectives, opinions, and approaches. Reconciliation is about recognizing the need to work together in a collaborative way. CNL is open and willing to grow its knowledge and understanding through meaningful interactions, consistent with the Government of Canada’s approach to reconciliation with Indigenous peoples.

CNL acknowledges WLFN’s concern about the effects on the Kichi-Sibi and NPD site from various activities in the past, present and future. CNL has assessed potential effects related to the safety of harvesting and consuming local foods, and no significant adverse effects were identified in the assessment. Section 8.9 of the EIS presents information about traditional land and resource use and Section 9.9 of the EIS assesses risk to traditional land and resource use VCs. Further Indigenous health is assessed in Section 9.10 of the EIS. CNL suggests a dedicated conversation to review the Indigenous receptor evaluated as part of the environmental assessment for the project.

CNL acknowledges WLFN's concerns about perceived effects from the NPD site. CNL has assessed potential nuisance effects related to dust and noise, loss of connection to the land, safety of harvesting and consuming local foods, and changes to access to the land; no significant adverse effects were identified in the assessment. The potential for contamination to reach the Kichi-Sibì (Ottawa River) is assessed in the EIS and is supported by long term modelling and detailed groundwater modelling. The EIS predicts no effects to surface water (including the Ottawa River) and follow up monitoring will be implemented to confirm these predictions.

The EIS and supporting studies have assumed that traditional uses do occur adjacent to the NPD site, whether on the Kichi-Sibì (Ottawa River) or outside the restricted / fenced area. CNL has also assumed that in the future there is an interest to re-establish traditional use activities on the NPD site. CNL conclusion is that the project won't interfere with traditional activities nor impact biological resources upon which they are dependent.

CNL is committed to building positive long-term relationships with Indigenous Nations and communities who have treaty and Aboriginal rights on the lands for the proposed NPD disposal facility, as well as working with other interested all Indigenous Nations, communities, and organizations. It is important to CNL that we continue our efforts to build a relationship with WLFN through meaningful engagement to address any potential issues and concerns on the proposed project.

CNL agrees that traditional knowledge from WLFN and other Indigenous Nations and organizations should be integrated into the EIS. The Near Surface Disposal Facility (NSDF) and NPD Projects have provided capacity to the Algonquin community closest to the NPD site (the Algonquins of Pikwàkanagàn First Nation (AOPFN)). AOPFN also completed a traditional knowledge and land use study and a culture and rights study. CNL is open and willing to discuss this topic further with WLFN to fully understand WLFN-specific interests.

Valued Components

In their comments on the draft EIS, received 2023 March, WLFN highlighted that WLFN needs an opportunity to provide values identified by the community. Some values that are very similar have been identified by other First Nations. A priority concern is any potential changes in local fishery species; as they are an important and significant indicator of understanding the potential effects and cumulative effects on inherent and protected rights from the proposed NPD Closure Project. WLFN has also highlighted that First Nations have traditional harvesting, and intercommunity harvesting protocols that need to be considered. Many of the species at risk listed within the valued components have a connection to WLFN where knowledge and stories that reflect the natural operations of various ecosystems, are held.

The EIS outlines how Indigenous engagement and input data has influenced the VCs used in the assessment. The revised draft EIS addressed potential effects to VCs in the aquatic

environment. The assessment covered the aquatic VCs of interest to Indigenous Nations, communities, and organizations, including the fish species identified during Indigenous engagement activities. The assessment concluded that there are no adverse residual effects on the aquatic environment expected from the project.

CNL is open and willing to discuss capacity support and funding with WLFN to seek input on VCs and incorporate WLFN's VCs into the NPD Closure Project.

4.4.16.4 Verification

Wolf Lake FN provided key input, identifying several interests and concerns related to the NPD Closure Project through their comments on the 2021 draft EIS. To confirm CNL has adequately captured WLFN's interests and concerns, position and knowledge, WLFN and CNL underwent a verification process where CNL provided the EIS comment responses and a draft table of interests and concerns to WLFN for their review and feedback. CNL has attempted to verify that WLFN's position, interests and concerns were adequately characterized. CNL continues to work with WLFN to address their concerns through ongoing discussions.

The summary *Table of Interests and Concerns* and the WLFN's input on verifying its completeness and accuracy is important. CNL shared an initial draft of this table 2023 June 07, seeking validation that the concerns and interests of WLFN were accurately recorded. WLFN has yet to confirm receipt of the table. CNL is seeking a meeting to discuss the WLFN feedback. An initial meeting was planned for 2023 May, however, CNL and WLFN did not meeting at that time. CNL is interested in continuing to engage with WLFN to address their concerns through ongoing discussions.

4.4.17 Anishinabek Nation Engagement

4.4.17.1 Engagement

Table X-1 of Appendix X includes a summary of key engagement activities that have occurred with the Anishinabek Nation on the NPD Closure Project. CNL has also provided a narrative summary of engagement with Anishinabek Nation.

Information-sharing

In 2016 July, CNL sent the Anishinabek Nation a letter to introduce the proposed NPD Closure Project, which included a request for input on any potential adverse impacts that project activities might have to the Anishinabek Nation's member communities followed by a second letter in 2016 November which inquired about asserted rights and traditional activities of the Anishinabek Nation's member communities. CNL did speak with the Grand Chief in 2016 to confirm how to correctly contact the Anishinabek Nation.

In late 2017, CNL shared the draft EIS and the Indigenous Engagement Report with Anishinabek Nation. CNL encouraged participation in the public comment period for the draft EIS and

requested community input and feedback for incorporation into the project. Anishinabek Nation did not submit comments on the draft EIS to the CNSC and CNL did not receive any feedback from Anishinabek Nation on this report.

Throughout 2018, 2019, 2020, 2021, 2022 and 2023 Anishinabek Nation received invitations to all engagement activities and have not attended any events to date.

In 2020 May, CNL shared the 2020 March revised draft EIS, which had been submitted to the CNSC, as well as the updated IER and inquired on Anishinabek Nation specific information.

In 2022 July, Anishinabek Nation, Deputy Grand Council (DGC) Chief attended CNL's Environmental Stewardship Council meeting held at the Chalk River Laboratories. This included an NPD Project update. Anishinabek Nation expressed interest in attending more ESC meetings as of 2023 February. CNL has facilitated the application process.

Throughout 2022 and early 2023, CNL contacted the Anishinabek Nation to invite them to participate in a site tour of the Chalk River Laboratories and area. No definitive responses were received.

Commitments

In 2021 April, CNL provided a project status update and a preliminary table of commitments to the Anishinabek Nation. In this letter, CNL requested any feedback on commitments by 2021 June 01.

In 2021 June, CNL followed up on the April letter with the Anishinabek Nation and has had no response from the Nation. To date, the Anishinabek Nation has not made CNL aware of specific concerns or interests related to this Project. CNL will continue to share Project information with the Anishinabek Nation. Should the Anishinabek Nation bring forward concerns or interests through this ongoing engagement or regulatory proceeding, CNL will seek to understand those concerns in the context of the EIS and the project and commits to continue to work together with the Anishinabek Nation to receive their feedback on the project.

4.4.17.2 Feedback

The Anishinabek Nation has not submitted any written comments on the NPD Closure Project Description or EIS and has not engaged with CNL on the NPD Closure Project. CNL is aware that the Anishinabek Nation issued a joint declaration in 2017 in opposition to a radioactive waste managed near waterways, and particularly mentions Rolphton, which is in reference to the NPD site.

5. Valued Components

VCs, sometimes referred to in EAs as valued ecosystem components (VECs), are environmental features that may be affected by a project and that have been identified to be of importance by the proponent, government agencies, Indigenous peoples, or the public. The value of a component not only relates to its role in the ecosystem, but also to the value people place on it. For example, it may have been identified as having scientific, social, cultural, economic, historical, archaeological, or aesthetic importance [4].

VCs are often thought of in terms of the aquatic and terrestrial environments where ecological features, individual species, or important groups of species may be identified. In some cases, an environmental component will not have a VC; rather it will be a pathway, or a means for transfer of an effect to a VC in another environmental component. For example, in the atmospheric environment, air quality and noise act as pathways for the transfer of effects to VCs in other environmental components, such as biota in the terrestrial environment.

Discussion of VCs in Section 5.4 focuses on VCs that reflect Indigenous interests, such as those related to Indigenous traditional land and resource use (Section 7.1.1). Indigenous peoples have also expressed a great deal of interest in other VCs, particularly those related to the natural environment.

5.1 Methods

5.2 Indigenous Engagement

The NPD Closure Project occurs within the general area of the AOO Land Claim (See Figure 3-3 in Section 3.2), where negotiations with the Crown have occurred since 1991. It also overlaps the Mattawa / Lake Nipissing Traditional Harvesting Territory for the MNO. Discussions with WTFN communities and AANTC member communities have also indicated that traditional harvest occurs in the general area surrounding the NPD site.

All Indigenous Nations, communities, and organizations practice or have practiced some traditional activities within the Local Study Area and Regional Study Area (Section 6.1.1) of the NPD Closure Project. Through CNL's engagement process, Indigenous Nations, communities, and organizations have conducted traditional knowledge studies to support the NPD Closure Project EIS and have identified VCs of particular interest to them. Through this engagement process, Indigenous interests have been incorporated into the selection of final VCs for the NPD Closure Project.

5.3 Selection of Valued Components (VCs) by Canadian Nuclear Laboratories

Selection of VCs for this project was accomplished via the following steps (full details in Section 5.2.4 of the EIS):

1. Create master list of candidate VC species, by reviewing relevant reference documents and applying EA process and site knowledge. From this, a consolidated master list of candidate VCs was produced. This list is presented in Appendix B of the EIS. These candidate VCs include biota such as fish or birds, as well as abiotic qualities such as cultural and heritage sites, or socio-economic entities such as fishing.
2. Using the environmental components identified in the project interactions matrix (Table 5.2-1 of the EIS), VCs were selected for and assigned to each environmental component. Some environmental components were identified as pathways, meaning effects in that environmental component would affect VCs in other environmental components. For other environmental components, a VC (from the master list of candidate VCs in Appendix B) was selected and assigned. The list of VCs is presented in Table 5.2-3 of the EIS.
3. Provide opportunity for VC engagement. Once a draft VC list was developed, input was solicited from Indigenous, agency, and public stakeholders.
4. Update Draft VC List to address relevant comments. Provide rationale for any changes and excluded suggestions.
5. Produce Final VC List.

Appendix B of the EIS provides a Master List of Candidate Valued Components considered for the NPD Closure Project, providing a rationale for including or not including the species as a VC. Appendix B also indicates where certain species of interest are represented by a VC. For example, fish VCs are walleye and emerald shiner (representing pelagic fish), and Lake Sturgeon and white sucker (representing benthic fish). Any other fish species of interest are 'mapped' to the appropriate representative fish species according to their characteristic (pelagic vs benthic). Effects of the project on fish are assessed through these main categories – pelagic fish and benthic fish- and not by specific species.

5.4 Valued Components Identified by Indigenous Nations, Communities and Organizations

The VCs selected for the NPD Closure Project (Table 5.2-3 of the EIS) reflect a wide range of Indigenous interests. Many of the interests and concerns raised by Indigenous Nations, communities, and organizations, and documented in Section 4.4 above, correspond directly or indirectly to the VCs selected for the project. Table 5-1 summarizes the key interests and concerns related to VCs that were expressed during engagement activities with Indigenous Nations, communities, and organizations.

As noted in Section 5.2.4 of the EIS, one of the considerations in the initial selection of VCs was traditional and current importance of a species to Indigenous peoples, based on available information. Based on Indigenous group feedback received during engagement activities, CNL

has added several human and non-human VCs that were identified as being of importance to Indigenous Nations, communities, and organizations. Berries, mushrooms, mink, river otter, weasel, red fox, moose and monarch butterflies were added as VCs, as well as soil quality, groundwater quality, groundwater flow and several Indigenous socio-economic and Indigenous health VCs. Table 5-1 identifies where VC related feedback has resulted in the addition of a new VC. Where the table indicates that no new VCs have been added, this affirms that direct, representative or related VCs that encompass the value or interest of the Indigenous community were already included in the assessment. A complete listing of VCs assessed by the project can be found in Table 5.2-3 of the EIS.

In many cases, concerns on a particular VC or topic were expressed by more than one commenter or group; therefore, in the table below, comments may have been consolidated, summarized or included as excerpts from larger submissions. The table indicates how the EIS and supporting TSDs assess or otherwise consider the potential effects from interactions of these VCs with the various project activities.

Table 5-1: Indigenous Communities’ Key Interests and Concerns related to Valued Components

a) Algonquins of Ontario

VC-related comment	How is this VC included in the assessment	Main Conclusion
Loss of connection to and use of lands and water.	Direct and/or Related Project VC: The EIS discusses concerns about loss of connection to land and water, and loss of land and water use, as part of the assessment of effects on traditional land and resource use (Sections 9.9.3 and 9.9.5). New VCs added to the assessment: None. Discussion: With respect to loss of land and water use, the lands and waters within the NPD site are not currently used by Indigenous communities. As discussed in Section 9.9.3 of the EIS, land use may change during and/or after the Institutional Controls phase. Renaturalization of the site may lead to an increase in wildlife and may benefit trapping, hunting, and gathering activities. In the long-term, these changes are expected to result in increased connection to and use of lands and water. A small licensed area will remain and access will be restricted, which will limit the total additional area of use, thus no measurable effects on land use are expected.	No adverse residual effects on traditional land and resource use are expected (Section 9.9.3.5). CNL has programs in place to enhance engagement and address any potential feelings of loss of connection to and use of lands and water (Section 9.9.5).
Protection of the Kichi-Sibi (Ottawa River): - Kichi-Sibi (Ottawa River) water quality, and potential for contamination to waterways, plants and animals - Wash out pit - Historic water discharges	Direct and/or Related Project VC: Potential impacts on water quality in the Kichi-Sibi (Ottawa River) are assessed in the EIS by considering the effects of the project on: • surface water environmental component (Section 9.3.3), • plant and animal VCs (Sections 9.4.3 and 9.6.3), • traditional land and resource use VCs (Section 9.9.3),	The EIS concludes that effects on site drainage are temporary and localized, and not expected to affect overall site drainage. No adverse residual effects on surface water quality are expected (Section 9.3.3.5). The EIS concludes that based on the assessment conducted, no adverse residual effects are expected from the project on Kichi-Sibi (Ottawa River) water quality (Section 9.2.3.5), plants and animals in the aquatic environment (Section 9.4.3.5), the health and socio-economic conditions of members of the public (Sections 9.8.3.5 and

VC-related comment	How is this VC included in the assessment	Main Conclusion
	human health and socio-economic VCs (members of the public and Indigenous communities that may use Kichi-Sibì (Ottawa River) water) (Sections 9.8.3, 9.10.1.3, 9.10.2.3, and 9.11.3). Historic water discharges to the Kichi-Sibì (Ottawa River) are discussed in the EIS as part of the determination of baseline levels (Section 8.3.3). New VCs added to the assessment: VCs related to the aquatic and terrestrial environments, Indigenous socio-economic and health conditions (Section 9.4.1, 9.6.1, 9.10.1, 9.10.2) Discussion: The EIS considers the effects of project activities on surface water quality and drainage (Section 9.3.3). It also assesses potential effects on changes to the surface water environment on plant and animal VCs, socio-economic and traditional land use VCs, as well as human health VCs (members of the public and Indigenous communities) that may use Kichi-Sibì (Ottawa River) water (Sections 9.4.3, 9.6.3, 9.8.3, 9.9.3, 9.10.2.3, 9.11.3). As part of the discussion, CNL has identified mitigation measures related to proper design and management of washout pits. Clarification has been added to the EIS, confirming that the washout pit would be lined with a watertight material to prevent infiltration of water into the ground (Section 4.3.1.3). The EIS baseline data includes monitoring data from the Kichi-Sibì (Ottawa River) near the NPD site (Sections 8.3.3, and 8.3.4.2). The Kichi-Sibì (Ottawa River) data are collected by CNL as well as independently by the CNSC as part of its IEMP. It is noted that in 2018, in response to public and Indigenous concerns, CNL ceased the practice of discharging liquid effluent from the facility sumps to the Kichi-Sibì (Ottawa River), and arranged for water to be sent to the Waste Treatment Centre at the CRL site (Section 8.3.3). CNL is also planning an additional baseline monitoring program of non-radiological and radiological parameters of interest in the Kichi-Sibì (Ottawa River), to document pre-project conditions and enable comparison on follow-up monitoring results to baseline conditions	9.11.3.5), and the health (Section 9.10.2.3.5) and socio-economic conditions (Section 9.10.1.4) of Indigenous peoples. The available baseline monitoring results indicate that the maximum concentrations (of radionuclides and non-radionuclides) in the Kichi-Sibì (Ottawa River) are well within the federal and provincial environment-based guidelines which ensure protection of aquatic life and drinking water. These results confirm that historical practices of water discharge to the Kichi-Sibì (Ottawa River) have been safe, and that Kichi-Sibì (Ottawa River) water quality has not been adversely affected by CNL’s historical practices (Section 8.3.3).

VC-related comment	How is this VC included in the assessment	Main Conclusion
	(Sections 9.3.5.2 and 12.3.2).	
Concerns about the safety of harvesting and consuming harvested foods.	Direct and/or Related Project VC: Safety of harvesting and consuming harvested foods is assessed using the Human Health Public VCs (Section 9.8.3) and Indigenous peoples Health VCs (Section 9.10.2.3). New VCs added to the assessment: VCs related to Indigenous health (Section 9.10.2) Discussion: The assessment of risk to human receptors includes consideration of exposures received during harvesting activities and consumption of locally harvested food. Wherever possible, conservative assumptions about future lifestyles and habits have been adopted in the assessment, to help ensure that potential exposures have not been underestimated (Section 9.8.3.3). As outlined in the PostSA TSD, locally harvested foods include crops and animal feed grown in local garden soil and irrigated with river water; fish, shellfish, aquatic plants and wildfowl living in the river; livestock grazing on lands adjacent to the river; wild foods obtained from the region of the facility. In addition, the analysis includes assumed occupancy factors for each exposure group. These occupancy factors estimate the fractions of time spent in various outdoor areas, including harvesting, and fishing locations. The EIS (Section 9.9.5) describes how some participants in the AOO AKLUS indicated concerns about contamination and the risk associated with harvesting and consuming foods from the area. CNL acknowledges this may result in: individuals not using an area or harvesting less food, or a feeling of discomfort or concern associated with contamination and risk. CNL will continue to work with Indigenous Nations, communities and organizations to address any of these negative perceptions. This may include working with each of the communities to ensure that proposed management actions and mitigations are well understood and effective. There are varying levels of confidence in the effectiveness of the proposed mitigation measures and CNL is committed to working with each community uniquely to address outstanding concerns (Section 9.9.5).	The EIS concludes that even considering the conservative assumptions made, no adverse residual effects on human health (members of the public and Indigenous communities) are anticipated from the project (Section 9.8.3.5, 9.10.2.3.5). CNL has programs in place to enhance engagement and address any potential negative perceptions of land use experiences (Section 9.9.5).
Presence of Algonquin cultural sites	Direct and/or Related Project VC:	No known cultural sites have been identified on the NPD property.

VC-related comment	How is this VC included in the assessment	Main Conclusion
(e.g., burial sites, historically significant sites, spiritual sites) and changes, past and present, to accessing these sites.	Impacts and access to cultural sites are discussed in the EIS by considering the presence of these sites on the NPD property (Section 8.9.2), and by assessing the effects of the project on the Cultural Resources and Ceremonies VC under traditional land and resource use (Section 9.9.3). New VCs added to the assessment: None. Discussion: The EIS discusses cultural sites around the NPD site. No known cultural features have been identified at the NPD site, but the Kichi-Sibì (Ottawa River) itself is recognized as an important cultural/heritage value for multiple reasons (Section 8.9.2). The Archaeology TSD assessed the NPD site beyond the proposed footprint of the project and determined that there is archaeological potential within the rest of the NPD site, both for historical homesteads and pre-(European) contact period. Although it was determined that there is high potential for cultural material to be present outside of the proposed project footprint, the Archaeology TSD did not recommend further archaeological assessment because these areas will not be impacted by the project. It is also noted that there are some registered archaeological sites outside of the NPD site (Archaeology TSD Section 3.2.2). The EIS assesses potential effects of the project on nearby traditional land use activities (Section 9.9.3). CNL has developed mitigation measures to minimize potential nuisance effects on nearby traditional land uses (Section 9.9.3.3).	Therefore, there is no potential for a blocking of access to cultural sites (Section 8.9.2). Based on the assessment conducted, the EIS expects no adverse residual effects on traditional land and resource use from the project (Section 9.9.3.5). CNL has programs in place to enhance engagement and address any potential negative perceptions of land use experiences (Section 9.9.5).
Impacts to Kichi-Sibì (Ottawa River) shoreline	Direct and/or Related Project VC: Impacts to the Kichi-Sibì (Ottawa River) shoreline are assessed in the EIS by considering the effects of the project on the aquatic habitat-related VCs (Section 9.4.3) and the Landscape and Visual Setting VC (Section 9.11.3). New VCs added to the assessment: None	The EIS concludes that no adverse residual physical or visual effects on the Kichi-Sibì (Ottawa River) shoreline are expected from project activities (Sections 9.4.3.2, 9.11.3.5).

VC-related comment	How is this VC included in the assessment	Main Conclusion
	Discussion: No physical disturbances to the Kichi-Sibi (Ottawa River) shoreline are expected from the project, because the project does not involve any in-water or near-water work (9.4.3). The EIS also considers changes to the visual character of the shoreline, as viewed from the Kichi-Sibi (Ottawa River), during project activities. In order to mitigate potential effects to landscape and visual setting, CNL will maintain the existing natural buffer (made up of the treed slope) for the duration of the Decommissioning Execution phase (Section 9.11.3.3).	
Bioaccumulation of contaminants in fish species	Direct and/or Related Project VC: Bioaccumulation of contaminants in fish species is assessed using the fish and fish-eating animal VCs selected in the EIS (Section 9.4.3, 9.6.3). New VCs added to the assessment: None Discussion: Bioaccumulation of contaminants in fish species was taken into account in the assessment of potential exposure risk to fish and fish-eating animal VCs (Section 9.4.3, 9.6.3). The EcoRA TSD used conservative assumptions wherever possible when estimating concentrations of contaminants in fish tissue, and when modelling transport of contaminants through the food chain. The EA Follow-Up Program (Section 12) includes monitoring of contaminants in fish tissue if any surface water exceedances are identified, during the Decommissioning Execution and Institutional Control phases (Section 12.3.2).	The EcoRA TSD determined that no adverse residual effects on non-human biota, including fish and fish-eating VCs, are anticipated from exposure to radiological or chemical contaminants, during any phase of the project (Sections 9.4.3.5, 9.6.3.5).
Impacts to Species at Risk, in particular the protection of chimney swifts	Direct and/or Related Project VC: Impacts to Species at Risk are assessed using the SAR VCs selected in the EIS, which include monarch butterfly, chimney swift, various bat species, eastern wolf, Blanding’s turtle and eastern milksnake (Section 9.6.3). Effects on chimney swifts are assessed using the chimney swift VC in the EIS, and in the Chimney Swift Studies TSD.	The EIS concludes that the project will result in no adverse residual effects on SAR species. This result applies to potential habitat-related effects as well as effects from exposure to chemical and radiological contaminants (Sections 9.4.3.5, 9.6.3.5). CNL’s follow-up program involves monitoring activities designed specifically to confirm the above conclusions and assess the effectiveness of the mitigation measures for protection of SAR

VC-related comment	How is this VC included in the assessment	Main Conclusion
	New VCs added to the assessment: Monarch butterfly Discussion: The EIS assesses several SAR that have been observed or are potentially present on site, including: monarch butterfly; little brown myotis; chimney swift; eastern wolf; Blanding’s turtle; and eastern milksnake (Section 5.2.4, 9.6.3). In the assessments of potential exposure effects to SAR species (in the EcoRA TSD), additional protective measures were applied, such as adding an extra safety factor to the radiological benchmarks for SAR species, and selecting chemical benchmarks protective at the individual level (EcoRA TSD Section 4). CNL has developed a number of mitigation measures to ensure the protection of biota, including SARs. Some of the planned measures are specific to the protection of SARs: chimney swifts, monarch butterflies, bats, migratory birds, amphibians and reptiles (Section 9.6.3.2). To address concerns related to the chimney swift: The EIS assesses potential exposure- and habitat-related effects to the chimney swift (Section 9.6.3.3). CNL has undertaken numerous studies specifically to address potential impacts to chimney swifts from decommissioning activities (Chimney Swift Studies TSD). As discussed above, CNL has developed a number of mitigation measures specifically for minimizing effects on chimney swifts; these include restrictions on: the timing of work activities (i.e., daylight only); placement of the grout batch mixing plant and noisy equipment as far as possible from the stack for work activities; minimizing noise, vibration and lighting levels (Section 9.6.3.2).	species. As outlined in Section 12.3.2, these include visual inspections, counts and site sweeps during specific periods. Additional mitigation measures and monitoring programs have been developed specifically for protection of the chimney swift (Sections 9.6.3.2, 9.6.5, 12.3.2).
Protection of Migratory bird habitat	Direct and/or Related Project VC: Effects on migratory bird habitat are assessed in the EIS by considering the effects of the project on the known chimney swift roost at the NPD site (Section 9.6.3). New VCs added to the assessment: None	The EIS concludes that no adverse residual effects on migratory bird habitat are expected (Section 9.6.3.5).

VC-related comment	How is this VC included in the assessment	Main Conclusion
	Discussion: CNL acknowledges that habitat protection has been expressed as an area of interest for Indigenous communities, and it has developed an Environmental Protection Procedure on Management of Land and Habitat (Hawkins 2024). Although the NPD Closure project does not involve destruction or removal of migratory bird habitat, the EIS does include specific mitigation measures for the protection of migratory birds and their habitat, including avoiding tree clearing (if required) during the breeding bird season, and ground nest surveys (Section 9.6.3.2). The EIS also specifically discusses migratory bird habitat of the chimney swift and bald eagle. Previously, a bald eagle’s nest had been identified on the NPD site. The nest was located approximately 875 m away from the facility, where work will be occurring. The nest is no longer present, the tree was blown down in a storm in 2021. CNL has developed mitigation measures specifically for the protection of migratory birds, such as conducting nest surveys; scheduling activities around nesting season; and establishing buffer zones and setbacks as needed (Section 9.6.3.2). Section 9.6.3.2 also outlines measures to be taken if a nest is found during project execution. Additional mitigation measures and monitoring programs have been developed specifically for protection of the chimney swift and its habitat (Sections 9.6.3, 12.3.2). The EIS notes that migratory bird habitat will continue to be available during the Institutional Controls phase and beyond.	
Socio-economic conditions of Indigenous communities that are interacting with the NPD site should be considered.	Direct and/or Related Project VC: Socio-economic and health conditions of Indigenous communities are assessed using the Indigenous Socio-economic and Indigenous Health VCs (Section 9.10.1 and 9.10.2). New VCs added to the assessment: Vcs related to Indigenous health and socio-economic conditions (Section 9.10.1 and 9.10.2) Discussion: Based on feedback from Indigenous communities, CNL has added sections on Indigenous	The EIS concludes that based on the assessment conducted, no adverse residual effects on the Indigenous Socio-economic environment or on Indigenous Health (Indigenous People or Indigenous Workers) are expected (Sections 9.10.1.4 and 9.10.2.3.5).

VC-related comment	How is this VC included in the assessment	Main Conclusion
	Socio-economic and Health conditions to the EIS (Sections 8.10.1, 8.10.2, 9.10.1 and 9.10.2). Several VCs have been selected with respect to this new environmental component, including Indigenous People and Indigenous Worker receptors. The EIS presents information on baseline socio-economic and health conditions in nearby Indigenous communities. Information that was provided to CNL by Indigenous communities has been incorporated into Section 8.10. Indicators considered include income, employment, labour force, education, housing, diet and water use in Section 8.10, along with a comparison to regional and provincial statistics where available. Indigenous socio-economic interactions are described and assessed in Section 9.10.1.3. Indigenous health interactions are described and assessed in Section 9.10.2.3 as well as in the DecomSA and PostSA TSDs. Potential economic and employment benefits to Indigenous peoples are discussed in Section 9.10.1.3 of the EIS. Mitigation measures for the protection of Indigenous socio-economic conditions and health are presented in Sections 9.10.1.3.2 and 9.10.2.3.2 respectively. No specific environmental monitoring has been identified for the Indigenous socio-economic environment. Monitoring in other environmental components will confirm the EIS predictions (i.e., that no effects are expected in the Indigenous socio-economic environment). Ongoing Indigenous, public and stakeholder engagement activities will take place throughout the Decommissioning Execution and Institutional Controls phases to identify any changing concerns or perceptions related to the project. Monitoring and follow-up activities related to the health of Indigenous peoples and Indigenous workers are discussed in Section 9.10.2.5.	
Indigenous Health: Concerns due to introduction of tritium into the Kichi-Sibi (Ottawa River)	Direct and/or Related Project VC: Potential effects on Indigenous peoples health including impacts from tritium in the Kichi-Sibi (Ottawa River) are assessed in the EIS using the Indigenous peoples Health VC (Section 9.10.2).	The EIS concludes that based on the assessment conducted, no adverse residual effects on Indigenous health (Indigenous People or Indigenous Workers) are expected (Sections 9.10.1.4 and 9.10.2.3.5). Follow-up monitoring of radionuclide levels in the Kichi-Sibi (Ottawa

VC-related comment	How is this VC included in the assessment	Main Conclusion
Postclosure safety and inclusion of an Indigenous receptor group	New VCs added to the assessment: VCs related to Indigenous health: Indigenous People and Indigenous Workers (Section 9.10.2) Discussion: CNL has incorporated information on Indigenous health indicators that was provided by Indigenous communities, into the description of baseline Indigenous health (Section 8.10.2). Based on feedback from Indigenous communities, CNL has added sections on Indigenous Socio-economic and Health Conditions to the EIS (Sections 8.10.1, 8.10.2, 9.10.1 and 9.10.2). Several VCs have been selected with respect to this new environmental component, including Indigenous People and Indigenous Worker VCs. The assessment of risk to human receptors includes consideration of exposures received from domestic and agricultural use of the Kichi-Sìbì (Ottawa River), including irrigation, drinking, swimming and fishing activities. Wherever possible, conservative assumptions about future lifestyles and habits of the Indigenous Health VCs have been adopted in the assessment, to help ensure that potential exposures have not been underestimated (Section 9.10.2.3). CNL’s planned mitigation measures for the protection of surface water are presented in Section 9.3.3.2.	River) is planned (see Section 9.3.5.2), to verify the predictions of the EIS and evaluate the effectiveness of the mitigation measures already implemented.
Impact on site’s terrestrial and wetland areas from project operations (e.g., grout batch mixing plant and staging areas).	Direct and/or Related Project VC: The EIS addresses the potential impacts of these activities to terrestrial and wetland areas, by discussing habitat- and exposure-related effects of the project to VCs in the terrestrial environment as well as the surface water environmental components, including wetlands (Sections 9.2.3, 9.3.3, 9.6.3). The VCs assessed include terrestrial and semi-aquatic VCs. New VCs added to the assessment: VCs related to terrestrial and semi-aquatic environment including monarch butterfly, moose, mink and otter Discussion: Section 4.3.1.2 of the EIS shows a map indicating the preferred grout batch mixing plant	Based on the mitigation measures described in the EIS, no adverse residual habitat-related effects on terrestrial and wetland areas are expected (Section 9.6.3.5). In addition no adverse residual exposure-related effects are expected on VCs in terrestrial or wetland areas (Section 9.6.3.5). The planned follow-up monitoring of air quality, surface water quality and groundwater quality will ensure that terrestrial and wetland areas are protected (Section 12.3.2).

VC-related comment	How is this VC included in the assessment	Main Conclusion
	location. The EIS assesses the potential physical effects and exposure-related effects of the project on terrestrial and wetland areas as follows: With respect to the terrestrial environment, an area of approximately 1.2 hectares, currently containing milkweed, will have to be cleared for this project. The milkweed is present on an area where asphalt remains from previous operations of the site. Milkweed is present elsewhere at NPD in smaller areas as well as along the Highway 17. The EIS notes that several varieties of wildflowers, which are an important nectar source for monarch butterflies during the fall migration, are also available on the NPD site (Sections 8.6.4.4, 9.6.3.3). Potential contaminant-related impacts to the terrestrial environment are evaluated in the EIS by assessing exposure-related effects on terrestrial VCs (Section 9.6.3). With respect to wetlands, the EIS notes that no project activities are expected to occur near the wetlands (Section 9.4.3.1). Potential contaminant-related impacts to wetland ecosystems are evaluated in the EIS by assessing exposure-related effects on VCs such as amphibians (e.g., green frog) and waterfowl (e.g., mallard, great blue heron). Mitigation measures for protection of the site’s terrestrial areas, and milkweed plants in particular, are presented in Section 9.6.3.2.	
Protection of habitat for wildlife (e.g., moose, white-tailed deer, bear, fox, wolf, five-lined skink and wild turkey).	Direct and/or Related Project VC: Protection of wildlife habitat is discussed in the EIS as part of the assessment of physical disturbance and noise effects (Section 9.6.3). New VCs added to the assessment: None Discussion: CNL acknowledges that habitat protection has been expressed as an area of interest for the communities, and it has developed an Environmental Protection Procedure on Management of Land and Habitat (Hawkins 2024). The EIS notes that project activities are expected to remain within the Site Study Area, which consists primarily of areas previously disturbed by human activity and contains various cultural vegetation communities. This area provides very little suitable habitat to support	The EIS concludes that there is limited potential for loss of habitat for animals potentially found in the Site Study Area during the Decommissioning Execution phase of the project. The loss of habitat associated with the NPD Closure Project is temporary and minor, displacing wildlife to cultural communities unaffected by project activities, or the surrounding forests. The project is not expected to introduce any physical barriers to wildlife (Section 9.6.3.3). Noise disturbances to wildlife, if any (as they are likely accustomed to noise from Highway 17), will be localized and temporary in nature (Section 9.6.3.3). Mitigation measures have been developed to minimize direct loss of wildlife from vehicle operation on-site as well as wildlife entering the site (Section 9.6.3.2). During the Institutional Controls and Post-Institutional Controls

VC-related comment	How is this VC included in the assessment	Main Conclusion
	resident terrestrial species (Section 8.6.1). The EIS assesses effects from physical disturbance, wildlife habitat fragmentation, noise, and roadkill (Sections 9.6.3.1, 9.6.3.3). The EIS proposes mitigation measures for the protection of terrestrial vegetation and wildlife habitat in the Site Study Area (Section 9.6.3.2).	phases, no adverse habitat-related effects are expected in the Site, Local or Regional Study Areas. Renaturalization of the Site Study Area over time may increase habitat for wildlife and would be beneficial for both vegetation and wildlife communities (Section 9.6.3.3). No adverse residual effects on wildlife habitat are expected (Section 9.6.3.5).
Protection of habitat for plants (e.g., oak, pine, birch, many other medicines).	Direct and/or Related Project VC: Protection of plant habitat is discussed in the EIS as part of the assessment of physical disturbance and noise effects on terrestrial vegetation (Sections 9.6.3). New VCs added to the assessment: None Discussion: It is noted that NPD Closure project activities are expected to remain within previously disturbed areas, and no tree clearing is planned (Section 9.6.3.2). The EIS proposes mitigation measures for the protection of terrestrial vegetation habitat in the Site Study Area (Section 9.6.3.2). The EIS considers construction-related effects on vegetation communities (Sections 9.6.3, 9.6.4).	No adverse habitat-related effects on terrestrial vegetation are expected in the Site, Local or Regional Study Areas (Sections 9.6.3.5). Construction-related effects on vegetation communities, such as dust, are expected to be localized and temporary (Sections 9.6.3). Mitigation measures and replanting plans have been developed to address milkweed plant removal. Renaturalization of the Site Study Area over time may increase habitat for wildlife and would be beneficial for both vegetation and wildlife communities (Section 9.6.3.3). Overall, no adverse residual effects on plant habitat are expected (Section 9.6.3.5).

VC-related comment	How is this VC included in the assessment	Main Conclusion
Commercial trapping Wildlife and harvesting and fishing areas Plant and natural materials gathering areas	Direct and/or Related Project VC: Potential effects on trapping (traditional and commercial), harvesting, gathering and trapping areas are assessed using the Trapping, Hunting, Fishing and Gathering VCs under the environmental component of traditional land and resource use (Section 9.9.3). New VCs added to the assessment: None Discussion: CNL acknowledges that fishing, harvesting, traditional and commercial trapping, and gathering of plants and natural materials are valued traditional and modern-day land use activities (Section 8.9.2). It is noted that these activities do not currently occur on the NPD site, and particularly not in the Site Study Area, where proposed project activities will be conducted. CNL has developed mitigation measures to minimize potential nuisance effects on traditional land uses occurring nearby (Section 9.9.3.2). The EIS assesses potential effects of the project on nearby traditional land use activities (Section 9.9.3). NPD Closure project activities are expected to remain within previously disturbed areas. Other than the removal of milkweed (a temporary effect discussed earlier), no removal or destruction of wildlife areas is expected. From a habitat perspective, the EIS assesses whether the project will affect vegetation communities in the Site, Local and Regional Study Areas (Section 9.6.3.3).	The EIS concludes that no adverse residual effects on traditional land and resource use are expected (Section 9.9.3.5). As discussed in Section 9.9.3 of the EIS, land use may change during and / or after the Institutional Controls phase. Renaturalization of the site may lead to an increase of wildlife and may benefit trapping, hunting, and gathering activities. In the long-term, these changes are expected to result in increased connection to and use of lands and water. Access to the licensed area will be restricted, which will limit the total additional area of use, thus no measurable effects on land use are expected.
Spawning habitat	Direct and/or Related Project VC: Protection of spawning habitat is discussed in the EIS (Sections 9.4.3, 12.3). New VCs added to the assessment: None Discussion: CNL acknowledges the presence of spawning habitat in the Kichi-Sibì (Ottawa River) (Section 8.9.1.3). No physical disturbances to spawning habitat are expected from the NPD Closure project, because the project does not involve any in-water or near-water work such as	The EIS concludes that none of the activities of the project are expected to affect fish habitat; there will be no infilling, construction or blasting in the river, and no activities near the wetlands (Section 9.4.3.1). The EIS also concluded that based on the assessment conducted, no adverse residual effects are expected on fish or other VCs in the aquatic environment from exposure to radiological or chemical contaminants (Section 9.4.3.5).

VC-related comment	How is this VC included in the assessment	Main Conclusion
	infilling, construction or blasting (Sections 9.4.3). With respect to chemical or radiological effects on habitat, CNL has developed mitigation measures (Section 9.4.3.2) and monitoring plans for the protection of the Kichi-Sibì (Ottawa River) from chemical and radiological releases. For example, the Draft Follow-up Effluent Monitoring Plan includes monitoring of water collection points and the washout pit (Section 12.3.1); the Draft Follow-up Environmental Monitoring Plan includes monitoring of on-site and Kichi-Sibì (Ottawa River) surface water quality (Section 12.3.2); and the Draft Follow-up Groundwater Monitoring Plan includes groundwater quality monitoring (Section 12.3.3). The EcoRA TSD considers effects to fish from chemical and radiological releases to the Kichi-Sibì (Ottawa River) (EcoRA TSD Section 2.2).	
Specific species identified as important by AOO during engagement activities: moose, white-tailed deer, lake trout, northern pike, walleye, sauger, smallmouth bass, muskellunge, beaver, marten, mink, otter, rabbit/hare, muskrat, fox (trapping), elk, black bear (hunting), bald eagle (cultural significance), waterfowl, grouse, cranberries, berries (blueberries, raspberries, serviceberries)	Direct and/or Related Project VC: Potential effects of the project on plants and animals are assessed in the EIS using the existing VCs and new VCs (Sections 9.4.3, 9.6.3, 9.9.3, 9.10.1.3, 9.10.2.3). The species of interest identified by AOO during Indigenous engagement have been assessed in the EIS and TSDs (in particular the EcoRA TSD), either directly as VCs or being represented by EcoRA receptors. New VCs added to the assessment: CNL added moose, fox, river otter, mink and berries as new VCs specifically in response to feedback from Indigenous communities, including AOO. The remainder of the identified species were already included as VCs and/or represented by an EcoRA receptor. Discussion: Potential effects of the project to all of these species are assessed in the EIS and EcoRA TSD. See Table 6.3-2 for mapping of these species to EcoRA receptors. In the EIS, some of these VCs are also assessed under existing traditional land and resource use VCs: Trapping, Hunting, Fishing and Gathering (Section 9.9.3).	The EIS concludes that the project will result in no adverse residual effects on non-human biota, including the species of interest identified by AOO. This result applies to potential habitat-related effects as well as effects from exposure to chemical and radiological contaminants (Sections 9.4.3.5, 9.6.3.5, EcoRA TSD).

b) AOPFN – Algonquins of Pikwàkanagàn First Nation

VC-related comment	How is this VC included in the assessment	Main Conclusion
Indigenous health receptor: Concern about the assumptions made when developing exposure profiles: dietary pathways (and changes due to perceived contamination), occupancy factors, locations of activities. Where is this information listed, and is it representative of community values? Concern that other factors related to Indigenous determinants of health and well-being were not being focused on, with the strong emphasis on Human Health Risk Assessment.	Direct and/or Related Project VC: Potential effects on Indigenous peoples health are assessed in the EIS using the Indigenous peoples Health VC (Section 9.10.2.3.3). New VCs added to the assessment: VCs related to Indigenous health: Indigenous People and Indigenous Workers (Section 9.10.2). Discussion: The assumptions made in developing the exposure profiles for the Indigenous Health VCs (i.e., Indigenous peoples and Indigenous Workers) are summarized in Section 8.10.2 (food sources and water use) and Section 9.10.2 (dietary intake values, time spent at various outdoor activity locations). CNL acknowledges that there is uncertainty in the characterization of potential effects to Indigenous VCs. This has been accounted for by using conservative assumptions wherever possible. For example, with the exception of hunters, receptors during the Post-institutional Controls phase were assumed to obtain 100% of their water from the Kichi-Sibì (Ottawa River), and all foods except grain were obtained 100% locally (Section 9.10.2.3.3). CNL intends to confirm the conservative assumptions related to the diet of this receptor, using the results of the recently completed Diet and Harvest study. If the survey results indicate that the assumptions made were not conservative enough, then this information will be captured within a future revision of the IER.	The conservative assumptions that were used in developing the exposure profiles for Indigenous Health VCs are expected to be protective of Indigenous peoples during all phases of the project. The EIS concluded that despite the conservative assumptions made, no adverse residual effects on Indigenous health (Indigenous People and Indigenous Workers) are anticipated from the project (Section 9.8.3.5, 9.10.2.3.5). AOPFN Concerns: This conclusion does not consider the full range of factors that contribute to the health of Indigenous peoples, nor has a monitoring program been set up to capture non-biophysical impacts on health in the EA Follow-up Monitoring Program.
Impacts on riparian ecosystems	Direct and/or Related Project VC: Protection of riparian ecosystems is discussed in the EIS as part of the assessment of potential effects on the surface water environment and aquatic plant and animal VCs. (Sections 9.4.3 and 9.6.3). New VCs added to the assessment: VCs that live and/or feed in the aquatic environment: moose, otter and mink. Discussion: CNL acknowledges the presence of riparian habitat on the NPD site, along the Kichi-Sibì (Ottawa River) shoreline. Some of this habitat has been previously disturbed, e.g., a small area that is maintained in a cleared state (with rip-rap on the shoreline) to enable access to the dry	Project activities are not expected to have any physical impacts on the current riparian habitat, because no project activities will occur near the shoreline (Section 9.4.4.3). The EIS concluded that no adverse residual effects (physical or exposure-related) are expected on riparian VCs from the project (Sections 9.4.3.5, 9.6.3.5). AOPFN Concerns: AOPFN is concerned that moose and deer have not been a focus of this assessment, as those are critical ungulates for traditional land and resource use purposes for the Nation. AOPFN has expressed a

VC-related comment	How is this VC included in the assessment	Main Conclusion
	hydrant near the shoreline, which was installed to draw water from the river if needed for fire suppression (Section 8.4.2.1). Contaminant-related impacts to riparian ecosystems are evaluated in the EIS by assessing exposure-related effects on riparian VCs such as amphibians (e.g., green frog) and waterfowl (e.g., mallard, great blue heron) (Section 9.6.3.3). CNL has initiated a waterfowl survey along the disturbed shoreline of the NPD property to document usage by waterfowl prior to the start of NPD Closure Project activities. This initiative also supports CNL’s biodiversity monitoring program. The planned follow-up monitoring of air quality, surface water quality and groundwater quality will ensure that riparian areas are also protected.	desire at CNL-operated, AECL-owned facilities, to be informed of any animal collisions or other morbidity / mortality incidents, and to involve the Neya Wabun Guardian Program in investigations of any such incident through the EA Follow-up Monitoring Program.
Reducing animal road mortality of sensitive species	Direct and/or Related Project VC: Effects to sensitive species from road mortality are assessed in the EIS using the Blanding’s turtle and eastern milksnake VCs (Section 9.6). New VCs added to the assessment: None. Discussion: The EIS assesses the potential for direct loss of wildlife on the NPD site as roadkill from on-site transportation as well from vehicles travelling to and from the site (Section 9.6.3.3). Mitigation measures have been developed to minimize direct loss of wildlife from on-site transportation site as well as vehicle travel entering the site. These measures, described in detail in Section 9.6.3.2, include fencing, speed limits, signage, surveys, training and sweeps. CNL notes that to date, no eastern milk snakes or Blanding’s turtle have been seen on the road at NPD. Due to the fact that the estimated traffic density and speed limit will remain low during this project, and that animals are expected to avoid areas of project activity, the mitigation measures to be implemented for the protection of the species during decommissioning operations will focus on staff and contractors behavior.	The EIS concludes that roadkill incidents are likely to be infrequent, and that no adverse residual effects on these species are expected (Section 9.6.3.5). CNL’s follow-up monitoring program includes roadkill mortality surveys during key time periods, to verify EIS predictions (Section 12.3.2.1).
Dust	Direct and/or Related Project VC: Effects from dust emissions are assessed using aquatic and terrestrial soil, plant and animal VCs as well as geological and hydrogeological, public and Indigenous health, land use and	Any effects on plant and animal VCs from project-related dust emissions are expected to be minor, localized and temporary. Based on the planned mitigation measures, no adverse residual effects on

VC-related comment	How is this VC included in the assessment	Main Conclusion
	socio-economic VCs (Sections 9.4, 9.5, 9.6, 9.8, 9.9, 9.10 and 9.11). New VCs added to the assessment: None. Discussion: The EIS discusses effects from dust emissions in nearly every environmental compartment: atmospheric, surface water, aquatic, geological, terrestrial, human health, traditional land and resource use, Indigenous socio-economic and health, socio-economic environment (Sections 9.2.3.2 to 9.11.3.2). CNL will employ mitigation measures associated with standard construction practices to control dust, such as spray misting, covering of haulage trucks, paving of roads, dust suppression technologies and communications with Indigenous communities (Sections 9.2.3.2, 9.3.3.2, 9.9.3.2). Monitoring of dust and noise are incorporated into the Draft Effluent Follow-up Monitoring Plan and Draft Environmental Monitoring Plan (Sections 12.3.1 and 12.3.2)	aquatic or terrestrial plant or animal VCs are expected from dust emissions from project activities (Sections 9.3.3.5, 9.4.3.5, 9.5.3.5, 9.6.3.5). The EIS determined that no measurable changes in air quality are predicted at human receptor locations. Though minor, temporary and localized nuisance effects may occur, no adverse residual effects are expected on members of the public, workers, traditional land and resource use, Indigenous peoples or Indigenous workers from dust emissions (Sections 9.8.3.5, 9.9.3.5, 9.11.3.5).
Effluent discharges to the aquatic environment	Direct and/or Related Project VC: Potential effects from project releases to the aquatic environment are assessed using the aquatic plant and animal VCs selected in the EIS, as well as the public and Indigenous human health, land use and socio-economic VCs. (Sections 9.4.3, 9.6.3, 9.8.3, 9.9.3, 9.10.3 and 9.11.3). New VCs added to the assessment: VCs related to the aquatic and terrestrial environments, Indigenous socio-economic and health conditions (Section 9.4.1, 9.6.1, 9.10.1, 9.10.2). Discussion: The EIS assesses the potential impacts of project-related emissions to non-human biota VCs in the aquatic environment (Section 9.4.3.3). It also assesses impacts related to health and socio-economic use of the Kichi-Sibi (Ottawa River) by Indigenous communities and members of the public (Sections 9.8.3, 9.10.1.3, 9.10.2.3, 9.11.3.3). Section 9.3.3.2 of the EIS provides a series of mitigation measures focused on protection of	The EIS concludes that no adverse residual effects on non-human biota in the aquatic environment are anticipated from exposure to radiological or chemical contaminants (Section 9.4.3.5). The EIS concluded that based on the predicted impacts after applied mitigation measures, no adverse residual effects on human health or socio-economics (including Indigenous receptors) are expected to result from the project (Sections 9.8.3.5, 9.10.1.3, 9.10.2.3.5, 9.11.3.5).

VC-related comment	How is this VC included in the assessment	Main Conclusion
	surface water, including CNL’s process for non-routine discharges. No un-assessed liquid effluent releases are permitted. Mitigation measures for the protection of surface water have been updated and expanded from the 2017 draft EIS, and include consideration of stormwater flows. CNL has developed mitigation measures and monitoring plans for the protection of the Kichi-Sibi (Ottawa River) from chemical and radiological releases. For example, the effluent monitoring plan includes monitoring of water collection points and the washout pit (Section 12.3.1); the environmental monitoring plan includes monitoring of on-site and Kichi-Sibi (Ottawa River) surface water quality (Section 12.3.2); and the groundwater monitoring plan includes groundwater quality monitoring (Section 12.3.3).	
Preservation of cultural resources	Direct and/or Related Project VC: Preservation of cultural resources is discussed in the EIS as part of the assessment of effects on traditional land and resource use (Section 9.9.3). New VCs added to the assessment: None. Discussion: The EIS discusses cultural sites around the NPD site. The AOPFN AKLUS report does not identify any known cultural features at the NPD site, and particularly not where proposed project activities will be conducted; however, the Kichi-Sibi (Kichi-Sibi (Ottawa River)) itself is recognized as an important cultural/heritage value for multiple reasons by AOPFN AKLUS participants (Section 8.9.2). The EIS assesses potential effects of the project on nearby traditional land use activities (Section 9.9.3). CNL has developed mitigation measures to minimize potential nuisance effects on nearby traditional land uses (Section 9.9.3.3).	Based on the assessment conducted, the EIS expects no adverse residual effects on traditional land and resource use from the project (Section 9.9.3.5). CNL has programs in place to enhance engagement and address any potential negative perceptions of land use experiences (Section 9.9.5). During the Institutional Controls and Post-Institutional Controls phases, renaturalization of the site may lead to an increase of wildlife and may benefit trapping, hunting, and gathering activities (Section 9.9.3.3). AOPFN Concerns: This conclusion does not examine the factors that influence connectedness and alienation from cultural / traditional use areas. The findings from the three AOPFN studies are in disagreement with this conclusion. AOPFN has also highlighted the need for improved risk communication. AOPFN is also opposed to using a “damaged baseline” – i.e., cultural and traditional use practices at the NPD site today – as the starting point for this assessment, as this is punitive to Indigenous peoples because the site has been cut off from use and occupancy by Indigenous peoples against their will since the 1960s.

VC-related comment	How is this VC included in the assessment	Main Conclusion
Perceptions of safety and quality of experience on the land	Direct and/or Related Project VC: Safety of using the land is assessed in the EIS using the Indigenous peoples Health VC (Section 9.10.2). Quality of experience on the land is discussed in the EIS as part of the assessment of effects on traditional land and resource use. (Section 9.9.3). New VCs added to the assessment: VCs related to Indigenous health – Indigenous People and Indigenous Workers (Section 9.10.2) Discussion: CNL has added to the sections on Indigenous Socio-Economic and Health (Sections 8.10.1, 8.10.2, 9.10.1 and 9.10.2). Several VCs have been selected with respect to this new environmental component, including Indigenous People and worker receptors. With respect to quality of experience on the land: The lands and waters within the NPD site are not currently used by Indigenous communities, but activities adjacent to the site are still possible and recorded, including along the Kichi-Sibi. As discussed in Section 9.9.3 of the EIS, land use may change during and / or after the Institutional Controls phase. Renaturalization of the site may lead to an increase of wildlife and may benefit trapping, hunting, and gathering activities. In the long term, these changes are expected to result in increased connection to and use of lands and water. Access to the licensed area will continue to be restricted, which will limit, by a small amount, the total additional area of use.	The EIS concluded that based on the assessment conducted, no adverse health effects to Indigenous receptors are expected during the Decommissioning Execution phase or Postclosure period (Section phase (Section 9.10.2.3.5). The EIS predicts no adverse residual effects on traditional land and resource use (Section 9.9.3.5). CNL has programs in place to enhance engagement and address any potential negative perceptions of land use experiences (Section 9.9.5). AOPFN Concerns: This conclusion does not examine the factors that influence connectedness and alienation from cultural/traditional use areas. The findings from the three AOPFN studies are in disagreement with this conclusion and find that a future with in-situ disposal has the potential to continue existing effects on traditional use and culture into the far future (potentially permanently), meaning an increase in the temporal scope of alienation, loss of use, fear and stigma associated with the site. AOPFN has also highlighted the need for improved risk communication. AOPFN is also opposed to using a “damaged baseline” – i.e., cultural and traditional use practices at the NPD site today – as the starting point for this assessment
AOPFN preferred harvesting sites	Direct and/or Related Project VC: Potential effects on harvesting areas are assessed using the Gathering VC under the environmental component of traditional land and resource use (Section 9.9.3). New VCs added to the assessment: None Discussion: CNL acknowledges that harvesting and gathering of plants and natural materials are valued traditional and modern-day land use activities (Section 8.9.2). It is noted that these activities do not currently occur on the NPD site, and particularly not in the Site Study Area, where proposed project activities will be conducted. CNL has developed mitigation measures to	The EIS concludes that no adverse residual effects on traditional land and resource use are expected (Section 9.9.3.5). As discussed in Section 9.9.3 of the EIS, land use may change during and / or after the Institutional Controls phase. Renaturalization of the site may lead to an increase of wildlife and may benefit harvesting activities. In the long term, these changes are expected to result in increased connection to and use of lands and water. Access to the licensed area will be restricted, which will limit the total additional area of use, thus no measurable effects on land use are expected.

VC-related comment	How is this VC included in the assessment	Main Conclusion
	minimize potential nuisance effects on traditional land uses occurring nearby (Section 9.9.3.2). The EIS assesses potential effects of the project on nearby traditional land use activities (Section 9.9.3). NPD Closure project activities are expected to remain within previously disturbed areas. Other than the removal of milkweed (a temporary effect discussed earlier), no removal or destruction of wildlife areas is expected.	AOPFN Concerns: This conclusion does not examine the factors that influence connectedness and alienation from cultural / traditional use areas. The findings from the three AOPFN studies are in disagreement with this conclusion. AOPFN has also highlighted the need for improved risk communication. AOPFN is also opposed to using a “damaged baseline” – i.e., cultural and traditional use practices at the NPD site today – as the starting point for this assessment.
AOPFN preferred fishing sites, fish and fish habitat	Direct and/or Related Project VC: Potential effects on fishing areas, fish, and fish habitat are assessed using the Fishing VC under the environmental component of traditional land and resource use (Section 9.9.3) and by assessing the effects of the project on fish and fish habitat (Section 9.4.3). New VCs added to the assessment: None. Discussion: CNL acknowledges that fishing is a valued traditional and modern-day land use activity (Section 8.9.2). There is no fishing on the NPD site or within the boundaries of the AECL property surrounding the NPD site. But there can be fishing in the Kichi-Sibi (Ottawa River) adjacent to the site, and property. CNL has developed mitigation measures to minimize potential nuisance effects on traditional land uses occurring nearby (Section 9.9.3.2). The EIS assesses potential effects of the project on nearby traditional land use activities (Section 9.9.3). NPD Closure project activities are expected to remain within previously disturbed areas. Fish species are included in the assessment of potential effects to fish from chemical and radiological contamination. Representative ‘pelagic’ fish (which inhabit the main water column of the river) and ‘benthic’ fish (bottom-feeding fish) are assessed, ensuring that all fish species in the Kichi-Sibi (Ottawa River) are considered. No physical disturbances to fish habitat are expected from the project, because the project does not involve any in-water or near-water work such as infilling, construction or blasting (Sections 8.4.3.2, 9.4.3.1, 9.4.3.2).	The EIS concludes that no adverse residual effects on traditional land and resource use are expected (Section 9.9.3.5). As discussed in Section 9.9.3 of the EIS, land use may change during and/or after the Institutional Controls phase. The EIS concludes that none of the activities of the project are expected to affect fish or fish habitat; there will be no infilling, construction or blasting in the river, and no activities near the wetlands (Section 9.4.3.1). AOPFN Concerns: CNL has evaluated exclusively impacts on fish (a biophysical value) without considering impacts on AOPFN preferred fishing sites (a human value). CNL has not characterized the many considerations that Indigenous would-be harvesters factor into decisions on whether, where, when and what to fish for. AOPFN remains concerned both; that there is no detailed Algonquin baseline for fish and fish habitat in the project-affected area, nor is there a proper characterization of potential factors influencing AOPFN willingness to fish in this area in the project case.
Kichi-Sibi as a cultural landscape	Direct and/or Related Project VC: Impacts and access to cultural sites are discussed in the EIS by considering the presence of	Based on the assessment conducted, the EIS expects no adverse residual effects on cultural resources from the project

VC-related comment	How is this VC included in the assessment	Main Conclusion
	these sites on the NPD property (Section 8.9.2), and by assessing the effects of the project on the Cultural Resources and Ceremonies VC under traditional land and resource use (Section 9.9.3). New VCs added to the assessment: None Discussion: The EIS discusses cultural sites around the NPD site. The Kichi-Sìbì (Ottawa River) itself is recognized as an important cultural / heritage value for multiple reasons (Section 8.9.2), as noted in the AOPFN AKLUS. CNL acknowledges the presence of aquatic and riparian habitat on the NPD site, along and in the Kichi-Sìbì (Ottawa River). Some of this habitat has been previously disturbed, e.g., a small area that is maintained in a cleared state (with rip-rap on the shoreline) to enable access to the dry hydrant near the shoreline, which was installed to draw water from the river if needed for fire suppression (Section 8.4.2.1). Contaminant-related impacts to riparian ecosystems are evaluated in the EIS by assessing exposure-related effects on aquatic and riparian VCs (Sections 9.4.3.3 and 9.6.3.3). CNL has initiated a waterfowl survey along the disturbed shoreline of the NPD property to document usage by waterfowl prior to the start of NPD Closure Project activities. This initiative also supports CNL’s biodiversity monitoring program. The planned follow-up monitoring of air quality, surface water quality and groundwater quality will ensure that aquatic riparian areas are also protected.	(Section 9.9.3.5). Project activities are not expected to have any physical impacts on aquatic and riparian habitat, because no project activities will occur in the water or near the shoreline (Section 9.4.4.3). The EIS concluded that no adverse residual effects (physical or exposure-related) are expected on aquatic and riparian VCs from the project (Sections 9.4.3.5, 9.6.3.5). CNL has programs in place to enhance engagement and address any potential negative perceptions of land use experiences (Section 9.9.5). AOPFN Concerns: This conclusion does not examine the factors that influence connectedness and alienation from cultural / traditional use areas. The findings from the three AOPFN studies are in disagreement with this conclusion. AOPFN has also highlighted the need for improved risk communication. AOPFN has also highlighted that basing an impact assessment on a human Valued Component (like the Kichi-Sìbì as a cultural landscape) purely or primarily on a set of findings re: biophysical VCs (in this case VCs associated with aquatic and riparian habitat and species), is not an accurate way to conduct such an assessment. This “biophysical proxy” approach is not best practice in current Canadian environmental assessment.
Species at Risk including lake sturgeon, eel and bald eagles	Direct and/or Related Project VC: Impacts to Species at Risk are assessed using the SAR VCs selected in the EIS, which include the bald eagle (Section 9.6.3). Lake sturgeon is included as a VC and is listed as Threatened under COSEWIC, and is assessed in Section 9.4.3. The American eel are represented as benthic fish receptor in the EcoRA. New VCs added to the assessment: None Discussion:	The EIS concludes that the project will result in no adverse residual effects on SAR species. This result applies to potential habitat-related effects as well as effects from exposure to chemical and radiological contaminants (Sections 9.4.3.5, 9.6.3.5). CNL’s follow-up program involves monitoring activities designed specifically to confirm the above conclusions and assess the effectiveness of the mitigation measures for protection of SAR species. As outlined in Section 12.3.2, these include visual

VC-related comment	How is this VC included in the assessment	Main Conclusion
	Impacts to Species at Risk are assessed using the SAR VCs selected in the EIS, which include the bald eagle (Section 9.6.3). Lake sturgeon is included as a VC and is listed as Threatened under COSEWIC, and is assessed in Section 9.4.3. The American eel are represented as benthic fish receptor in the EcoRA. In the assessments of potential exposure effects to SAR species (in the EcoRA TSD), additional protective measures were applied, such as adding an extra safety factor to the radiological benchmarks for SAR species, and selecting chemical benchmarks protective at the individual level (EcoRA TSD Section 4). CNL has developed a number of mitigation measures to ensure the protection of biota, including SARs. Some of the planned measures are specific to the protection of bald eagle (Section 9.6.3.2). The EIS notes that American eels were they were once abundant in this stretch of the Kichi-Sibi (Ottawa River), the range of the eel has been reduced due to barriers in the Kichi-Sibi (Ottawa River) (e.g. dams). Eels are uncommon upstream of the Cheneaux generating station (>100 km downstream) (Section 8.4.3.2, Appendix B).	inspections, counts and site sweeps during specific periods.
Specific species identified as important by AOPFN during engagement activities: badger, bear, beaver, coyote, fisher, fox, marten, moose, muskrat, otter, rabbit/hare, raccoon, squirrel, weasel, white-tailed deer, wolf (Algonquin), bait fish, bass, brook trout, burbot, catfish, chub, jackfish/northern pike, lake sturgeon, lake trout, lake whitefish, mud pout/brown bullhead, muskellunge, pickerel/walleye, speckled trout, sucker, sunfish, yellow perch, bald eagle, barn swallow, ducks, goose, grouse, partridge, turtle, birch (tea and topical medicine), cedar (in medicinal pouches), pine, poplar (tea and topical medicine), spruce, tamarack (medicinal:	Direct and/or Related Project VC: Potential effects of the project on plants and animals are assessed in the EIS using the existing VCs and new VCs (Sections 9.4.3, 9.6.3, 9.9.3, 9.10.1.3, 9.10.2.3). The species of interest identified by AOPFN during Indigenous engagement have been assessed in the EIS and TSDs (in particular the EcoRA TSD), either directly as VCs or being represented by EcoRA receptors. New VCs added to the assessment: CNL added moose, fox, otter, weasel, mushrooms and berries as new VCs specifically in response to feedback from Indigenous communities, including AOPFN. The remainder of the identified species were already included as VCs and/or represented by an EcoRA receptor. Discussion: Potential effects of the project to all of these species are assessed in the EIS and EcoRA TSD. See Table 6.3-4 for mapping of these species to EcoRA receptors. In the EIS, some of these VCs are also assessed under existing traditional land and resource Use VCs: Trapping, Hunting, Fishing and Gathering (Section 9.9.3).	The EIS concludes that the project will result in no adverse residual effects on non-human biota, including the species of interest identified by AOPFN. This result applies to potential habitat-related effects as well as effects from exposure to chemical and radiological contaminants (Sections 9.4.3.5, 9.6.3.5, EcoRA TSD). AOPFN Concerns: This conclusion does not include involvement of on-the-ground Indigenous Knowledge data collection nor has it been verified by AOPFN's Algonquin Advisory Committee.

VC-related comment	How is this VC included in the assessment	Main Conclusion
tea and topical), willow (teething relief), blueberries, cattails (medicinal rub), dandelions, fiddleheads, juniper bush (medicinal tea), Labrador tea, wiken (muskrat root or sweet flag), prickly ash, raspberry (berries, leaves), red willow, gzibimkshk (scouring rush), magajim mashkiai (sweet fern) (medicinal and ceremonial), wild leek or onion, chaga.		

c) Métis Nation of Ontario (MNO)

VC-related comment	How is this VC included in the assessment	Main Conclusion
Separate consideration of Indigenous Health and Indigenous Socio-Economic Conditions. Inclusion of Métis use and enjoyment of the area surrounding the NPD site as a sub-component of the socio-economic environment. Inclusion of MNO data, e.g., existing vegetation types and in the description of baseline Indigenous socio-economic conditions.	Direct and/or Related Project VC: In response to feedback received during Indigenous engagement activities, CNL has added Indigenous health and Indigenous socio-economic VCs (Section 9.10). Indigenous resident use and enjoyment of the area is included as a VC under the Indigenous socio-economic component. New VCs added to the assessment: VCs related to Indigenous health: Indigenous People and Indigenous Workers (Section 9.10.2). Discussion: CNL has added new environmental components (and associated VCs) to the EIS (Section 8.10), describing current Indigenous socio-economic and Indigenous health conditions. Information from the TKLUS undertaken for the MNO (Know History 2019), such as on Métis harvesting regions, baseline socio-economic conditions, existing vegetation types, and the importance of walleye, has been incorporated into this new Section 8.10.1, as well as into Sections 7 (Indigenous Engagement) and 8.9 (traditional land and resource Use). Several VCs have been selected with respect to these new environmental components, including Indigenous resident use and enjoyment of land, Indigenous People health and Indigenous worker health receptors. Potential effects of the project on these VCs are assessed in Section 9.10.1.3 and 9.10.2.3.	Overall, the EIS concluded that based on the assessment conducted, no adverse residual effects on the Indigenous Socio-Economic environment or on Indigenous health (Indigenous members of the public or workers) are expected (Sections 9.10.1.3 and 9.10.2.3.5).
Inclusion of Métis rights and interests in	Direct and/or Related Project VC:	Based on the assessment conducted, the EIS predicts no adverse

VC-related comment	How is this VC included in the assessment	Main Conclusion
the assessment, particularly, MNO’s perception and intangible aspects of Métis way-of-life.	The EIS and Indigenous Engagement Report now reference Aboriginal and / or treaty rights to be inclusive of Métis rights (Sections 5, 7, 8 and 9). Métis rights and interests and the MNO’s perception and intangible aspects of Métis way-of-life are discussed in the EIS as part of the assessment of effects on traditional land and resource use (Section 9.9.3). New VCs added to the assessment: None. Discussion: Specific references to Métis rights and interests have been added to the EIS (Sections 5, 7, 8 and 9). The EIS assesses potential project effects on several VCs that have been identified as rights-based activities, under the traditional land and resource Use component (Section 9.9). Perceptions about performing traditional land use activities are discussed in Section 9.9.5 of the EIS. CNL and the MNO continue to discuss critical aspects of MNO’s rights, particularly, the MNO’s perception and intangible aspects of the Métis way-of-life to determine how to incorporate them into the project.	residual effects on traditional land and resource use (Section 9.9.3.5). CNL has programs in place to enhance engagement and address any potential negative perceptions of land use experiences (Section 9.9.5).
Potential long-term impacts on Métis harvesting rights	Direct and/or Related Project VC: Impacts on harvesting activities are considered in the EIS assessment of potential effects on traditional land and resource use VCs (Section 9.9.3). New VCs added to the assessment: None. Discussion: Harvesting does not currently occur on the NPD site, and particularly not in the Site Study Area, where proposed project activities will be conducted. The EIS assesses potential effects of the project on nearby Indigenous land use activities (Section 9.9.3). CNL has developed	The EIS predicts no adverse residual effects on traditional land and resource use (Section 9.9.3.5). CNL has programs in place to enhance engagement and address any potential negative perceptions of land use experiences (Section 9.9.5).

VC-related comment	How is this VC included in the assessment	Main Conclusion
	mitigation measures to minimize potential nuisance effects on nearby traditional land uses (Section 9.9.5).	
No VCs have been selected for the Atmospheric Environment	Direct and/or Related Project VC: The atmospheric environment has been identified as a “pathway”, meaning that changes in the atmospheric environment could result in effects to VCs in other environmental compartments. Therefore, the EIS assesses the potential effects of the project on the atmospheric environment, using human and non-human biota VCs in other environmental compartments. New VCs added to the assessment: None. Discussion: The EIS identifies potential interactions of the project with the atmospheric environment (Section 9.2.3.1) and presents mitigation measures to reduce air and noise emissions (Section 9.2.3.2). The potential effects of releases to air from the project are assessed throughout the remainder of Section 9, to VCs in: the aquatic environment (Section 9.4), the terrestrial environment (Section 9.6), human health (Section 9.8), traditional land and resource use (Section 9.9), Indigenous socio-economic and health (Section 9.10) and socio-economic (Section 9.11).	The EIS predicts no adverse residual effects related to air and noise emissions (Sections 9.4.3.5, 9.6.3.5, 9.8.3.5, 9.9.3.5, 9.10.1.3, 9.10.2.3.5, 9.11.3.5).
Effects of the project and sediment quality on Métis rights to fish	Direct and/or Related Project VC: Impacts on Métis rights to fish are assessed in the EIS using the Fishing activities VC under the environmental component of Traditional land and resource Use (Section 9.9.3), and by assessing the effects of the project on fish and fish habitat (Section 9.4.3). New VCs added to the assessment: None. Discussion: With respect to sediment quality, Section 2.6.2 of the EIS has been updated to reflect new information, stating “Recently, radiological and non-radiological sediment sampling was undertaken as part of Phase II Environmental Site Assessment (ESA). Based on the results of the Phase II ESA, it is considered unlikely that the NPD site has impacted sediment quality in the Ottawa River.”	The EIS concludes that none of the activities of the project are expected to affect fish habitat; there will be no infilling, construction or blasting in the river, and no activities near the wetlands (Section 9.4.3.1).

VC-related comment	How is this VC included in the assessment	Main Conclusion
	In addition, before the NPD Closure Project begins, CNL is planning to undertake additional sediment and surface water monitoring to provide baseline values to compare future ‘follow-up’ surface water and sediment monitoring results against. Follow-up monitoring will ensure that there is minimal impact to surface water and sediment (and in turn to fish). The description of traditional Fishing activity in the EIS (Section 8.9.1.5) includes a listing of the fish species harvested in the MNO TKLUS (KnowHistory 2019). These species are included in the assessment of potential effects to fish from chemical and radiological contamination. Representative ‘pelagic’ fish (which inhabit the main water column of the river, like Walleye and Emerald Shiner) and ‘benthic’ fish (bottom-feeding fish) like White Sucker are assessed, ensuring that all fish species in the Kichi-Sibi (Ottawa River) are considered. No physical disturbances to fish habitat are expected from the project, because the project does not involve any in-water or near-water work such as infilling, construction or blasting (Sections 8.4.3.2, 9.4.3.1, 9.4.3.2).	
Effects from dust and noise on aquatic species of importance that may extend beyond the property line	Direct and/or Related Project VC: The EIS assesses the potential effects of dust and noise emissions to aquatic VCs, including those beyond the NPD property line (Section 9.4.3.3). New VCs added to the assessment: None. Discussion: Aquatic VCs are assessed in areas extending beyond the NPD property line: the Local Study Area, which extends 50m into the Kichi-Sibi (Ottawa River), and the Regional Study Area (Section 5.2.1.1), which includes the stretch of the Kichi-Sibi (Ottawa River) from near the Des Joachims Generating Station, to 30 km downstream of the NPD site (which includes CRL), and extends across the river to include the Quebec shoreline (Section 8.3.1). CNL will employ mitigation measures associated with standard construction practices to control dust, such as spray misting, covering of haulage trucks, paving of roads, dust suppression technologies and communications with Indigenous communities (Sections 9.2.3.2, 9.3.3.2, 9.9.3.2). Monitoring of dust and noise are incorporated into the Draft Effluent Follow-up Monitoring Plan and Draft Environmental Monitoring Plan (Sections 12.3.1 and 12.3.2)	The EIS concludes that no adverse residual effects on non-human biota in the aquatic environment (in the Site, Local or Regional Study Areas) are anticipated from exposure to dust or noise emissions (Section 9.4.3.5).
Habitat for plants (e.g., oak, ground hemlock and berries) and wildlife (e.g., moose, partridge, grouse, rabbit, deer,	Direct and/or Related Project VC: Protection of plant and animal habitat is discussed in the EIS as part of the assessment of physical disturbance and noise effects (Section 9.6.3).	No adverse habitat-related effects on terrestrial vegetation are expected in the Site, Local or Regional Study Areas. Construction-related effects on vegetation communities, such as dust, are

VC-related comment	How is this VC included in the assessment	Main Conclusion
duck, goose).	New VCs added to the assessment: None. Discussion: It is noted that NPD Closure project activities are expected to remain within previously disturbed areas, and no tree clearing is planned (Section 9.6.3.2). The EIS proposes mitigation measures for the protection of terrestrial vegetation habitat in the Site Study Area (Section 9.6.3.2). The EIS considers construction-related effects on vegetation communities (Sections 9.6.3, 9.6.4).	expected to be localized and temporary (Sections 9.6.3.5). Renaturalization of the Site Study Area over time may increase habitat for wildlife and would be beneficial for both vegetation and wildlife communities (Section 9.6.3.3). Overall, no adverse residual habitat-related effects on terrestrial vegetation or wildlife are expected (Section 9.6.3.5).
Small and large game harvesting areas Fish harvesting areas Plant and natural materials harvesting areas Trapping	Direct and/or Related Project VC: Potential effects on harvesting, gathering and trapping areas are assessed using the Gathering and Trapping activities VCs under the environmental component of traditional Land and Resource Use (Section 9.9.3). New VCs added to the assessment: None. Discussion: CNL acknowledges that fishing, harvesting, traditional and commercial trapping, and gathering of plants and natural materials are valued traditional and modern-day land use activities (Section 8.9.2). It is noted that these activities do not currently occur on the NPD site, and particularly not in the Site Study Area, where proposed project activities will be conducted. CNL has developed mitigation measures to minimize potential nuisance effects on traditional land uses occurring nearby (Section 9.9.3.2). The EIS assesses potential effects of the project on nearby traditional land use activities (Section 9.9.3). NPD Closure project activities are expected to remain within previously disturbed areas. Other than the removal of milkweed (a temporary effect discussed earlier), no removal or destruction of wildlife areas is expected. From a habitat perspective, the EIS assesses whether the project will affect vegetation communities in the Site, Local and Regional Study Areas (Section 9.6.3.3).	The EIS concludes that no adverse residual effects on traditional land and resource use are expected (Section 9.9.3.5). As discussed in Section 9.9.3 of the EIS, land use may change during and / or after the Institutional Controls phase. Renaturalization of the site may lead to an increase of wildlife and may benefit trapping, hunting, and gathering activities. In the long term, these changes are expected to result in increased connection to and use of lands and water. Access to the licensed area will be restricted, which will limit the total additional area of use, thus no measurable effects on land use are expected.
Métis cultural practice sites	Direct and/or Related Project VC: Potential impacts on Métis cultural practice sites are discussed in the EIS by considering the presence of these sites on the NPD property (Section 8.9.3) and by assessing the effects of the project on the traditional land and resource use VCs, which include traditional activities as well as cultural resources and ceremonies.(Section 9.9.3).	Based on the assessment conducted, the EIS predicts no adverse residual effects on traditional land and resource use (Section 9.9.3.5). CNL has programs in place to enhance engagement and address any potential negative perceptions of land

VC-related comment	How is this VC included in the assessment	Main Conclusion
	New VCs added to the assessment: None. Discussion: The EIS discusses cultural sites around the NPD site. No known cultural features have been identified at the NPD site, but the Kichi-Sibi (Ottawa River) itself is recognized as an important cultural / heritage value for multiple reasons (Section 8.9.2). No cultural practices are currently conducted on the NPD site, and particularly not where proposed project activities will be conducted. The EIS assesses potential effects of the project on nearby traditional land use activities (Section 9.9.3). CNL has developed mitigation measures to minimize potential nuisance effects on nearby traditional land uses (Section 9.9.3.3).	use experiences (Section 9.9.5). During the Institutional Controls and Post-Institutional Controls phases, renaturalization of the site may lead to an increase of wildlife and may benefit trapping, hunting, and gathering activities (Section 9.9.3.5).
Ottawa River water quality	Direct and/or Related Project VC: Potential impacts on water quality in the Kichi-Sibi (Ottawa River) are assessed in the EIS by considering the effects of the project on: • surface water environmental component (Section 9.3.3), • plant and animal VCs (Sections 9.4.3 and 9.6.3), • human health and socio-economic VCs (members of the public and Indigenous communities that may use Ottawa River water) (Sections 9.8.3, 9.10.1.3, 9.10.2.3, and 9.11.3). New VCs added to the assessment: VCs related to the aquatic and terrestrial environments, Indigenous socio-economic and health conditions (Section 9.4.1, 9.6.1, 9.10.1, 9.10.2) Discussion: The EIS considers the effects of project activities on surface water quality and drainage (Section 9.3.3). It also assesses potential effects on changes to the surface water environment on plant and animal VCs, socio-economic and traditional land use VCs, as well as human health VCs (members of the public and Indigenous communities) that may use Ottawa River water (Sections 9.4.3, 9.6.3, 9.8.3, 9.9.3, 9.10.2.3, 9.11.3).	The EIS concludes that based on the assessment conducted, no adverse residual effects are expected from the project on Ottawa River water quality (Section 9.2.3.5), plants and animals in the aquatic environment (Section 9.4.3.5), the health and socio-economic conditions of members of the public (Sections 9.8.3.5 and 9.11.3.5), and the health (Section 9.10.2.3.5) and socio-economic conditions (Section 9.10.1.3) of Indigenous peoples.
Better understanding of the groundwater flow system	Direct and/or Related Project VC: The existing groundwater flow around the NPD site is discussed in the EIS as part of the determination of baseline hydrogeological conditions (Section 8.5.5) New VCs added to the assessment:	The available information on local and regional baseline groundwater flow conditions is presented in Sections 8.5.3 and 8.5.5. Additional geoscientific characterization work conducted by CNL has improved our understanding of the groundwater flow system.

VC-related comment	How is this VC included in the assessment	Main Conclusion
	CNL has added a groundwater flow VC. Discussion: In response to feedback from Indigenous communities, CNL completed additional geoscientific characterization and updated its Geosynthesis TSD to better understand the local geology and hydrogeology. These additional findings are summarized in Section 8.5.3 and 8.5.5 of the EIS. CNL also has a detailed, calibrated groundwater flow model (Groundwater Modelling TSD) used to define hydrogeological conditions into the future to support PostSA TSD.	
Current and future impacts to groundwater quality	Direct and/or Related Project VC: The EIS considers project impacts to groundwater quality in Section 9.5.3. The baseline groundwater quality conditions, which are summarized in Section 8.5.6, are indicative of past impacts on groundwater. New VCs added to the assessment: Groundwater quality and soil quality VCs. Discussion: The EIS also assesses impacts to VCs in other environmental compartments (e.g., the aquatic environment) from changes to groundwater conditions associated with the project. As part of the discussion, CNL has identified mitigation measures related to proper design and management of washout pits. Clarification has been added to the EIS, confirming that the washout pit would be lined with a watertight material to prevent infiltration of water into the ground (Section 4.3.1.3).	The available baseline groundwater data, which represent past impacts on groundwater, indicate that baseline groundwater radionuclide levels are below the Maximum Acceptable Concentrations. Some non-radionuclide levels were detected in amounts exceeding guideline limits; this is discussed further in EIS Section 8.5.6. With respect to future groundwater quality: The EIS concluded that based on the assessment conducted, no adverse residual effects are expected from the project on groundwater quality (Section 9.5.3.5).
Specific species identified as important by MNO during engagement activities: moose, berries (chokecherries, blueberries, raspberries), bass, northern pike/jackfish, trout, walleye, partridge, goose, grouse, turkey, rabbit, sturgeon, wintergreen, chaga, fiddleheads, trees suitable for the traditional Métis craft of canoe building (cedar, oak, ash, yellow birch)	Direct and/or Related Project VC: Potential effects of the project on plants and animals are assessed in the EIS using the existing VCs and new VCs (Sections 9.4.3, 9.6.3, 9.9.3, 9.10.1.3, 9.10.2.3). The species of interest identified by MNO during Indigenous engagement have been assessed in the EIS and TSDs (in particular the EcoRA TSD), either directly as VCs or being represented by EcoRA receptors. New VCs added to the assessment: CNL added moose, mushrooms and berries as new VCs specifically in response to feedback from Indigenous communities, including MNO. Discussion: Potential effects of the project to all of these species are assessed in the EIS and EcoRA TSD.	The EIS concludes that the project will result in no adverse residual effects on non-human biota, including the species of interest identified by MNO. This result applies to potential habitat-related effects as well as effects from exposure to chemical and radiological contaminants (Sections 9.4.3.5, 9.6.3.5, EcoRA TSD). The EIS concluded that based on the predicted impacts after applied mitigation measures, no adverse residual effects on Indigenous health or Indigenous socio-economics are expected to result from the project.(Sections 9.10.1.4, 9.10.2.4).

VC-related comment	How is this VC included in the assessment	Main Conclusion
	See Table 6.3-3 for mapping of these species to EcoRA receptors. In the EIS, some of these VCs are also assessed under existing Traditional land and resource Use VCs: Trapping, Hunting, Fishing and Gathering (Section 9.9).	

d) Algonquin Anishinabeg Nation Tribal Council (AANTC)

VC-related comment	How is this VC included in the assessment	Main Conclusion
Effluent discharges at the NPD Closure Project site and overall surface water and stormwater management	Direct and/or Related Project VC: Potential effects from effluent discharges are assessed using the plant and animal VCs selected in the EIS, as well as human health VCs, i.e., members of the public and Indigenous communities that may use Ottawa River water (Sections 9.4.3, 9.6.3, 9.8.3, 9.10.3, 9.11.3). The potential effects of the projects on surface water quality (i.e., in the Ottawa River) are also assessed in the EIS (Section 9.3). In addition to assessment of effects, surface water management is discussed in the EIS in the context of mitigation measures and monitoring (Section 9.3.3.2 and 9.3.3.5). New VCs added to the assessment: None. Discussion: It is noted that in 2018, in response to concerns raised by the AANTC, CNL ceased the practice of discharging liquid effluent from the facility sumps to the Ottawa River, and arranged for water to be sent to the Waste Treatment Centre at the CRL site (Section 8.3.3). The EIS assesses the potential impacts of project-related emissions to non-human biota VCs that may use the Ottawa River (Sections 9.4.3.3, 9.6.3.3). It also assesses impacts related to health and socio-economic use of the Ottawa River by Indigenous communities and members of the public (Sections 9.8.3, 9.10.1.3, 9.10.2.3, 9.11.3.3). Section 9.3.3.2 of the EIS provides a series of mitigation measures focused on protection of	The EIS concludes that no adverse residual effects on non-human biota in the aquatic environment are anticipated from exposure to radiological or chemical contaminants (Section 9.4.3.5). The EIS concluded that based on the predicted impacts after applied mitigation measures, no adverse residual effects on human health or socio-economics are expected to result from the project (Sections 9.8.3.5, 9.10.1.3, 9.10.2.3.5, 9.11.3.5). Based on the mitigation measures for the protection of surface water, it was determined that no adverse residual effects on surface water quality are expected from the project (Section 9.3.3.5).

VC-related comment	How is this VC included in the assessment	Main Conclusion
	surface water, including CNL’s process for non-routine discharges. No un-assessed liquid effluent releases are permitted. Mitigation measures for the protection of surface water have been updated and expanded from the 2017 draft EIS, and include consideration of stormwater flows. CNL has developed mitigation measures and monitoring plans for the protection of the Ottawa River from chemical and radiological releases. For example, the effluent monitoring plan includes monitoring of water collection points and the washout pit (Section 12.3.1); the environmental monitoring plan includes monitoring of on-site and Ottawa River surface water quality (Section 12.3.2); and the groundwater monitoring plan includes groundwater quality monitoring (Section 12.3.3).	
Potential effects to the aquatic environment	Direct and/or Related Project VC: Potential effects to the aquatic environment are assessed using the aquatic plant and animal VCs selected in the EIS (Section 9.4.3). New VCs added to the assessment: VCs that live and/or feed in the aquatic environment: moose, otter and mink. Discussion: The EIS assesses the potential impacts of project-related emissions to non-human biota VCs in the aquatic environment (Section 9.4.3.3). Based on feedback received during Indigenous engagement, CNL confirmed that fish species of Indigenous importance were captured in the assessment, specifically in the EcoRA calculations (Section 7.3). The aquatic environment is protected by the mitigation measures employed in the other environmental components, e.g., surface water environment, atmospheric environment and geological and hydrogeological environment (Section 9.4.3.2).	The EIS concludes that no adverse residual effects on non-human biota in the aquatic environment are anticipated from exposure to radiological or chemical contaminants (Section 9.4.3.5).
Historic releases to the aquatic environment	Direct and/or Related Project VC: Historic releases to the aquatic environment are discussed in the EIS as part of the baseline characterization of the surface water environment (Section 8.3.3). New VCs added to the assessment: None. Discussion:	The available baseline monitoring results indicate that the maximum concentrations (of radionuclides and non-radionuclides) in the Ottawa River are well within the federal and provincial environment-based guidelines which ensure protection of aquatic life and drinking water. These results confirm that historical practices of water discharge to the Ottawa River have been safe, and that Ottawa River water quality has not been adversely affected by CNL’s

VC-related comment	How is this VC included in the assessment	Main Conclusion
	The EIS considers monitoring data from the Ottawa River near the NPD site, in order to determine the baseline levels, which are indicative of historic water discharges (Sections 8.3.3, and 8.3.4.2). The Ottawa River data are collected by CNL as well as independently by the CNSC as part of its Independent Environmental Monitoring Program (IEMP). CNL is also planning a baseline monitoring program of non-radiological and radiological parameters of interest in the Ottawa River, to document pre-project conditions and enable comparison on follow-up monitoring results to baseline conditions (Sections 8.3.4.2, 9.3.5.2, 12.3.2). It is noted that in 2018, in response to concerns raised by the AANTC, CNL ceased the practice of discharging liquid effluent from the facility sumps to the Ottawa River, and arranged for water to be sent to the Waste Treatment Centre at the CRL site (Section 8.3.3).	historical practices (Section 8.3.3).
Better understanding of the bedrock groundwater flow system	Direct and/or Related Project VC: The existing groundwater flow around the NPD site is discussed in the EIS as part of the determination of baseline hydrogeological conditions (Section 8.5.5). New VCs added to the assessment: CNL has added a groundwater flow VC. Discussion: In response to feedback from Indigenous communities, CNL completed additional geoscientific characterization and updated its Geosynthesis TSD, including information on bedrock groundwater. These additional findings are summarized in Section 8.5.2 and 8.5.5 of the EIS. CNL also has a detailed, calibrated groundwater flow model (Groundwater Modelling TSD) used to define hydrogeological conditions into the future to support Postclosure Safety Analysis.	The available information on the baseline bedrock groundwater flow is presented in Section 8.5.5, and includes a descriptive hydrogeological framework for the NPDWF site and surrounding area. Additional geoscientific characterization work conducted by CNL has improved our understanding of the groundwater flow system.

e) Kitigan Zibi Anishinabeg (KZA) First Nation

VC-related comment	How is this VC included in the assessment	Main Conclusion
Impacts to biota, specifically chimney swifts	Direct and/or Related Project VC: Effects on chimney swifts are assessed using the chimney swift VC, in the EIS and in the Chimney Swift Studies TSD. Additional terrestrial and aquatic VCs, including species identified during Indigenous engagement activities, have been selected to represent other biota in the effects assessment (Section 5.2.4.2). New VCs added to the assessment: None Discussion: The EIS assesses exposure-related effects to all non-human biota VCs, and habitat-related effects to non-human biota VCs that could potentially experience disturbance to their habitat, including chimney swifts (Sections 9.4.3 and 9.6.3). CNL has developed a number of mitigation measures to ensure the protection of biota. Some of the planned measures are specific to the protection of chimney swift, other migratory birds, amphibians and reptiles (Section 9.6.3.2). CNL has developed a number of mitigation measures specifically for minimizing effects on chimney swifts. As outlined in Section 9.6.3.2, these include restrictions on: the timing of work activities (i.e., daylight only); placement of the batch plant and noisy equipment as far as possible for the stack; minimizing noise, vibration and lighting levels. CNL has undertaken numerous studies specifically to address potential impacts to chimney swifts from decommissioning activities (Chimney Swift Studies TSD). CNL’s follow-up program involves monitoring activities designed specifically to confirm the above conclusions and assess the effectiveness of the chimney swift-related mitigation measures. As outlined in Section 12.3.2, these include roost observations and roost counts during specific periods.	With respect to habitat-related effects, the EIS concluded that during the Decommissioning Execution phase, there is limited potential for loss of habitat and noise disturbances for animals potentially found in the Site Study Area. The loss of habitat and noise disturbances are temporary and minor. No adverse residual habitat-related effects on biota are expected (EIS Section 9.6.3.5). During the Institutional Controls and Post-Institutional Controls phases, no adverse habitat-related effects are expected in the Site, Local or Regional Study Areas. Renaturalization of the Site Study Area over time may increase habitat for wildlife and would be beneficial for both vegetation and wildlife communities (EIS Section 9.6.3.3). With respect to exposure-related effects, the EIS concluded that no adverse residual effects on non-human biota in the terrestrial or aquatic environments are anticipated from exposure to radiological or chemical contaminants (EIS Section 9.6.3.5).
Monarch butterflies	Direct and/or Related Project VC: As a result of feedback from KZA staff and technical experts, CNL added monarch butterflies as a VC. Impacts related to habitat and exposure are assessed in the EIS (Section 9.6).	Based on the mitigation measures described in the EIS, no adverse residual exposure or habitat-related effects on the Monarch butterfly are expected, during any phase of the project (EIS Section 9.6.3.5).

VC-related comment	How is this VC included in the assessment	Main Conclusion
	New VCs added to the assessment: Monarch butterfly. Discussion: The EIS assesses project-related habitat and exposure effects to monarch butterfly (EIS Section 9.6.3.3). Mitigation measures for the protection of monarch butterflies, such as sweeping of work areas and avoiding vegetation removal during periods of monarch presence, are outlined in EIS Sections 9.6.3.2 and 9.6.3.3. In addition, during site restoration, the cleared area will be reseeded with milkweed (EIS Section 9.6.3.3). CNL’s follow-up program includes conducting presence and habit surveys, to verify the prediction of no adverse residual effects, and to determine the effectiveness of the mitigation measures EIS (Section 12.3.2). Surveys will be conducted for a period of 3 years and information on milkweed establishment and Monarch larvae and chrysalis occupancy will be monitored (EIS Section 9.6.3.3).	
Indigenous rights	Direct and/or Related Project VC: Indigenous rights are assessed in the EIS using the VCs under traditional land and resource use (Section 9.9). These include traditional activities as well as cultural resources and ceremonies. New VCs added to the assessment: None Discussion: The EIS assesses potential effects of the project on nearby traditional land use activities (Section 9.9.3). CNL has developed mitigation measures to minimize potential nuisance effects on nearby traditional land uses (Section 9.9.3.2).	Based on the assessment conducted, the EIS predicts no adverse residual effects on traditional land and resource use (EIS Section 9.9.3.5). CNL has programs in place to enhance engagement and address any potential negative perceptions of land use experiences (EIS Section 9.9.5).
Protection of the environment, in particular water.	Direct and/or Related Project VC: Protection of the environment is assessed throughout the EIS, including: consideration of how the project may interact with the various environment components; developing mitigation measures to minimize project impacts and protect the environment; assessing potential impacts of the project on relevant VCs; determining whether any adverse residual effects may occur; and developing monitoring programs to confirm the findings of the assessment.	The EIS concludes that the project will result in no adverse residual effects on plants or animals in the terrestrial or aquatic environments. This result applies to potential habitat-related effects as well as effects from exposure to chemical or radiological contaminants (EIS Sections 9.4.3.5, 9.6.3.5). The EIS concluded that based on the assessment conducted, no

VC-related comment	How is this VC included in the assessment	Main Conclusion
	With respect to protection of water in particular: Potential effects to surface water are assessed using the plant and animal VCs and human (public and Indigenous health) receptor VCs selected in the EIS (Sections 9.4, 9.6, 9.8, 9.10). New VCs added to the assessment: VCs related to the aquatic and terrestrial environments, groundwater, Indigenous socio-economic and health conditions (Section 9.4.1, 9.5.1, 9.6.1, 9.10.1, 9.10.2). Discussion: The EIS considers the effects of project activities on surface water quality and drainage (Section 9.3.3). It also assesses potential effects on changes to the surface water environment on plant and animal VCs, socio-economic and traditional land use VCs, as well as human health VCs (members of the public and Indigenous communities) that may use Ottawa River water (Sections 9.4.3, 9.6.3, 9.8.3, 9.9.3, 9.10.2.3, 9.11.3). Mitigation measures have been developed for the protection of the environment surrounding the facility, including the Ottawa River (Section 10).	adverse residual effects are expected from the project on surface water quality (Section 9.3.3.5), plants and animals in the aquatic environment (Section 9.4.3.5), the health and socio-economic conditions of members of the public (Sections 9.8.3.5 and 9.11.3.5), and the health (Section 9.10.2.3.5) and socio-economic conditions (Section 9.10.1.3) of Indigenous peoples.

f) Williams Treaties First Nations (WTFN): includes comments from Alderville First Nation, Curve Lake First Nation and Hiawatha First Nation

VC-related comment	How is this VC included in the assessment	Main Conclusion
Protection of the Chimney Swift	Direct and/or Related Project VC: Effects on chimney swifts are assessed using the chimney swift VC, in the EIS (Section 9.6.3) and in the Chimney Swift Studies TSD. New VCs added to the assessment: None. Discussion: The EIS assesses potential exposure-related effects and habitat-related effects to the chimney swift (Section 9.6.3.3). CNL has developed a number of mitigation measures specifically for minimizing effects on chimney swifts. As outlined in Section 9.6.3.2, these include restrictions on: the timing of work activities (i.e., daylight only); placement of the batch plant and noisy equipment as far as possible for the stack; minimizing noise, vibration and lighting levels.	The EIS concludes that based on the studies and assessment conducted, no adverse residual effects on the chimney swift are expected from habitat or exposure-related project impacts (Section 9.6.3.5).

VC-related comment	How is this VC included in the assessment	Main Conclusion
	CNL has undertaken numerous studies specifically to address potential impacts to chimney swifts from decommissioning activities (Chimney Swift Studies TSD). CNL’s follow-up program involves monitoring activities designed specifically to confirm the above conclusions and assess the effectiveness of the chimney swift-related mitigation measures. As outlined in Section 12.3.2, these include roost observations and roost counts during specific periods.	
Species at Risk (SAR)	Direct and/or Related Project VC: Impacts to Species at Risk are assessed using the SAR VCs selected in the EIS, which include monarch butterfly, chimney swift, various bat species, eastern wolf and Blanding’s turtle (Section 9.6.3). New VCs added to the assessment: Monarch butterfly Discussion: The EIS assesses several SAR that have been observed or are potentially present on site, including: monarch butterfly; little brown myotis; chimney swift; eastern wolf; Blanding’s turtle; and eastern milksnake (Section 5.2.4, 9.6.3). In the assessments of potential exposure effects to SAR species (in the EcoRA TSD), additional protective measures were applied, such as adding an extra safety factor to the radiological benchmarks for SAR species, and selecting chemical benchmarks protective at the individual level (EcoRA TSD Section 4). CNL has developed a number of mitigation measures to ensure the protection of biota, including SARs. Some of the planned measures are specific to the protection of SARs: chimney swifts, monarch butterflies, bats, migratory birds, amphibians and reptiles (Section 9.6.3.2). CNL’s follow-up program involves monitoring activities designed specifically to confirm the above conclusions and assess the effectiveness of the mitigation measures for protection of SAR species. As outlined in Section 12.3.2, these include visual inspections, counts and site sweeps during specific periods.	The EIS concludes that, with the exception of removal of the residence / hibernaculum of a small number of bats using the NPDWF and potential incidental harm during demolition / grouting activities (see Section 9.6.3.5), EIS concluded that the project will result in no adverse residual effects on SAR species. This result applies to potential habitat-related effects as well as effects from exposure to chemical and radiological contaminants (Sections 9.4.3.5, 9.6.3.5).
Protection of the Environment (specifically Ottawa River)	Direct and/or Related Project VC: Protection of the environment is assessed throughout the EIS, including: consideration of how	The EIS concludes that the project will result in no adverse residual effects on plants or animals in the terrestrial or aquatic

VC-related comment	How is this VC included in the assessment	Main Conclusion
	the project may interact with the various environment components; developing mitigation measures to minimize project impacts and protect the environment; assessing potential impacts of the project on relevant VCs; determining whether any adverse residual effects may occur; and developing monitoring programs to confirm the findings of the assessment. With respect to protection of the Ottawa River in particular: Potential effects to the Ottawa River are assessed using plant and animal VCs, socio-economic and human (public and Indigenous health) receptor VCs selected in the EIS (Sections 9.4, 9.6, 9.8, 9.10.1, 9.10.2). New VCs added to the assessment: VCs related to the aquatic and terrestrial environments, Indigenous socio-economic and health conditions (Section 9.4.1, 9.6.1, 9.10.1, 9.10.2). Discussion: The EIS considers the effects of project activities on surface water quality and drainage (Section 9.3). It also assesses potential effects of changes to the surface water environment on plant and animal VCs as well as human health VCs (members of the public and Indigenous groups) that may use Ottawa River water. Mitigation measures have been developed for the protection of the environment surrounding the facility, including the Ottawa River (Section 10).	environments. This result applies to potential habitat-related effects as well as effects from exposure to chemical or radiological contaminants (Sections 9.4.3.5, 9.6.3.5). The EIS concluded that based on the assessment conducted, no adverse residual effects are expected from the project on Ottawa River water quality (Section 9.3.3.5), plants and animals in the aquatic environment (Section 9.4.3.5), the health and socio-economic conditions of members of the public (Sections 9.8.3.5 and 9.11.3.5), and the health (Section 9.10.2.3.5) and socio-economic conditions (Section 9.10.1.3) of Indigenous peoples.
Aquatic Environment (specifically that wetlands are sacred to WTFN and interest in the benthic invertebrate community)	Direct and/or Related Project VC: The EIS addresses the potential impacts of these activities to the aquatic environment and wetland areas, by discussing habitat- and exposure-related effects of the project to VCs in the aquatic and terrestrial environments as well as the surface water environmental components, including wetlands (Sections 9.2.3, 9.3.3, 9.4.3, 9.6.3). The VCs assessed include aquatic and terrestrial VCs. New VCs added to the assessment: VCs related to terrestrial and semi-aquatic environment including moose, mink and otter. Discussion: EIS assesses the potential physical effects and exposure-related effects of the project on aquatic and wetland areas as follows:	Based on the mitigation measures described in the EIS, with the exception of bat habitat, no adverse residual habitat-related effects on VCs in aquatic and wetland areas are expected (Section 9.4.3.5, 9.6.3.5). The planned follow-up monitoring of air quality, surface water quality and groundwater quality will ensure that terrestrial and wetland areas are protected (Section 12.3.2).

VC-related comment	How is this VC included in the assessment	Main Conclusion
	With respect to wetlands, the EIS notes that no project activities are expected to occur near the wetlands (Section 9.4.3.1). Potential contaminant-related impacts to wetland ecosystems are evaluated in the EIS by assessing exposure-related effects on VCs such as benthic invertebrates, amphibians (e.g., green frog) and waterfowl (e.g., mallard, great blue heron), and semi-aquatic mammals (e.g., moose, mink, otter). Mitigation measures for protection of the site’s terrestrial areas, and milkweed plants in particular, are presented in Section 9.6.3.2.	
Specific species identified by Curve Lake and Hiawatha: mushrooms and benthic invertebrates (specifically mussels)	Direct and/or Related Project VC: Potential effects of the project on plants and animals, including mushrooms and benthic invertebrates, are assessed in the EIS using the existing VCs and new VCs (Sections 9.4.3, 9.6.3, 9.9.3). The species of interest identified by WTFN during Indigenous engagement have been assessed in the EIS and TSDs (in particular the EcoRA TSD), either directly as VCs or being represented by EcoRA receptors. New VCs added to the assessment: CNL added mushrooms as a new VC specifically in response to feedback from Indigenous communities, including WTFN. Discussion: Potential effects of the project to all of these species are assessed in the EIS and EcoRA TSD. See Table 6.3-5 for mapping of these species to EcoRA receptors. In the EIS, mushrooms are also assessed under the existing Gathering VC in Traditional land and resource use (Section 9.9).	The EIS concludes that the project will result in no adverse residual effects on non-human biota, including the species of interest identified by WTFN. This result applies to potential habitat-related effects as well as effects from exposure to chemical and radiological contaminants (Sections 9.4.3.5, 9.6.3.5, 9.9.3.5, EcoRA TSD).

CNL will continue to work with Indigenous Nations, communities, and organizations to address the above indicated interests and concerns, and ensure that proposed management actions and mitigations are well understood and effective.

As noted in Table 5-1 several Indigenous Nations, communities and organizations (AOO, AOPFN, MNO, Curve Lake and Hiawatha) have also shared VC species of interest either through their comments on the draft EIS, engagement activities or traditional knowledge, land use or other studies. The species of interest for each community are outlined in individual community specific tables below. The Indigenous-identified VCs were reviewed against the VCs selected by CNL for the EIS and EcoRA TSD. Moose, fox, otter, mink, short-tailed weasel, berries, and mushrooms were added to the EcoRA assessment specifically in response to Indigenous feedback on VCs. The remainder of species identified as VCs through Indigenous engagement are already represented through receptors in the EcoRA. The mapping of VCs to receptor species is outlined in Table 5-2 through Table 5-5 below.

Table 5-2: VCs Identified by the Algonquins of Ontario through comments on the IES

Identified Valued Component (species)	Represented by receptors (see EcoRA TSD)
Moose	Moose
White-tailed deer	White-tailed deer
Lake trout	Pelagic Fish
Northern pike	Pelagic Fish
Walleye	Pelagic Fish
Sauger	Pelagic Fish
Smallmouth bass	Pelagic Fish
Muskellunge	Pelagic Fish
Beaver	Muskrat
Marten	Short-tailed weasel
Mink	Mink
Otter	Otter
Rabbit / hare	Meadow vole
Muskrat	Muskrat
Fox (trapping)	Fox
Elk	White-tailed deer
Black bear (hunting)	Black bear
Bald eagle (cultural significance)	Bald eagle
Waterfowl	Mallard
Grouse	Ruffed Grouse
Cranberries	Aquatic vegetation
Berries (blueberries, raspberries, serviceberries)	Berries

Table 5-3: VC's Identified by Métis Nation of Ontario through the TKLUS

Valued Component (species)	Represented by receptors (see EcoRA TSD)
Moose	Moose
Berries (chokecherries, blueberries, raspberries)	Berries
Bass	Pelagic Fish
Northern pike / jackfish	Pelagic Fish
Trout	Pelagic Fish
Walleye	Pelagic Fish
Partridge	Ruffed grouse
Goose	Mallard
Grouse	Ruffed grouse
Turkey	Ruffed grouse
Rabbit	Meadow vole
Sturgeon	Benthic Fish
Kichi-Sibi (Ottawa River) water quality	Environmental component, pathway to human health and non-human biota
Wintergreen	Terrestrial vegetation
Chaga	Fungi (mushrooms)
Fiddleheads	Terrestrial vegetation
Trees suitable for the traditional métis craft of canoe building (cedar, oak, ash, yellow birch)	Terrestrial vegetation

Table 5-4: VCs identified by Algonquins of Pikwàkanagàn First Nation through the Report on the AKLUS

Valued Component (species)	Represented by receptors (see EcoRA TSD)
Badger	Short-tailed Shrew
Bear	Black Bear
Beaver	Muskrat
Coyote	Eastern Wolf (SAR)
Fisher	Short-tailed Weasel
Fox	Red Fox
Marten	Short-tailed Weasel
Moose	Moose
Muskrat	Muskrat
Otter	Northern River Otter
Rabbit/Hare	Meadow vole
Raccoon	Muskrat
Squirrel	Meadow Vole
Weasel	Short-tailed Weasel
White-tailed Deer	White-tailed deer
Wolf (Algonquin)	Eastern Wolf
Bait Fish	Benthic Fish & Pelagic Fish
Bass	Pelagic Fish

Valued Component (species)	Represented by receptors (see EcoRA TSD)
Brook Trout	Pelagic Fish-
Burbot	Benthic Fish
Catfish	Benthic Fish
Chub	Pelagic Fish
Eel	Pelagic & Benthic Fish
Jackfish / Northern Pike	Pelagic Fish
Lake Sturgeon	Benthic Fish
Lake Trout	Pelagic Fish
Lake Whitefish	Benthic Fish
Mud Pout (or Brown Bullhead)	Pelagic Fish-
Muskellunge	Pelagic Fish-
Pickering / Walleye	Pelagic Fish-
Speckled Trout	Pelagic Fish-
Sucker	Benthic Fish
Sunfish	Pelagic Fish
Yellow Perch	Pelagic Fish-
Bald Eagle	Bald Eagle
Barn Swallow	Chimney Swift
Ducks	Mallard
Goose	Mallard
Grouse	Ruffed grouse
Partridge	Ruffed grouse
Turtle	Blanding's turtle (SAR)
Birch (tea and topical medicine)	Terrestrial Vegetation
Cedar (in medicinal pouches)	Terrestrial Vegetation
Pine	Terrestrial Vegetation
Poplar (tea and topical medicine)	Terrestrial Vegetation
Spruce	Terrestrial Vegetation
Tamarack (medicinal: tea and topical)	Terrestrial Vegetation
Willow (teething relief)	Terrestrial Vegetation
Blueberries	Berries
Cattails (medicinal rub)	Terrestrial Vegetation
Dandelions	Terrestrial Vegetation
Fiddleheads	Terrestrial Vegetation
Juniper bush (medicinal tea)	Terrestrial Vegetation
Labrador Tea	Terrestrial Vegetation
Wiken (Muskrat Root or Sweet Flag)	Terrestrial Vegetation
Prickly Ash	Terrestrial Vegetation
Raspberry (berries, leaves)	Berries
Red Willow	Terrestrial Vegetation
Gzibimkshk (Scouring Rush)	Terrestrial Vegetation
Magajim mashkiai (Sweet Fern) (medicinal and ceremonial)	Terrestrial Vegetation

Valued Component (species)	Represented by receptors (see EcoRA TSD)
Wild Leek or Onion	Terrestrial Vegetation
Chaga	Fungi (mushrooms)

Table 5-5: VCs Identified by Williams Treaties First Nations

Valued Component (species)	Represented by receptors (see EcoRA TSD)
Benthic Invertebrates (including mussels)	Benthic Invertebrates
Mushrooms	Fungi (mushrooms)

5.4.1 AOPFN Perspective on the use of Representative Species, and other VC-Related Issues

The Algonquins of Pikwàkanagàn have raised several concerns about the comprehensiveness and representativeness of some of the VCs chosen by CNL for this environmental assessment. AOPFN has the following remaining concerns with the VCs and how they are discussed in Table 5-1 (b) and Table 5-4 above:

- In relation to human health, CNL has adopted a relatively narrow perspective on human health that is focused on biophysical impacts to human health, with little or no emphasis on other factors that influence Indigenous population health. This is particularly concerning to AOPFN because of the fear, stigma, and alienation felt by AOPFN members associated with the nuclear industry in general, and actively stated concerns with the proposed Project to create a permanent radioactive waste disposal facility in AOPFN territory. AOPFN has recommended an approach be adopted by CNL that considers Indigenous determinants and overall impacts of health in a more detailed and holistic fashion recognizing that health is an overall state of well-being caused by a combination of social, economic, cultural, mental and biophysical factors. To date, CNL has not revised its assessment of Indigenous human health in relation to the NPD Closure Project to adopt a more holistic evaluation of human health.
- Where CNL has adopted certain species to “represent” other species, this decision was not informed by Algonquin Knowledge. In addition, AOPFN was not subject to detailed consultation with our elders and land users about the appropriateness of using certain species as “proxies” for other species. Algonquin Knowledge recognizes that each species is unique, with its own special characteristics and responses to external stimuli. AOPFN has called for an Algonquin Knowledge baseline data collection period to collect more detailed information about habitat and hazard conditions for terrestrial and aquatic species at and around the NPD site. In 2022/23 AOPFN knowledge holders completed four 1-day seasonal inventory visits for the area of the site potentially affected by the project. AOPFN provided recommendations from these inventory visits including the need for a more comprehensive inventory covering the entire NPD property. CNL and AOPFN are still discussing next steps for collection of AOPFN Algonquin knowledge baseline data for the broader NPD property.

- AOPFN has raised concerns about species where “representativeness” as understood by CNL’s western science (Table 6.3-4) may not be appropriate when understood through an Algonquin lens. Non-exclusively, examples include rabbits being “represented” by meadow vole, and beaver being “represented” by muskrat. Also notable is that the many fish species that AOPFN has identified are not considered on their specific merits, but rather with two generic categories – pelagic and benthic. Most concerning to AOPFN is that our members provided information about specific vegetation species used for medicines, food and other traditional purposes. Even though the attributes of these different vegetation species (and their uses by AOPFN members) are varied and specific, they are housed under a single “representative” VC of “terrestrial vegetation”. This is not appropriate to AOPFN and additional work to understand the values, distribution, abundance, and risks to impacts of specific aquatic and terrestrial vegetation is required.
- AOPFN notes as well that final decisions on what VCs to include was made by CNL, and was not verified as appropriate by AOPFN, which suggests that Algonquin Knowledge is still not treated as of equivalent value to western science in CNL’s environmental assessment.
- AOPFN is strongly opposed to the use of a “damaged” current baseline for the assessment of effects, rather than focusing on the rightful ability of AOPFN members to use and occupy the area for cultural and traditional use purposes. The adoption of this approach to consider effects of the project only as against “current” use by AOPFN members is fundamentally punitive to AOPFN members because Canada has imposed alienation and loss of use of the area against AOPFN members since the 1960s, against AOPFN’s will and without consultation of AOPFN. In addition, using a current “damaged” baseline to assess impacts of a decommissioning project, which should be designed to make things better for the environment and Indigenous peoples, is not an appropriate approach, as it is not designed to identify the best future for these VCs, but only to identify one that doesn’t make things worse. This is not acceptable to AOPFN and AOPFN considers it beneath the honour of the Crown to accept this approach.
- AOPFN has also highlighted that basing an impact assessment on a human Valued Component (like the Kichi-Sibì (Ottawa River) as a cultural landscape) purely or primarily on a set of findings re: biophysical VCs (in this case VCs associated with aquatic and riparian habitat and species), is not an accurate way to conduct such an assessment. This “biophysical proxy” approach is not best practice in current Canadian environmental assessment.
- As a general comment about VCs, CNL identifies a number of elements of its Follow-up Monitoring Program in Table (b) above. To date, no Indigenous-led or even Indigenous-informed monitoring elements are in place for existing on-site and off-site environmental monitoring, nor are there any details on how Algonquin Knowledge and AOPFN members will be involved in applying the Follow-up Monitoring Program. Given

that Indigenous communities (and not only AOPFN) have identified extensive concerns about impacts on traditional land and resource use, culture, and Indigenous health that are not echoed in CNL's findings, building Indigenous objectives, indicators, thresholds and responses into the follow-up monitoring is critical, regardless of what decommissioning strategy is eventually adopted. In addition, AOPFN notes that for many of the VCs of concerns to AOPFN, there is not yet an appropriate risk communication strategy set up for the NPD facility to communicate risks to AOPFN members in a fashion that will demonstrably gain their trust and reduce impacts on AOPFN use and occupancy at and around the NPD site.

AOPFN has identified additional remaining concerns on VCs in Table 5-1 (b) above, under "AOPFN Concerns". AOPFN remains open to filling some of the identified knowledge, baseline and assessment gaps with CNL prior to the completion of the environmental assessment.

6. Description of Existing Environment

6.1 Traditional Land and Resource Use

Indigenous interests expressed to CNL during engagement with communities have been considered in the following assessment. CNL relied on information obtained through engagement activities and various studies and reports, many of which were led by Indigenous peoples.

6.1.1 Spatial Boundaries

The spatial boundaries associated with the Indigenous traditional land and resource use environment were determined based on the potential for the project to affect Indigenous peoples and their use of land in proximity to the facility for traditional purposes. These spatial boundaries fall within a much broader area of traditional land use.

The Site Study Area for the Traditional land and resource use environment is the same as the general Site Study Area (see Figure 6-1 below).

The Local Study Area has been defined as the Site Study Area plus an area with a 1-km radius beyond the Site Study Area (see Figure 6-1 below).

The Regional Study Area has been defined as the Site Study Area and an area with a 5-km radius beyond the Site Study Area, as illustrated in Figure 6-2 below.

All of the study areas noted here are illustrated in Figure 6-2, along with areas of Crown land (including both federal and provincial lands).

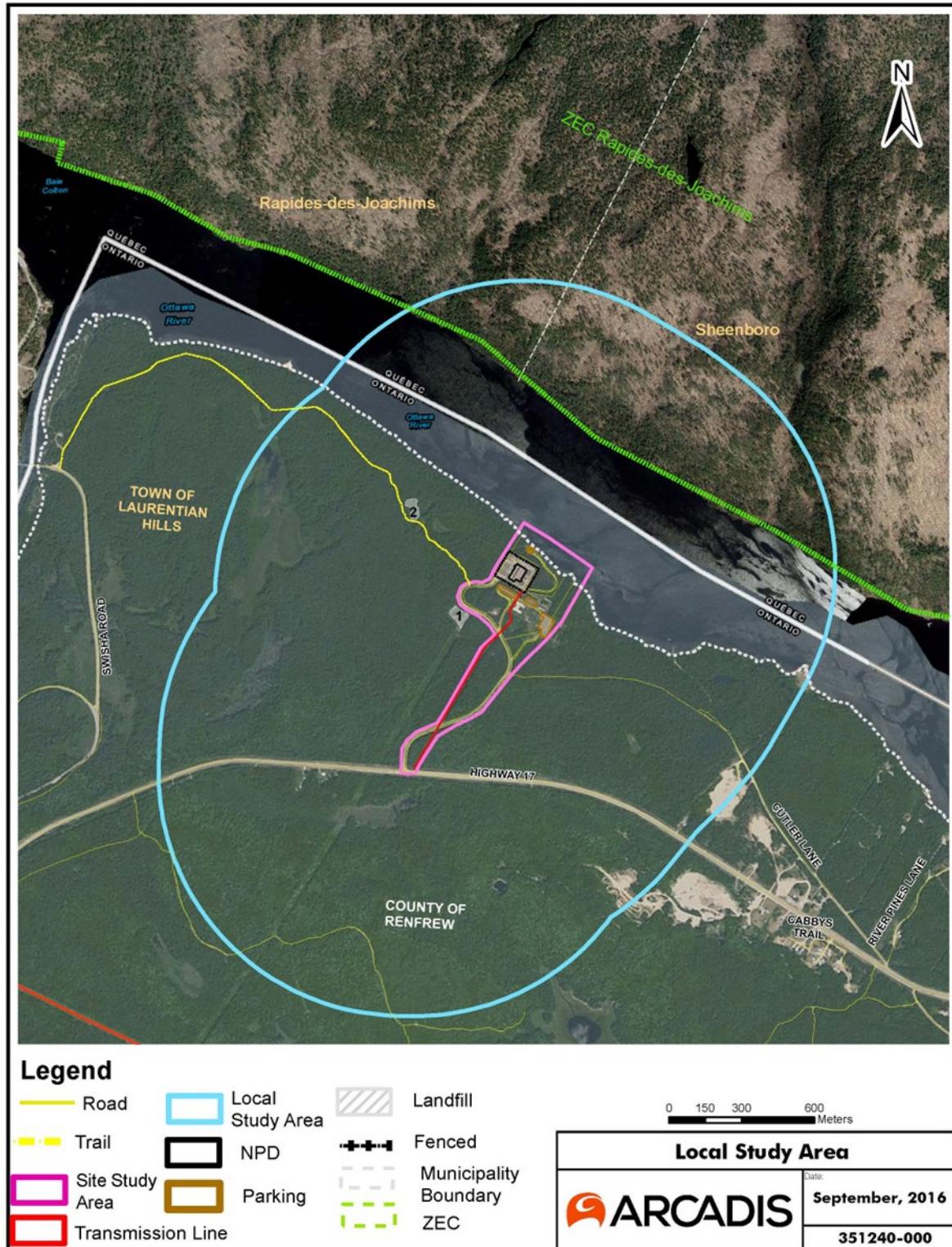


Figure 6-1: Traditional Land and Resource Use Site and Local Study Area



6.1.2 Traditional Land and Resource Use

6.1.2.1 Methods

Indigenous interests expressed to CNL during engagement with Indigenous Nations, communities, and organizations identified for the NPD Closure Project have been considered in the following assessment. In 2016 CNL, on two occurrences, sent letters to the identified Indigenous Nations, communities, and organizations requesting information on traditional land and resource use in the area surrounding the NPD Closure Project and the CRL site. CNL also sent a letter 2020 in May asking questions to verify assumptions made in lieu of having responses to previous letters or direct input from the Indigenous communities and organization.

Information on traditional land use activities by Indigenous peoples has been drawn from: existing studies and reports; Indigenous organization websites; the MNO Traditional Knowledge and Land Use Study [91]; the AOO AKLUS [92]; the AOPFN AKLUS [93]; the AOPFN Diet and Harvest Study [94]; the AOPFN Culture and Rights Study [95]; the KZA submission for NSDF (KZA, 2023), the KFN submission from NSDF (KFN 2023); formal and informal engagement activities; and general knowledge of the region. The MNO reviewed the 2020 March revised draft EIS which included incorporation of the findings of the MNO TKLUS. The AOO and AOPFN have also provided CNL with feedback on how their AKLUS studies were incorporated into this section. Information on traditional land and resource use and how it was gathered for each Indigenous Nations, organization and community is also documented below.

In the absence of specific feedback from identified Indigenous Nations, communities, and organizations, traditional land and resource use is assumed wherever there are publicly accessible lands (e.g., Ontario Crown land), which is a conservative approach to the assessment and also to reflect the dynamic practice of traditional land and resource use by Indigenous peoples in time and space. By making this assumption, it is more likely effects will be identified and assessed and potential use will be factored into project planning.

Algonquins of Pikwàkanagàn First Nation (AOPFN)

Traditional land and resource use knowledge for the AOPFN is primarily derived from the October 2020 AOPFN AKLUS [93]. Algonquin Knowledge was defined in the study as,

“a body of knowledge and information shared by Algonquin peoples and transmitted between Indigenous peoples, which supports traditional land use for the benefit and well-being of Indigenous peoples” [93] (p.5).

The same consultant that prepared the AOO AKLUS [92] also prepared the AOPFN AKLUS [93]. Additionally, some information on Algonquin traditional use has come through two other studies completed in 2021. CNL provided funding to AOPFN for two studies, a Culture and Rights Study [94] and a Diet and Harvest Study [95]. While not wholly traditional land and resource use studies, both studies included AOPFN traditional knowledge inputs and valuable

material on traditional land and resource use and therefore are considered for purposes of the analysis. Both studies build on the previously prepared AKLUS and are specific to AOPFN. Potential effects, issues and recommendations raised in those two Reports are being discussed directly with AOPFN and are included in the Section 4 summary discussion of interests and concerns and in Appendix C – Table C-4. While both Reports are identified as Confidential some key findings related to traditional use have been included in this Report.

Some contextual information on Algonquin traditional knowledge and use in this EIS is taken from supporting documents associated with resource management plans for the Ottawa Valley and surrounding region. Specifically, this information has been documented in Supporting Documentation to Forest Management Plans for the Ottawa Valley Forest, Nipissing Forest, Algonquin Park Forest, Mazinaw-Lanark Forest and Bancroft-Minden Forest. These five forests cover a wide area of central-eastern Ontario roughly equivalent to the AOO Settlement Area.

The Supporting Documentation to those Forest Management Plans includes documents such as the Aboriginal Background Information Reports which describes use of natural resources and protection of identified Aboriginal Values. That information is intended to describe traditional uses and protection of natural resources on Ontario Crown land over this wide region but does not include private or federal Crown land. These Reports describe traditional uses undertaken by all AOO communities including the AOPFN. The NPD site is located within the general area of the Ottawa Valley Forest but that Forest Management Plan has no jurisdiction over the NPD site, nor does it describe use of the site. These Forest Management Plans do describe in general terms, traditional use occurring on Crown lands near the NPD site; however, it should be noted that the findings from these Supporting Documents were not verified with AOPFN Knowledge Keepers for the development of this EIS. It is also noted that the forest management planning process does not enable fulsome documentation of Algonquin knowledge, land use and occupancy data and is subject to limitations as a source of this data.

Algonquins of Ontario (AOO)

Traditional land and resource use knowledge for the AOO is primarily derived from the 2020 December released AKLUS. The same consultant that prepared the AOO AKLUS [92] also prepared the AOPFN AKLUS which was released in 2020 October [93]. In the two reports, Algonquin Knowledge was defined in the study as:

A body of knowledge and information shared by Algonquin peoples and transmitted between Indigenous peoples, which supports traditional land use for the benefit and well-being of Indigenous peoples.

Some contextual information on Algonquin traditional knowledge and use in this EIS is taken from supporting documents associated with resource management plans for the Ottawa Valley and surrounding region. Specifically, this information has been documented in Supporting Documentation to Forest Management Plans for the Ottawa Valley Forest [22] Nipissing Forest [28], Algonquin Park Forest [85], Mazinaw-Lanark Forest [87] and Bancroft-Minden Forest [88].

These five forests cover a wide area of central-eastern Ontario roughly equivalent to the AOO Settlement Area.

The Supporting Documentation to those Forest Management Plans includes documents such as the Aboriginal Background Information Reports which describes use of natural resources and protection of identified Aboriginal Values. That information is intended to describe traditional uses and protection of natural resources on Ontario Crown land over this wide region but does not include private or federal Crown land. These Reports describe traditional uses undertaken by all AOO communities including the AOPFN. The NPD site is located within the general area of the Ottawa Valley Forest but that Forest Management Plan has no jurisdiction over the NPD site, nor does it describe use of the site. These Forest Management Plans do describe in general terms, traditional use occurring on Crown lands near the NPD site. It is noted that the forest management planning process does not enable fulsome documentation of Algonquin knowledge, land use and occupancy data and is subject to limitations as a source of this data.

Métis Nation of Ontario (MNO)

The MNO have completed a traditional knowledge and land use study that documents use of lands and waters near the CRL site [91]. Some other information on traditional land and resource use in this area of Ontario was obtained from the MNO website. Forest Management Plans prepared by the Ontario Ministry of Natural Resources and Forests for the area around the NPD site describe traditional Algonquin use for the AOO and AOPFN but traditional use of the MNO is not described.

Williams Treaties First Nations (WTFN)

While CNL was unable to find any documents such as forest management plans to describe Williams Treaties First Nation community uses near the NPD site, some WTFN members indicated verbally during an engagement in the spring of 2020 that they may have members living and / or harvesting near the NPD site. CNL has requested any information describing these communities' traditional uses near the NPD site. In the absence of additional feedback from WTFN, CNL has conservatively assumed that harvesting activities by Williams Treaties communities are undertaken in the Kichi-Sibi (Ottawa River) Valley. Forest Management Plans prepared by the Ontario Ministry of Natural Resources and Forests for the area around the NPD site describe traditional Algonquin use for the AOO and AOPFN but traditional use of the Williams Treaties communities is not described.

Kitigan Zibi Anishinabeg First Nation

KZA submitted information to the CNSC for the NSDF Hearing that provided some insight into traditional use undertaken by the community. That information included a background on the KZA community, traditional territory and rights. That filing also included an appendix with a Brief of Documents. One of those documents was a 1993 report by Jacques Frenette titled "Contemporary Occupation and Use of Territory among the Algonquins of Maniwaki". While

dated, this report did provide some comprehensive information on KZA that covered the historical period (up until the 1950s) and the modern period (up until the date of the Report).

Kebaowek First Nation

KFN also submitted information to the CNSC for the NSDF Hearing that provided some insight into traditional use undertaken by the Nation.

Algonquin Anishinabeg Nation Tribal Council (AANTC) Communities

CNL has requested any information describing these communities' traditional uses near the NPD site. While no information describing recent traditional use by AANTC community members has been found or identified CNL is of the opinion that likely there is some use occurring on the Kichi-Sibi (Ottawa River) or on the Quebec side of the Kichi-Sibi (Ottawa River) by some individuals from these communities. Thus, CNL has conservatively assumed that AANTC community member's access and practice traditional activities along the Kichi-Sibi (Ottawa River) or on the Quebec side of the Kichi-Sibi (Ottawa River). Forest Management Plans prepared by the Ontario Ministry of Natural Resources and Forests for the area around the NPD site describe traditional Algonquin use for the AOO and AOPFN but traditional use of the AANTC communities is not described.

6.1.2.2 Results

6.1.2.2.1 General

Information gathered on traditional use is described below.

6.1.2.2.2 Algonquins of Piwakànanàgàn First Nation

The NPD site is situated within the unceded Algonquin Territory, where negotiations with the Crown have occurred since 1991.

As part of a submission to the CNSC for a 10-year renewal of the Nuclear Research and Test Establishment Operating Licence for the CRL (Commission Member Document 18-H2.51), the AOO (including AOPFN) identified that it asserts unextinguished and constitutionally protected Aboriginal R to unceded traditional territory in Eastern Ontario (referred to as the "Settlement Area") and is currently in negotiations towards a modern-day treaty with the governments of Ontario and Canada. The NPD Closure Project will occur within the Settlement Area.

The Settlement Area includes 36,000 km² within the watersheds of the Kichi-Sibi (Ottawa River) and the Mattawa River. It is recognized that AOPFN citizens continue to practice traditional land use activities throughout this region. Algonquin traditional use has occurred for a very long period of time. In the *Aboriginal Background Information Report* to the Forest Management Plan for the Ottawa Valley Forest (OVF) 2011 to 2021 it was indicated that:

"Since the 1700's the Algonquins were known to spend the majority of the year occupying the different parts of the Ottawa Valley hunting, fishing, trapping and gathering among other things. These activities necessitated use of timber and other resources." [22]

The AOO website describes the importance of traditional harvest to all Algonquin communities:

“The harvesting of flora and fauna for food and trade has been integral to the Algonquin way of life since time immemorial. These practices embody an inherent respect for the environment and a fundamental commitment to the sustainable management of resources which has been passed from generation to generation.

The Algonquins of Ontario (AOO) are comprised of ten Algonquin communities, including the Algonquins of Pikwàkanagàn First Nation, Antoine, Kijicho Manito Madaouskarini (Bancroft), Bonnechere, Greater Golden Lake, Mattawa/North Bay, Ottawa, Shabot Obaadjiwan, Snimikobi and Whitney and Area.

The rights of Aboriginal people in Canada to engage in traditional activities, including the harvesting of wildlife, fish, migratory birds and plants, is recognized by the Constitution Act, 1982 and upheld by the Supreme Court of Canada. As stewards of our ancestral lands, the AOO recognize the importance of exercising this right in a responsible manner.”[89]

In the AOPFN AKLUS it was documented how hunting territories were managed, including dealing with encroachment and stewardship:

“The Algonquins passed down their family hunting-territories from generation to generation. It was the duty of each generation to protect their lands against encroachment, to grant permission to outsiders to pass over their lands, and to manage their territory’s resources to ensure an ongoing livelihood for their people.” ([84], p. 19)

The AOO, including AOPFN, further re-iterated the importance of traditional harvest in their Agreement-In-Principle with the Governments of Ontario and Canada. In Chapter 8, it is indicated that:

“The Final Agreement will provide that Beneficiaries have the right to Harvest Fish, Wildlife, Migratory Birds and Plants for Domestic Purposes throughout the year within the Settlement Area as further described in this Chapter.” ([90], p. 51).

As indicated in the quotation above, the intent of such harvest is for domestic purposes and not for commercial purposes (AOO et al 2016). Indigenous peoples, including the ancestors of the modern-day Algonquins living in the Ottawa Valley undertook traditional activities throughout the lands and waters of the Ottawa Valley, including the NPD site and the adjacent Kichi-Sìbì (Ottawa River) for fishing, trade and transportation.

AOPFN Algonquin Knowledge and Use Study

The AOPFN AKLUS identified three major objectives on page 8 [84]:

- Document evidentiary information that shows where and how Algonquins currently and historically have used the lands and waters around the NSDF and NPD sites, and Algonquin concerns related to these projects.
- Demonstrate how proposed and ongoing nuclear projects may impact Algonquin land use and occupancy.

- Propose appropriate mitigation measures and recommendations to ensure impacts to AOPFN rights and interests are minimized or accommodated (the AOPFN has expressed to CNL that this list is preliminary).

The temporal scope of the study included both historic (includes information participants know about through teaching or knowledge transfer from past generations, including oral history) and current (anything that occurred in a participant's lifetime) use. The geographical scope of the study included a 25 kilometer radius study area, which is extended by 5 kilometers more along the downstream side of the Kichi-Sìbì (Ottawa River). The high importance of the Kichi-Sìbì (Ottawa River) to the Algonquin people is well described in the AOPFN AKLUS report.

Map biography information that was collected included the following: locations of wildlife harvesting, trapping, fishing and gathering of plants or natural materials; locations of culturally and / or historically significant sites; locations of camps or places where people stay overnight on the land; travel routes and trails; areas of ecological importance; and, areas of demographic importance (e.g., locations of current or past residences or birthplaces).

The oral history information that was collected included: harvesting philosophy and techniques; use of harvested species for food, medicine, ceremony, crafts or economic purposes; Algonquin cultural knowledge; perspectives on cultural harvesting areas, cumulative effects on development and changes to the environment and land use activities; perspectives about ways the NPD Closure project may alter participants' use of the lands and waters; and, suggestions for how participants would like to see their concerns mitigated. It was also noted by study participants that the knowledge necessary for land-based practices is passed on and learned through generations ([84], p. 417). This means that continued access to traditional lands is important for this cultural continuance.

The features mapped include the following AOPFN Algonquin Land Use and Occupancy Categories: travel routes; boat launches or landings; personal fishing areas; commercial trapping or snaring; fish spawning habitat; bird habitat; reptile or amphibian habitat; species at risk habitat; mammal habitat; plant habitat; wildlife harvesting area; plant and natural materials gathering area; overnight locations; and, Algonquin cultural sites or areas of demographic importance.

The AKLUS also included sections on Algonquin history and the archaeological assessment that occurred as a part of the NPD Closure Project [84].

The AKLUS involved the participation of thirteen members of Pikwàkanagàn and represents some of the traditional use occurring within the study area. AOPFN specifically expressed that this must be viewed as a "snapshot" of use by a small subset of the AOPFN community, with the understanding that absence of data does not equate to absence of use and value in a certain location by AOPFN members [84].

Land Use values were reported in the TKLUS but were not specifically shown on maps in the report to protect the confidentiality of the locations. An Algonquin Land Use and Occupancy Map was included in the Report that documented traditional use in the identified study areas near the NPD site. The map was divided into one square kilometer grid squares. Grid squares

were shaded where traditional use was documented within a particular square kilometer (data being present in the square). Unshaded areas do not equate to an absence of use but may be simply an absence of data given the constraints of the study.

Along with mapping and describing land use, the Study team also asked oral history questions that focused on: the participant's Algonquin Knowledge of the area; their perceptions of current harvesting areas; perspectives on cumulative effects of development; and, changes to the environment and land use activities. The AOPFN AKLUS report ([84], p.28) notes that the features mapped fall into several different Algonquin land use and occupancy categories. The report notes that:

"These results demonstrate the extent to which Algonquins exercise their inherent rights and interests on the lands and waters surrounding the NPD project site and were used to inform the recommended mitigation and accommodation measures proposed in Section 4.0." ([84], p.28)

AOPFN participants in the study expressed their deep connections to the area around the NPD site:

The proposed NPD project is located within AOPFN's traditional territory, the lands and waters throughout which hold great cultural, historical and ecological significance to the Algonquins. Interview participants described deep connections to this area extending back through generations, emphasizing the importance of the lands and waters to Algonquin culture and ways of life that have existed throughout history and continue into the present day. Interview participants described exercising their Aboriginal rights and interests throughout the area, mapping sites of both land-use and occupancy, including sites where participants hold Algonquin Knowledge. Given these deep connections Algonquins hold to the NPD project study area, interviewees expressed a number of concerns related to the project and how it may impact their connection to and use of these lands and waters. ([84], p. 38).

The AOPFN AKLUS [84] goes on to note that there are numerous features mapped in and around the NPD site. As well there are some values that are mapped on a grid that overlaps the NPD site. AOPFN traditional use with respect to trapping, hunting, fishing, gathering and cultural uses and ceremonies is reported further below. Beyond traditional uses and cultural / historic sites, the AOPFN AKLUS also documents areas of important habitat including fish spawning (Oga (pickerel / walleye) and lake sturgeon), species at risk (bald eagle) and mammal (waboz (rabbit), makwa (bear), wawashkeshi (white-tailed deer), monz (moose) and mahingan (wolf)) habitat. The number of habitat areas, in particular mammal habitat areas documented in the AKLUS study area is extensive and represents the category with the largest number of recorded observations.

The AOPFN AKLUS report [84] generally describes the concerns harvesters have with respect to environmental impacts from nuclear facilities in the Algonquin Settlement area. These concerns are articulated both in a historical and present-day context (concerns both about the existing facilities and future uses). The concerns are associated with harvesting, health, and well-being, ability to connect to land and waters, and overall impact to the environment and specifically the Kichi-Sibi (Ottawa River). One AOPFN AKLUS participant also noted that the strong medicinal plants can be found alongside waterways ([84], p. 34).

AOPFN Diet and Harvest Study

The purpose of the Diet and Harvest Study [94], “is to provide a baseline of current AOPFN harvesting patterns, along with an understanding of reliance on and concerns related to both the Algonquin food system and commercially available food products to inform human health risk modelling for the AOPFN general population and most sensitive consumer”. The Diet and Harvest Study included a detailed dietary survey which reached the target of 250 AOPFN households on and off the AOPFN Reserve. The survey included questions on: household demographics; harvesting practice areas / use in the last five years; dietary patterns (Algonquin food and agricultural food products and usual sources); sources of water; food security; engagement in traditional activities; perception of health, community strengths and vulnerabilities; and potential project concerns.

An informative discussion of Algonquin Food System Practices is included in the Report. That philosophy is described in a quote from the AOPFN website:

“Our philosophy is to only take what you need; give in order to receive; recognize that you are an equal part of all that is; be thankful for everything that you get” [20].

The Diet and Harvest Report goes on to note the concerns that AOPFN members have with respect to perceived contamination on the Kichi-Sibi (Ottawa River) (p. 27) as well as the challenges of harvesting across the AOPFN unceded territory due to land settlement and development activities that have reduced the area of land for traditional harvest (including, without limitation, the NPD site) over the last couple of centuries.

The Diet and Harvest Report summarized succinctly the interconnected importance of traditional harvest, food and the Algonquin Way of Life.

“Harvesting and reliance on Algonquin foods continue to be a central aspect of AOPFN lifeways. Despite negative impacts on access, food quality, and availability, the practice of harvesting, processing, and eating Algonquin foods continue to serve crucial social, knowledge transmission, cultural, nutritional, and food security / sovereignty needs. Algonquin foods and the places they are harvested in are also interconnected with personal and family histories.” (p. 35)

The dietary frequency of Algonquins foods (which would be traditionally harvested) being consumed by study participants was tabulated with the following findings.

- Eighty-seven percent identified eating fish and aquatic animals with an average of 39.3 days consumption per year (pickerel / walleye were the most widely consumed but northern pike, bass, lake and speckled trout and lake whitefish were also consumed by 27% to 42% of the population).
- Eighty-seven percent identified eating land animals and furbearers with an average of 44.3 days of consumption per year (moose and deer were by far the most widely eaten animals).
- Forty-six percent identified eating birds with an average of 7.2 days of consumption per year (grouse, turkeys, ducks and geese).

- Thirty-nine percent reported eating berries and nuts with an average of 27.7 days of consumption per year.
- Thirty-eight percent reported eating other plant food (e.g., maple syrup, fiddleheads, cedar tea, wild rice, wild leeks) with an average of 20.6 days of consumption per year.
- Twenty-three percent reported eating mushrooms (e.g., maple syrup, fiddleheads, cedar tea, wild rice, wild leeks) with an average of 20.6 days of consumption per year.
- Forty-eight percent use plant species (sage, sweetgrass and cedar) for medicinal purposes and either burned and inhaled or applied the plant to skin.

The traditional food system of the AOPFN community is comprised of more than 100 kinds of animals, fish, birds, berries, nuts and plants.

Estimates of daily Algonquin food intake by species were calculated from the food frequency data and available average portion size data reported in the First Nations Food, Nutrition, and Environment Study (FNFNES) Ontario report. Four potential intake levels were assessed representing different proportions of Algonquin food consumption. These various intake levels provide data useful for human health impact assessment. The survey also provided data on local agricultural food consumption.

Participants in the Diet and Harvest survey were asked to identify where they harvest within the Algonquin territory. That area was divided into six areas; Area 1: the Ontario side of the Kichi-Sibì (Ottawa River), Rolphton, and Petawawa; Area 2: Algonquin Provincial Park; Area 3: Pikwàkanagàn, Bancroft, and Whitney; Area 4: Kingston, Prescott, and Calabogie; Area 5: Ottawa; and Area 6: Quebec side of the Kichi-Sibì (Ottawa River), Rolphton, and Portage du Fort. Area 1 is the area that includes both NPD and CRL. That is a large area that generally stretches from North Bay in the north to Pembroke in the south and from the Kichi-Sibì (Ottawa River) to the northern and eastern boundaries of Algonquin Provincial Park.

The level of involvement of Algonquin households in traditional harvesting is described below.

“Seventy-three percent (73%) of AOPFN households that participated in the AOPFN Diet and Harvest survey (183/250) identified themselves as active harvesters. Seventy-seven percent of harvesters are on the land harvesting and/or camping for 3 weeks in the year, while 22% indicate they are harvesting between 1 and 3 months in a year.” (p. 59)

Breaking down the participation of Algonquin households in traditional activities by geographic region resulted in the following findings. Area 1 which is geographically described above and includes NPD and CRL sites is highlighted in bold in the text below.

“Over half (56%) of all respondents (n=141), had fished in the territory within the last five years. Areas that were more commonly fished included the areas surrounding Pikwàkanagàn, Bancroft, and Whitney (73% of active fishers) and Algonquin Provincial Park (72% of active fishers). A small proportion (~7%) reported fishing on the north side of the Kichi-Sibì in Quebec and south of Bancroft, while approximately one in four reported fishing in the area between North Bay and Petawawa. Eighteen percent fished within the zone containing the proposed CNL sites. Fourteen percent reported going outside of the provided areas to fish.

Figure 10 identifies the most common hunting areas for the 165 survey respondents who identified themselves as active hunters. Algonquin Provincial Park is the most actively used (93% of active hunters) followed by the areas surrounding Pikwàkanagàn, Bancroft, and Whitney (45% of active hunters). Twelve percent hunt on the south side of the Kichi-Sibì between North Bay and Pembroke while 8% travel beyond the territory.

There is a lower overall number of harvesters compared to hunters and fishers but a similar pattern of harvesting, concentrated within Algonquin Provincial Park (77% of active plant harvesters) and in the areas surrounding Pikwàkanagàn, Whitney, and Bancroft (70% of active plant harvesters). A small proportion (12%) are harvesting on the south side of the Kichi-Sibì between North Bay and Pembroke and in the areas south of Renfrew County around Ottawa (13%). Some (11%) active plant harvesters reported going outside of the territory to harvest.

Mushrooms tend to be harvested in Renfrew County and Algonquin Provincial Park with a small percentage of members (<5%) harvesting on the northern side of the Kichi-Sibì (Ottawa River) between Rolphton and Portage-du-Fort, while 6% of members indicated that they harvested outside of these areas.” (pp. 60 – 63).

The Diet and Harvest study also discussed barriers to harvest and avoidance. The Report describes how areas such as NPD have been fenced off preventing access to this area for harvesting. Fears of contamination and the health of country foods are also cited as a major barrier preventing harvest and leading to avoidance behavior around fenced off facilities and in the aquatic environment:

“For many harvesters, there is also strong uncertainty around the quality and safety of Algonquin foods from both the CNL Projects and other industrial activities (hydro-electric development, forestry)” (p. 67).

The survey asked respondents about what factors were limiting their traditional food use. Uncertain quality / safety of food use around nuclear facilities was cited by 39% of survey respondents. Other factors included: uncertain quality / safety of food due to forestry (pesticides / herbicides) (37%); animal health concerns (ticks/cysts) (35%); sustainability/conservation concerns (24%); and, not enough time (54%).

Part of the AOPFN traditional territory was also divided up into zones for one very specific question as to whether any areas were commonly avoided. Zone 5 which is a square running from Pembroke to Rolphton, west into Algonquin Park and east into Quebec, and containing the NPD site, was an area subject to a higher degree of avoidance than any other area.

“Approximately three quarters (76%) of active harvesters (n=183) reported avoiding areas due to quality or safety concerns. Zone 5, which includes the proposed CNL Projects, is the most commonly avoided area, due to perceived food safety and quality concerns and highly restricted access to harvesting areas. Of those respondents who said they avoid areas (n=139), 92% avoided zone 5. This is more than double the proportion of avoidance of any other zone within the Study.”

It should be noted that this Zone 5 area would also include Garrison Petawawa and also the communities from Pembroke to Rolphton between the Kichi-Sibì (Ottawa River) and the

Trans-Canada Highway. In summary, AOPFN members expressed concerns about the loss of lands for traditional use from various activities that have occurred on their traditional territories.

“AOPFN presence across and use of the land has been ongoing since time immemorial yet these culturally important and life-sustaining practices have been limited and impacted through overlapping barriers to accessing Algonquin foods in the recent past. Industrial activity, privatization of Algonquin land into private property parcels, fragmentation of harvesting areas, reduction in available habitat, and the real and perceived contamination of the lands and waters in Algonquin territory have resulted in areas with marked avoidance and dramatically limited use.” (p. 73)

The concern about the loss of land area to harvest from was also considered in relationship to the economic and nutritional importance of traditional Algonquin foods to community members that are facing food security challenges. This was described in the Report as follow:

“The term “food insecurity” is commonly used to describe households and individuals who identify as not having enough income to purchase adequate food from grocery stores. This is often measured using an income-related food security tool. In this Diet and Harvest survey, participants simply were asked whether they were concerned about their household’s ability to obtain sufficient amounts of grocery foods.” (p. 73)

The Report noted that in “the last year, one in every four AOPFN respondent families experienced challenges in purchasing adequate amounts of food to feed their families.” (p 73)

AOPFN Culture and Rights Study

The purpose of the Culture and Rights Study [94] is described below.

“The purpose of the Report is to provide current information and context regarding the existing status of AOPFN culture and Section 35 rights in relation to the area where the project is proposed, and a preliminary consideration of anticipated interactions between the project and AOPFN rights. This is primarily an initial project interactions report, meaning it does not contain a full assessment of these impacts or consideration of evolving commitments made by parties to avoid, reduce or compensate for these effects. It is understood that a formal Rights Impact Assessment (RIA) will be conducted by AOPFN with the Canadian Nuclear Safety Commission staff during the environmental assessment (EA) for the project. Data from this Study is expected to inform that RIA process.”

The Culture and Rights Study is described in this traditional land and resource use section because it is the earnest desire of CNL to better understand Algonquin perspectives on Algonquin culture and rights and what that means practically on a day-to-day basis. This is pointed out in Chapter 1 of the Report and is conveyed in the AOPFN Vision Statement (p. 13):

“Living in harmony with our cultural values enables our People to live in a healthy, natural environment, and to participate productively in modern society.

The Algonquin People know and cherish their Rights: they protect their Rights by exercising them in their daily lives. (AOPFN Vision Statement)”

The Culture and Rights Study differs from the AKLUS and Diet and Harvest Studies in that it describes how rights are conceptualized through traditional activities. This is described on page 39 of the Report.

“this Study is concerned with how AOPFN members conceptualize their rights to engage in such activities on the lands of their unceded territory. These rights are in part based on the seasonal movement through AOPFN territory that existed prior to and during the early settlement period, and the ability to practice them is tied to members’ Algonquin culture and identity.”

AOPFN rights were considered within the context of three VCs, solely developed for the Culture and Rights Study: Harvesting and Traditional Use Rights; Governance and Stewardship Rights; and Cultural Continuity Rights. The central importance of land to the culture and community of AOPFN was described eloquently in the Report:

“AOPFN culture can be thought of as a way of life, a system of knowledge, values, beliefs and behaviour, passed down between generations of AOPFN members. It encompasses the systems within which people live, play, work, and interact with one another and their surroundings on a day-to-day basis. Culture is reflected and embedded in AOPFN practices and the relationships between people and their natural environment. Culture includes physical elements that can be seen and touched (tangible cultural resources) and other elements that, while equally important, are non-physical, subjective, and knowledge or value-based (intangible cultural resources). Example intangible elements of culture include:

- *communally-held knowledge, values, and ways of knowing and transmitting knowledge;*
- *spiritual practices, ceremonies and beliefs;*
- *traditions and traditional pursuits;*
- *visual and physical aspects of landscapes with which people identify, and connectedness to places and spaces; and*
- *a common understanding of humankind’s connection to, and role in, the natural environment.*

For many AOPFN members, their culture is the foundation of their personal identity, and the values, beliefs, knowledge, skills, symbols and activities that are built into their culture provides the “glue” for their well-being and connection to other members of their community and culture group. And land is the critical element of culture, as described by an AAC member:

‘The land connects us to the past and to the future. (AOPFN Advisory Committee (AAC) member, January 25, 2021)’ (pp. 14 – 15).

Information for the Report was largely drawn from focus groups and verification sessions and key informant interviews. The interviews gathered qualitative and site-specific information in study areas around the NPD site. The study areas for the Culture and Rights study are as follows: the Site Study Area is the NPD Closure Project Footprint (with a 250 m buffer zone around the project). The Local Study Area is a 5 km radius around the NPD site, and the

Regional Study Area is a 25 km radius around the NPD site (these study areas are different than those in the EIS).

Eleven AOPFN community members were interviewed.

Mapped values included those that would be considered traditional land and resource values considered by this EIS. These values included:

- Habitation values (including temporary, occasional, seasonal, and permanent camps and cabins);
- Cultural and spiritual values (including burial sites, ceremonial areas, and community gathering areas);
- Subsistence values (including harvest and kill sites, plant collection areas, and trapping areas);
- Environmental feature values (including specific, highly valued habitat for moose, elk, and deer); and
- Transportation values (including trails, water routes, and navigation sites).

The temporal boundaries included past, current, and planned future knowledge and use.

- A past value refers to an account of knowledge and use prior to living memory, passed down through history;
- A current value refers to an account of knowledge and use within living memory; and
- A planned future value refers to anticipated or intended knowledge or use.

Based on the key informant interviews, the Culture and Rights Study characterized the local study areas as follows:

“participants have knowledge of the areas within the SSA/Project Footprint, but primarily due to lack of access and perceived risk contributing to stigma associated with the NPD site and its surroundings, have largely been alienated from the vicinity for many decades. As a result, AOPFN members often do not feel they have the ability to access or make informed decisions about the SSA. Similarly, within the LSA, participants are aware of wildlife habitat, but would need access to data and more opportunity to monitor current conditions to make decisions about harvesting based on safety. Within the Regional Study Area, some participants continue to harvest closer to Algonquin Provincial Park.”

AOPFN participants reported one site-specific value related to Harvesting and Traditional Use Rights, two site-specific values related to Governance and Stewardship Rights, and four site-specific values related to Cultural Continuity Rights within the Project Footprint (inclusive of data randomized for confidentiality with a 1 km buffer). The Harvesting and Traditional Use value was a fishing site for walleye last used in summer 2020. The Governance and Stewardship values were: an area AOPFN members avoid because elders warned them about the nuclear activity; and an area where AOPFN members emphasize the need to access data about health of animals, plants, and water before deciding whether or not to harvest. The Cultural Continuity

values were: a recreational water route used by AOPFN members to access locations along the Kichi-Sibì, including Oiseau Rock, last used in summer 2020; and, multiple water routes that are no longer used by AOPFN families for travel and harvesting purposes. (pp. 34 – 35).

AOPFN participants also reported three site-specific values related to Harvesting and Traditional Use Rights within the Local Study Area (5 km radius of the project) including a fishing site for walleye and harvesting locations for birch bark and spruce roots (p. 35).

AOPFN participants reported nine site-specific values related to Harvesting and Traditional Use Rights and two site-specific values related to Governance and Stewardship Rights within the Regional Study Area (25 km radius of the project). The three Harvesting and Traditional Use sites included: a fishing site for bass and a fishing area AOPFN members avoid due to concerns about contamination; moose kill sites; and, good moose habitat. The Governance and Stewardship rights values were: an area along the waterfront of the Kichi-Sibì (Ottawa River) that participants feel could be used by AOPFN for commercial, harvesting, and recreational purposes if it were accessible (essentially a potential future use site); and, an area where AOPFN members emphasize the need access to data about health of animals, plants, and water before deciding whether or not to harvest (p. 35).

Harvesting and Traditional Use Rights

AOPFN members described their rights as pertaining to the following traditional activities: hunting; trapping; fishing; gathering food plants and medicines; gathering plants and other natural materials for crafting and other cultural activities (e.g., birch bark for canoes); and habitation of camps and camping sites (p. 40). These activities do closely align with the traditional activities described in other IER sections.

The Report and AOPFN participants described the concept of “sufficiency resources” that are required for the practicing of rights related to harvesting and traditional use. These were listed in the Report as follows (pp. 40-41):

- healthy populations of game in preferred hunting areas;
- healthy populations of fish in preferred fishing water bodies (including the Kichi-Sibì (Ottawa River), other rivers and streams, lakes, and ponds);
- clean and plentiful water from natural sources on the land;
- healthy and abundant food plants and medicines in preferred areas;
- confidence in the quality of wild foods (e.g., free from contamination);
- reasonable access to lands, waters, and resources,
- accessible within the constraints of time and cost;
- an adequate land base on which to pursue harvesting and traditional use;
- feelings of safety and security on the land;
- healthy cultural and spiritual relationships with the land;

- high levels of traditional knowledge of specific locations, and the ability to pass this knowledge across generations; and
- the ability to maintain traditional governance, land tenure, and stewardship systems.

The Report goes on to describe changes over time to AOPFN rights in the project area and throughout all the AOPFN traditional territory since European contact and describes the cumulative effects of settlement and industrial activities. It is noted specifically how the NPD area became an exclusion area and AOPFN members therefore were unable to practice rights in the area. Concerns about contamination of the lands and wild game are also described. The Culture and Rights Study also utilizes in data and AOPFN member statements from the Diet and Harvest and AKLUS studies to illustrate concerns.

Governance Rights

Algonquin governance and stewardship rights are best described by text directly from the Report:

“Algonquin governance and stewardship practices extend back to the time prior to and around early settlement, as described in the Background (see Section 3.1). The following characteristics are of note and provide context for how AOPFN members today view their governance and stewardship rights:

- *Algonquin ancestors moved about their territories seasonally to various permanent sites;*
- *Territories were divided by family-based landholdings, the boundaries of which citizens understood and respected, and descendants in present day have noted that accessing allocated family hunting grounds for Algonquin foods is part of their heritage, and a practice passed on from their ancestors;*
- *These family-based land tenures included, besides access to hunting and harvesting, the duty to steward the land to ensure continuity of resources for future generations, protect against encroachment, and manage who had permission to travel through the lands;*
- *Algonquin ancestors charged tolls for passage along the Ottawa River, and issued leases and collected rents from settlers; and*
- *Algonquin ancestors never surrendered or ceded title to their traditional territories.”*
(p. 54)

AOPFN rights related to governance and stewardship were described by participants as: right to self-determination; right to participate in decision-making matters which would affect their rights; right to use traditional Algonquin government structure in decision-making; right to exercise traditional land tenure systems (e.g. who can access resources in which locations); right to exercise traditional stewardship systems (e.g. using protocols to protect species) to protect and conserve lands and resources for future generations; and right to access

information about the health of animals, fish, plants, medicines, and water, to be able to make informed decisions about harvesting and consumption of resources (p. 56).

AOPFN members also expressed how a “sufficiency of resources” is necessary for the practice of rights related to governance. These resources include but are not limited to: ability to maintain traditional governance, land tenure, and stewardship systems; ability to participate in decision-making processes regarding AOPFN unceded territory; adequate consultation processes for projects proposed in AOPFN unceded territory; and adequate accommodation of AOPFN requests regarding projects proposed in unceded AOPFN territory (p. 56). AOPFN members note in the Report how these rights have eroded over time:

“Regional cumulative effects on AOPFN members’ ability to practice governance rights include a long history of land dispossession through the settlement period, long history of lack of consultation regarding projects in AOPFN unceded territory, diminished access to and control over AOPFN unceded territory, gradually being pushed inland away from water bodies over time resulting in changes in territorial autonomy, confinement to the Pikwàkanagàn reserve, residential schools and associated interruption of transmission of governance practices between generations.

Based on information collected from AOPFN members for this Study, in the time that nuclear projects have been constructed and operating in AOPFN’s territory (i.e., since 1943), AOPFN members have not been adequately consulted about these projects, including the NPD. Especially because AOPFN territory is unceded, participants and AAC members considered this to be an ongoing violation of their governance and stewardship rights.” (p. 57)

Cultural Continuity Rights

With respect to the topic of cultural continuity, AOPFN described the following rights: right to practice AOPFN culture; right to transfer knowledge between generations about the practice of AOPFN culture; right to freely travel across the land and waters of AOPFN territory and right to protect and conserve the lands and resources so future generations can practice their rights (p. 65). In turn, these rights are dependent on access to their traditional lands and resources and the ability to harvest and the concern is expressed that since the take up of the lands for the NPD Closure Project those lands are unavailable for AOPFN to practice in that specific area.

The Report described the current conditions with respect to AOPFN Cultural Continuity Rights in the project area include the following:

- Diminished ability to teach and transfer knowledge to the next generation, and limited lands that can support this activity;
- Reduced feelings of safety and peaceful enjoyment of their land;
- No ability to revive practicing seasonal travel in the Study Area, due to cumulative impacts of alienation from AOPFN lands; and
- Continued sense of connection to the land and their heritage despite being barred from full access to their territories.” (p. 70)

6.1.2.2.3 Algonquins of Ontario

The NPD Closure Project occurs within unceded Algonquin Territory, subject to AOO's Land Claim, where negotiations with the Crown have occurred since 1991.

As part of a submission to the CNSC for a 10 year renewal of the Nuclear Research and Test Establishment Operating Licence for the CRL (Commission Member Document 18 H2.51), the AOO identified that it asserts unextinguished and constitutionally protected Aboriginal Rights to unceded traditional territory in Eastern Ontario (referred to as the "Settlement Area") and is currently in negotiations towards a modern day treaty with the governments of Ontario and Canada. The NPD Closure Project occurs within the Settlement Area. The Settlement Area includes 36,000 km² within the watersheds of the Kichi-Sibi (Ottawa River) and the Mattawa River. This area is the unceded traditional territory of the AOO, composed of 10 Algonquin communities—the Algonquins of Pikwàkanagàn First Nation, Antoine, Kijicho Manito Madaouskarini (Bancroft), Bonnechere, Greater Golden Lake, Mattawa/North Bay, Ottawa, Shabot Obaadjiwan (Sharbot Lake), Snimikobi (Ardoch) and Whitney and Area—and it is recognized that AOO citizens continue to practice traditional land use activities throughout this region. Algonquin traditional use has occurred for a very long period of time. In the Aboriginal Background Information Report to the Forest Management Plan for the Ottawa Valley Forest 2011 to 2021, it was indicated that:

Since the 1700s the Algonquins were known to spend the majority of the year occupying the different parts of the Ottawa Valley, hunting, fishing, trapping and gathering among other things. These activities necessitated use of timber and other resources. ([22])

The AOO website describes the importance of traditional harvest to all Algonquin communities:

"The harvesting of flora and fauna for food and trade has been integral to the Algonquin way of life since time immemorial. These practices embody an inherent respect for the environment and a fundamental commitment to the sustainable management of resources which has been passed from generation to generation.

The Algonquins of Ontario (AOO) are comprised of ten Algonquin communities, including the Algonquins of Pikwàkanagàn First Nation, Antoine, Kijicho Manito Madaouskarini (Bancroft), Bonnechere, Greater Golden Lake, Mattawa/North Bay, Ottawa, Shabot Obaadjiwan, Snimikobi and Whitney and Area.

The rights of Aboriginal people in Canada to engage in traditional activities, including the harvesting of wildlife, fish, migratory birds and plants, is recognized by the Constitution Act, 1982 and upheld by the Supreme Court of Canada. As stewards of our ancestral lands, the AOO recognize the importance of exercising this right in a responsible manner." [89]

The AOO, including AOPFN, further re-iterated the importance of traditional harvest in their Agreement-In-Principle with the Governments of Ontario and Canada. In Chapter 8, it is indicated that:

“The Final Agreement will provide that Beneficiaries have the right to Harvest Fish, Wildlife, Migratory Birds and Plants for Domestic Purposes throughout the year within the Settlement Area as further described in this Chapter.” [90].

As indicated in the quotation above, the intent of such harvest is for subsistence / community use purposes and not for commercial purposes (AOO 2016). Indigenous peoples, including the ancestors of the modern-day Algonquins living in the Ottawa Valley undertook traditional activities throughout the lands and waters of the Ottawa Valley, including the NPD site and the adjacent Kichi-Sibì (Ottawa River) for fishing, trade and transportation.

Traditional land and resource use knowledge for the AOO is primarily derived from the 2020 December released AKLUS [89]. Twenty (20) individuals participated in the AOO AKLUS, including 16 interviewees from the Algonquin communities of Greater Golden Lake, Kijicho Manito Madousakarini, Mattawa/North Bay, Ottawa and Sinimikobi, and two interviewees from the AOPFN. The AOO AKLUS also included the participation of two non-Algonquin Knowledge Holders, who are not Indigenous rights-holders, but hold a deep understanding of Algonquin knowledge and values and have a strong relationship with the AOO. The Algonquin communities of Bonnechere and Whitney and Area signed on in support of the project but were unable to participate in data collection. The total sample size of the AKLUS is small given the number of AOO members.

The AOO AKLUS indicates that the methodology used by the joint AOO and SVS research team is based on the best practices of Terry Tobias in his manual, *Living Proof: The Essential Data Collection Guide for Indigenous Use and Occupancy Map Surveys*.

The goal of the study was documented as:

The goal of the Study was to collect specific land use and occupancy data and Algonquin knowledge to determine how and where the NPD and NSDF projects will intersect and impact Algonquin use and occupancy. The research team collected this data through map biography and semi-structured interviews with Algonquin elders, land users, harvesters and Knowledge holders. [90].

The temporal scope of the study included both historic (includes information participants know about through teaching or knowledge transfer from past generations, including oral history) and current (anything that occurred in a participant’s lifetime) use. The geographical study area for the AOO AKLUS was a 25 kilometer radius from the NPD and an additional 5 kilometer radius further downstream on the Kichi-Sibì (Ottawa River). The temporal scope of the study

was for current and historic use. The high importance of the Kichi-Sibi (Ottawa River) to the Algonquin people is well described in the AOO AKLUS report.

Concerns about the proposed NPD Closure Project were documented in the Report and formalized into a series of comments and recommendations. Participants expressed general concerns related to the loss of connection to, and use of the lands and water, the proximity of the project to the Kichi-Sibi (Ottawa River), contamination of country foods, bioaccumulation of contaminants in important species, threats to species at risk such as lake sturgeon and American eel, as well as the safety of the harvest, access to cultural sites, the archaeological potential of the area and the flow of information to the AOO.

The AKLUS also included sections on Algonquin history and the archaeological assessment that occurred as a part of the NPD Closure Project. It should be noted that given the small sample size of this AOO AKLUS, the data only represents a “snapshot” of traditional land use and occupancy within the Study Area.

6.1.2.2.4 Métis Nation of Ontario

The NPD Closure Project also occurs within the Mattawa / Lake Nipissing Traditional Harvesting Territory for the MNO Mattawa Métis Council, North Bay Métis Council and Sudbury Métis Council (MNO 2017, no date), which is part of MNO Region 5. The NPD Closure Project is also located in close proximity to the northern border of MNO Region 6.

The MNO completed a TKLUS [92] that was undertaken specifically for the NSDF and NPD Closure Projects through funding supplied by the CNSC. The study area used in the TKLUS included a 50 km radius from the NPD and NSDF projects but documented use beyond that radius. While the study only involved 11 participants it did document significant use within its study area. Because the study only involved 11 participants, the results should not be taken as the only land uses by MNO citizens in the region.

While best efforts were taken to ensure that the TKLUS was representative of Métis land use, it should be remembered that the study included a small number of participants and was restricted both due to capacity and by a backlog in the citizenship review process at the MNO registry. Additionally, some Métis Citizens practice avoidance behavior and do not harvest in the area surrounding the proposed NPD Closure Project due to concerns about plant and animal contamination.

6.1.2.2.5 Kitigan Zibi Anishinabeg First Nation

Kitigan Zibi in its 2023 submission to the CNSC for the NSDF Hearing described its community's connection to the Kichi-Sibi (Ottawa River) watershed:

“Since time immemorial, the Algonquin Nation has occupied the length of the Kichi Sibi (Ottawa River), watershed, from its headwaters in north central Québec, all the way to its outlet in Montréal. Prior to contact, the Algonquin People were known as the

Omàmiwininiwag. They had a clan governance system based on the Kichi Sibi (Ottawa River) watershed. The Algonquin Nation has never ceded, nor abandoned its traditional territory. Their rights and title have not been extinguished. Hence, the Kichi Sibi (Ottawa River) Watershed, including the CRL site, still remains unceded and the Algonquin First Nations still hold to this day their inherent rights to it.” (p. 2)

In that submission KZA goes on to describe historical and contemporary traditional use in its traditional territory and includes reference to NSDF (on the CRL property).

“KZA community members continue to occupy, manage, safeguard and intensively use lands and waterways as they carry out traditional and contemporary activities on their traditional lands. No treaties were signed by us in relation to our land and these rights remain unextinguished.

Within the Algonquin Nation, Aboriginal title is held at the community level. KZA asserts Aboriginal rights and title over our traditional lands which are located in present-day Ontario and Québec and depicted below in Figure 6-3. While the NSDF site is not within KZA’s title territory, the impacts of the proposed NSDF will undoubtedly be felt downstream from it. At its closest, the NSDF would be less than 38 kilometers from KZA’s traditional lands. Consequently, our rights that flow from our title are engaged in this process. We continue to maintain that the Crown’s duty to consult lies at the higher end of the spectrum, given the strong prima facie case for our claim and the serious potential adverse effect upon it. Given the community-specific nature of rights, KZA must be consulted with as an independent nation and with the recognition of its specific rights” (KZA, 2023, pp. 2 – 3).



Figure 6-3: Traditional Territory of the KZA in Relation to CRL and NSDF

While NPD is not described in the above passage nor depicted in the map above, the NPD site is located 30 kilometers upstream of the NSDF (Chalk River) site and is therefore also outside of KZA's traditional territory. However, as indicated in the submission from KZA, it is very concerned about the proximity of the NSDF to this territory. CNL assumes that this concern extends to NPD. The importance of the Kichi Sibi (Ottawa River) is further described below.

"The Kichi Sibi is at the core of KZA's history, culture and traditional activities, a testament to the historical and cultural importance of this area to Anishinabe. The Kichi Sibi is KZA's main ancestral water route and is still today a major cultural site, gathering place, and fishing spot. It is where KZA members share their traditional knowledge and culture and teach their youth their way of living and knowing. It is therefore clear why KZA seeks to maintain both the ecological components and the unique cultural and spiritual integrity of the Kichi Sibi watershed. As an Anishinabe Heritage Site, it remains a cornerstone of KZA's identity."

The CRL site is of particular significance to KZA given its proximity to several important cultural and spiritual sites along the Kichi Sibi (Ottawa River). Prior to contact, we exercised our inherent rights along the Kichi Sibi in gathering, making offerings, and conducting ceremonies at these locations. One such example is Oiseau Rock, known in Algonquin as "Migizi Kiishkaabikaan". The Migizi Kiishkaabikaan is a rock face 150 meters above the Kichi Sibi (Ottawa River), located across from the CRL and NSDF site. The access to this significant site would and has been

hindered by being just across the Ottawa River from the Chalk River facility.” (KZA, 2023, p. 5).

Harvesting Rights

The KZA submission also described harvesting use, rights and practices of the community and in relation to the Kichi-Sibì (Ottawa River) near the CRL site.

“Since time immemorial, KZA has been protecting, occupying and using the Kichi Sibì and its watershed to live from the land, and through it. Still today, KZA people enjoy the Kichi Sibì, navigate its flows, fish on its waters, and gather on its shores. This river has always been a major waterway to travel through our traditional territory and a famous gathering and fishing spot. In and beyond the Kichi Sibì, KZA traditional territory encompasses the whole watershed and, hence surrounds CRL site and NSDF site. KZA members still enjoy and use all the entire Algonquin Nation traditional territory to which they still have access, including the NSDF surrounding area. From the Kichi Sibì and roads, they reach into the area surrounding the CRL site to practice their traditional activities. They hunt in that area, in particular moose, gather medicinal products (bark, root, leaf, etc.) from various plants and trees, and pick food supply (blueberry, raspberry, nuts, wild garlic, etc.). Members using this area have noticed moose yards and many other special wildlife habitats in the vicinity of the CRL site. The CRL site is in fact part of one of the richer sections of the Kichi Sibì, being one of the better areas where fish abound and an area of particular interest for KZA members looking to exercise fishing rights. They fish many species on the river, for instance Oga (Walleye), Trout, Burbot (Lota lota), Bass, Perch, Muskellunge, Northern Pike (Esox lucius), Bullhead, Catfish, Smelt, American eel (Anguilla rostrata), Lake Sturgeon (Acipenser fulvescens) and many others.” (p. 16)

Right to Dignity of Our Culture

In their NSDF submission KZA described a concept, “Right to Dignity of Our Culture” which is tied to traditional use and is important in contextualizing the importance of the Kichi Sibì (Ottawa River).

“KZA’s culture and history are deeply rooted into the Kichi Sibì, making this river an essential cultural area. To maintain a relationship with the territory, KZA must be able to protect, revitalize and teach their ways of being to future generations. KZA’s ways of being are often understood in relation to natural environment and physical landscapes. KZA’s relationship with the land is based on being grateful for its wealth and respecting it. A crucial aspect of this relationship is KZA’s ability to use, travel through, and enjoy the surroundings in peace, without fear or trepidation. Physical obstructions in or alterations to the natural environment can not only sever the physical but also the spiritual relationship to the territory. One of our inherent understandings is that Women are Keepers of the Waters and Men are Keepers of the Fire. Men’s firekeeping teachings include the Earth’s internal fire. Traditional knowledge teaches that the heat from the burying of nuclear waste would change the Earth’s internal fire and that the nuclear energy leaching into the water, and then flowing into living forms, would disturb all

life.” (KZA, 2023, p. 17)

Along with their submission on the NSDF Hearing, KZA provided in an appendix an older but fairly comprehensive study on traditional use (Frenette, 1993).

“Our most recent formal study of land use and occupancy was prepared thirty years ago by Jacques Frenette. Although we recognize that the territory of our community is never permanently fixed, this study presents a general picture of our use and occupancy within our territory.” (KZA, 2023, p 10)

The Frenette study was completed in in the early 1990s. While dated it does provide an overview of traditional and contemporary use in the periods (1850 to 1950) and to the period immediately pre-dating the study (1980s). The Report noted that during the 1850 to 1950 period traditional use was based on family hunting territories, although due to competition for resources from non-Indigenous peoples and other resource extraction activities this type of use could not be maintained. (Frenette, pp. 10 -11)

The Frenette study was a fairly exhaustive study of the KZA’s traditional territory and traditional uses both in the historical period and contemporary (1980s) period. In the historical period traditional uses included trapping, hunting, fishing and gathering with a wide diversity of species utilized. The Frenette report also outlines the broader history of KZA’s forced dependence on colonial systems through the progressive limitation of harvesting area or denial of access to lands which were previously healthy and available for traditional food harvesting (trapping, hunting, fishing, and gathering).

6.1.2.2.6 Kebaowek First Nation

KFN has indicated in their submission to the CNSC for NSDF (KFN, 2023) that the NPD site is located on the area they have identified as an area of their asserted rights and title for themselves, TFN and WFN (KFN, 2023, Figure 1). They furthermore indicated that their members of the broader Algonquin Nation — can still exercise their rights throughout the Algonquin Nation’s entire traditional territory, which covers a larger area of both Quebec and Ontario.

KFN has documented traditional use on the Ottawa near the NPD site. In their NSDF submission KFN indicated that (pp. 27 and 28):

“In 2015 and 2016, KFN conducted a survey to obtain baseline inventory of harvesting and fixed cultural sites that living KFN members had used during their lifetimes. From November 2015 to May 2016, 46 members completed individual map-biography interviews to determine where they had engaged in each of 53 different land use activities. They mapped 10,344 features, including some in and around the Chalk River”

On page 28 there is a Figure that does not have any place names on it but based on the geography of the Kichi-Sibi (Ottawa River) the far eastern end of the Figure appears to include Swisha and Rolphton and therefore NPD.

As part of the NSDF submission KFN noted on page 28 that:

“In May 2023, Kebaowek completed a Rights Impact Survey related to the NSDF project which has presented more opportunities for land use and occupancy mapping of rights and responsibilities data collection in the area. This land use and occupancy information is not comprehensive, but it does provide a robust sample of the exercise of rights, livelihood, and cultural practices, and continued current use of lands and resources by the community members within Algonquin traditional territory”

In the survey it was indicated that KFN members don’t get to practice traditional uses as much as they like to, but survey respondents did indicate which traditional uses they participated in their territory over the last three years. The uses and their participation by men and women is provided below:

- Ceremony (female – 37%, male – 27%);
- Harvesting Medicines (female – 45%, male – 37%);
- Gathering Foods (female – 27%, male – 37%);
- Trapping (female – 12%, male – 20%);
- Fishing (female – 80%, male – 85%);
- Hunting (female – 45%, male – 68%); and,
- Camping (female – 73%, male – 68%).

With respect to fishing it was noted that the average annual catch is 63 fish with fishing done by both rod and net. KFN members also reported that 75% of the time they often or sometimes shared the foods that they harvested.

It was also noted in the survey that 61% own their own camp, 21% occupy the land but that 19% don’t have a camp.

The submission from KFN on the NSDF also included a survey of activities members engaged around CRL/NSDF. These activities included hunting, fishing, gathering and spiritual activities (in particular visiting Oiseau Rock). These activities may or may not be representative of activities undertaken near NPD (spiritual activities in particular may be unique to Oiseau Rock).

6.1.2.2.7 Williams Treaties First Nations and AANTC

Engagements with the WTFN and AANTC communities have verbally indicated traditional use also occurs near the NPD site. CNL continues to engage these communities on more exact formal indications of traditional use.

6.1.2.2.8 Trapping

Trapping in Ontario occurs on licenced traplines on provincial land that are administered by the MNRF. There are approximately 50 licenced trapline areas in the OVF which is slightly over 800,000 ha [22]. The trapping of fur bearing animals is a traditional and modern day land and resource use activity practiced by Indigenous peoples in the Ottawa Valley.

Trapping is one resource-based activity that has both a traditional and commercial aspect to it. Most Indigenous trappers trap for personal and cultural reasons as well as for the financial benefit of selling the furs and accessing country foods. Trapping, among other areas of importance, can produce some income to offset a trapper's costs and time.

The right to trap furbearing animals is outlined in section 8.3.24 of the AOO Agreement In Principle. The inclusion of such a chapter indicates the importance of trapping as a cultural activity to the AOO. Targeted species include (but are not limited to) beaver (*Castor canadensis*), fisher (*Martes pennant*) and marten (*Martes Americana*) [83].

CNL has assumed that trapping is occurring on provincial land in the OVF (and the nearby Algonquin Park Forest) by registered Algonquins who are members of one of the ten AOO communities. Evidence from the AOO AKLUS confirms this. While most of the trapping documented in the AKLUS is occurring several kilometers south and west of the NPD site, trapping was identified as close as immediately southwest of both Rolphton and Rapides des Joachims [92].

Trapping or snaring was identified in the AOPFN AKLUS study area in Algonquin Park significantly southwest of the NPD site [92].

In the MNO TKLUS it was identified that trapping has been a foundational element of Métis way of life and land use since the genesis of the Métis. Of the 11 participants in the MNO TKLUS, 7 reported participation in trapping although none had trapped within the 50 km study area.

CNL is unsure if Indigenous individuals from other First Nations and communities are trapping in the OVF.

6.1.2.2.8.1 Site / Local Study Area

There is no trapping within the site study area, which is in the CNL Exclusion Zone. The vast majority of lands within the Ontario portion of the Local Study Area are federal lands owned by AECL with remaining lands in private tenure. A small portion of the Local Study intersects one designated Trapline Area (PE026) [95]. Engagement with all Indigenous communities to the end of 2021 May has not resulted in the identification of any Indigenous trappers operating within the Site Study Area, although it is possible.

6.1.2.2.8.2 Regional Study Area

The Regional Study Area intersects two designated Trapline Areas (PE026 and PE027) [95]. It is possible but not yet determined whether there are Indigenous peoples holding these traplines. Engagement with all Indigenous Nations, communities and organizations to the end of 2021 August has not resulted in the identification of any Indigenous trappers operating within this study area, although it is possible through ongoing engagement.

As indicated above, the AKLUS did identify trapping by an AOO member in grids immediately southwest of both Rolphton and Rapides-des-Joachims. This would indicate that trapping by this AOO individual(s) was likely occurring with the Regional Study Area. It is not clear from the AKLUS whether the trapping this location was current or historic.

As indicated above, the AOPFN AKLUS identified trapping in the AKLUS study area in Algonquin Park, which is significantly beyond the Regional Study Area for the NPD Closure Project used by CNL but is within the Regional Study Area for the AOPFN AKLUS.

As noted in the Socio-economic TSD, trapping may also be occurring by landowners on private land adjacent to the Federal lands owned by AECL as trapping on private lands is permitted. This trapping on private land may or may not be undertaken by Indigenous peoples.

6.1.2.2.9 Hunting

Hunting continues to be practiced by Indigenous people in the Ottawa Valley (the Ottawa Valley Forest is the provincial Crown land that surrounds the NPD site). Hunting today includes moose, elk, white-tailed deer (and possibly also black bear), small game (including partridge) and waterfowl. Hunting in both the AOO and AOPFN AKLUSs is generally described as a “Wildlife Harvesting Area”. The AOO and AOPFN AKLUSs confirmed that the targeted species were primarily moose and deer (also referred to as monz and wawashkeshi in the AOPFN AKLUS) but also included small game such as grouse, partridge, bears, frogs and rabbits ([88],[92]).

As indicated in both the AKLUSs harvesting activities such as hunting or fishing hold great significance for the Algonquins beyond the activity or sport:

“harvesting for many participants is not about the sport of hunting or fishing, it is a way of life that provides an opportunity to apply teachings from Elders, put healthy and culturally important foods on the table, connect with the spirit of ancestors and reap what the Creator has graciously provided to the Algonquin people”. ([88] p. 49; [92] p. 58).

The AOO (which includes the AOPFN) prepares an annual Algonquin Harvest Management Plan specifically to address the hunting of larger game including moose, elk and deer [90]. The harvesting of wildlife is outlined in Section 8.3 of the AOO Agreement-In-Principle. The inclusion

of such a chapter indicates the importance of hunting as a cultural activity to the AOO. As already indicated, the AOO has received funding from CNSC and CNL for a large AKLUS in the Ottawa Valley that will encompass traditional uses, including hunting, near the NPD site. As shown in Images 6.2, the Regional Study Area overlaps Wildlife Management Unit 48. Targets for moose have been identified for Algonquin harvest in WMU 48 [90]. While there is no elk harvest in this Wildlife Management Unit, it is expected that there is likely harvest of deer, small game and waterfowl in this management unit.

Seven of the eleven participants in the MNO TKLUS have hunted within the 50 km study area, although the mapping demonstrates that most of the use is in the Deux Rivières area, close to 20 km west of the NPD site (see Figure 3, [91]). The harvest included both large and small game including moose, partridge, grouse, rabbit, deer, duck and goose [91]. There was only one documented hunting use within 10 km of the NPD site by an MNO citizen and that was use of the hydroelectric transmission corridor from the Des Joachims Hydroelectric Generating Station. As already indicated, the MNO TKLUS represents a sample of MNO citizens and therefore there could be other hunting in proximity to the NPD site. There could be MNO citizens that hunt closer to the NPD site.

KZA's traditional territory covers (see Figure 6-3 above) a large area of Quebec and a smaller area of Ontario, generally east of NPD, KZA (2023) and Frenette (1993) discussed the importance of hunting to KZA.

6.1.2.2.9.1 Site / Local Study Area

Due to restricted access (e.g., there are “no trespassing” signs and gates at roadways) to the site there is no wildlife harvesting permitted on the NPD site or within the boundaries of the AECL property surrounding the NPD site. Therefore, there is no traditional harvesting occurring within the Site Study Area, except that it is possible for harvesters to hunt for waterfowl on the Kichi-Sìbì (Ottawa River) immediately adjacent to the site which could be in the Site Study Area. As noted above, the Local Study Area is largely comprised of Federal lands owned by AECL with some lands in private tenure. As described in the Socio-economic TSD, the Federal lands include an approximate 380 ha Exclusion Zone. It is possible that there is harvesting occurring on adjacent private property (hunting on private land is subject to landowner permission). It is possible that there is waterfowl hunting along the Kichi-Sìbì (Ottawa River) shoreline of the NPD site. Hunting for waterfowl in Ontario commonly occurs along waterways, and there are no restrictions preventing an individual from hunting along the Kichi-Sìbì (Ottawa River). Therefore, it seems reasonable that Indigenous peoples from all of the Indigenous organizations and communities may hunt waterfowl along the Kichi-Sìbì (Ottawa River). The AOO AKLUS did not identify any hunting in the site or local study area, but as it represents a sample, it is possible that AOO members might hunt in the Local Study Area.

The AOPFN AKLUS identifies hunting in very close proximity to the NPD site. While it is not possible for hunting to occur within the Site Study Area (except for waterfowl hunting on the

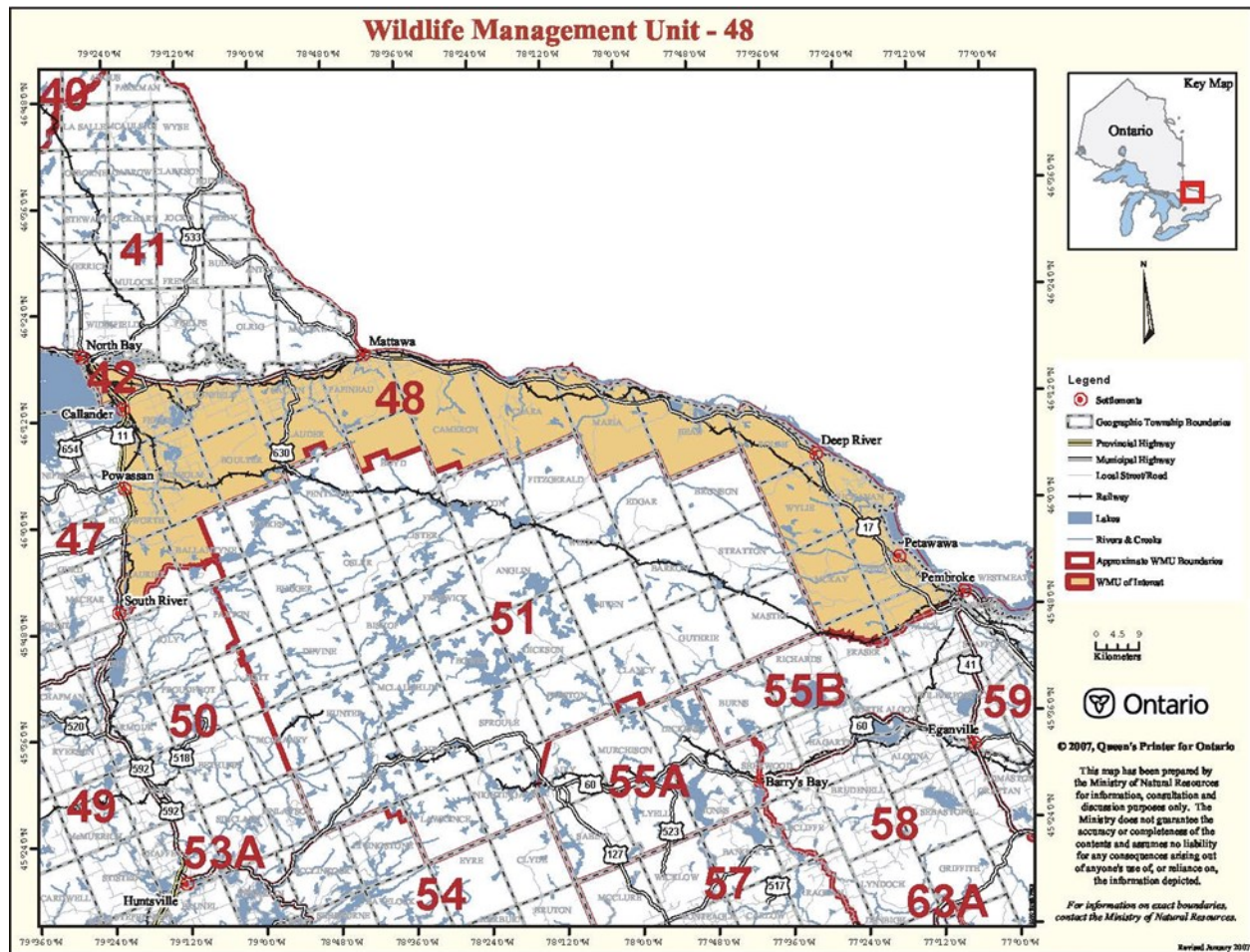
Ottawa River) it is possible that hunting is occurring in the Local Study Area or adjacent to it. Based on how the AKLUS was undertaken and how the location data is presented it is not possible to know precisely if hunting is occurring in the Local Study Area but it cannot be ruled out.

On the Quebec side of the Kichi-Sìbì (Ottawa River), the area is fairly remote (i.e., limited road infrastructure and not easy to get access to) but could be used for traditional hunting. No Indigenous community or organization has indicated that it is harvesting in the Local Study Area but it is possible some of the Local Study Area outside of the NPD perimeter might be used for traditional hunting. Both the MNO and the AOO have agreements on hunting with the Ontario Ministry of Natural Resources which suggest the majority of their hunting occurs on the Ontario side of the Kichi-Sìbì (Ottawa River).

6.1.2.2.9.2 Regional Study Area

The Regional Study Area includes provincial, federal and private lands where hunting by Indigenous groups has been recorded.

The provincial Wildlife Management Unit that envelops the NPD site is Wildlife Management Unit #48 Table 6-4.



Source: MNR, 2007

Figure 6-4: Wildlife Management Unit #48

Algonquin harvest in this management unit is known, as targets for moose have been identified for it (AOO 2017b). While there is no elk harvest in this management unit it would be expected that there is likely harvest of deer, small game and waterfowl in this management unit. While it is not confirmed, it is very likely that there is traditional hunting by Indigenous people within 5 km of the perimeter of the AECL-owned lands. The AOO AKLUS identified one record of harvest within the regional study area south of Rolphton and the Trans-Canada Highway. As the AOO AKLUS is a sample of uses by AOO members, hunting may be more extensive than what the study indicated. The AOO AKLUS documents more significant wildlife harvesting or hunting to the south of the NPD site within Algonquin Park.

The AOPFN AKLUS does identify multiple incidents of hunting within the Regional Study Area. As the AOPFN AKLUS is just a sample of uses by AOPFN members, hunting may be more extensive than what the study indicated. The AOPFN AKLUS also documents significant hunting beyond the EIS Regional Study Area but within the AOPFN AKLUS Regional Study Area. In fact,

most of the area is hunted. Most of this hunting is located on the Ontario side of the Kichi-Sibì (Ottawa River) and therefore west and south of the NPD site.

The MNO TKLUS demonstrated that one individual has hunted along the transmission corridor from the Des Joachims Hydroelectric Generating Station.

The traditional hunting that is occurring is likely occurring on provincial Crown lands, as hunting on private land requires landowner permission.

It would be expected that some Indigenous people in Quebec also hunt on the Quebec side of the Kichi-Sibì (Ottawa River). Likely the hunting of animals is similar to Ontario and targets moose, deer, small game and waterfowl.

It is possible that there is waterfowl hunting along the Kichi-Sibì (Ottawa River) shoreline of the NPD site. Hunting for waterfowl in Ontario commonly occurs along waterways, and there are no restrictions preventing an individual from hunting along the Kichi-Sibì (Ottawa River). Therefore, it seems reasonable that Indigenous peoples from all of the Indigenous Nations, organizations, and communities may hunt waterfowl along the Kichi-Sibì (Ottawa River).

6.1.2.2.10 Fishing

The importance of the Kichi-Sibì (Ottawa River) as a major travel and transportation corridor and its overall ecological and cultural importance was mentioned by multiple Indigenous communities. Both AKLUSs and information provided by KZA identify the Kichi-Sibì (Ottawa River) as a major water travel route for Algonquin peoples. Fishing is a traditional and modern day land and resource activity practiced by Indigenous peoples in the Ottawa Valley. Fish species traditionally targeted have likely included the same type of fish that occur today such as walleye (*Sander vitreus*), smallmouth bass (*Micropterus dolomieu*), and northern pike (*Esox Lucius*) (AECL 2010). Historically, lake sturgeon (*Acipenser fulvescens*), suckers (*Catostomidae* spp.) and American eel (*Anguilla rostrata*) would have also been likely taken. Along with these species, the AKLUS also identified the following other species that have been harvested including: yellow perch (*Perca flavescens*), catfish (*Ameiurus* spp.) and speckled trout (*Salvelinus fontinalis*), lake trout (*Salvelinus namaycush*), burbot (*Lota* sp.) and muskellunge (*Esox masquinongy*). The AOPFN AKLUS specifically mapped fishing areas for Bass, Lake Trout and Walleye ([88]). But along with those three species the importance of other species was noted: Brook Trout (also known as Speckled Trout), Burbot, Catfish, Chub, Jackfish / Northern Pike, Lake Sturgeon, Lake Whitefish, Mud Pout (or Brown Bullhead), Muskellunge, Sucker, Sunfish and Yellow Perch. Baitfish were also noted to be important, but the species of baitfish weren't identified. The Report also identified the importance of Kichi-Sibì (Ottawa River) to AOPFN for cultural and historic reasons but also for traditional use including fishing [88].

The AOO AKLUS mapped fishing areas for Bass, Brook Trout, Catfish, Mudpout, Jackfish / Northern Pike, Lake Sturgeon, Muskellunge, Pickerel / Walleye, Speckled Trout and Yellow

Perch [92]. Along with those species the AOO AKLUS noted the importance of both American Eel, Burbot and Chub as well.

The harvesting of fish is outlined in Section 8.2 of the AOO Agreement in Principle (AOO, Government of Ontario, Government of Canada 2015). The inclusion of such a section indicates the importance of fishing as a cultural activity to the AOO.

Fishing is a common activity undertaken by Pikwàkanagàn harvesters with key species of interest being bass, trout, and pickerel / walleye. While fishing is a common activity some participants of the AOPFN AKLUS did indicate a concern with eating fish near the CNL facilities out of concern of contamination. This was documented clearly in the Diet and Harvest Study [93]. CNL recognizes that it will need to work more with AOPFN and evaluate communication needs and risk concerns and seek solutions with AOPFN. This is a topic of concern to Indigenous peoples as well. CNL is committed to working with the Algonquins of Pikwàkanagàn on addressing these concerns.

Eight of the eleven participants in the MNO TKLUS have fished in the 50 km study area identified in the Know History [91] study. This included fishing on the Kichi-Sìbì (Ottawa River) upstream of Rolphton. There was also other MNO fishing in the study area in waterbodies to the west of Kichi-Sìbì (Ottawa River) towards Algonquin Park. Fish species harvested in the MNO study included walleye, trout, bass, northern pike and lake sturgeon. It was also noted that three of the eleven participants participated in a commercial sturgeon fishery as children. It is unclear based on the mapping on Figure 5 of the Know History [91] study where that fishing occurred, but it appears the closest commercial fishing to the NPD site was approximately 5 kilometers to the west on the Kichi-Sìbì (Ottawa River). It should be noted that there is no longer a commercial sturgeon fishery on the Kichi-Sìbì (Ottawa River).

KZA's traditional territory covers Figure 6-4 a large area of Quebec and a smaller area of Ontario and on the Kichi-Sìbì (Ottawa River) it is situated downstream but in close proximity to NPD. KZA (2023) and Frenette (1993) discussed the importance of fishing to KZA.

There may be Indigenous owned and operated resource-based tourism establishments such as sport fishing or other water-based tourism industries hunting or eco-tourism. CNL is unaware of any such enterprises operating in the study areas but it is possible.

6.1.2.2.10.1 Site / Local Study Area

Due to the restricted access (e.g., there are "no trespassing" signs and gates at roadways) to the site there is no fishing on the NPD site or within the boundaries of the AECL property surrounding the NPD site. There may be fishing in the Kichi-Sìbì (Ottawa River) adjacent to the site and property which could be in the Site Study Area.

6.1.2.2.10.2 Regional Study Area

There is fishing by Algonquin people on the Kichi-Sìbì (Ottawa River) in the vicinity of the NPD site. This is not surprising given the significance of the Kichi-Sìbì (Ottawa River) and its importance to Algonquin and other Indigenous peoples.

The AOO AKLUS identified that fishing occurs all along the Kichi-Sìbì (Ottawa River) within the study area (the study area with respect to the Kichi-Sìbì (Ottawa River) is 25 kilometers upstream but 30 kilometers downstream) of the AKLUS including within the Regional Study Area for the NPD Closure Project.

The AOPFN AKLUS identified fishing in the Regional Study Area [88], likely on the Kichi-Sìbì (Ottawa River). While the number of personal fishing areas identified by AOPFN members within the AKLUS was very limited, this likely underrepresents AOPFN fishing use on the Kichi-Sìbì (Ottawa River). In the 2021 August Diet and Harvest Report, eighteen percent of AOPFN survey respondents fished within a zone containing the proposed CNL sites. Including the Kichi-Sìbì (Ottawa River). While there are other waterbodies in this zone it seems likely that some of this fishing was in the Kichi-Sìbì (Ottawa River). The eighteen percent figure is significantly less than other areas within AOPFN traditional territory but does demonstrate more use than what was conveyed in solely looking at the AKLUS (as indicated in section 6.1.2.2.2, the Diet and Harvest Study identifies that this area is harvested less for a number of reasons but including concerns associated with the nuclear facilities). Also, in the Culture and Rights Study AOPFN, participants reported one value related to Harvesting and Traditional Use Rights, specifically fishing sites in each of the three Culture and Rights Study Areas.

Indigenous people maintain some commercial fish licenses for inland waters in Ontario. However, there is currently no commercial fishery on the Kichi-Sìbì (Ottawa River). Historically, there likely was a commercial sturgeon fishery on the Kichi-Sìbì (Ottawa River) and members of the MNO in their TKLUS indicated that they had historically participated in a commercial fishery [91].

Fishing was not reported in other waterbodies within the 5 km Regional Study Area of the NPD site in any traditional use study, however it seems reasonable that traditional fishing is likely to also occur in lakes that are in proximity to the site such as Tee Lake (see Figure 6-4), which is within the Regional Study Area.

In summary, while only one of the traditional use studies reported fishing within the Regional Study Area, it seems very likely that one or all the communities have individuals that fish or have fished along the Kichi-Sìbì (Ottawa River) within the Regional Study Area at some point in time.

6.1.2.2.11 Gathering

Gathering is a traditional and modern day land and resource use activity practiced by Indigenous peoples in the Ottawa Valley. The gathering of plants, berries, mushrooms, etc. has been for subsistence, medicines, crafts and other purposes. Gathering activities can also have a commercial component to them. The most common example of this is blueberry picking. Other gathering activities that might have a commercial component to them such as gathering other

plant materials for food or craft use. In engagement sessions, documentation, and as demonstrated through the AOO AKLUS has documented the importance of large birch trees for canoe building.

Recent work by the AOPFN in the Diet and Harvest Study has reported that AOPFN survey respondents collect fifteen different kinds of berries and nuts, twenty-six kinds of other plant foods, three kinds of mushrooms and three kinds of plants for medicines throughout AOPFN traditional territory. While there are fewer AOPFN survey respondents who indicated that they eat plant material as compared to fish and mammals, thirty-nine percent reported eating berries and / or nuts, thirty-eight percent other plants foods, twenty-three percent mushrooms and forty-eight percent using plant materials for medicines [93]. According to the Diet and Harvest Study, while there are fewer plant harvesters than hunters and anglers, close to a third of respondents reported collecting plants. While the primary areas for collecting plants were identified in Algonquin Park and in the area south of the Park, the area between North Bay and Pembroke on the south side of the Kichi-Sibi (Ottawa River) (the area containing NPD and CRL) was used by some plant harvesters [93].

The AOO (including AOPFN) has indicated the importance of traditional harvest in its Agreement-in-Principle with the Governments of Ontario and Canada. In Chapter 8, it is indicated that: “The Final Agreement will provide that Beneficiaries have the right to Harvest Fish, Wildlife, Migratory Birds and Plants for Domestic Purposes throughout the year within the Settlement Area as further described in this Chapter.” (AOO, Government of Ontario, Government of Canada 2015). This would include all Crown lands within the Settlement Area.

The harvesting of plants is outlined in Section 8.5 of the AOO Agreement in Principle (AOO, Government of Ontario, Government of Canada 2016) [90].

The AOO AKLUS identified plant and natural material gathering areas and documented their importance with respect to them not only as food items but also their importance as medicines and for ceremonial reasons. The plants collected included the following: balsam fir, blueberries, cranberries, raspberries, blackberries, strawberries, reindeer lichen, thorn apple, sumac, pine, pearly everlasting, sumac, sphagnum moss, wintergreen, etc. [92].

The harvesting of plants by the Algonquins of Pikwàkanagàn is recognized as a benefit not only in terms of the provision of food but also for medicinal reasons. As well, many of the plants are important for cultural use in terms of ceremonies. The AOPFN AKLUS report notes that it is evident that there are Algonquin species of importance surrounding the proposed project [88].

Both the AOO and AOPFN AKLUSs documented gathering within the 25 kilometer AKLUS study areas.

The MNO TKLUS [92] documented that the collection of plants, berries, wood and other natural materials is a practice associated with both historical and modern day Métis communities. Four

of the 11 participants in the MNO TKLUS documented collecting and gathering activities within the 50 km study area. The study noted that gathering can be the main reason for a trip or be a secondary reason. The MNO harvesting in this 50 km study area is generally located closer to Deux Rivières, but there is harvesting closer to the NPD site as it appears harvesting has occurred along and near the Highway 17 corridor. Some of the plant material that was and is gathered includes berries and fruit (raspberries, blueberries, choke cherries); maple syrup; fiddleheads; medicinal plants; tea plants; and materials for crafts and canoe making. Some gathering activities require a wide diversity of plant species for medicinal purposes, tea making and canoe building.

KZA's traditional territory covers (see Figure 6-3) a large area of Quebec and a smaller area of Ontario and on the Kichi-Sibi (Ottawa River), it is situated downstream but in close proximity to NPD, KZA (2023) and Frenette (1993) discussed the importance of gathering to KZA.

6.1.2.2.11.1 Site / Local Study Area

Due to restricted access (e.g., there are “no trespassing” signs and gates at roadways) to the site, there is no gathering on the NPD site or within the boundaries of the AECL property surrounding the NPD site. It is possible that there may be some gathering activities in the Local Study Area within private lands adjacent to the Federal lands and along the west shore of the Kichi-Sibi (Ottawa River). Results from the MNO TKLUS indicate that traditional gathering has occurred along the Highway 17 Corridor near the site, which is in the Local Study Area.

Through engagement, the Métis have indicated an interest in learning of the possible presence of blueberry. Section 8.6 of the EIS includes low sweet blueberry as a species that has been identified at the NPD site. Providing this ecosite remains following post-construction, this area may become available for future gathering if access is granted.

6.1.2.2.11.2 Regional Study Area

Results from the AOO AKLUS demonstrated that some plant gathering occurs south of the NPD site and the Trans-Canada Highway.

Results from the AOPFN AKLUS did not identify any gathering within the EIS Regional Study Area but in fairly close proximity to it. As noted above, close to a third of respondents to the AOPFN survey reported collecting plants and the area between North Bay and Pembroke on the south side of the Kichi-Sibi (Ottawa River) (the area containing NPD and CRL) was used by some plant harvesters. As well, the land near River was noted by at least one AOPFN member as containing plants with stronger medicinal value.

Results from the MNO TKLUS indicate that traditional gathering has occurred along the Highway 17 Corridor near the site, which is in the Regional Study Area. Other Indigenous people also likely gather plant materials and other resources on provincial Crown land in the Regional Study Area.

As indicated previously, the traditional use studies represent samples and aren't definitive. Given that the Regional Study Area particularly on the Ontario side is relatively well accessed it seems probable that traditional gathering likely occurs on Crown lands within the Regional Study Area.

6.1.2.2.12 Cultural Resources and Ceremonies

Indigenous peoples place a high degree of value on specific sites of cultural, historical, spiritual, social or ecological significance. These sites may have broader cultural significance related to the practice of formal or informal ceremonies at or near these sites. The AOO, AOPFN, KZA, WLFN and MNO have all communicated the importance of the Kichi-Sibì (Ottawa River) to their communities.

CNL is aware that the entire NPD site has been a restricted area that prevents local Indigenous people from practicing any traditional activities including cultural ones on the NPD lands. Some Indigenous groups have indicated that concerns about potential contamination likely extending the effect to an even larger area which has been referred to by different groups in different ways but has produced an "alienation" effect to a wider area. Some communities have also expressed that not exercising these traditional activities including ones such as hunting and fishing impacts cultural continuity. The interconnected nature of traditional activities and culture was documented in AOPFNs Culture and Rights Study. CNL does realize that the current baseline environment of the NPD site is one where these activities can't be currently practiced. Therefore, CNL recognizes that the baseline environment is not one desirable to Indigenous peoples and the desire is to return the lands back to pre-development condition.

The AOO AKLUS documents locations of culturally and/or historically significant sites and refers to them as Algonquin Cultural Sites [93].

The AOPFN AKLUS report does not identify any known cultural features at the NPD site but aligned with informal communications mentioned above, the Kichi-Sibì (Ottawa River) itself is recognized as an important cultural / heritage value for multiple reasons by AOPFN AKLUS participants. As already described, hunting and fishing and all traditional uses have cultural aspects to them.

In the MNO TKLUS, interviewees have expressed an important spiritual and cultural connection to the Kichi-Sibì (Ottawa River) corridor [92].

Interviewees reported feeling a spiritual and cultural connection to the Ottawa River corridor. They attributed this feeling to their family being present in this area for generations and the historic connection between the Ottawa River and the fur trade. Many participants shared stories about their ancestors which have been passed down from the 19th century. The historic travel routes, burial grounds, religious sites, and gathering places associated with these stories strengthen links to their Métis heritage. [92].

A submission by KZA for the NSDF project also demonstrates the importance of Kichi-Sibì (Ottawa River) to them.

6.1.2.2.12.1 Site Study Area

CNL notes that to date there has been no indication that Indigenous cultural ceremonies occur at the NPD site. However, this issue is discussed in further detail below.

A Stage 1 Archaeological Assessment of the NPD site (Archaeology TSD) was undertaken by Kinickiniick Heritage Consulting and is titled: “Stage 1 Archaeological Assessment of the Nuclear Power Demonstration (NPD) Property Part of Lots 41-45, 48 & Town Plot, Range A & B Rolph Twp. (Geo), Township of Laurentian Hills, Renfrew County”. The Stage 1 Assessment determined that there is no archaeological potential within the decommissioning footprint due to extensive disturbance during facility construction.

As indicated in the Archaeology TSD, historical photographs of NPD under construction clearly show that disturbance throughout the nuclear power plant grounds was deep and extensive, including the shoreline of the Kichi-Sibì (Ottawa River). There is no archaeological potential within the proposed disturbance footprint for the NPD decommissioning. As required by the OMCTS (2011) [97], the Archaeology TSD assessed beyond the proposed footprint of the project and determined that there is archaeological potential within the rest of the NPD site, both for historical homesteads and pre-(European) contact period. Although it was determined that there is high potential for cultural material to be present outside of the proposed project footprint, the Archaeology TSD did not recommend further archaeological assessment because these areas will not be impacted by the project. It is also noted that there are some registered archaeological sites outside of the NPD site (see Section 3.2.2 of the Archaeology TSD).

The Archaeology TSD provides an overview of the archaeological and historical context around the NPD site spanning many periods. Readers who are interested in this historical context are encouraged to read this TSD.

In summary, there are no known cultural ceremonies that occur at the NPD site at present.

6.1.2.2.12.2 Regional Study Area

CNL acknowledges that there are proposed Algonquin land claim settlement lands located near the NPD site (near Tee Lake) that likely are of significance to certain members of the AOO. There may be cultural ceremonies associated with this area, which is situated south of the NPD property. There is also a cultural site that was noted in the AOO AKLUS near the Swisha Dam. This site is not on AECL property but is within the Regional Study Area. In the AOO AKLUS there was some concern expressed about the NPD Closure Project and access to cultural sites. However, as already indicated there are no known cultural sites on the NPD Property and the NPD Closure Project is proposed for the NPD site, so there is no potential for a blocking of access or other potential impact to this or other cultural sites.

6.2 Indigenous Socio-Economic

This section of the IER addresses Indigenous socio-economic interests.

6.2.1 Spatial Boundaries

The spatial boundaries with respect to the Indigenous socio-economic environment were determined based on the potential for the project to affect Indigenous communities and their proximity to the facility.

The Site Study Area for the Indigenous socio-economic environment is the same as the general Site Study Area defined in Figure 6-1.

The Local Study Area has been defined as the Site Study Area plus a 1 km area beyond the Site Study Area, and is the same as that used for Indigenous land and resource use (see Figure 6-1 above) environment. Both the Indigenous Land and Resource Use and Socio-Economic Environmental Components utilized a Regional Study Area that was defined as the Site Study Area and a 5 km radius beyond that.

There are no Indigenous communities such as First Nations reserves within a 5 km radius of the NPD site. The closest Indigenous community to the NPD site is the Algonquins of Pikwàkanagàn First Nation located on Golden Lake, 75 km (measured as a straight line) from the NPD site. It is possible that there are some Indigenous individuals and / or families that do live within 5 km of the NPD site.

Negative Indigenous socio-economic effects outside of the 5 km radius of the site are unlikely, however, CNL has identified all the Indigenous Nations, communities, and organizations it is engaging with in this section. Detailed information is only provided for Indigenous Nations or communities within 100 km of the NPD site. There are several reasons for this. First, there are a number of AOO and MNO communities within 100 km of the site but except for AOPFN these are no physical communities that can be found in one specific location such as a First Nation Reserve. Therefore, they have different socio-economic characteristics (i.e. the population is dispersed in a wider area) and they aren't reliant on the same set of infrastructure or decision-making processes, which can be key socio-economic considerations. Second, Statistics Canada Census information can be found for AOPFN Reserve (and other populated Reserves) but is not available at an organizational level for other AOO or MNO communities. Third, information on all the Indigenous Nations, communities, and organizations is Section 3. Lastly, First Nation Reserves beyond 100 km were not considered to be potentially affected from a socio-economic perspective except as potential economic beneficiaries. For these reasons, the regional study area for Indigenous socio-economic was defined as an area of 100 km.

While not necessary, this section also includes a population estimate of Indigenous people within four large census divisions surrounding the NPD site. These include: Renfrew County, Ontario; Nipissing District, Ontario; Pontiac Regional Municipality, Quebec; and Témiscamingue Regional Municipality, Quebec. Large areas of these four Census Divisions extend beyond 100 km from the NPD site. Note that there are small slivers of three other census divisions just within the 100 km radius, including Haliburton, Hastings and La Vallée-de-la-Gatineau. However, these are all essentially unpopulated rural and park areas.

These Census Divisions are shown in Figure 3-2. The figure also shows two census subdivisions which are discussed in this section. These are: AOPFN Reserve; and the Town of Laurentian Hills within which the NPD site is located.

Note that engagement undertaken with Indigenous communities suggests an interest in economic opportunities associated with the project. CNL is open to discussing economic opportunities with any of the Indigenous communities identified with this project.

6.2.2 Site / Local Study Area

There are no Indigenous communities in either the Site or Local Study Areas. There are no Indigenous individuals living in the Site Study Area. There may be Indigenous individuals and families living in the local study area.

6.2.3 Regional Study Area

This report identifies and describes the wide array of Indigenous peoples, communities and organizations that CNL has been engaging with for the NPD Closure Project. Communities with a potential interest in the project and included in CNL's Indigenous Engagement Program were identified in consultation with the CNSC and through information largely derived from available public sources. As noted in Section 3 above, these include government sources (e.g., the Government of Canada's ATRIS web portal), First Nation community profile information from the INAC website (which is updated semi-annually) and Indigenous community and organization websites.

A list of Indigenous Nations, communities, and organizations with a potential interest in the project is outlined below and explained in more detail in Section 3. Table 3-2 identifies and describes each of the Indigenous communities in terms of their location, approximate distance to the NPD site, and whether the specific Indigenous community is a physical community with one defined location such as a First Nations Reserve. Knowing whether the Indigenous community is located in one physically defined location is helpful in understanding socio-economic information associated with the community (e.g., Census of the Population data potentially available for First Nation communities on Reserves is not available for Indigenous communities where there is no singular physical location).

Table 3-2 demonstrates that there is only one physical Indigenous community within 100 km of the NPD site. That community is the Algonquins of Pikwàkanagàn First Nation. More information on the Algonquins of Pikwàkanagàn is provided below.

Algonquins of Pikwàkanagàn First Nation

The Algonquins of Pikwàkanagàn First Nation occupy one area of reserve lands: Pikwàkanagàn No. 06216 (Table 3-20). Situated on the southeast shore of Golden Lake where it flows into the Bonnechere River in Renfrew County, Ontario, the reserve covers an area of 688.8 ha. Pikwàkanagàn First Nation has a total registered population of 2,892 (as of September 2019, [18]). Roughly 84 per cent of the registered population resides off reserve lands (2,434).

The reserve was established through a Crown patent in 1873 following several petitions from the community who were known at the time as Golden Lake. AOPFN recently voted in favor of

the “Algonquins of Pikwàkanagàn Land Code” and “Individual Agreement” with the Government of Canada under the federal *First Nations Lands Management Act* (1999) which provides the First Nation with the authority to develop land laws associated with the reserve lands, resources and the environment, and according to the community, enabling increased opportunity for economic development and the potential addition of lands. The Individual Agreement transfers control over the Algonquins of Pikwàkanagàn First Nation land and resources previously under the *Indian Act* to the Algonquins of Pikwàkanagàn First Nation under their Land Code [19].

AOPFN is governed by an elected council comprised of a Chief and six councillors. The electoral system for this community is a Custom Electoral System and council election occurs every three years through voting members of the First Nation. Several standing committees are present within the First Nation’s administration, each of which is represented by at least one council member. These committees provide planning and decision-making processes and include: Health and Social; Education; Finance; Personnel and General Administration; Lands, Estates and Membership; Economic Development, Housing and Archaeology [19]). AOPFN is a member Nation of the Algonquins of Ontario and is also associated with the Union of Ontario Indians - Southeast Region.

AOPFN is a signatory of the AOO Agreement-in-Principle (2016) described in Section 3.2, as well as the earlier issued AOO 1983 Comprehensive Land Claim.

The 2021 Census of the Population provides some detailed information for the population of people that live on the Pikwàkanagàn Reserve (no other Algonquin community or Métis community will have Census of the Population data as they do not have Reserves). Data including population, demographic, Indigenous identity and language and other characteristics is presented below.

Table 6-1 shows the approximate on-reserve population and total private dwellings of the Algonquins of Pikwàkanagàn First Nation.

Table 6-2 shows the percentage change in population from 2016 to 2021, including the average and median age of the population. The values for Laurentian Hills, Renfrew County and Ontario are also provided for the purpose of comparison.

Table 6-1: Algonquins of Pikwàkanagàn First Nation – On reserve Population and Total Dwellings

	Algonquins of Pikwàkanagàn First Nation
Population - 2016	440
Population - 2021	490
Total Private Dwellings	191

Source: Statistics Canada 2023 [100].

Table 6-2: Algonquins of Pikwàkanagàn First Nation – Population Change and Age of Population On-Reserve

	Pikwàkanagàn First Nation	Average across Laurentian Hills, Deep River and Petawawa	Renfrew County	Ontario
Percent Change 2016 to 2021	11.4%	1.6%	3.9%	4.60%
Average Age of the Population	38.6	40.6	44.1	41.9
Median Age of the Population	38.4	40.5	45.2	42.4

Source: Statistics Canada 2023 [100].

The Census data shows Pikwàkanagàn First Nation had a total population on-reserve of 490 individuals in 2021, which confirms most of the population lives off-reserve. The average age of the population in 2021 is 38.6, which is slightly younger than the average age for Laurentian Hills, Renfrew County and the province of Ontario.

Information on Indigenous identity and knowledge of Indigenous languages is presented in Table 6-3.

Table 6-3: Algonquins of Pikwàkanagàn First Nation – Mother Tongue, Knowledge of Languages and Indigenous Identity

	Algonquins of Pikwàkanagàn First Nation
Population – 2021	490
Mother Tongue – Indigenous	5
Language Spoke Most Often at Home	
English	490
Indigenous Languages	0
Knowledge of Languages	
English	480
French	15
Algonquin	0
Indigenous Population	
Total Population	490
Indigenous Identity	415
Indigenous Identity – First Nations	400
Indigenous Identity – Métis	10
Population by Registered or Treaty Indian Status	
Total – Status Indian	384
Total – Non-Status	95

Source: Statistics Canada 2023 [100].

AOPFN have linguistic traditions in the Algonquin language [19] even though only a small percentage of the population identified as having knowledge of the Algonquin language (Table 6-3) As shown in Table 3-8, most of the individuals that live on reserve in Pikwàkanagàn are Status Indians and self-identify as First Nations individuals.

Within the community, efforts are being taken to revitalize the language and culture through language programs and the community's Algonquin Way Cultural Centre. The centre is operated by a not-for-profit organization, Omàmiwininì Pimàdjowin, established by the First Nation's Council to foster and preserve the Algonquin cultural traditions, customs, practices, heritage, language and arts. The organization stewards a collection of approximately 600 historical / cultural objects including ceremonial, hunting and trapping, canoe and water transportation, and military paraphernalia at the centre[19][20].

Discussions with various Indigenous communities have revealed an interest in economic, employment and contracting opportunities associated with CNL. With respect to the AOPFN more specifically, Information on income, employment and labour force status is presented in Table 6-4 and Table 6-5. Table 6-5 also provides a comparison to Laurentian Hills, Renfrew County and Ontario.

Table 6-4: Algonquins of Pikwàkanagàn First Nation – Population and Labour Force Status

	Algonquins of Pikwàkanagàn First Nation
Population – 2021	490
Labour Force Status	
Total Population	375
In the Labour Force – Employed	175
In the Labour Force – Unemployed	20
Not in the Labour Force	175

Source: Statistics Canada 2023 [100].

Table 6-5: Algonquins of Pikwàkanagàn First Nation – Selected Income and Employment Information

	Pikwàkanagàn First Nation	Average across Laurentian Hills, Deep River and Petawawa	Renfrew County	Ontario
Average Employment Income in 2020 for Full-Time Workers	\$28,600	\$62,550	\$68,800	\$82,400
Composition of Total Income				
Market Income (includes employment)	58%	87.2%	79.8%	82.8%
Employment Income	50%	67.7%	62.2%	76.4%
Government Transfers	42%	12.6%	20.2%	17.1%
Median Total Income of Households	\$50,000	\$82,466	\$80,000	\$41,200
Average Total Income of Households	\$61,600	\$75,750	\$94,600	\$56,350
Average After Tax Income of Households	\$59,200	\$63,306	\$80,700	\$46,280
Participation in the Economy				
Participation Rate	53.3%	60.4%	57.6%	62.8%

Employment Rate	46.7%	56.1%	52.3%	55.1%
Unemployment Rate	10%	6.1%	9.1%	12.2%

Source: Statistics Canada 2023 [100].

As shown in Table 6-5, the average total income of households for AOPFN was \$28,600. This is significantly lower than the average total income of households in Laurentian Hills, Renfrew County and Ontario.

AOPFN also has a higher unemployment rate (10%) than each of the other census areas identified above. Similarly, the participation rate and employment rates are lower than the other three geographies.

Table 6-6 presents the highest certificate, diploma or degree obtained by individuals as a general representation of the education / training level attainment.

Table 6-6: Algonquins of Pikwàkanagàn First Nation – Highest Certificate, Diploma or Degree Obtained

	Algonquins of Pikwàkanagàn First Nation
Highest Certificate, Diploma or Degree (15 and older)	
Total	375
No Certificate, Diploma or Degree	85
Secondary High School or Equivalent	150
Apprenticeship or trades certificate or diploma	35
Trades certificate or diploma other than Certificate of Apprenticeship or Certificate of Qualification	35
Certificate of Apprenticeship or Certificate of Qualification	10
College, CEGEP or other non-university certificate or diploma	95
University Bachelor's degree	10

Source: Statistics Canada 2023 [100].

As Table 6-6 shows slightly under one half of the population has some post-secondary school certificate, diploma, degree or qualification and roughly three-quarters of the adult population has completed secondary school or equivalent.

Information on housing on the AOPFN is provided in

Table 6-7 and Table 6-8.

Table 6-7: Algonquins of Pikwàkanagàn First Nation – Population, Household and Dwelling Characteristics

	Algonquins of Pikwàkanagàn First Nation
Population – 2021	490

Household and Dwelling Characteristics	
Total Occupied Dwellings	185
Single-detached House	175
Other Attached Dwelling	5
Apartment in a Building with Less than 5 Storeys	5

Source: Statistics Canada 2023 [100].

Table 6-8: Algonquins of Pikwàkanagàn First Nation – Average Household Size and Average Size of Census Families

	Algonquins of Pikwàkanagàn First Nation	Average across Laurentian Hills, Deep River and Petawawa	Renfrew County	Ontario
Average Household Size	2.6	2.3	2.3	2.6
Average Size of Census Families	2.9	2.8	2.8	2.9

Source: Statistics Canada 2023 [100].

Table 6-7 indicates that the total number of occupied dwellings on reserve are 185, of which almost all are single detached-houses. Table 6-8 indicates that the average household size is 2.6 and is therefore similar to Renfrew County and Ontario in general.

Houses on the reserve are serviced by wells and private septic systems. The community has a Public Works Department that is responsible for roads and waste management.

Indigenous People in the Region Surrounding the NPD site

Table 6-9 shows the Indigenous population in the surrounding Census Divisions in Ontario and Quebec, specifically Renfrew County, Nipissing District, Témiscamingue and Pontiac Regional Municipalities. Figure 3-2 shows all four of these census divisions.

Table 6-9: 2021 Census of the Population – Aboriginal Peoples in Surrounding Census Division to NPD Site

	Renfrew County CD*	Nipissing County CD*	Témiscamingue MRC** (CD*)	Pontiac MRC** (CD*)	Total	Percent of the Population
Total Population	106,365	84,716	16,132	14,764	221,977	
Mother Tongue - Aboriginal Languages	25	185	65	0	275	0.1%
Knowledge of Aboriginal Languages	80	530	150	0	760	0.3%
Aboriginal Population (Aboriginal Identity)	9,045	11,995	2,380	2,420	34,885	15.7%
Aboriginal Identity - First Nations	5,095	6,720	1,940	700	14,445	6.5%
Aboriginal Identity - Métis	3,540	4,775	395	1,595	10,305	4.6%
Registered or Treaty Indian	2,750	4,805	1,830	375	9,760	4.4%

Source: Statistics Canada 2023 [100].

*CD = census division

**MRC = Municipalité régionale de comté

The 2021 Census of the Population reports that approximately 15.7% of the population of Renfrew County, Nipissing District and the Regional Municipalities of Témiscamingue and Pontiac identified themselves as Aboriginal people. Of that 15.7%, 6.5% identified as First Nations individuals and 4.6% as Métis³. The MNO has a more involved citizenship test than self-identification. Also, 4.4% of the population identified themselves as a Registered or Treaty Indian (under the *Indian Act*).

The four combined Census Divisions represent a very large land area stretching in the northwest to include North Bay and Temagami, Ontario, in the northeast beyond Témiscamingue Quebec and southeast to Bristol in Quebec.

³ It should be noted that the Census of the Population relies on self-identification of Indigenous identity. The MNO requires all of its potential applicants to meet the citizenship requirements of its Registration Policy. Therefore, the population of Métis peoples as represented by the census versus the MNO may be (and likely are) different.

Table 6-10: Laurentian Hills – Mother Tongue, Knowledge of Languages and Indigenous Identity

	Laurentian Hills
Population – 2021	2,885
Mother Tongue – Indigenous	5
Language Spoke Most Often at Home	
English	2,770
Indigenous Languages	0
Knowledge of Languages	
English	2,880
French	350
Algonquin	0
Indigenous Population	
Total Population	2,885
Indigenous Identity	340
Indigenous Identity – First Nations	230
Indigenous Identity – Métis	90
Population by Registered or Treaty Indian Status	
Total – Status Indian	150
Total – Non-Status	95

Source: Statistics Canada 2023 [100].

The NPD site is located within the Town of Laurentian Hills. Details about the Indigenous population within the Township appear in Table 6-10 above. Of a total population of 2,885 it is estimated that there are 340 individuals that self-identify as Aboriginal identity (11.8%). Just less than three-quarters of these (230) self-identify as First Nations in contrast to 90 identified as Métis. The Census revealed that there were 150 Registered or Treaty Indians, which is less than the 340. It is possible that the Census forms were not fully completed or that some of the 285 that self-identified as First Nations are not Registered or Treaty Indians.

Resource Industries

A description of the traditional land and resource use by Indigenous peoples, as relevant for the assessment of the NPD Closure Project, is provided in Section 6.1.2. This section focuses on resource-based uses that are of a non-commercial nature and undertaken by Indigenous peoples which could be affected by direct changes to the environment. The most typical resource-based use activities undertaken by Indigenous peoples that can have a commercial component to them include trapping and commercial fishing (and possibly gathering). It is also possible that Indigenous peoples participate in or operate resource-based tourism enterprises that could be potentially affected by changes to the environment.

Trapping is one resource-based activity that has both a traditional and commercial aspect to it. Most Indigenous trappers trap for personal and cultural reasons as well as for the financial benefit of selling the furs. Trapping can produce some income to offset a trapper's costs and time. As previously indicated, the two traplines near the NPD site have not been identified as traplines registered to Indigenous peoples.

Indigenous people do maintain some commercial fish licenses for inland waters in Ontario. However, there is currently no commercial fishery on the Kichi-Sibi (Ottawa River). Historically, there likely was a commercial sturgeon fishery on the Kichi-Sibi (Ottawa River) and members of the MNO in their TKLUS indicated that they had historically participated in a commercial fishery.

The most common gathering resource that has a commercial component to it is blueberry picking. Other gathering activities might have a commercial component to them such as gathering other plant materials for food or craft use. Gathering is a common activity undertaken by Indigenous peoples. As described in Section 6.1.2, the Site Study Area is located within the NPD site and gathering in this area would be prohibited by CNL. Gathering could occur within the Local Study Area or Regional Study Area outside of the CNL fenceline. It is possible there may be some gathering along the shoreline of the Kichi-Sibi (Ottawa River), adjacent to the NPD site. Indigenous peoples may collect plants and other materials on Crown lands and public waterways without restrictions. One individual from the MNO identified gathering plant material along the Highway 17 corridor, potentially in the Local Study Area or Regional Study Area.

Finally, Indigenous individuals may own and operate resource-based tourism establishments such as sport fishing or hunting or eco-tourism. Such commercial activities would not be rights based but could be operated by Indigenous peoples.

6.3 Indigenous Health

6.3.1 Spatial Boundaries

The spatial boundaries with respect to the Indigenous Health are the same as employed for Human Health.

The Site and Local Study Areas for human health (and therefore Indigenous Health) are the same as those delineated in Figure 6-1. As these areas are all owned by the Federal Government, there are no residents (Indigenous or non-Indigenous) present. Workers are, and will continue to be, present in this area for the duration of the decommissioning, and as such the Site and Local Study Areas will describe baseline worker health. As CNL is encouraging Indigenous employment and contracting opportunities, CNL has assumed that a number of workers may be Indigenous.

The Regional Study Area for the Indigenous Health assessment consists of the Renfrew County and District and Region de l'Outaouais Health Units, illustrated in Figure 6-5 and Figure 6-6.

Renfrew County and District has a land area of 14,980 km² and a population of approximately 103,000. The Region de l'Outaouais has a land area of 30,760 km² and a population of approximately 369,000.

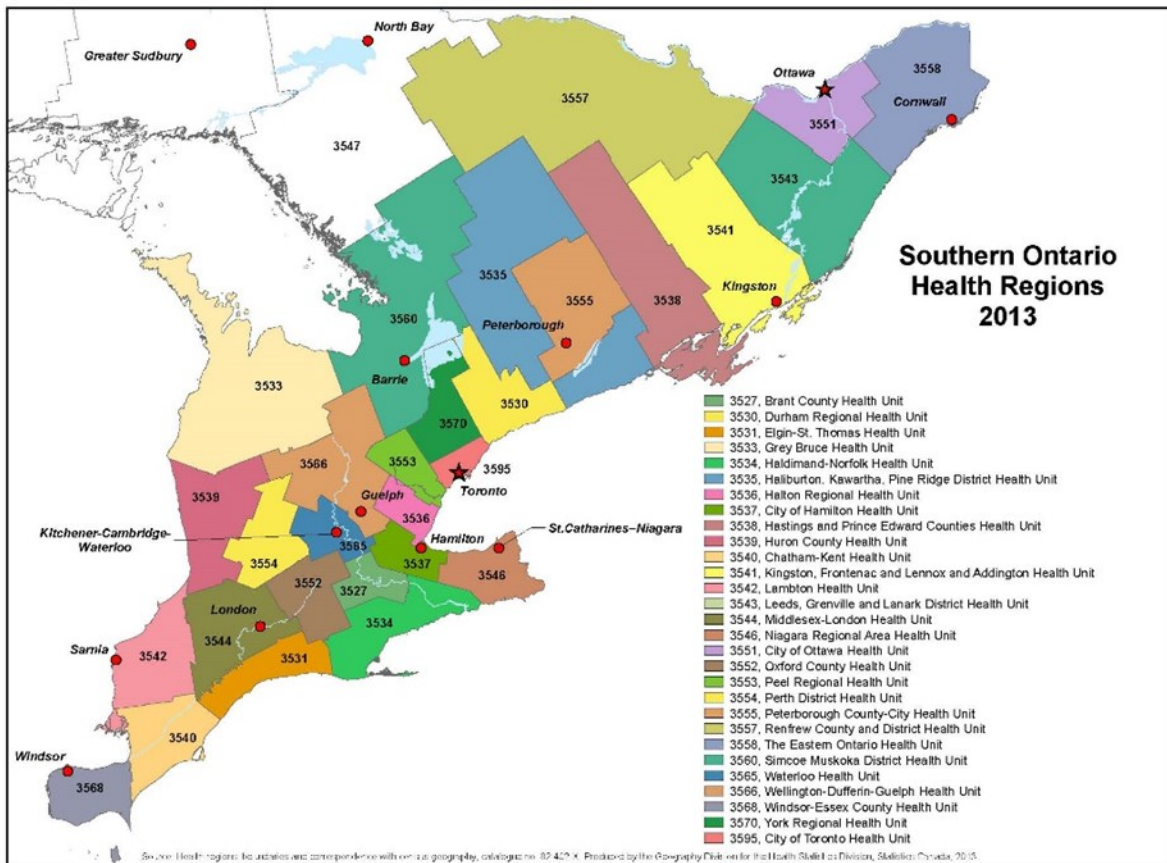


Figure 6-5: Southern Ontario Health Regions

Renfrew County and District Health Unit is #3557, near the top of the Figure (Source: Statistics Canada).

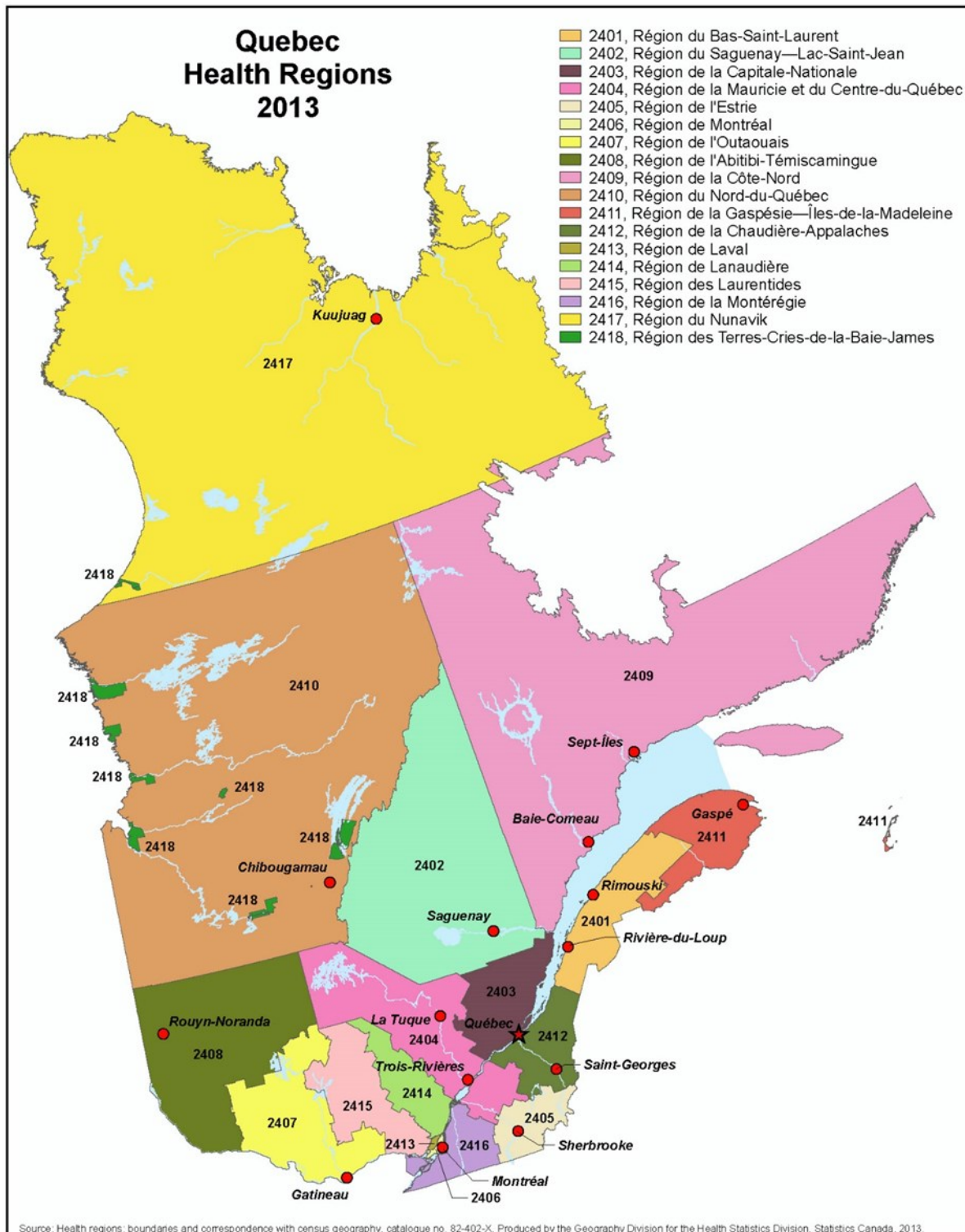


Figure 6-6: Quebec Health Regions – Region de l'Outaouais is #2407 (Source: Statistics Canada)

6.3.2 Site/Local Study Area

As discussed above, there are no residents (Indigenous or non-Indigenous) present within the

Site / Local Study Area, as it is owned by the Federal Government. The only people present in the Site / Local Study Area will be workers and visitors. Workers are assumed to live within the Regional Study Area. As such, the results presented for the Regional Study Area are also applicable to the workers at the site. In addition to the information presented for the Regional Study Area, worker health information is also presented in the EIS.

As the description of the existing environment with respect to Indigenous Health is the same as Human Health, see Section 8.8.2 of the EIS.

6.3.3 Regional Study Area

The description of the existing environment with respect to Indigenous Health in the Regional Study Area is the same as the description under Human Health. There is no Indigenous-specific health information available for the Regional Study Area. The reader is referred to Section 8.8.3 of the Project EIS, specifically 8.8.3.1 (Statistics Canada Health Profiles) and 8.8.3.2 (Childhood Leukemia around Nuclear Facilities).

Section 8.8.3.3 of the EIS is titled “Local Food Consumption” and requires more detailed consideration within the context of Indigenous Health. The diets of Indigenous people can be different than the general population through the consumption of a higher proportion of country foods obtained through hunting, fishing and gathering activities. Section 8.8.3.3 of the EIS provides information on the local food consumption characteristics for people living in the Regional Study Area, based on the NPD DRL Study [101]. CNL supported a harvest and diet study by AOPFN that provides information to more comprehensively consider how some Indigenous peoples may interact with their environment and correspondingly the effects of the project on Indigenous Health. In addition to higher ingestion rates for country foods, pathways of smoke inhalation (medicinal plants) and rubbing of plants into the skin are also considered.

Section 7.1 and Section 7.3 (of this IER) provide some additional assumptions associated with the lifestyle survey involving local food consumption and consideration of Indigenous and non-Indigenous people.

This section provides information on the local food consumption characteristics for people living in the Regional Study Area, based on the NPD DRL Study [101]. The following assumptions were made in developing DRLs, as noted in Section 8.8.3.3 of the Project EIS:

- Resident groups grow fruits, vegetables and potatoes in a garden that is irrigated by river water (relevant for aquatic releases only);
- The farm groups are also assumed to grow fruits, vegetables and potatoes, at a larger scale;
- Resident groups buy some local meat from a local butcher shop (locally-raised meat);
- Farm groups are assumed to raise other animals for their own consumption (i.e., not for sale);
- Resident and farm groups hunt local deer; and

- Local residents and cottage residents fish in the Kichi-Sibì (Ottawa River) (relevant for aquatic releases only).

As represented in Section 8.8.3.3 of the Project EIS and repeated here, Table 6-11 presents the local food consumption percentages that were assumed in the DRL study.

Table 6-11: Percentage of Food from Local Sources

Receptor Group	Animal Products							Plant Products			Fish
	Beef	Pork	Poultry	Lamb	Venison	Eggs	Cow Milk*	Fruit	Garden Vegetables	Potatoes	
Airborne Effluents											
Rapides-des-Joachims, Point Stewart and Rolphton residential	10	0	0	0	100	0	0	10	20	20	0
Cottage	0	0	0	0	0	0	0	0	0	0	0
Mackey Beef Farm	100	50	50	100	100	50	20	20	50	50	0
Bass Lake beef farm	100	50	50	0	100	50	20	20	50	50	0
Liquid Effluents											
Cottage	0	0	0	0	0	0	0	0	0	0	100
Point Stewart residential	0	0	0	0	0	0	0	10	20	20	50
Deep River residential	0	0	0	0	0	0	0	10	20	20	50

6.3.4 Local Water Use

The majority of people within the Regional Study Area obtain their domestic water (used for ingestion, washing, bathing, and swimming) from groundwater wells. In the region, nearby residential communities such as Point Stewart and Rapides-des-Joachims rely on groundwater wells for their domestic water use.

Table 6-12 summarizes the statistics on the groundwater wells as presented in Ontario Ministry of the Environment, Conservation and Parks (MECP) well records.

Table 6-12: Summary of MECP Groundwater Week Records in Vicinity of NPD

Well Type	Number of Wells	Well Depths (m)	Static Water Level Depth (m)
Overburden	13	3.0 – 32.6	Not Reported
Bedrock	69	4.7 – 193.5	0.9 – 21.9 with one artesian well

It is noted in the PostSA TSD that these wells draw water from deep aquifers. The farm groups also obtain all their water from wells, including that used to raise livestock. Most residents of Deep River have access to a municipal water supply, which is pulled from the river. Residents of Deep River and Point Stewart, as well as the cottage group, may also use the Kichi-Sibì (Ottawa River) for swimming during the summer months [102].

Additionally, the MOECC database of water supply wells [103] was queried for the region between Rolphton and Pembroke. The number and depth of the water supply wells, and the formation from which they draw water, are shown in Table 6-13. The basic summary statistics for well depths for the unspecified wells are quite similar to the entire dataset, so it’s reasonable to assume that the unspecified wells follow a similar distribution between bedrock and overburden.

Table 6-13: Members of Bedrock, Overburden and Unspecified Wells and Well Depths

Source Unit	Number of Wells	Depth (m)			
		Average	Median	Min	Max
Bedrock	1151	53.9	45.7	5.5	395.9
Overburden	246	21.7	18.3	1.2	111.6
Unspecified	505	48.5	38.1	1.8	253.0
All Wells	1902	48.3	38.4	1.2	395.9

The database also provides the total depths of the wells. Figure 6-7 is a frequency plot of well depths for wells completed in bedrock, in overburden, and for wells where the formation supplying water is unspecified. Information on wells obtained in 2017 from the community survey undertaken by CNL [104]. However, the well information response in the survey was extremely limited relative to the MOECC database.

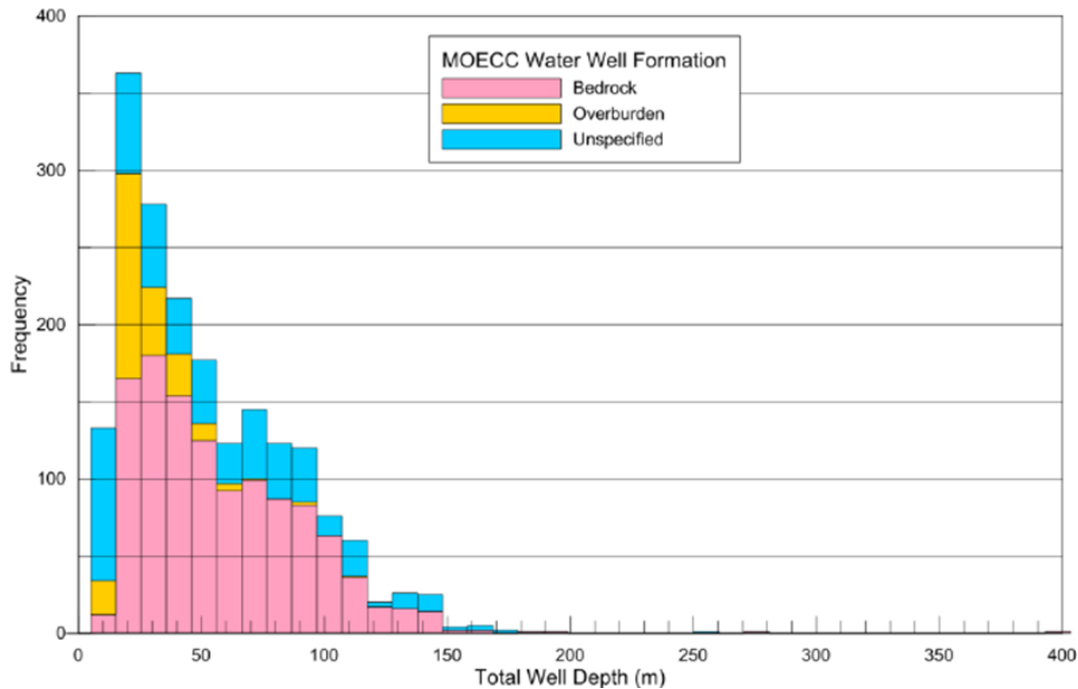


Figure 6-7: Total Depth Frequencies for Wells Completed in Overburden, Bedrock and in Unspecified Formations

Although it is evident from the MOECC database that there are some shallow water supply wells, if statistical data are used to calculate potential exposures, median well depth (38 m) would be a reasonable selection for residential and farming groups.

It is noted that this MOECC database contains records submitted to the province by licensed water well drilling companies. It is possible that some homes, and more likely some cottages that are used seasonally (and that may have limited or no road access), draw their water supply from hand-driven well points or from hand-dug wells installed by the owner, rather than by a contracted well driller. Such unrecorded installations will be shallow, and almost certainly restricted to overburden. One might reasonably speculate that wells installed by the property owner will be between 5 and 10 m deep. The rates of water production from such manually installed wells will frequently be small, so the numbers of permanent homes using such water sources will also be limited.

7. Assessment and Mitigation of Environmental Effects

7.1 Traditional Land and Resource Use

7.1.1 Selection of Valued Components

As outlined in Section 5.2.4 of the EIS, VCs for traditional land and resource use were selected based on consideration of a number of factors, including the:

- Knowledge of Indigenous traditional land and resource use practices that interact with the environment;
- Aboriginal and / or treaty rights;
- Engagement (as documented in this IER); and,
- Consideration of other environmental assessments.

The VCs for traditional land and resource use, with rationale for their selection, are listed in Table 7-1.

Table 7-1: Valued Component Selection for Traditional Land and Resource Use

Environmental Component	VC	Rationale
Traditional Land and Resource Use by Indigenous Peoples	Trapping	Trapping of fur bearing animals is a traditional and modern-day land and resource use activity practiced by Indigenous peoples in the Ottawa Valley. Trapping is a licenced activity in Ontario on provincial land although trapping on private land is allowed. Fur bearing animals may include marten, beaver, otter, fox, mink, etc. Trapping is an activity that provides important links to cultural continuity and Indigenous ways of life, including but not limited to clothing, gifts. Trapping was specifically identified as a rights-based activity in REGDOC, 3.2.2 [1].
	Hunting	Hunting is a traditional and modern-day land and resource use activity practiced by Indigenous peoples in the Ottawa Valley. The hunting of large game involves deer, moose and elk but also possibly black bear. Small game includes waterfowl, rabbits, grouse, etc. Hunting is an activity that provides important links to cultural continuity and Indigenous ways of life. Hunting was specifically identified as a rights-based activity in REGDOC, 3.2.2 [1].
Traditional Land and Resource Use by Indigenous Peoples	Fishing	Fishing is a traditional and modern-day land and resource activity practiced by Indigenous peoples in the Ottawa Valley. The Kichi-Sibi (Ottawa River) was and is

Environmental Component	VC	Rationale
		still used for sport and subsistence fishing. Fish species targeted on the Kichi-Sibi (Ottawa River) in the present likely include walleye, northern pike and smallmouth bass (AECL 2010). Historically, sturgeon, American eel and possibly suckers would have also been an important part of the catch. Fishing was specifically identified as a rights-based activity in REGDOC, 3.2.2 [1].
	Gathering	Gathering is a traditional and modern-day land and resource use activity practiced by Indigenous peoples in the Ottawa Valley. The gathering of plants, berries, mushrooms, etc. is for subsistence, medicines, crafts and other purposes. Gathering is an activity that provides important links to cultural continuity and Indigenous ways of life. Gathering was specifically identified as a rights-based activity in REGDOC, 3.2.2 [1].
	Cultural Resources & Ceremonies	Indigenous peoples place a high degree of value on specific sites of cultural, historical, archaeological, spiritual, social or ecological significance. These sites may have broader cultural significance related to the practice of formal or informal ceremonies and as places to connect to the lands and waters in a culturally and spiritually important way at or near these sites. The conducting of cultural ceremonies was specifically identified as an activity in REGDOC, 3.2.2 [1]. This VC will assess whether any known sites of significance and the associated cultural ceremonies will be affected by the proposed undertaking.

7.1.1.1 Indigenous Engagement Feedback – Key Interests and Concerns related to Traditional Lands and Resource Use VCs

This section describes how the input from Indigenous engagement activities influenced the selection of VCs in the traditional land and resource use assessment Table 7-2 summarizes the key interests and concerns raised by Indigenous peoples related to VCs for the evaluation of potential effects to the traditional land and resource use assessment (based on Table 5-1 above), and demonstrates how the interest or concern has been addressed in the present assessment.

Table 7-2: Summary of Interests and Concerns Raised During Indigenous Engagement Activities that Influenced the Scope of the Traditional Land and Resource Assessment

Interest or Concern	How the Interest Was Included in the Assessment
Loss of connection to and use of lands and water, and perceptions of safety and quality of the experience on the land	The EIS discusses concerns about potential loss of connection to land and water (e.g., feeling of discomfort or concern), and loss of land and water use in Section 7.1.5 of this IER. Safety of using the land is assessed using the Indigenous peoples Health VC (Section 7.3). CNL's Public Information Program enhances engagement with Indigenous peoples and is meant to address negative perceptions by providing educational opportunities and sufficient factual information. Changes to land and water use are discussed in the EIS as part of the expected outcomes of renaturalization during and after the Institutional Controls phase (Section 7.1.3).
Presence and preservation of cultural landscapes, sites and resources (e.g., burial sites, historically significant sites, spiritual sites) including the Kichi-Sibi, and changes, past and present, to accessing these sites.	Impacts and access to cultural sites are discussed by considering the presence of these sites on the NPD property (Section 6.1.2), and by assessing the effects of the project on the Cultural Resources and Ceremonies VC under traditional land and resource use (Section 7.1.3). No known cultural features have been identified at the NPD site, but the Kichi-Sibi (Ottawa River) itself is recognized as an important cultural / heritage value for multiple reasons (Section 6.1.2). Potential effects of the project on nearby traditional land use activities are assessed in Section 7.1.3. CNL has developed mitigation measures to minimize potential nuisance effects on nearby traditional land uses (Section 7.1.3.3).
Commercial Trapping Wildlife and harvesting and fishing areas Plant and natural materials gathering areas	Potential effects on trapping (traditional and commercial), harvesting, gathering and trapping areas are assessed using the Trapping, Hunting, Fishing and Gathering VCs under the environmental component of traditional land and resource use (Section 7.1.3). CNL acknowledges that fishing, harvesting, traditional and commercial trapping, and gathering of plants and natural materials are valued traditional and modern-day land use activities (Section 6.1.2). It is noted that these activities do not currently occur on the NPD site, and particularly not in the Site Study Area, where proposed project activities will be conducted. CNL has developed mitigation measures to minimize potential nuisance effects on traditional land uses occurring nearby (Section 7.1.3.2).
Indigenous rights	CNL has not conducted an assessment of impacts on rights but has provided evidence in the EIS to support the conduct of a rights impact assessment between the CNSC and AOPFN.

Note: The table above provides a summary of the concerns expressed by multiple Indigenous groups. See Table 5-1 for a more detailed listing of key interests and concerns from each Indigenous group.

7.1.2 Assessment Boundaries

Indigenous traditional knowledge was considered in the development of the assessment boundaries. CNL drew the assessment boundaries beyond the NPD property boundaries to include Crown land in Ontario and Quebec and also to include the Kichi-Sibi (Ottawa River). As traditional activities most commonly occur on Crown lands and waters (as opposed to private

lands), the inclusion of Crown lands beyond the NPD property allows for identification of potential traditional activities near the NPD site.

7.1.2.1 Spatial Boundaries

Similar to the traditional land and resource use baseline characterization in Section 6.1 above, the Site Study Area for this assessment is consistent with the general Site Study Area defined in Figure 6-1 above.

The Local Study Area has been defined as the Site Study Area plus an area with a 1-km radius beyond the Site Study Area (Figure 6-1).

The Regional Study Area has been defined as the Site Study Area plus an area with a 5-km radius beyond the Site Study Area (Figure 6-2).

7.1.2.2 Temporal Boundaries

The temporal boundaries are the same as the standard temporal boundaries outlined in Section 5.2.1.2 of the EIS. The temporal boundaries for the EA establish the timeframes for which the direct, indirect and cumulative effects are assessed. The following three phases were identified for the NPD Closure Project:

- Decommissioning Execution, which includes all activities associated with decommissioning including setup and operation of the batch mixing plant, grouting and demolition activities, installation of the concrete cap and engineered cover, as well as site restoration and demobilization. The execution-related activities are expected to take two years;
- Institutional Controls, or a period of at least 100 years, but lasting as long as necessary, as determined by regulatory agencies that follows the Decommissioning Execution phase, where long-term care and maintenance, oversight, and environmental monitoring would be performed by CNL in order to ensure that the disposal system performs as expected, that human safety is ensured until the short lived nuclear wastes decay to below the acceptance criteria and that problems that may impact the long-term stability of the facility can be rectified; and

Post-Institutional Controls, is the period of time following the Institutional Control period, occurring after ~year 2128 and continuing indefinitely.

7.1.3 Identification of Residual Effects

7.1.3.1 Project Environment Interactions

As shown in Table 7-3, potential effects to traditional Land and Resource Use may occur as a result of operations and activities in the Decommissioning Execution, Institutional Controls and Post-Institutional Controls phases, in particular:

- Installation and operation of the batch mixing plant;
- Grouting of below grade structures;
- Removal of above grade structures;
- Install concrete cap and engineered cover;
- Final site restoration;
- Renaturalization;
- Facility performance during the Institutional Controls phase; and
- Facility performance during the Post-Institutional Controls phase.

Table 7-3: Project Environmental Interactions with Traditional Land and Resource Use

		Project Works and Activities	Potential Interaction
Decommissioning Execution	1	Batch Mixing Plant	
	1.1	Designate footprint, create access, temporary fencing (east side of main building).	On-site activities may produce nuisance effects for nearby trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).
	1.2	Assign storage area for raw materials, ship in sand. Likely east side of licensed area.	Raw material transport may result in roadkill and produce nuisance effects for nearby trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).
	1.4	Truck in necessary water supply or connection to dry hydrant for water source.	Trucking in water supply will affect traffic and transportation and produce exhaust and dust. Trucking may produce nuisance effects for nearby Indigenous residents or Indigenous resource industries.
	1.5	Provide slip pipe access to reactor side.	On-site activities may produce nuisance effects for nearby trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).
	1.6	Construct washout pit. Lined excavation with water transfer. Likely near batch mixing station.	Earth-moving may produce nuisance effects for nearby trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).
	1.7	Level area for concrete pumper.	Earth-moving may produce nuisance effects for nearby trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).

		Project Works and Activities	Potential Interaction
	1.8	Mix grout to required formula.	On-site activities may produce nuisance effects for nearby trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).
	1.9a	Truck grout to pumping station (20 trips per day).	Trucking may result in roadkill and produce nuisance effects for nearby trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).
	1.11	Sample and dewater the cleaning pit. Emplace sediments into voids in condenser room.	On-site activities may produce nuisance effects for nearby trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).
	1.12	Demobilize batch plant after cap pour.	Demobilization activities may produce nuisance effects for nearby trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).
	2	Grouting of Below Grade Structure	
	2.1	Room preparation (e.g., sealing of pipes).	Equipment and material transportation may produce nuisance effects for nearby trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).
	2.3	Grout Fill Nuclear Area.	On-site activities may release air containing tritium, lead and asbestos, and produce nuisance effects for nearby trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).
		Project Works and Activities	Potential Interaction
Decommissioning Execution	3	Removal of Above Grade Structure	
	3.1	Conventional heavy equipment knockdown of reactor hall.	Demolition may release surface contamination and produce nuisance effects for nearby trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).
	3.2	Sizing of material such as cutting steel beams or crushing masonry for fitting into void areas.	Material sizing may release surface contamination and produce nuisance effects for nearby trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).
	3.3	Set up laydown area and perform clearance surveys on materials for possible recycle.	On-site material transportation may result in roadkill and produce nuisance effects for nearby trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).
	3.4	Steel and rubble emplaced in condenser pit. Fill to 380 level.	On-site material transportation may result in roadkill and produce nuisance effects for nearby trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).

		Project Works and Activities	Potential Interaction
	3.5	Grout first level of demolition material in condenser room.	On-site material transportation may result in roadkill and produce nuisance effects for nearby trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).
	3.6	Steel and rubble emplaced in condenser room. Fill to 400 level.	On-site material transportation may result in roadkill and may produce nuisance effects for nearby trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).
	3.7	Grout second level of demolition material in condenser room.	On-site material transportation may result in roadkill and produce nuisance effects for nearby trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).
	3.8	Steel and rubble in condenser room. Fill to 425 level.	On-site material transportation may result in roadkill and produce nuisance effects for nearby trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).
	3.9	Grout third level of demolition material in condenser room.	On-site material transportation may result in roadkill and produce nuisance effects for nearby trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).
	3.10	Demolition block walls and inside walls around control room and change rooms.	Demolition may release surface contamination and produce nuisance effects for nearby trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).
		Project Works and Activities	Potential Interaction
Decommissioning Execution	3.11	Collapse ceilings of furnace room and adjacent rooms.	Demolition may release surface contamination and produce nuisance effects for nearby trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).
	3.12	Emplace block wall rubble in furnace room or condenser room.	On-site material transportation may result in roadkill and produce nuisance effects for nearby trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).
	3.13	Remove recyclables from guard house.	On-site material transportation may result in roadkill and produce nuisance effects for nearby trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).
	3.14	Demolish guard house and emplace in furnace room and adjacent rooms.	Demolition may release surface contamination and produce nuisance effects for nearby trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).

		Project Works and Activities	Potential Interaction
	3.15	Grout furnace room and adjacent areas to ground level.	On-site material transportation may result in roadkill and produce nuisance effects for nearby trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).
	3.16	Demolish above grade portion of pressure relief pit. Fill with grout.	Demolition may release surface contamination and produce nuisance effects for nearby trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).
	4	Install Concrete Cap and Engineered Cover	
	4.1	Concrete Cap (construct forms, install rebar, and pour, level and slope concrete).	On-site material transportation may result in roadkill and produce nuisance effects for trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).
	4.2	Engineered Cover (ship in materials, layer and shape mound, install geotextile layer, grade property, install remaining earth layers and seed).	On-site material transportation may result in roadkill and produce nuisance effects for nearby trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).
	5	Final Site Restoration	
	5.1	Site Restoration (install fencing, install monitoring wells if required, remediate areas affected by previous operations or decommissioning activities, washout pit, complete closure surveys, etc.).	On-site material transportation may result in roadkill and produce nuisance effects for nearby trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).
	5.2	Demobilize Site (Remove temporary facilities, decontaminate equipment, remove power upgrades, poles and lines, return transformers).	On-site material transportation may result in roadkill and produce nuisance effects for nearby trapping, hunting, fishing, gathering, and cultural activities / ceremonies (noise and dust).
		Project Works and Activities	Potential Interaction
IC*	6	Long-Term Care and Maintenance	
	6.7	Renaturalization.	Land Use may change during and / or after the Institutional Controls phase. Renaturalization of site may lead to an increase of wildlife and may benefit trapping, hunting, and gathering activities.
	6.8	Facility performance during the Institutional Controls phase	Groundwater will start to enter and eventually resaturate the grouted structure. Contaminant release from the grouted structure may affect non-human biota (e.g., game and fish species) health and / or populations.
PIC**	7	Post-Institutional Controls	
	7.1	Facility performance during the Post-Institutional Controls phase.	Groundwater in the resaturated and eventually degraded grouted structure will become contaminated. Contaminant release from the grouted structure may affect non-human biota (e.g., game and fish species) health and/or populations.
		Renaturalization	Land Use may change during and/or after the

		Project Works and Activities	Potential Interaction
			Institutional Controls phase. Renaturalization of site may lead to an increase of wildlife and may benefit trapping, hunting, and gathering activities.

Notes:

* - IC: Institutional Controls phase

** - PIC: Post-Institutional Controls phase.

7.1.3.2 Proposed Mitigation Measures

The mitigation measures presented below are preliminary and have been developed based on the current understanding of the project. As the project approaches detailed work planning, details will be refined, and additional mitigation measures may be developed as required; including mitigations developed collaboratively with Indigenous peoples that encompass Indigenous Knowledge. CNL has initiated discussions with Indigenous communities on project commitments that will help address concerns such as those related to traditional land and resource use VCs (these commitments are identified in the 'Next Steps' column of the Tables of Interests and Concerns – Appendices J through BB). CNL looks forward to discussing additional mitigation of effects with Indigenous peoples.

In addition to the in-design mitigation measures identified in Section 4.1 of the project EIS, the following mitigation measures have been identified to ensure the protection of the Indigenous land and resource use environment:

- dust suppression measures as described in EIS Section 9.2.3.2;
- If previously undocumented archaeological resources are discovered, then CNL will suspend decommissioning activities immediately and will engage a licensed consultant to carry out archaeological fieldwork, in compliance with Section 48(1) of the *Ontario Heritage Act*, and outlined in CNL's procedure Management of Cultural Resources (CNL 2022a). CNL remains open to engagement with Indigenous Nations, communities and organizations in the event of a discovery of an archaeological resource. If any human remains are identified during construction, CNL will immediately notify the police or coroner and the Registrar of Cemeteries, Ministry of Public and Business Service Delivery, and Indigenous Nations, communities and organizations;
- construction activities will generally occur between 7 am and 7 pm with the overall objective of minimizing nuisance effects (i.e. noise and traffic) on traditional resource users in the Local and Regional Study Areas. It is noted that special or emergency circumstances may require deviation from this restriction; and,

- periodic communication updates on project construction activities to Indigenous Nations, communities and organizations are required, including construction schedule, activities, dedicated contact person for inquiries and emergencies, etc.

7.1.3.3 Effects After Mitigation

In this section, indirect effects to traditional land and resource use are discussed for each phase of the project.

Decommissioning Execution Phase

Site / Local Study Area

As discussed above in Section 7.1.3.2, CNL will minimize potential nuisance effects (i.e., noise) on nearby traditional land uses (e.g., hunting, trapping, fishing, gathering, ceremonies) by instituting restrictions on construction hours and days of the week.

Construction activities will not impede traditional resource harvesting activities on adjacent provincial and private lands. Construction activities at the NPD site will be very localized, controlled and temporary in duration. Therefore, any disturbance effects will be minor, localized and temporary in duration.

Any effects on the terrestrial and aquatic environments (i.e., fish and wildlife displacement, contamination) would also affect the ability to hunt and fish in the Local Study Area.

Regional Study Area

As noted in the Socio-Economic TSD, the traffic and transportation effects associated with the project are expected to be greatest by far during the Decommissioning Execution phase. Within the Regional Study Area, the transportation / haul route will be limited to Highway 17 and the NPD Site access road from the highway. As discussed in Section 7.1.3.2, CNL will minimize traffic nuisance effects on nearby traditional land users in the Regional Study Area by instituting restrictions on construction hours and days of the week. No measurable noise or dust nuisance effects are expected for traditional land users in the Regional Study Area.

There will be nuisance effects (noise and dust) in the Regional Study Area for nearby traditional land uses (e.g., hunting, trapping, fishing, gathering, ceremonies) that should largely be mitigated by a variety of general and specific construction mitigation measures identified in Section 7.1.3.2.

Institutional Controls and Post-Institutional Controls

Site / Local Study Area

As determined in the EcoRA TSD, no adverse residual effects have been predicted for terrestrial or aquatic biota. As the exposure assessment undertaken in the EcoRA TSD demonstrates that the proposed project has no adverse effect on game or sportfish species, the project is not expected to have any adverse effects to Indigenous peoples traditional harvesting that could

potentially occur during the Institutional Controls and Post-Institutional Controls phases. Therefore, no potential effects are expected on traditional land and resource use in the Site and Local Study Areas in the postclosure period (Institutional Controls and Post-Institutional Controls phases).

Renaturalization may increase vegetation and habitat for wildlife, providing a potential benefit to traditional hunters, trappers and gathers in the NPD Site and Local Study Areas in the postclosure period.

During the Institutional Controls phase, land in the Local Study Area surrounding the licensed area may be released for other uses by AECL. As lands will only be released as applicable under the soil and groundwater quality guidelines, no residual effects are expected.

Regional Study Area

Since there are no effects expected in the Site and Local Study Areas, no effects to traditional land and resource use are expected in the Regional Study Area for the postclosure period (Institutional Controls and Post-Institutional Controls phases).

7.1.3.4 Prediction Confidence and Uncertainty

There are private lands immediately adjacent to the NPD Site and Federal lands, and it is possible but unknown whether traditional land uses occur on these lands. It is conservatively assumed that adjacent lands and waters will be used by hunters, trappers, anglers and gatherers.

REGDOC 2.9.1 on *Environmental Protection: Environmental Principles, Assessments and Protection Measures* ([6], Appendix C.8) requires identification of any concerns raised by Indigenous people about the facility or activity in relation to any Indigenous or treaty rights. This information is provided in this IER Sections 4.4 and Appendices J through to BB.

7.1.3.5 Residual Effects

Table 7-4 summarizes the effects assessment above and presents the residual effects that were identified on traditional land and resource use. The residual effects Table 7-4 are grouped by effect rather than by individual interaction as listed in Table 7-3.

Table 7-4: Summary of Residual Effects on Traditional Land and Resource Use

Environmental Component	Source of Effect	Potentially Affected VCs	Potential Effect	Proposed Mitigation	Potential Effect After Mitigation	Residual Effect
Decommissioning Execution						
Traditional Land and Resource Use	On-site transportation, demolition, material sizing.	Trapping Hunting Fishing Gathering	Nuisance effects (dust, and noise).	Dust suppression, restricting hours of activity, communication with Indigenous groups.	Minor, temporary and localized nuisance effect on nearby Indigenous land users.	No adverse residual effects.
Traditional Land and Resource Use	All interactions with the terrestrial environment (see EIS Section 9.6.3.1).	Trapping Hunting	Wildlife displacement, contamination, or mortality affecting hunting activities.	See mitigation measures identified for the terrestrial environment in EIS Section 9.6.3.2.	No measurable habitat or exposure effects, and therefore no effects on hunting, are expected.	No adverse residual effects.
Traditional Land and Resource Use	All interactions with the aquatic environment (see EIS Section 9.3.3.1).	Fishing	Fish displacement, contamination, or mortality affecting traditional angling activities.	See mitigation measures identified for the aquatic environment in EIS Section 9.4.3.2.	No measurable habitat or exposure effects, and therefore no effects on fishing, are expected.	No adverse residual effect.
Institutional Controls and Post-Institutional Controls phase						
Traditional Land and Resource Use	Renaturalization	Trapping Hunting Gathering	During the Institutional Controls and Post-Institutional Controls phases, renaturalization of site may lead to an increase of wildlife and may benefit trapping, hunting, and gathering activities.	No proposed mitigation.	Potential benefit for traditional hunting, trapping and gathering activities. Access to the licensed area will be restricted, which will limit the total additional area of use, thus no measurable effects are expected.	No adverse residual effects.

7.1.4 Assessment of Residual Effects

Based on the assessment described above, no adverse residual effects on traditional land and resource use have been predicted.

7.1.5 Monitoring and Follow-Up

Monitoring and follow up programs are not specifically identified for traditional land and resource use; rather, monitoring for environmental media (e.g., for air quality, surface water quality, groundwater quality) will be implemented to verify the environmental effect predictions made by the EIS for land and resource use, and to promote land user comfort around the safety of the Local Study Area, Regional Study Area and surrounding areas for traditional land and resource use (i.e., to reduce perceptions of adverse NPD Closure Project effects on traditional land and resource use that are not anticipated to occur).

CNL has been carrying out discussions with some Indigenous communities (AOO, AOPFN and MNO) on greater involvement by them in the environmental follow up monitoring both in the development and implementation of the programs. CNL also recognizes that Indigenous Knowledge is an important aspect to be incorporated into its existing environmental monitoring programs. To date, no specific environmental monitoring has been identified for traditional land and resource use, although preliminary discussions have occurred. Monitoring in other environmental components will confirm the EIS predictions (i.e., that no effects are expected on traditional land and resource use). CNL has workshops planned to gather feedback on its draft follow-up monitoring plans, which will not be finalized until an environmental assessment decision is made for this project. CNL looks forward to working together with Indigenous communities to integrate Indigenous Knowledge into the follow-up monitoring at NPD.

The evidence in the AKLUS indicates, and AOPFN and MNO have explicitly stated, that their citizens have negative perceptions associated with performing traditional activities (such as harvesting) near the NPD site. Some participants in the AOO and AOPFN AKLUS indicated concerns about contamination and the risk associated with harvesting and consuming foods from the area. For the different Indigenous groups, this may result in individuals not using an area such as suggested in the MNO study [92], or Indigenous peoples harvesting less food in the area, or just promote a feeling of discomfort or concern associated with contamination and risk ([92][84]). The perceptions and willingness to consume traditional foods can partially be addressed by an Indigenous-driven risk-informed communication program for the NPD Closure Project which CNL agrees is an important activity to pursue. CNL acknowledges the AOPFN have identified the key role of the country foods monitoring program in mitigating the concerns of the AOPFN. CNL will continue discussions on the implementation of a Guardian program at the NPD site and more broadly on all CNL sites located in Algonquin traditional territory. An Indigenous driven monitoring program can help to reduce fear or anxiety associated with traditional uses occurring adjacent to and near the AECL properties and build confidence that the decommissioning strategy and mitigation measures are effective.

Monitoring to verify effects predictions will be on-going during the decommissioning and institutional control phases, and the need for and duration of monitoring will be reviewed based on an annual review of monitoring data. This monitoring will be integrated into the CNL Environmental Monitoring Program.

7.1.6 AOPFN Perspective on Effects to Traditional Land and Resource Use

The following subsections (7.1.6.1, 7.1.6.2, and 7.1.6.3) present the AOPFN's view in their own words. The AOPFN has completed three studies (Algonquin Knowledge and Land Use [93], Diet and Harvest [94] and Culture and Rights [95] that draw on AOPFN Algonquin Knowledge to expand the understanding of Traditional Land and Resource Use in the NPD Closure Project Study Area. These sections summarize key findings of the studies and differences in the perspective and approach used by the AOPFN to assess potential effects on Traditional Land and Resource Use. These are initial comments only; a more formal AOPFN-relevant effects characterization process for Traditional Land and Resource Use will be provided in the final EIS (if CNL engages with AOPFN in this process) or in an AOPFN submission to the Commission.

7.1.6.1 AOPFN Concerns with CNL's Assessment Approach

It is AOPFN's position that the original Draft EIS for the NPD Closure Project and recent revisions to EIS Sections 8.9 and 9.9 do not yet adequately interpret or consider AOPFN Algonquin Knowledge as reflected in the AOPFN AKLUS Report, the Culture and Rights Study, or the Diet and Harvest Study. While there is reference to each of the three AOPFN studies in the revised Sections 8.9 and 9.9, there are gaps and errors that suggest a more detailed analysis is required. Such analysis would properly integrate the studies' findings into the EIS as they relate to consideration of impacts on traditional land and resource use.

AOPFN has raised these concerns directly with CNL. In summary (and in no particular order) they include the following:

- Specific Valued Components (listed below) identified by AOPFN Knowledge holders in the three AOPFN studies were not covered in the Draft EIS in a meaningful way, and not adequately considered in the effects assessment on TLRU:
 - Fish spawning areas and fish habitat of importance to AOPFN;
 - Fish Species of Cultural Importance (Including Ashigan (Bass), Lake Trout, and Speckled Trout);
 - Culturally Important Plants (including Cattails and Muskrat root / Sweet flag);
 - Furbearers of Cultural Importance (including Amik (Beaver), Pashkwajàsh (Coyote), Odjig (Fisher), Wàbisheshi (Marten), Nigig (Otter), Wàbòz (Rabbit), Esiban (Raccoon), Wàgosh (Fox), Adjidimò (Squirrel), and Shingosi (Weasel);
 - Mónz and Mónz Habitat;
 - Wawáshkeshi Habitat;
 - Partridge;
 - AOPFN preferred harvesting sites;

- AOPFN preferred fishing sites;
- Kichi-Sibì as a cultural landscape; and
- AOPFN member cultural continuity and way of life;
- CNL does not identify any valid primary or secondary impact pathways on traditional land and resource use from the proposed Project. In contrast, as discussed further in Section 7.1.6.2 below, AOPFN sees obvious primary and secondary pathways for reduced long-term ability and willingness to conduct Traditional Land and Resource Use practices at and around the NPD site. This is based on AOPFN's understanding that the project will continue in perpetuity to see the location fenced off and in an unnatural condition, and that in-situ disposal will physically turn the site from a temporary radioactive waste storage site to a permanent radioactive waste disposal facility;
- CNL uses the term "renaturalization" to refer to what will occur at the NPD site with in-situ disposal. This is neither defined nor contextualized, and the concept seems to differ from AOPFN's understanding of what is "natural". From AOPFN's perspective, in a future with in-situ disposal, the underground conditions will be unnatural, and on the surface, portions of the site will be unnaturally fenced off, covered with a concrete cap and unable to return to a forested condition. These are unnatural conditions that will lead to longer-term / permanent access restrictions and visible impediments to use and occupancy for AOPFN members;
- CNL suggests that its identified lack of scientifically measurable impact pathways on biophysical VCs can be used as a proxy for impacts on Traditional Land and Resource Use. From AOPFN's perspective, no assessment of Traditional Land and Resource Use can be accurately completed without considering additional factors such as faith in country foods, visible condition of an area, and sense of safety and security on the land. AOPFN has continually advised CNL that using a biophysical proxy for the human endeavour of traditional land and resource use is not a defensible approach to this type of impact assessment. In the NPD Culture and Rights Study, AOPFN identified 17 distinct "Sufficiency Resources" considered by AOPFN members when deciding whether, when and where to harvest, with the intention that impact assessors also consider these when looking at impacts on Traditional Land and Resource Use [95]. Many of these sufficiency resources go far "beyond the biophysical", but CNL's assessment approach still does not;
- CNL claims that "Indigenous knowledge was considered in the development of the assessment boundaries". This is not an accurate statement. CNL has chosen to ignore the larger Local Study Area and Regional Study Area used by AOPFN peoples in three studies, thus rejecting AOPFN Algonquin Knowledge. The result is Local Study Areas and Regional Study Areas that are 25 times smaller than those chosen by the AOPFN Algonquin knowledge holders themselves. This contributes to the continued lack of understanding of just how large the impact zone on Traditional Land and Resource Use is around the NPD site, which remains an open question in this EA;
- CNL does not integrate into its effects characterization any of the impact pathways identified by AOPFN in the three AOPFN studies, nor is there evidence overall that CNL considered the three AOPFN studies in any meaningful way in Section 9.9;

- CNL suggests that because the site is already off limits to AOPFN members, additional adverse effects on Traditional Land and Resource Use cannot occur in a future with in-situ disposal essentially by definition. The reality is that in the Institutional Control Period, and potentially in the Post-Institutional Control Period, in-situ disposal represents a continuation of several existing barriers to AOPFN Traditional Land and Resource Use, depriving AOPFN of the ability to meaningfully reconnect to an area from which they have been alienated by Canada's actions since the 1960s. This temporal extension of an existing adverse effect is entirely material to this impact assessment and cannot be magically explained away as "no impact" simply because AOPFN members cannot currently access the site for traditional purposes. To suggest that this is the case is a highly cynical and disrespectful approach to impact assessment that is not reconcilable to the findings of AOPFN's three studies;
- CNL does not identify any concrete new mitigation or monitoring measures over and above what it already has in place. Given that the current version does not include any Indigenous-led monitoring or communication mechanisms to reduce or better monitor impacts on Traditional Land and Resource Use, this mitigation and monitoring must be held in low confidence. For example, CNL's suggestion that its Public Information Program is an effective mitigative measure to reduce fear and stigma associated with NPD is not supported by any evidence, and is contrasted by findings of geographically focused use, occupancy and harvesting avoidance centred around the NPD location (see [93] and [94]); and
- In the end, the only effect identified by CNL on Traditional Land and Resource Use is a beneficial one through eventual "renaturalization", and from AOPFN's perspective this is indicative of the wrong-headedness of CNL's approach to this assessment. In reality, during Institutional Control and possibly permanently, existing adverse effects on access and willingness to harvest from the project area are extremely likely to continue due to a variety of observable and perceptual factors. Such factors are well known to impact on Indigenous use and occupancy, and CNL's inability to recognize or characterize this as an adverse effect is indicative of an assessment approach that is fundamentally flawed. It does not help, nor is it acceptable to AOPFN, that CNL did not engage the traditional land and resource users themselves in developing the methods or conducting the assessment.

Due to the concerns outlined above, substantial gaps thus remain in the Proponent's approach to the assessment on Traditional Land and Resource Use in the current iteration of the EIS. Revised EIS sections continue to place a strong focus on biophysical factors and physical access, ignoring other factors that may diminish or impede AOPFN traditional use such as sensory experience (changes in noise, smell, visual appearance of the landscape) and AOPFN members' sense of safety on the land (fears of contamination real or "perceived"). As has been expressed by members of the AAC directly to CNL (in a meeting on 2021 July 22), impacts from the development of a permanent radioactive waste disposal facility are not just about risk perception; they are about changes to the environment that contradict AOPFN Algonquin values and understandings of how things should be. The three AOPFN studies capture many of

AOPFN's concerns about how the project will affect the quality and accessibility of the land, and these concerns should have been incorporated in the effects assessment section of the EIS. Best practice dictates that all potential impact pathways should be considered, and that for impacts on the human environment, these pathways should be considered by the people who would be impacted themselves, not solely by outsiders with no traditional knowledge of how local Indigenous peoples use and value the location and its surroundings.

AOPFN asserts that past and current uses of the NPD area do not define AOPFN's future use or limit the future exercise of Traditional Land and Resource Use practices in the area. AOPFN has a reasonable expectation of resuming the exercise of these Traditional Land and Resource Use practices in the future, as was the case in the past. AOPFN can see from the evidence that portions of the land covered by and impacted on by the project will not be re-naturalized over time or returned to near-natural conditions that allow AOPFN members to reconnect with – or be willing to reconnect with – this site.

7.1.6.2 AOPFN Findings in Relation to Traditional Land and Resource Use

The findings of the three AOPFN studies demonstrates that there is significant AOPFN Algonquin knowledge, land use and occupancy within the NPD Study Area. The site is important to the health, wellbeing, way of life and AOPFN Algonquin rights for AOPFN members. The data provided in the three AOPFN studies also demonstrates that there is a deep cultural connection to the area. According to AOPFN Algonquin knowledge holders, the relationships that participants have with the land extend beyond the simple harvesting of resources. In many instances, these harvesting activities foster relationships with the land in ways that non-Algonquin people do not immediately understand or recognize.

The Culture and Rights Study and Diet and Harvest Study both identified extensive alienation from and loss of use of the area at and around the NPD site, as reported by AOPFN members. For example, the Diet and Harvest Study involved a survey of 250 AOPFN families, the results of which show (among other findings) that the area around the NPD site is one of two areas (the other being the vicinity of Chalk River Laboratories) where AOPFN members have the highest levels of concern about contamination (real or perceived) of country food resources. Perceived risk of contamination plays a critical role in identifying impact pathways. It makes people change their practices and influences the acceptability of the project, and these effects cannot be discounted from their impact on food security, health, and transmission of skills and knowledge to future generations.

Because of the risk of contamination (real or perceived), the NPD site has had a contributory role in the historical reduction of AOPFN members' ability to practice AOPFN rights, both at the site itself and in a yet-to-be-determined zone of influence around the site. Further research to establish the geographic boundaries of this zone of influence and to characterize these historic harms is essential. Such research would require assessing not only the extent of loss of use and alienation from the NPD site and its surroundings over time, but also the factors influencing this loss of use and alienation (such as psychosocial impacts caused by the fear and stigma

associated with the NPD site). This would result in a better characterization of the factors that have led to this alienation and loss of use, and better understanding of the implications of psychosocial impacts on AOPFN socio-cultural health and well-being, thus informing the recognition and reconciliation framework.

The Culture and Rights Study [93] identified the following existing impact pathways related to Traditional Land and Resource Use in the Study Area:

- Lack of access to the NPD site since 1962;
- Diminished quality and quantity of game species in preferred hunting areas;
- Lack of confidence in the health of animals, fish, medicines, and waters, and in their safety for human consumption;
- Diminished access to preferred hunting and fishing areas in the broader Study Area, due to provincial boundaries, land privatization, industrial activity, and increased traffic.

With these existing impact pathways in mind, AOPFN members considered a future with in-situ disposal and identified additional effects of alienation due to contamination (real or perceived) for a number of values (e.g., cultural continuity, fishing, hunting etc.). According to AOPFN members, NPD Closure Project interactions could impact AOPFN harvesting and traditional use rights in the Study Area by exacerbating concerns about contamination of water, fish, wildlife, and medicines in proximity to the project. Given that oral and experiential transmission of knowledge between generations of Algonquins is the primary source of learning about how and where to use the land and water, these concerns about perceived contamination would also almost certainly carry forward and impact future generations' ability to harvest in the area. These concerns can be further described as follows:

- AOPFN members are concerned about their continued ability to harvest and consume wildlife and natural materials from the area, given the location of the project within the Algonquin Settlement Area where AOPFN members harvest food, medicines, and other natural materials. Specifically:
 - Some AOPFN members hunt in the vicinity of the project as a source of sustenance. Environmental impacts related to the NPD Closure Project have the potential to impact members' food security;
 - Some AOPFN members harvest plant medicines in the vicinity of the project, and are concerned about the safety and effectiveness of medicines growing close to a nuclear in-situ disposal site;
 - Some AOPFN members are already opting to release their fish catches from this area instead of consuming due to contamination concerns. Such concerns related to bioaccumulation in fish normally harvested from the Kichi-Sibi (Ottawa River) could limit both intake and what species are fished, thereby affecting diet and food security;
- Harvesting sites could become compromised in the future, leading to concerns over safety that would impact members' abilities to pass on AOPFN knowledge on harvesting

to children. This would in turn affect the ability of future generations to use the area; and

- Project-related activities would exacerbate the issue of alienation and further limit members' access to the area, and perpetuate the difficulty of exercising their Aboriginal rights.

In summary, for AOPFN members, NPD Closure Project impacts related to Traditional Land and Resource Use are likely to include:

- Continuing negative impacts on AOPFN nutrition and food security, harvesting and traditional use due to long-term physical alienation from the land, and uncertainty about contamination of water, land, plants, and wildlife in proximity to the project, including an extension of the period of time the area is both physically and psycho-socially "off limits" to AOPFN members for the practice of harvesting rights; and
- Ongoing impacts on AOPFN cultural continuity at the NPD site due to continued alienation and impacts to the health of the land, water, and resources, thus impacting future generations' ability to learn and practice their culture or harvest resources at and near the NPD sites. The storage of radioactive wastes permanently at the site may extend the number of members who deem it unacceptable to harvest in the vicinity of the NPD site.

7.1.6.3 AOPFN Summary and Recommended Next Steps

As demonstrated in the preceding Sections 7.1.6.1-7.1.6.2, the three AOPFN study findings support the concerns AOPFN has raised over the CNL's underestimation of the project's impacts on traditional land and resource use, as well as on culture and heritage resources. The AOPFN studies confirm the following:

- Not all AOPFN Valued Components were captured in the EIS;
- Highly valued key cultural areas exist in close proximity to the project;
- AOPFN concerns, including contamination (real and perceived) and stigma associated with permanent radioactive waste disposal at this location, have not been adequately addressed in the EIS; and
- AOPFN members are highly concerned with cumulative effects from the NPD, and existing alienation and loss of use (and related impacts) have not been properly characterized in the draft EIS as an important cumulative effects contextual factor.

The AOPFN studies indicate that there will be both direct and indirect effects on Traditional Land and Resource Use from the proposed decommissioning plan, given that the temporal continuation of existing adverse effects (which, from AOPFN's perspective, can and should be removed through decommissioning) will be maintained into the long-term, effectively permanent future, through: a. fencing in of portions of the site; and b. physically turning the

facility into a permanent radioactive waste disposal facility. These will likely have direct effects on the following attributes of Traditional Land and Resource Use:

- 1) Permanent continuation of lack of physical access to a portion of the NPD site;
- 2) Permanent continuation of unwillingness of AOPFN members to harvest from around the area covered by a permanent radioactive waste disposal facility and its surroundings (to an areal extent that has yet to be established or even contemplated by CNL);
- 3) Long-term continuation of in reduced faith in country foods harvesting at and around the NPD site (to a real extent that has yet to be established or even contemplated by CNL); and
- 4) The above effects will have associated likely impacts such as increased reliance on store-bought foods, lack of cultural connection to an important part of the AOPFN cultural landscape, inability to pass on Algonquin knowledge about the site, and fear, stigma and alienation effects on individual and community health, among other spin off effects.

AOPFN finds that perception of risk and observation of the nature of the facility by its members are real phenomena. As Algonquin people, AOPFN members are naturally risk-averse when it comes to alterations of the land from natural conditions because:

- a. They are highly attuned to what is natural and normal due to their long-term use and occupancy of – and strong cultural connection to – their lands and waters; and
- b. They have been subject to many micro- and macro- harms caused by settlers, industries, and governments in the past, that make them both wary of and highly concerned about risk of any future changes.

Add to this the primary impact pathways from the NPD Closure Project – specifically the long-term continuation of an avoidable location-specific effect in the form of fencing off and not allowing the NPD site to return to a natural condition, and the permanent cementing in place of radioactive materials very close to the Kichi-Sibi, converting the site from a temporary radioactive waste storage facility to a permanent radioactive waste disposal site – and there are legitimate reasons for AOPFN members to have concerns about a future with the project.

AOPFN remains open to working with CNL so that CNL can better understand and integrate the findings of the three AOPFN studies, and the understandings of AOPFN Algonquin knowledge holders (e.g., the people who actually practice Traditional Land and Resource Use in the project area), into a revised approach to assessing impacts on Traditional Land and Resource Use in the EIS. If CNL engages us on this, we expect that this section of the draft EIS will be updated in the final EIS. If it is not, AOPFN will engage the Commission on this in a direct fashion.

AOPFN will also continue to engage with CNL to improve the mitigation and monitoring measures that AOPFN feels need to be in place to improve conditions for – and understanding of – Traditional Land and Resource Use practices by our members in the future, no matter what decommissioning strategy is eventually adopted at the NPD site.

7.1.7 Conclusion

CNL's assessment of potential effects to traditional land and resource use (Section 7.1.3.3) evaluated how project activities may affect traditional land and resource use VCs and adheres to the requirements of CEAA, 2012. CNL supported several Indigenous Nations, communities and organizations (AOO, AOPFN and MNO) completing traditional knowledge and land use studies that include unique community perspectives, incorporating their observations and beliefs, into an assessment of effects to traditional land and resource use. Indigenous Nations, communities and organizations often prefer a different approach, consider different factors and evaluate against a different baseline than CNL and subsequently the findings of the communities and CNL differ. CNL invited the AOPFN to share their perspective and has included that material within this IER (Section 7.1.6). CNL is continuing to engage with the AOPFN and other Indigenous communities on the topic of effects to traditional land and resource use and to develop commitments that will alleviate concerns and gain trust about the safety of traditional land use near the NPD site.

Traditional land and resource use VCs were selected based on the potential for the NPD Closure Project to interact with the features of the land and resource use environment. In addition, VCs for traditional land and resource use were selected based on a consideration of knowledge of traditional land and resource use practices that interact with the environment, Indigenous and / or Treaty rights and community engagement. Concerns expressed by Indigenous groups during engagement activities are captured and taken into consideration in Table 7-2.

The NPD Closure Project Site Study Area is located entirely within the Exclusion Zone. Therefore, aside from the operations and activities undertaken by CNL, other land uses of the NPD site are prohibited due to restricted public access. The lands of the Local Study Area have minimal public Crown and private lands and as such, there is likely limited if any traditional land and resource use occurring there. Within the Regional Study Area there are provincial Crown lands where traditional land and resource use likely occurs, however, the NPD Closure Project will not have activities that occur on these lands. Furthermore, the project is not predicted to have any biological effects beyond the NPD site that would impact on traditional land and resource use including consumption.

Monitoring activities in other environmental components (i.e., atmospheric, surface water, geological and hydrogeological and terrestrial environments, and ambient radioactivity) will verify the accuracy of the EA predictions and effectiveness of measures implemented to mitigate potential adverse environmental effects related to traditional land and resource use. If monitoring identifies concerns in the other environmental components, CNL will assess the implications to traditional land and resource use (e.g., through ongoing Indigenous engagement activities).

7.2 Indigenous Socio-Economic

As required under paragraph 5(1)(c) of the Canadian Environmental Assessment Act, 2012 [4], the EIS should describe the effects of any changes the project may cause to the environment, with respect to Aboriginal peoples, on socio-economic conditions.

7.2.1 Selection of Valued Components

Six VCs were selected with respect to the Indigenous socio-economic environment. These included: population and demographics; economy and employment; housing and infrastructure; Indigenous resident and use and enjoyment of private property; decision-making, and resource industries. These were selected for three reasons. Some input from Indigenous peoples and the CNSC was provided on Indigenous socio-economic considerations. Most of these are typical socio-economic considerations. Lastly, they were selected to include hard (housing and infrastructure) considerations; quantitative factors (economy, population and demographic); and, softer social considerations (decision-making and use and enjoyment of private property).

The Indigenous socio-economic effects assessment includes both direct effects on socio-economic VCs (e.g., the Economy and Employment VC as affected by potential employment opportunities) and indirect socio-economic effects related to a change in the environment (e.g., Indigenous Resident Use and Enjoyment of the Property as affected by changes in air and noise emissions; and Resource Industries).

While not required under *CEAA* (2012), the scope of the NPD socio-economic effects assessment was expanded to include potential direct socio-economic effects given these effects are of interest to stakeholders and Indigenous communities and peoples.

Table 7-5: Selection and Rationale of Valued Components for the Indigenous Socio-Economic Environment

Environmental Component	VC	Rationale
Indigenous Socio-Economic Environment	Population and Demographics	Population and demography are one of the most common ways to describe a community.
	Economy and Employment	Most Indigenous communities strive for improved employment and economic development opportunities.
	Housing and Infrastructure	Housing is a key concern of Indigenous people. Physical infrastructure within Indigenous communities is often inadequate, dated and difficult to finance. Water infrastructure might be a concern.
	Indigenous Resident – Use and Enjoyment of Private Property	There may be Indigenous people who live within a few kilometers of the NPD site and might experience nuisance effects. Project-related effects on quality of life are driven by potential Project-induced changes in environment (i.e., changes in air quality, ambient noise, increases in traffic volume and visual disturbances)
	Decision-Making	Indigenous communities often have a unique and decentralized decision-making structure.
	Resource Industries	Indigenous peoples often participate in resource based industries that can be potentially affected by changes to the environment. Resource industries can include: trapping, commercial fishing, commercial resource based tourism and gathering. Resource use industries are different than traditional use as they represent commercial uses associated with these natural resources. Project-related effects on resource based industries are driven by potential Project-induced changes in the environment. These changes could include: direct effect on natural resources such as fish, wildlife or animals upon which these resources industries are dependent. As well, project-induced changes in the environment might limit access to these natural resources.

7.2.1.1 Indigenous Engagement Feedback – Key Interests and Concerns Related to Indigenous Socio-Economic VCs

This section describes how the input from Indigenous engagement activities influenced the selection of VCs in the Indigenous socio-economic environment assessment. Table 7-6 summarizes the key interests and concerns raised by Indigenous peoples related to VCs for the evaluation of potential effects to the Indigenous socio-economic environment (based on Table

5-1 above), and demonstrates how the interest or concern has been addressed in the present assessment.

Table 7-6: Summary of Interests and Concerns Raised During Indigenous Engagement Activities that Influenced the Scope of the Indigenous Socio-economic Assessment

Interest or Concern	How the Interest Was Included in the Assessment
Socio-economic conditions of Indigenous communities that are interacting with the NPD site	Based on feedback from Indigenous groups, CNL has added an assessment of Indigenous Socio-Economic and Health Conditions and Effects (Sections 6.2, 6.3, 7.2 and 7.3 of this IER). This IER presents information on baseline socio-economic conditions in nearby Indigenous communities. Information that was provided to CNL by Indigenous groups has been incorporated into Section 6.2. Indigenous socio-economic interactions are described and assessed in Section 7.2.3. Indigenous health interactions are described and assessed in Section 7.3.3.
Use and enjoyment of the area surrounding the NPD site by Indigenous people	Based on feedback from Indigenous groups, CNL added an assessment of Indigenous Socio-Economic Conditions and Effects (Sections 6.2 and 7.2 of this IER). Indigenous resident use and enjoyment of the area is included as a VC under this new Indigenous socio-economic component.
Inclusion of data provided by Indigenous groups	Data from studies provided by Indigenous groups have been incorporated (Sections 4 and 6 of this IER). This includes traditional knowledge and land use information (Section 6.1 of this IER), and information on baseline socio-economic conditions (Section 6.2).

Note: The table above provides a summary of the concerns expressed by multiple Indigenous groups. See Table 5-1 for a more detailed listing of key interests and concerns from each Indigenous group.

7.2.2 Assessment Boundaries

7.2.2.1 Spatial Boundaries

The Site Study Area for the Indigenous socio-economic environment is the same as the general Site Study Area defined in Table 6-1. The Local Study Area has been defined as the Site Study Area plus a 1 km area beyond the Site Study Area and is the same as that used for Indigenous land and resource use (see Table 6-1). Both the Indigenous land and resource use and socio-economic environmental components utilized a Regional Study Area that was defined as the Site Study Area and a 5 km radius beyond that. However, there are no Indigenous communities such as First Nations reserves within a 5 km radius of the NPD site. The closest Indigenous community to the NPD site is the Algonquins of Pikwàkanagàn First Nation located on Golden Lake. AOPFN is located 75 km (measured as a straight line) from the NPD site. It is possible that there are some Indigenous individuals and / or families that do live within 5 km of the NPD site. Negative socio-economic effects are unlikely outside of the 5 km radius of the site, however, the Regional Study Area extends 100 km beyond the NPD site.

7.2.2.2 Temporal Boundaries

The temporal boundaries are the same as the standard temporal boundaries outlined in Section 7.1.2.2

7.2.3 Identification of Residual Effects

Based on the assessment described above, no adverse residual effects on the Indigenous socio-economic environment have been predicted.

7.2.3.1 Project Environment Interactions

As shown in Table 7-5, potential effects to the socio-economic environment may occur as a result of operations and activities in the Decommissioning Execution, Institutional Controls and Post-Institutional Controls phases, in particular:

- Installation and operation of the batch mixing plant;
- Grouting of below grade structures;
- Removal of above grade structures;
- Install concrete cap and engineered cover;
- Final site restoration;
- Renaturalization;
- Facility performance during the Institutional Controls; and
- Facility performance during the Post-Institutional Controls phase.

Table 7-7: Project Environmental Interactions in the Indigenous Socio-Economic Environment

		Project Works and Activities	Potential Interaction
Decommissioning Execution	1	Batch Mixing Plant	
	1.1	Designate footprint, create access, temporary fencing (east side of main building).	Establishing the project footprint and installing fencing may affect the landscape and visual setting from the Kichi-Sibi (Ottawa River). On-site activities may produce nuisance effects for nearby Indigenous residents (noise, dust and traffic) or Indigenous resource industries.
	1.2	Assign storage area for raw materials, ship in sand. Likely east side of licensed area.	Raw material transport may produce nuisance effects for nearby Indigenous residents or Indigenous resource industries.
	1.4	Truck in necessary water supply or connection to dry hydrant for water source.	Trucking in water supply will affect traffic and transportation and produce exhaust and dust. Trucking may produce nuisance effects for nearby Indigenous residents or Indigenous resource industries.
	1.5	Provide slip pipe access to reactor side.	On-site activities may produce nuisance effects for nearby Indigenous residents or Indigenous resource industries.

		Project Works and Activities	Potential Interaction
	1.6	Construct washout pit. Lined excavation with water transfer. Likely near batch mixing station.	Earth-moving may produce nuisance effects for nearby Indigenous residents or Indigenous resource industries.
	1.7	Level area for concrete pumper.	Earth-moving may produce nuisance effects for nearby Indigenous residents or Indigenous resource industries.
	1.8	Mix grout to required formula.	On-site activities may produce nuisance effects for nearby Indigenous residents or Indigenous resource industries.
	1.9a	Truck grout to pumping station (20 trips per day).	Trucking will affect traffic and transportation and produce exhaust and dust. Trucking may produce nuisance effects for nearby Indigenous residents (noise and dust) or Indigenous resource industries.
	1.11	Sample and dewater the cleaning pit. Emplace sediments into voids in condenser room.	On-site activities may produce nuisance effects for nearby Indigenous residents (noise) or Indigenous resource industries.
	1.12	Demobilize batch plant after cap pour.	Demobilization will require removal of equipment and materials from the site via truck, thereby affecting traffic and transportation. Demobilization activities may produce nuisance effects for nearby Indigenous residents (noise, dust, traffic) or Indigenous resource industries.
	2	Grouting of Below Grade Structure	
	2.1	Room preparation (e.g., sealing of pipes).	Equipment and material transportation may produce nuisance effects for nearby Indigenous residents (traffic).
	2.3	Grout Fill Nuclear Area.	On-site activities may produce nuisance effects for nearby Indigenous residents (noise, dust, traffic) or Indigenous resource industries.
	3	Removal of Above Grade Structure	
Decommissioning Execution	3.1	Conventional heavy equipment knockdown of reactor hall.	Demolition equipment transportation to the site, and on-site material transportation will affect traffic. Demolition may produce nuisance effects for nearby Indigenous residents / land users (noise, dust, traffic) or Indigenous resource industries.
	3.2	Sizing of material such as cutting steel beams or crushing masonry for fitting into void areas.	Material sizing may produce nuisance effects for nearby Indigenous residents (noise, dust, traffic) or Indigenous resource industries.
	3.3	Set up laydown area and perform clearance surveys on materials for possible recycle.	On-site material transportation may produce nuisance effects for nearby Indigenous residents (noise, dust, traffic) or Indigenous resource industries.
	3.4	Steel and rubble emplaced in condenser	On-site material transportation may produce

		Project Works and Activities	Potential Interaction
		room. Fill to 380 level.	nuisance effects for nearby Indigenous residents (noise, dust, traffic) or Indigenous resource industries.
	3.5	Grout first level of demolition material in condenser room.	On-site material transportation may produce nuisance effects for nearby Indigenous residents (noise, dust, traffic) or Indigenous resource industries.
	3.6	Steel and rubble emplaced in condenser room. Fill to 400 level.	On-site material transportation may produce nuisance effects for nearby Indigenous residents (noise, dust, traffic) or Indigenous resource industries.
	3.7	Grout second level of demolition material in condenser room.	On-site material transportation may produce nuisance effects for nearby Indigenous residents (noise, dust, traffic) or Indigenous resource industries.
	3.8	Steel and rubble in condenser room. Fill to 425 level.	On-site material transportation may produce nuisance effects for nearby Indigenous residents (noise, dust, traffic) or Indigenous resource industries.
	3.9	Grout third level of demolition material in condenser room.	On-site material transportation may produce nuisance effects for nearby Indigenous residents (noise, dust, traffic) or Indigenous resource industries.
	3.10	Demolition block walls and inside walls around control room and change rooms.	Demolition equipment transportation to the site, and on-site material transportation will affect traffic and transportation. Demolition may produce nuisance effects for nearby Indigenous residents (noise, dust, traffic) or Indigenous resource industries.
	3.11	Collapse ceilings of furnace room and adjacent rooms.	Demolition equipment transportation to the site, and on-site material transportation will affect traffic and transportation. Demolition may produce nuisance effects for nearby Indigenous residents (noise, dust, traffic) or Indigenous resource industries.
Decommissioning	3.12	Emplace block wall rubble in furnace room or condenser room.	On-site material transportation may produce nuisance effects for nearby Indigenous residents (noise, dust, traffic) or Indigenous resource industries.
	3.13	Remove recyclables from guard house.	On-site material transportation may produce nuisance effects for nearby Indigenous residents (noise, dust, traffic) or Indigenous resource industries.

		Project Works and Activities	Potential Interaction
	3.14	Demolish guard house and emplace in furnace room and adjacent rooms.	Demolition equipment transportation to the site, and on-site material transportation will affect traffic and transportation. Demolition may produce nuisance effects for nearby Indigenous residents (noise, dust, traffic) or Indigenous resource industries.
	3.15	Grout furnace room and adjacent areas to ground level.	On-site material transportation may produce nuisance effects for nearby Indigenous residents (noise, dust, traffic) or Indigenous resource industries.
	3.16	Demolish above grade portion of pressure relief pit. Fill with grout.	Demolition equipment transportation to the site, and on-site material transportation will affect traffic and transportation. Demolition may produce nuisance effects for nearby Indigenous residents (noise, dust, traffic) or Indigenous resource industries.
	4	Install Concrete Cap and Engineered Cover	
	4.1	Concrete Cap (construct forms, install rebar, and pour, level and slope concrete).	On-site material transportation may produce nuisance effects for nearby Indigenous residents (noise, dust, traffic) or Indigenous resource industries.
	4.2	Engineered Cover (ship in materials, layer and shape mound, install geotextile layer, grade property, install remaining earth layers and seed).	Shipping in materials will affect traffic and on-site material transportation may produce nuisance effects for nearby Indigenous residents (noise, dust, traffic) or Indigenous resource industries.
	5	Final Site Restoration	
	5.1	Site Restoration (install fencing, install monitoring wells if required, remediate areas affected by previous operations or decommissioning activities, washout pit, complete closure surveys, etc.).	On-site material transportation may produce nuisance effects for nearby Indigenous residents (noise, dust, traffic) or Indigenous resource industries.
	5.2	Demobilize Site (Remove temporary facilities, decontaminate equipment, remove power upgrades, poles and lines, and return transformers).	Removal of temporary facilities, equipment and utilities will improve the landscape and visual setting. On-site material transportation will affect transportation safety and may produce nuisance effects for nearby Indigenous residents (noise, dust, traffic) or Indigenous resource industries.
	6	Long-Term Care and Maintenance	
IC*	6.7	Renaturalization.	Land Use designation may change during the Institutional Controls phase.

		Project Works and Activities	Potential Interaction
	6.8	Facility performance during the Institutional Controls phase.	Groundwater will start to enter and eventually resaturate the grouted structure. Contaminant release from the grouted structure may affect non-human biota (e.g., game and fish species) health and / or populations.
PIC**	7	Post-Institutional Controls	
	7.1	Facility performance and renaturalization during the Post-Institutional Controls phase.	Groundwater in the resaturated and eventually degraded grouted structure will become contaminated. Contaminant release from the grouted structure may affect non-human biota (e.g., game and fish species) health and / or populations.
	7.2	Renaturalization	Land Use may change during and / or after the Institutional Controls phase. Renaturalization of site may lead to an increase of wildlife and may benefit Indigenous land users (e.g. hunters, trappers, etc.).

Notes:

* - IC: Institutional Controls phase

** - PIC: Post-Institutional Controls phase

7.2.3.2 Proposed Mitigation Measures

The mitigation measures presented below are preliminary and have been developed based on the current understanding of the project. As the project approaches detailed work planning, details will be refined, and additional mitigation measures may be developed as required; including mitigations developed collaboratively with Indigenous peoples that encompass Indigenous Knowledge.

In addition to the in-design mitigation measures identified in Section 4.1 of the EIS, the following mitigation measures have been identified to ensure the protection of the Indigenous socio-economic environment:

- dust mitigation measures as described in Section 7.1.3.2;
- post speed limits on-site;
- if previously undocumented archaeological resources be discovered, CNL will suspend decommissioning activities immediately and will engage a licensed consultant to carry out archaeological fieldwork, in compliance with Section. 48 (1) of the *Ontario Heritage Act* and outlined in CNL's procedure Management of Cultural. CNL remains open to engagement with Indigenous Nations, communities and organizations in the event of a discovery of an archaeological resource. If any human remains are identified during construction, CNL will immediately notify the police or coroner and the Registrar of Cemeteries, Ministry of Small Business and Consumer Services, and Indigenous communities or organizations.
- construction activities will generally occur between 7 am and 7 pm wherever possible, with the overall objective of minimizing nuisance effects (i.e. noise and traffic) on

residents in the Local and Regional Study Areas. It is noted that special or emergency circumstances may require deviation from this restriction;

- when a significant amount of off-site transportation is required (e.g., during raw material delivery), the timing of equipment and material shipping to the site should be staggered to minimize the contribution of the project to peak traffic volumes;
- during the Decommissioning Execution and Institutional Controls phases, restrict access to the licensed area via a fence with a locked gate to deter trespassing;
- periodic communication updates on project construction activities to local residents including local Indigenous residents are recommended, including construction schedule, activities, dedicated contact person for inquiries and emergencies etc. Periodic communication updates can occur with Indigenous communities if requested;
- the greatest effect of traffic and transportation associated with the project will occur during the Decommissioning Execution phase. Within the Local and Regional Study Areas, the transportation / haul route is limited to Highway 17 and the NPD site access road from the highway;
- review of a company's safety records which includes any traffic accidents or driver's records, as per CNL's contracting and hiring practices;
- the NPD Project may provide contracting and supplier opportunities to Indigenous local and regional businesses. CNL has been working with Indigenous organizations on facilitating such economic and contracting opportunities; and,
- CNL and the CNSC have provided funding for Indigenous participation in the NPD Closure Project, including funding for consultation and engagement sessions, participation in third-party reviews, preparation of traditional knowledge and land use studies.

As there are potentially positive economic and employment benefits to Indigenous peoples there are enhancement measures that could be employed to capitalize on these potential opportunities. Some discussions have occurred on the types of economic opportunities associated with the NPD Closure Project. CNL will proactively seek, engage and support meaningful discussion on issues and opportunities related to the NPD Closure Project as part of the PIP, which can be found on the CNL website (www.CNL.ca). CNL, as part of the PIP, will notify residents of NPD Closure Project decommissioning commencement via door-to-door delivery of letters, where stakeholders will have the opportunity to voice their questions or concerns about activities related to the decommissioning execution part of the notification, the letter will include all CNL contact details (e.g., website, telephone, email etc.) to provide clear direction on how to contact CNL if they have questions, concerns or complaints related to the NPD Closure Project. A web link to a Feedback Form that is currently on the NPD Closure Project webpage on www.CNL.ca will also be included in the notification and will outline the above process of when an issue or concern is submitted. CNL will continually evaluate both the process and the outcome of the ongoing engagement and communication activities to address and manage issues as they arise.

7.2.3.3 Effects after Mitigation

In this section, potential Indigenous socio-economic effects are discussed for each phase of the project. Potential effects of the project are assessed relating to population and demographics, economy and employment, housing and infrastructure, use of private property, decision-making and resource industries.

Population and Demographics

The NPD Closure Project would have no negative effect on the populations or demographic characteristics of the Indigenous populations in any of the study areas. It is possible that economic opportunities associated with the project might provide some employment opportunities and therefore keep more Indigenous peoples living in the region. This would be a positive effect, but these individuals may stay in the region anyways. Overall, no effect on population and demographic characteristics is predicted.

Economy and Employment

The project could have a minor positive effect on Indigenous economic and employment opportunities in the region. These could include contract construction, monitoring and other opportunities.

Housing and Infrastructure

There are no known Indigenous-owned / managed water intake structures or other infrastructure downstream of the NPD site. The closest Indigenous community to the NPD site is Pikwàkanagàn which is 75 km southwest of the NPD site on Golden Lake. There would be no effect of the project on either the housing or infrastructure of the Algonquins of Pikwàkanagàn First Nation or any other Indigenous community, all of which are a greater distance away.

Indigenous Resident – Use and Enjoyment of Private Property

As demonstrated in Table 9-10.2 the proposed project without mitigation may result in some nuisance effects that might impact Indigenous peoples who own or rent homes within a few kilometers of the NPD site. Those assessments of residual effects are described further below.

Decision-Making

The project would have no effects on the governance structures within Indigenous communities or organizations. Participant funding has been provided by the CNSC and CNL to help Indigenous Nations, communities, and organizations review materials associated with the NPD Closure Project.

Resource Industries

The project is predicted to have no effect on Indigenous resource industries.

As indicated in the Traditional Land Resource Use section, the NPD Closure Project SSA is located entirely within the Exclusion Zone. Therefore, aside from the operations and activities undertaken by CNL, other land uses of the site are prohibited due to restricted public access. The lands of the LSA have minimal public Crown and private lands and as such, there is likely limited if any resource use industry activities occurring there. Within the Regional Study Area

there are provincial Crown lands where traditional land and resource use likely occurs, however, the NPD Closure Project will not have activities that occur on these lands. Furthermore, the project is not predicted to have any biological effects beyond the NPD site that would impact on resource industry uses including consumption.

With respect to the different resource industries: there is no commercial fishery on the Kichi-Sibì (Ottawa River); the two traplines surrounding the NPD site have not been identified as Indigenous; there are no known Indigenous tourism enterprises operating in close proximity to the NPD site; and, it is possible that there is some gathering activity occurring in the local and regional study areas.

Re-naturalization of the site may increase vegetation and habitat for wildlife, providing a potential benefit to resource activities should they develop in the area.

Decommissioning Execution Phase

Site Study Area

No effects after mitigation are expected in the Site Study Area during the Decommissioning Execution phase. As discussed in the Socio-Economic TSD, the project may affect transportation operations and safety through the transportation of materials and equipment on-site. This will largely be mitigated by posting and adhering to speed limits on-site. The remaining effect is minor and inherent in vehicle operation.

There are no Indigenous residents within the Site Study Area, and no nuisance effects are expected on land users (i.e. anglers, hunters, trappers, tourists) in the Site Study Area.

Local Study Area

The traffic and transportation effects associated with the project are expected to be greatest during the Decommissioning Execution phase. Within the Local Study Area, the transportation / haul route will be limited to Highway 17 and the NPD site access road from the highway.

There are approximately ten residents within the Local Study Area, and there may be nuisance effects (i.e. noise, traffic) associated with the Decommissioning Execution phase. It is unknown what percent of these ten may be Indigenous, but 2016 Census data identified that 13.5% of the population of Town of Laurentian Hills identified itself as Aboriginal.

The project is expected to result in increased traffic volumes, which may be reflected in a potential increase in incidents and delays, even after mitigation measures. The increase traffic volume is expected to be temporary and minor, thus the effects on transportation safety and Highway 17 traffic not significant. The Ministry of Transportation (MTO) has reviewed the project and concluded that it has no traffic or transportation-related concerns with respect to the project 0.

Regional Study Area

The traffic and transportation effects associated with the project are expected to be greatest during the Decommissioning Execution phase. The transportation / haul route will be limited to Highway 17 and the NPD site access road from the highway. As discussed in Section 7.2.3.2, CNL

will minimize potential traffic nuisance effects on residents and by instituting restrictions on construction hours and days of the week. No measurable noise or dust nuisance effects are expected for residents and land users in the Regional Study Area.

The project is expected to result in increased traffic volumes and an increased likelihood of incidents and delays, even after mitigation measures. The Ministry of Transportation (MTO) has reviewed the project, and concluded that it has no traffic or transportation-related concerns with respect to the project 0.

There will be nuisance effects (noise, dust, traffic) for Indigenous residents if they live within a few kilometers of the NPD site, however they should largely be mitigated by a variety of general and specific construction mitigation measures identified in Section 7.2.3.2 above.

Institutional Controls Phase and Post-Institutional Controls Phase

Site and Local Study Areas

No potential Indigenous socio-economic effects have been identified in the Site and Local Study Areas for the Institutional Controls and Post-Institutional Controls phases.

Regional Study Area

No potential Indigenous socio-economic effects have been identified in the Regional Study Area for the Institutional Controls and Post-Institutional Controls phases.

7.2.3.4 Predication Confidence and Uncertainty

There are private lands immediately adjacent to the NPD property and it is unknown whether the residents Indigenous or non-Indigenous, however this assessment has assumed that they may be Indigenous.

7.2.3.5 Residual Effects

Table 7-8 summarizes the effects assessment above and presents the residual effects that were identified for the Indigenous socio-economic environment. The residual effects in 8 are grouped by effect rather than by individual interaction as listed in Table 7-5.

Table 7-8: Summary of Residual Effects to Indigenous Health

Environmental Component	Source of Effect	Potentially Affected VCs	Potential Effect	Proposed Mitigation	Potential Effect After Mitigation	Residual Effect
Decommissioning Execution						
Indigenous Socio-Economic Environment	Employee, material and equipment transportation to and from site	Traffic and transportation	Increased traffic volume could affect the safety of road users	Timing of shipments will be staggered when possible	Traffic delays and the probability of traffic incidents may increase temporarily during the Decommissioning Execution phase as a result of increased volume	No adverse residual effects
Indigenous Socio-Economic Environment	On-site transportation, demolition, material sizing	Residents – use / enjoyment of property	Nuisance effects (dust, noise and traffic)	Dust suppression, restricting hours of activity, communication with public	Minor, temporary and localized nuisance effect on residents and nearby land users use and enjoyment of land	No adverse residual effects
Institutional Controls						
Indigenous Socio-Economic Environment	Re-naturalization	None	None	No proposed mitigation	None	No adverse residual effects
Post-Institutional Controls						
Indigenous Socio-Economic Environment	Re-naturalization	None	None	No proposed mitigation	None	No adverse residual effects

7.2.4 Monitoring and Follow Up

No specific environmental monitoring has been identified for the Indigenous socio-economic environment. Monitoring in other environmental components will confirm the EIS predictions (i.e., that no effects are expected in the Indigenous socio-economic environment). Ongoing Indigenous, public and stakeholder engagement activities will take place throughout the Decommissioning Execution and Institutional Controls phases to identify any changing concerns or perceptions related to the project. CNL is willing to discuss socioeconomic monitoring measures during construction activities with Indigenous communities.

Other more general considerations of the EA follow-up program (e.g., sampling and analysis procedures, information management and reporting) are presented in Section 12 of the Project EIS.

7.2.5 Conclusion

The assessment of potential effects to the Indigenous socio-economic environment (Section 7.2.3.3) evaluated how project activities may affect Indigenous socio-economic VCs, and took into consideration the concerns expressed by Indigenous groups during engagement activities (Section 7.2.1.1).

The assessment in Section 7.2.4 found that based on the predicted impacts after applied mitigation measures, no adverse residual effects on the Indigenous socio-economic environment are expected to result from the project. Monitoring activities in other environmental components (i.e., atmospheric, surface water, geological and hydrogeological and terrestrial environments, ambient radioactivity and human health) will verify the accuracy of the EA predictions and effectiveness of measures implemented to mitigate potential adverse environmental effects related to the socio-economic environment. If monitoring identifies concerns in the other environmental components, CNL will assess the implications to the Indigenous socio-economic environment (e.g., through ongoing Indigenous, public and stakeholder engagement activities).

7.3 Indigenous Health and Indigenous Receptor

As required under paragraph 5(1) (c) of the *Canadian Environmental Assessment Act*, 2012 [4], the EIS should describe the effects of any changes the project may cause to the environment, with respect to Aboriginal peoples, on health.

7.3.1 Selection of Valued Components

VCs for Indigenous Health were selected to encompass the potential effects of the project on Indigenous health as well as exposure via pathways from environmental components (e.g., atmospheric, surface water environment, geological and hydrogeological environment, ambient radioactivity). The VCs for Indigenous health, along with rationale for their selection, are listed in Table 7-9.

Table 7-9: Selection and Rationale of Valued Components for the Indigenous Health Environment

Environmental Component	Sub-Category	VC and Rationale
Indigenous Health	Indigenous People	Indigenous peoples may be exposed to health risk as a result of the project. The potential effects on humans associated with changes in atmospheric, surface water, geological and hydrogeological conditions (radiological and chemical releases and concentrations), and external gamma radiation are considered.
	Indigenous Worker	Indigenous workers may be exposed to health risk as a result of performing their duties relative to the project. The potential effects on humans associated with changes in atmospheric, surface water, geological and hydrogeological conditions (radiological and chemical releases and concentrations) and external gamma radiation are considered.

7.3.1.1 Indigenous Engagement Feedback – Key Interests and Concerns related to Indigenous Health VCs

This section describes how the input from Indigenous engagement activities influenced the selection of VCs in the Indigenous Health assessment. **Error! Reference source not found.** summarizes the key interests and concerns raised by Indigenous peoples related to VCs for the evaluation of potential effects to Indigenous health (based on Table 5-1 above), and demonstrates how the interest or concern has been addressed in the present assessment.

Table 7-10: Summary of Interests and Concerns Raised During Indigenous Engagement Activities that Influenced the Scope of Indigenous Health Assessment

Interest or Concern	How the Interest Was Included in the Assessment
Separate consideration of Indigenous Health Conditions	In response to feedback received during Indigenous engagement activities, CNL has added new environmental components (and associated VCs) to the IER, describing current Indigenous health conditions (Section 6.3 of this IER) and potential effects to Indigenous health VCs (Section 7.3).
Inclusion of Indigenous group receptor	In response to feedback from Indigenous groups, CNL has created a new environmental component: Indigenous Health. The VCs identified for the assessment of Indigenous Health are Indigenous People and Indigenous Workers. Potential impacts to Indigenous People and Indigenous Workers are assessed in Section 7.3.3. Additionally, CNL has incorporated information on Indigenous health indicators provided by Indigenous groups into the description of baseline Indigenous health (Section 6.3).

Interest or Concern	How the Interest Was Included in the Assessment
Safety of harvesting and consuming harvested foods.	Safety of harvesting and consuming harvested foods is assessed using the Human Health Public VCs (Section 7.1.3) and Indigenous peoples Health VCs (Section 7.3.3). The Indigenous peoples Health VC, which was added to the EIS based on Indigenous group feedback on VCs (Section 7.3).
Concerns due to introduction of tritium into the Kichi-Sibi (Ottawa River)	Potential effects on Indigenous peoples health from tritium in the Kichi-Sibi (Ottawa River) are assessed using the new Indigenous peoples Health VC that was added to the EIS in response to feedback from Indigenous groups on VCs (Section 7.3). The assessment of risk to human receptors includes consideration of exposures received from domestic and agricultural use of the Kichi-Sibi (Ottawa River), including irrigation, drinking, swimming and fishing activities. Wherever possible, conservative assumptions about future lifestyles and habits have been adopted in the assessment, to help ensure that potential exposures have not been underestimated (Section 7.3).
Concern about the assumptions related to dietary pathways (and changes due to perceived contamination), occupancy factors, locations of activities.	The assumptions made in developing the exposure profiles for the Indigenous Health VCs (i.e., Indigenous peoples and Indigenous Workers) are summarized in Section 6.3 (food sources and water use) and Section 7.3 (dietary intake values, time spent at various outdoor activity locations). CNL acknowledges that there is uncertainty in the assessment of potential effects to Indigenous VCs. This has been accounted for by using conservative assumptions wherever possible. For example, with the exception of hunters, receptors during the Post-Institutional Controls phase were assumed to obtain 100% of their water from the Kichi-Sibi (Ottawa River), and all foods except grain were obtained 100% locally (Section 7.3.3.3). CNL intends to review the results of a harvest and diet study that is currently underway by a nearby Indigenous group, and compare the results to the conservative assumptions used to characterize the diet of the Indigenous VCs (as described above). If the survey results indicate that the assumptions made were not conservative enough, then this information will be captured within a future revision of the IER TSD.

Note: The table above provides a summary of the concerns expressed by multiple Indigenous groups. See Table 5-1 for a more detailed listing of key interests and concerns from each Indigenous group.

7.3.2 Assessment Boundaries

7.3.2.1 Spatial Boundaries

The spatial boundaries with respect to the Indigenous Health are the same as employed for Human Health.

Similar to the human health baseline characterization in Section 8.8 of the Project EIS, the Site and Local Study Areas for this assessment are consistent with the general spatial boundaries

shown in Table 6-1. As this area is all owned by the Federal Government, there are no residents present. Workers (including Indigenous workers) are, and will continue to be, present in this area for the duration of the decommissioning, and as such the Site / Local Study Areas will describe baseline worker health.

The Regional Study Area for this assessment consists of the Renfrew County and District Health Unit, and Region de l'Outaouais Health Unit, illustrated in Figure 6-5 and Figure 6-6.

7.3.2.2 Temporal Boundaries

The temporal boundaries for this assessment are the standard temporal boundaries outlined in Section 7.1.2.2.

7.3.3 Identification of Residual Effects

7.3.3.1 Project Environment Interactions

As shown in Table 7-11, potential effects to Indigenous health may occur as a result of interaction with Decommissioning Execution operations and activities associated with:

- Batch mixing plant;
- Grouting of below grade structures;
- Removal of above grade structures;
- Installation of concrete cap and engineered cover;
- Final site restoration;
- Facility performance during the Institutional Controls phase; and
- Facility performance during the Institutional Controls phase.

Table 7-11: Project Environment Interactions in Indigenous Health

		Project Works and Activities	Potential Interaction
Decommissioning Execution	1	Batch Mixing Plant	
	1.1	Designate footprint, create access, temporary fencing (east side of main building).	Work conducted near the facility has the potential to release dust, increase radiation doses to Indigenous workers.
	1.2	Assign storage area for raw materials, ship in sand. Likely east side of licensed area.	Work conducted near the facility has the potential to increase radiation doses to Indigenous workers. Dust and vehicle emissions may affect Indigenous worker health.
	1.3	Set up mixing stations, hook up electrical power or diesel power.	Work conducted near the facility has the potential to increase radiation doses to Indigenous workers.
	1.4	Truck in necessary water supply or connection to dry hydrant for water source.	Work conducted near the facility has the potential to increase radiation doses to workers. Dust and vehicle emissions may affect Indigenous worker health.
	1.5	Provide slip pipe access to nuclear area.	This activity has the potential to release dust and

		Project Works and Activities	Potential Interaction
			increase radiation doses to Indigenous workers. Specifically, to the Indigenous workers drilling holes for slip pipe access and workers nearby.
	1.6	Construct washout pit. Lined excavation with water transfer. Likely near batch mixing station.	Work conducted near the facility has the potential to increase radiation doses to Indigenous workers. Dust and vehicle emissions may affect Indigenous worker health.
	1.7	Level area for concrete pumper.	Work conducted near the facility has the potential to increase radiation doses to Indigenous workers. Dust and vehicle emissions may affect Indigenous worker health.
	1.8	Mix grout to required formula.	Work conducted near the facility has the potential to increase radiation doses to Indigenous workers. Dust and equipment emissions may affect Indigenous worker health.
	1.9a	Truck grout to pumping station (20 trips per day).	Work conducted near the facility has the potential to increase radiation doses to Indigenous workers. Dust and vehicle emissions may affect Indigenous worker health.
Decommissioning Execution	1.11	Sample and dewater the cleaning pit. Emplace sediments into voids in condenser room.	Work conducted near the facility has the potential to increase radiation doses to Indigenous workers. Dust and vehicle emissions may affect Indigenous worker health.
	1.12	Demobilize batch plant after cap pour.	Work conducted near the facility has the potential to increase radiation doses to Indigenous workers. Dust and vehicle emissions may affect Indigenous worker health.
	2	Grouting of Below Grade Structure	
	2.1	Room preparation (e.g., sealing of pipes).	Work conducted within the facility has the potential to increase radiation doses to Indigenous workers.
	2.2	Systems Preparation Large Vessels.	The activities associated with this task are routine construction activities. Potential effects on Indigenous workers as part of this task are grouped with activity 1.5 (Provide slip pipe access to nuclear area).
	2.3	Grout Fill Nuclear Area.	Displacement of air containing dust, tritium, lead and asbestos may result in effects to Indigenous people and workers.
	3	Removal of Above Grade Structure	
	3.1	Conventional heavy equipment knockdown of reactor hall.	Release of surface contamination may increase exposure to dust, radioactivity and other potential contaminants to Indigenous people and workers.
	3.2	Sizing of material such as cutting steel beams or crushing masonry for fitting into void areas.	Release of surface contamination may increase exposure to dust, radioactivity and other potential contaminants to Indigenous people and workers.

		Project Works and Activities	Potential Interaction
Decommissioning Execution	3.3	Set up laydown area and perform clearance surveys on materials for possible recycle.	Conducting clearance surveys has the potential to increase radiation doses to Indigenous workers.
	3.4	Steel and rubble emplaced in condenser room. Fill to 380 level.	Displacement of dust, lead, asbestos and tritium in air from the facility has the potential to increase exposure to Indigenous people and workers.
	3.5	Grout first level of demolition material in condenser room.	Displacement of dust, lead, asbestos and tritium in air from the facility has the potential to increase exposure to Indigenous people and workers.
	3.6	Steel and rubble emplaced in condenser room. Fill to 400 level.	Displacement of dust, lead, asbestos and tritium in air from the facility has the potential to increase exposure to Indigenous people and workers.
	3.7	Grout second level of demolition material in condenser room.	Displacement of dust, lead, asbestos and tritium in air from the facility has the potential to increase exposure to Indigenous people and workers.
	3.8	Steel and rubble in condenser room. Fill to 425 level.	Displacement of dust, lead, asbestos and tritium in air from the facility has the potential to increase exposure to Indigenous people and workers.
	3.9	Grout third level of demolition material in condenser room.	Displacement of dust, lead, asbestos and tritium in air from the facility has the potential to increase exposure to Indigenous people and workers.
	3.10	Demolition block walls and inside walls around control room and change rooms.	Release of dust and surface contamination may increase exposure to Indigenous people and workers.
	3.11	Collapse ceilings of furnace room and adjacent rooms.	Release of dust and surface contamination may increase exposure to Indigenous people and workers.
	3.12	Emplace block wall rubble in furnace room or condenser room.	Displacement of dust, lead, asbestos and tritium in air from the facility has the potential to increase exposure to Indigenous people and workers.
	3.14	Demolish guard house and emplace in furnace room and adjacent rooms.	Release of surface contamination may increase radiation doses to Indigenous people and workers.
	3.15	Grout furnace room and adjacent areas to ground level.	Displacement of dust, lead, asbestos and tritium in air from the facility has the potential to increase exposure to Indigenous people and workers.
	3.16	Demolish above grade portion of pressure relief pit. Fill with grout.	Release of dust and surface contamination may increase exposure to Indigenous people and workers.
	4	Install Concrete Cap and Engineered Cover	
	4.1	Concrete Cap (construct forms, install rebar, and pour, level and slope concrete).	Work conducted near the facility has the potential to release dust and increase radiation doses to Indigenous workers.
	4.2	Engineered Cover (ship in materials, layer and shape mound, install geotextile layer, grade property, install remaining earth layers and seed).	Work conducted near the facility has the potential to release dust and increase radiation doses to Indigenous workers.

		Project Works and Activities	Potential Interaction
	5	Final Site Restoration	
	5.2	Demobilize Site (Remove temporary facilities, decontaminate equipment, remove power upgrades, poles and lines, and return transformers).	Work conducted near the facility has the potential to release dust and increase radiation doses to Indigenous workers.
	6	Long Term Care and Maintenance	
IC*	6.8	Facility performance during the Institutional Controls phase	Groundwater will start to enter and eventually resaturate the grouted structure. Contaminated groundwater will flow out and has the potential to affect Indigenous people.
	7	Post-Institutional Controls	
PIC**	7.1	Facility performance during the Post-Institutional Controls phase	Groundwater in the resaturated and eventually degraded grouted structure will become contaminated. Contaminated groundwater will flow out and has the potential to affect Indigenous people.

Note

*Institutional Controls

**PIC: Post-Institutional Controls

7.3.3.2 Proposed Mitigation Measures

The mitigation measures presented below are preliminary and have been developed based on the current understanding of the project. As the project approaches detailed work planning, details will be refined, and additional mitigation measures may be developed as required.

In addition to the in-design mitigation measures identified in Section 4.1 of the Project EIS, mitigation measures identified in other environmental components, such as dust suppression and vehicle maintenance may also reduce the potential for effects on Indigenous worker and people health. The following mitigation measures are outlined in the DecomSA TSD.

General:

- Staff and contractors will receive orientation to ensure they are aware of decommissioning activities, hazards, and emergency procedures;
- Signs will be posted to indicate where decommissioning work is taking place and to alert people to detours where applicable;
- Work control documents will be developed to guide safe execution of the decommissioning activities;
- Hazards to personnel will be identified through work control documents and eliminated or controlled using engineered controls, administrative controls, and PPE;
- Regular updates will be given to site personnel on updates in the proposed decommissioning work plans;

- CNL health and safety programs are in place to prevent and mitigate injury to personnel;
- An NPD Emergency Procedure [112] is in place and is consistent with CNL's Emergency Preparedness Program. This procedure will be updated to include decommissioning activities;
- Emergency response is available through local municipal Fire Department;
- Stop work procedures will be followed for power outages;
- Overall site 'good housekeeping' will be upheld;
- Contractor Health & Safety Management Program, reviewed by supply chain management and meeting CNL requirements;
- Periodic communication updates to local residents on the project construction activities, including construction schedule, activities, dedicated contact person for inquiries and emergencies etc.; and
- Communications with Indigenous communities, and individuals (to be discussed further with Indigenous communities).

Structural:

- Structural assessments will be performed to ensure that all demolition work is done in accordance with safe work practices and civil / engineering requirements;
- Appropriate methods will be used during the demolition process to provide support and ensure that unintended structural failure does not occur;
- If inclement weather occurs during the performance of project work, activities would be stopped (if deemed necessary) in order to minimize weather-related risks;
- A demolition plan is prepared in accordance with PEO standards and approved by a Professional Engineer qualified in this discipline; and
- An exclusion zone will be established for decommissioning activities.

Radiation Dose:

Radiological work assessments will be performed as detailed work packages are developed. They will include specific measures to reduce collective and individual Indigenous worker dose to ensure that the dose is below relevant dose threshold standards. As per current practice at the NPD site, all internal and external doses received by NPD workers will be monitored and reported as part of the operational dose management program. This system will be in effect during the Decommissioning Execution phase of the project:

- As mentioned above, work control documents will be prepared for all activities. Where there is the potential for workers to encounter radiological hazards, the preparation of work control documents include a radiological assessment completed by CNL health physics personnel. Work control documents are then developed to include radiological aspects as appropriate.

- Hazards to personnel will be identified through work control documents and eliminated or controlled using engineered controls, administrative controls, and PPE.
- Utilization of air monitors (including particulate contamination as well as tritium-in-air), dosimeters, and bioassay will be used as required to detect the spread and uptake of contamination before it exceeds limits.
- Emergency response capability is available from local municipalities.
- An NPD Emergency Procedure [112] is in place and is consistent with CNL's Emergency Preparedness Program. This procedure will be updated to include decommissioning activities.

Asbestos:

- Signage will be installed to indicate asbestos laydown / interim-storage areas.
- Procedures will be in place for handling and storage of abated asbestos (bagged).
- Work control documents will be developed for all activities, including those involving handling of abated (bagged) asbestos and transite.

PCBs:

- Work control documents will be developed for all activities, including those involving handling PCB-containing materials.
- Sources of PCBs will be confirmed through characterization and will be clearly identified prior to executing activities involving handling of PCB-containing materials (e.g., caulking, paint, cables, etc.).
- Appropriate personal protection equipment (e.g., respirators and Tyveks) will be available and used.

Lead:

- Work control documents will be developed for all activities, including those involving lead-containing materials.
- Sources of lead are known and will be clearly identified prior to executing decommissioning activities.
- Appropriate personal protection equipment will be used, based on the nature of the activities (e.g. gloves, respirators, etc.).

Mercury:

- Work control documents will be developed for all activities, including those involving mercury-containing equipment / instrumentation.
- Sources of mercury are known and will be clearly identified prior to executing decommissioning activities.

Hydrogen Generation:

- Ensuring proper ventilation during grouting.

- Pouring grout in batches to allow a set up time between pours.

7.3.3.3 Effects After Mitigation

Decommissioning Execution

Site and Local Study Area

Non-radiological

During the Decommissioning Execution phase, the site and local study areas will be occupied primarily by workers. Vehicle and equipment operation and on-site transportation will release NO_x, SO₂, VOCs, TSP, PM₁₀, and PM_{2.5}. These activities are discussed in Section 9.2 of the Project EIS. In the DecomSA TSD, it is conservatively assumed that these activities will occur simultaneously (i.e., the maximum potential emissions and releases are considered). Worker exposure to NO_x, SO₂, VOCs, TSP, PM₁₀, and PM_{2.5} for all activities is considered here. The release of these contaminants will be mitigated by standard dust suppression measures listed in Section 7.1.3.2, as well as proper vehicle maintenance to reduce emissions. No adverse health effects to Indigenous workers are anticipated in the Site and Local Study Areas.

Grouting and removal of the above grade structure will result in the displacement of air from inside the facility, which contains suspended lead and asbestos. This was assessed in Section 8.5 of the DecomSA TSD. Exposure to workers will be limited by following the appropriate work control documents described in Section 7.3.3.2. Worker exposures were compared to benchmark values (8-hr limits in this case) to produce (unitless) SI values. An SI of 1 means that the worker exposure is equal to the benchmark value. The SIs for lead and asbestos for near-field workers were 4.75×10^{-8} and 2.14×10^{-8} respectively, indicating that no adverse health effects to workers are expected.

Radiological

Activities that may result in radiation exposure for workers are assessed in the DecomSA TSD. These activities include drilling holes in below grade structures, displacement of air from the facility during grouting and emplacement, and demolition. Radiation protection protocols, work control documents, safeguards and mitigation will reduce the extent of exposure for the workers and are described in Section 7.3.3.2 above.

The maximum total dose rate for workers received during grouting and emplacement was predicted to be 1.35×10^{-5} mSv/y in the DecomSA TSD. The maximum total dose received by a driller while creating slip pipe access was 0.527 mSv. Contaminant release during demolition calculated to result in a maximum total dose of 5.92×10^{-5} mSv. On an annual basis, these doses are well below the regulatory limit of 50 mSv/y for NEW [113]; therefore, no adverse health effects to Indigenous workers are anticipated.

Regional Study Area

Non-Radiological

The DecomSA TSD assesses chemical exposure of members of the public in the Regional Study Area during the Decommissioning Execution phase. During grouting, exposure to lead and asbestos for members of the public was compared to benchmark values, resulting in maximum SI of 1.04×10^{-4} and 4.7×10^{-7} respectively. During demolition, the maximum SI for lead for members was 8.53×10^{-2} . All exposure concentrations are lower than the public benchmark values.

Lastly, the deposition of lead to soil was assessed at receptor locations and compared against the MOE [114] Table 8 soil criterion for lead of 120 µg/g. The maximum soil concentration calculated from demolition or grouting was four orders of magnitude below this criterion.

Therefore, no adverse health effects are anticipated for Indigenous peoples (e.g., from releases to air or surface water).

Radiological

As determined in the DecomSA, the maximum total dose rate to the public during grouting and emplacement was calculated to be 5.76×10^{-6} mSv/y. The maximum total dose rate to the public during demolition was calculated to be 8.18×10^{-5} mSv/y. Both maximum total dose rates are well below the public dose rate limit of 1 mSv/y by 4 orders of magnitude. Thus, no adverse health effects are expected for Indigenous peoples in the Regional Study Area.

Institutional Controls and Post-Institutional Controls

Site and Local Study Area

The PostSA TSD examines several potential scenarios for the postclosure period (Institutional Controls and Post-Institutional Controls phases) as a way to capture and quantify uncertainties in the future conditions at the site (for detail on these scenarios, the reader is directed to the PostSA TSD) and assess the potential for radiological and non-radiological contamination to affect human health (including Indigenous health) for these scenarios. The reader is directed to the PostSA TSD, which details the results of the assessment of radiological and non-radiological contamination on human health (among other environmental components) for these scenarios. Human health results are briefly summarized here.

The PostSA TSD considers several potential exposed groups, for example:

- Site resident family: A highly conservative group that maximizes potential exposures. This is reflected by a small household (comprising two adults, a child and an infant) residing directly over the disposal facility and pursuing a self-sufficient lifestyle. This includes use of potentially contaminated river water for domestic and agricultural purposes.
- A hunting / recreational group, represented by a small number of adults and children making hunting and / or recreational use of the river and the area surrounding the NPD.

Their exposure pathways, including obtaining wild foods, is also representative of the types of habits that might be exhibited by Indigenous groups.

- An offsite resident receptor group, represented by two households (adults and children) that reside alongside the Kichi-Sibi (Ottawa River) at Deep River and Ottawa / Gatineau. These households are assumed to use river water from the Kichi-Sibi (Ottawa River) for domestic use and as drinking water, and to use the Kichi-Sibi (Ottawa River) for recreational swimming.
- An Indigenous receptor characterized using information from a dietary study completed by the AOPFN. In keeping with the study's findings, it is assumed that the indigenous receptor supplements their diet with additional (uncontaminated) groceries purchased from local shops. This receptor also includes additional pathways for smoke inhalation and rubbing of medicinal plants into the skin. Their exposure pathways include:
 - time spent on the shoreline for recreation and fishing;
 - time spent swimming in the river;
 - ingestion of fish caught from the river;
 - hunting of game that uses the river for drinking water, foraging of wildfoods and honey;
 - inhalation of smoke from burning medicinal plants; and
 - rubbing medicinal plants into the skin.
- A self-sufficient Indigenous receptor group is also investigated as a sensitivity case, represented by adults and children following a traditional lifestyle using the area around the NPD, including the Kichi-Sibi (Ottawa River), for hunting and gathering. The exposure pathways for the self-sufficient Indigenous receptor group include:
 - time spent on the shoreline for recreation and fishing;
 - time spent swimming in the river;
 - ingestion of fish caught from the river; and
 - hunting of game that uses the river for drinking water, foraging of wild foods and honey.

For the normal evolution scenario, potential wildlife exposures are limited to those that may occur in the river and at the shoreline. The radionuclide concentrations in the surface environment are expected to be highest in these areas. With the exception of hunters, all receptors are assumed to obtain 100% of their water from the Kichi-Sibi (Ottawa River) for the normal evolution.

In the post closure period, dietary intake values for site resident group were adopted from CSA (2018) [115], which were conservatively based on 95th percentile energy intakes. The assessment also conservatively assumed that all foods except grain were obtained 100% locally

by site resident, as shown in Table 7-12 below.

Table 7-12: Dietary Intakes for the Site Resident Group (Table E-48 in PostSA TSD)

Category	Local Fraction	Infant	Child	Adult	Notes
Fish (g/d)	1	6.4	18.5	28.1	1
Shellfish (g/d)	1	0.6	2.1	5.7	1
Cows' milk (g/d)	1	837.5	787.6	464.5	2
Goat's milk (g/d)	1	93.1	87.5	51.6	2
Beef (g/d)	1	18	53.2	194.9	3
Beef liver (g/d)	1	1.0	2.9	6.7	1
Pork (g/d)	1	13.4	40.1	81.4	1
Lamb (g/d)	1	0.1	3.9	2.4	1
Poultry (g/d)	1	31.6	83.8	159.8	1
Eggs (g/d)	1	8.2	30.9	79	1
Grain (g/d)	0	211.7	539.7	671.8	4
Fruit & vegetables (g/d)	1	308.5	607.9	935	5
Potatoes (g/d)	1	33.1	118.4	196.7	1
Honey (g/d)	1	1.8	5.2	6.7	1

Notes:

1 Table G.9c of CSA (2022).

2 Total milk from Table G.9c of CSA (2022) split assuming that 90% comes from cows' milk and the remaining 10% comes from goat's milk.

3 Combines beef and veal from Table G.9c of CSA (2022).

4 The climate and small self-sufficient lifestyle are not amenable to providing grain.

5 Combines fruit and berries plus vegetables Table G.9c of CSA (2022).

Table 7-13: Dietary Intakes for the Recreational / Hunter Group (Table E-49 in PostSA TSD)

Category	Local Fraction ¹	Infant	Child	Adult	Notes
Fish (g/d)	0.1	6.4	18.5	28.1	2
Shellfish (g/d)	0.1	0.6	2.1	5.7	2
Deer (g/d)	0.1	0.09	0.3	1.17	3
Rabbit (g/d)	0.1	0.24	0.75	2.82	3
Goose (g/d)	0.1	15.8	41.9	79.9	4
Duck (g/d)	0.1	15.8	41.9	79.9	4

Notes:

1 The recreational/hunter group is taken to spend 10% of their recreational/hunting time in the potentially contaminated area.

2 Based on the default dietary intakes in Table G.9c of CSA (2022).

3 High intake rates of deer and rabbit are assumed. These are taken to be three times the default dietary intakes in Table G.9c of CSA (2022).

4 The default poultry intake in Table G.9c of CSA (2022) is taken to be equally distributed between goose and duck meat.

**Table 7-14: Dietary Intakes for the Self-Sufficient Indigenous Receptor Group
(Table E-62 PostSA TSD)**

Category	Local Fraction*		Ingestion Rate (g/day)	
		Infant	Child	Adult
Deer ¹	0.1 ¹	189.7 ⁵	270.4	557.3
Moose ¹	0.1 ¹	189.7 ⁵	270.4	557.3
Grouse	0.44 ¹	94.9 ⁵	135.4	278.7
Duck	0.44 ¹	147.6 ⁶	278.7	278.7
Fish ²	1	207.03 ⁵	295.1	608.2
Berries ³	0.2 ¹	918.6 ⁶	1,734.2	1,038.1
Mushrooms ⁴	1	1	1.5	1.6
Honey	1	1.8	5.2	6.7

Notes:

* Local fractions are based on the scenario description and on the nature of the receptor.

1 The local fraction for deer and moose assumes that all hunting occurs in the contaminated area, however, is set to 0.1 to account for the likely use of less contaminated foraging sites within a large home range, as recommended in CSA 2022. The local fraction of grouse, duck and berries are taken from CSA 2022.

2 Fish are assumed to be taken from the Ottawa River.

3 Berries will be considered separately from other fruits and vegetables, and will be modeled as strawberries (as per CSA 2022).

4 Modeled as Generic Fruit and Vegetables from CSA (2022).

5 Derived by scaling the adult intake value.

6 Derived by scaling the child intake value.

Radiological

In the normal evolution scenario dose rate estimates, the highest dose rate was received by a Site Resident (0.00008 mSv/y). This is over 1,000 times lower than the dose rate criterion of 0.25 mSv/y.

The peak dose rate to a member of the hunter group is only 0.0000004 mSv/y. This is also due to ingestion of food from wild animals that consumed plants and water from the area. These are negligible levels of exposure.

The offsite receptor is also considered, living downstream of the NPDDF and using river water to drink and wash with. Therefore, the only exposure pathways considered are ingestion of the contaminated water, and/or external radiation from the water (e.g., bathing and swimming). As the offsite receptor lives beyond any region that can be subject to institutional control, exposures may occur earlier than 100 years after closure. The results indicate that the peak dose rate is 25 million times lower than the dose rate criterion of 0.25 mSv/y. The dose arises through ingestion of radionuclides in river water.

The peak dose rate to the Indigenous receptor characterized using the AOPFN dietary study is 10,000 times lower than the dose rate criterion of 0.25 mSv/y. This is also due to ingestion of food from wild animals that consumed plants and water from the area. These are negligible levels of exposure.

To examine the sensitivity of the lifestyle assumptions, and to respond to Indigenous feedback on the project, the PostSA includes a sensitivity case examining a case where an Indigenous person – living what is intended to be representative of a traditional self-sufficient lifestyle – is assumed to live in the vicinity of the NPDDF. This self-sufficient Indigenous group is assumed to ingest a range of wild and naturally-occurring foodstuffs, such as deer, moose, grouse, duck, fish, berries, mushrooms and honey.

Results indicate that the peak dose to adults and children in the self-sufficient Indigenous receptor group is 1000 time lower than the dose rate criterion of 0.25 mSv/y.

The PostSA also assessed several disruptive event scenarios (as described in Section 9.1 of the EIS). In all cases the dose results are below the corresponding criterion for disruptive event cases (see the PostSA TSD for further information).

Therefore, all dose rates estimated for the normal evolution and disruptive event scenarios were below the relevant dose rate criteria in the PostSA TSD.

The radiation dose to workers performing duties associated with Institutional Controls, within the Licensed Area, will be negligible based on the anticipated radiological zoning (CNL Radiological Zone 1).

Non-radiological

The PostSA TSD determined that lead is the only non-radioactive contaminant that may reach the environment in any considerable concentration.

As discussed in Section 9.5.3.3 of the EIS, the PostSA TSD results show that the highest lead concentration in groundwater is 4×10^{-7} mg/L and occurs in the bedrock at 12,000 years after closure. The calculated concentrations of lead in all environmental media are far lower than the relevant MOE generic Site Condition Standards (2011 – Table 6, 7, 8, 9) for groundwater and the Health Canada [116] and Quebec (MELCC) drinking water guideline for lead.

The PostSA also assessed two disruptive event scenarios.

- In the site investigation scenario, the peak lead concentrations in all media are the same as for the normal evolution scenario, and well below criteria.
- In the extreme degradation of engineered barrier scenario, the peak lead concentrations in all media are below all applicable guidelines.

Regional Study Area

Since no effects on Indigenous human health have been identified in the Site and Local Study Areas, no effects are expected in the Regional Study Area for the Post-Institutional Controls phase. The offsite receptor (Deep River and Ottawa / Gatineau resident) is discussed above.

7.3.3.4 Predication Confidence and Uncertainty

Uncertainty in the DecomSA TSD is addressed through conservative assumptions (i.e., variability in airborne contaminant concentrations in the facility is accounted for by the assumption that concentrations are equal to the most contaminated room for each contaminant).

There is some uncertainty in the characterization of potential effects to Indigenous groups, due to lack of site-specific information on diet and lifestyle. However, this has been accounted for this using conservative assumptions of a self-sufficient Indigenous traditional lifestyle. Other Indigenous concerns such as effects on land use and socio-economic conditions are assessed separately in Section 7.1 and 7.2.

In the PostSA TSD, uncertainties in postclosure conditions and events (e.g. floods, human intrusion) and key parameters (e.g. inventory of contamination) are addressed inherently by assessing several disruptive scenarios. Conservative assumptions are also used to address other uncertainties, such as sediment characteristics.

7.3.3.5 Residual Effects

Table 7-15 summarizes the effects assessment above and presents the residual effects that were identified in human health. The residual effects in Table 7-15 are grouped by effect rather than by individual interaction as listed in Table 7-12.

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Table 7-15: Summary of Residual Effects to Indigenous Health

Environmental Component	Source of Effect	Potential Effect	Proposed Mitigation	Potential Effect After Mitigation	Residual Effect
Decommissioning Execution					
Indigenous Health: Public (non-radiological)	All vehicle and equipment production of NO _x , SO ₂ , TSP, PM ₁₀ , and PM _{2.5} .	Localized changes in the atmospheric environment may affect nearby Indigenous residents.	Mitigation measures (e.g. dust suppression, equipment maintenance) for the atmospheric environment are described in Section 7.1.3.2.	For all activities, no measurable changes in air quality are predicted, therefore no effects are expected.	No adverse residual effects.
Indigenous Health: Worker (non-radiological)	All vehicle and equipment production of NO _x , SO ₂ , TSP, PM ₁₀ , and PM _{2.5} .	Localized effects are expected in the atmospheric environment which may affect Indigenous workers.	Mitigation measures (e.g. dust suppression, equipment maintenance) for the atmospheric and surface water environments are described in Section 7.1.3.2.	No effects are expected on worker health from changes in air quality.	No adverse residual effects.
Indigenous Health: Worker (radiological)	Establishing footprint.	Indigenous workers are expected to be exposed to small amounts of radiation during this activity.	Following work control documents and radiation protection protocol.	All doses are expected to be well below relevant dose criteria.	No adverse residual effects.
Indigenous Health: Public (non-radiological)	Stockpile grout ingredients.	Runoff from stockpiles may affect surface water quality which may affect nearby Indigenous residents.	Mitigation measures (e.g., runoff diversion, dust suppression) for the surface water environment are described in Section 7.1.3.2.	No measurable changes in water quality in the Kichi-Sibi (Ottawa River), therefore no effects to the public / Indigenous are predicted.	No adverse residual effects.
Indigenous Health: Worker (non-radiological)	Stockpile grout ingredients.	Runoff from stockpiles may affect surface water quality which may affect Indigenous workers.	Mitigation measures (e.g., runoff diversion, dust suppression) for the surface water environment are described in Section 7.1.3.2.	No measurable changes in water quality in the Kichi-Sibi (Ottawa River), therefore no effects to Indigenous workers are predicted.	No adverse residual effects.
Indigenous Health: Worker (radiological)	Provide slip pipe access to nuclear	Drilling holes for slip pipe access has the potential to	Follow work control documents and radiation	All doses are expected to be well below relevant dose criteria.	No adverse residual

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Environmental Component	Source of Effect	Potential Effect	Proposed Mitigation	Potential Effect After Mitigation	Residual Effect
	area.	increase radiation doses to Indigenous workers.	protection protocol.		effects.
Indigenous Health: Public (non-radiological)	Construction and operation of washout pits.	Surface water quality may be affected by washout pit construction and operation which may affect nearby Indigenous residents.	Mitigation measures (e.g., proper washout pit design and management) for the surface water environment are described in Section 7.1.3.2.	Localized site drainage effects are expected but will not affect the surface water environment as a whole. No measurable changes on water quality in the Kichi-Sibì (Ottawa River), therefore, no effects on the public are predicted.	No adverse residual effects.
Indigenous Health: Worker (non-radiological)	Construction and operation of washout pits.	Surface water quality may be affected by washout pit construction and operation which may affect Indigenous workers.	Mitigation measures (e.g., proper washout pit design and management) for the surface water environment are described in Section 7.1.3.2.	No measurable changes in water quality in the Kichi-Sibì (Ottawa River), therefore no effects to workers are predicted.	No adverse residual effects.
Indigenous Health: Public (radiological and non-radiological)	Grout fill nuclear area.	Displacement of air from the facility containing lead, asbestos and tritium which may affect nearby Indigenous residents.	No mitigation measures have been identified.	Lead and asbestos are well below benchmark values for nearby residents. Tritium exposure calculations for the public are well below the minimum regulatory requirement.	No adverse residual effects.
Indigenous Health: Worker (radiological and non-radiological)	Grout fill nuclear area.	Displacement of air from the facility containing lead, asbestos and tritium which may affect Indigenous workers.	Follow work control documents and radiation protection protocol.	Lead and asbestos are well below benchmark values for workers. Tritium exposure calculations for workers are below worker dose criterion.	No adverse residual effects.
Indigenous Health: Public (radiological)	Demolition of above grade structures.	Surface contamination of the structure may be released into the atmospheric environment which may affect	Mitigation measures (e.g., runoff diversion, dust suppression) for the atmospheric environment are described in Section 7.1.3.2.	All doses are expected to be well below relevant dose criteria.	No adverse residual effects.

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Environmental Component	Source of Effect	Potential Effect	Proposed Mitigation	Potential Effect After Mitigation	Residual Effect
		Indigenous people.			
Indigenous Health: Worker (radiological)	Demolition of above grade structures.	Surface contamination of the structure may be released into the atmospheric environment which may affect Indigenous worker health.	Follow work control documents and radiation protection protocol (Section 7.1.3.2.	All doses are expected to be well below relevant dose criteria.	No adverse residual effects.
Indigenous Health: Public (radiological and non-radiological)	Demolition of above grade structures.	Runoff may affect surface water quality and Indigenous peoples.	Mitigation measures (e.g., runoff diversion, dust suppression) for the surface water environment are described in Section 7.1.3.2.	No measurable changes in water quality in the Kichi-Sibi (Ottawa River), therefore no effects to the public are predicted.	No adverse residual effects.
Indigenous Health: Public (radiological and non-radiological)	Sizing of material.	Runoff and release of surface contamination may affect Indigenous peoples health.	Relevant mitigation measures (e.g., runoff diversion, dust suppression) for the surface water environment are described in Section 7.1.3.2.	No measurable changes in water quality in the Kichi-Sibi (Ottawa River), therefore no effects to the public are predicted.	No adverse residual effects.
Indigenous Health: Worker (radiological and non-radiological)	Sizing of material.	Runoff and release of surface contamination may affect Indigenous worker health.	Relevant mitigation measures (e.g., runoff diversion, dust suppression) for the surface water environment are described in Section 7.1.3.2.	No measurable changes in water quality in the Kichi-Sibi (Ottawa River), therefore no effects to workers are predicted.	No adverse residual effects.
Indigenous Health: Worker (radiological)	Clearance surveys on potentially recyclable material.	Conducting clearance surveys has the potential to increase radiation doses to Indigenous workers.	Following work control documents and radiation protection protocol (Section 7.1.3.2).	All doses are expected to be well below relevant dose criteria.	No adverse residual effects.
Institutional Controls and Post-Institutional Controls					
Indigenous Health: Public (radiological)	Facility performance during the postclosure	Exposure to radionuclides in groundwater, surface water, sediment, food, as well as external radiation	In-design mitigations to isolate and contain the inventory in order to reduce the potential of groundwater	All doses are expected to be well below relevant dose criteria.	No adverse residual effects.

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Environmental Component	Source of Effect	Potential Effect	Proposed Mitigation	Potential Effect After Mitigation	Residual Effect
	period.	could affect Indigenous health.	contamination and effects on Indigenous health.		
Indigenous Health: Public (non-radiological)	Instantaneous degradation of the concrete and grout, altering the hydraulic properties and decreasing contaminant transport times.	Exposure to lead in groundwater, surface water, sediment, soil and food could affect Indigenous health.	In-design mitigations to isolate and contain the inventory in order to reduce the potential of groundwater contamination and effects on Indigenous health.	The PostSA TSD determined that there is no likely exposure pathway from groundwater to humans.	No adverse residual effects.

7.3.4 Assessment of Residual Effects

Based on the assessment described above, no adverse residual effects on Indigenous health have been predicted.

7.3.5 Monitoring and Follow-Up

The VCs for Indigenous Health care worker and Indigenous peoples (general) health. Monitoring and follow-up activities related to human health are discussed below and in Table 7-16. Further action will be triggered if parameters are above applicable guidelines or other notable changes are observed.

Other more general considerations of the EA follow-up program (e.g., sampling and analysis procedures, information management and reporting) are presented in Section 12 of the Project EIS.

Decommissioning Execution

CNL will continue to conduct radiation dose monitoring and indoor air quality monitoring during the Decommissioning Execution phase to confirm that there are no effects on worker health.

Monitoring conducted in other environmental components (i.e., atmospheric environment and ambient radioactivity) will also confirm EIS predictions for effects on Indigenous worker and public health during the Decommissioning Execution phase.

Institutional Controls

CNL will conduct radiation dose monitoring during the Institutional Controls phase to confirm that there are no effects on worker health.

Monitoring conducted in other environmental components (i.e., atmospheric environment, geological and hydrogeological environment and ambient radioactivity), such as radiation protection surveys and groundwater monitoring, will also confirm EIS predictions for effects on Indigenous worker and Indigenous public health during the Institutional Controls phase.

Table 7-16: Monitoring and Follow-Up Activities for Human Health

Environmental Component	Environmental Subcomponent	Conceptual Monitoring Program	Monitoring Program Objective	Suggested Duration	Relation to Current NPD Monitoring Program
Decommissioning Execution Phase					
Indigenous Health	Indigenous Worker Health	Potential Source(s) of Effects: - Batch mixing plant. - Grouting of below grade structures. - Removal of above grade structures. - Installation of concrete cap and engineered cover. - Final site restoration Proposed monitoring: - Perform routine bioassays as well as TLDs to monitor whole-body dose. Routine radiation protection surveys, as per ambient radioactivity above. - Monitor indoor air quality. - Estimate combustible gases (e.g., based on project-related traffic and equipment), as per atmospheric environment above. - Monitor parameters of concern (e.g., lead, asbestos, tritium) in air displaced from grouting the below grade structure and removal of the above grade structure, as per atmospheric environment above. - Wildlife: noise monitoring, as per atmospheric environment above. - Conduct monitoring for each new activity for a short time period to confirm no effect, as per atmospheric environment above. Trigger for further action:	Verify EA prediction (i.e., no adverse residual effect on worker health).	Air quality parameters and industrial hygiene: For each new activity, monitor for minimum one week. Estimation of combustible gases: event-based (e.g., as required for reporting). Routine radiation protection surveys: periodic.	Workers within the NPDWF are currently monitored by CNL Dosimetry Services, which includes routine bioassay as well as assignment of TLDs to monitor whole-body dose. NPDWF currently conducts annual industrial hygiene assessment of lead, asbestos and mould in air within the facility.

Environmental Component	Environmental Subcomponent	Conceptual Monitoring Program	Monitoring Program Objective	Suggested Duration	Relation to Current NPD Monitoring Program
		Investigation if parameters are above applicable guidelines identified.			
Institutional Controls phase					
Indigenous Health	Indigenous Worker Health	Potential Source(s) of Effects: - Radiological exposure during worker presence on-site (e.g., for monitoring and long-term care and maintenance of the site). Proposed monitoring: - Perform routine bioassays as well as TLDs to monitor whole-body dose. - Routine radiation protection surveys, as per ambient radioactivity above. - Monitor parameters of concern in air, as per the atmospheric environment above. Trigger for further action: Investigation if parameters are above applicable guidelines identified.	Verify EA prediction (i.e., no adverse residual effect on worker health).	Air quality parameters: For each new activity, monitor for minimum one week. Routine radiation protection surveys: periodic.	Workers within the NPDWF are currently monitored by CNL Dosimetry Services, which includes routine bioassay as well as assignment of TLDs to monitor whole-body dose.
Indigenous Health	Indigenous General Public health	Potential Source(s) of Effects: - Potential leaching of soluble contaminants from degradation of grouted structure. Proposed Monitoring: - Routine groundwater analyses for parameters of concern (chemical and / or radiological) as per the geological and hydrogeological environment.	Verify EA prediction (i.e., no adverse residual effect on groundwater quality or related VCs).	Sampling and analysis of groundwater: periodic.	NPDWF currently conducts non-periodic (i.e., occasional event-based) groundwater monitoring.

7.3.6 Conclusion

The assessment took into consideration the concerns expressed by Indigenous Nations, communities, and organizations during engagement activities (Section 7.3.1.1). For example, other medicinal pathways have been added to CNL's assessment in addition to ingestion (inhalation and skin application). The assessment in Section 7.3.4 found that based on the predicted impacts after applied mitigation measures, no adverse residual effects on Indigenous health are expected to result from the project. Monitoring activities in other environmental components (i.e., atmospheric, surface water, and geological, and hydrogeological environments and ambient radioactivity) will verify the accuracy of the EA predictions and effectiveness of measures implemented to mitigate potential adverse environmental effects related to Indigenous health. If monitoring identifies concerns in the other environmental components, CNL will assess the implications to Indigenous health (e.g., using human health risk assessment as required).

8. CNL's Long-Term Relationship with Indigenous Peoples

CNL recognizes First Nations and the MNO as stewards of the land and CNL is working towards developing long-term meaningful relationships with each Nation that occupies and has traditional territories and modern-day interests near its operations. CNL recognizes that such relationships may take a long time to form but believes this is consistent with the Government of Canada's approach to reconciliation with Indigenous peoples. This is particularly important as engagement with Indigenous peoples on the NPD Closure Project has highlighted other interests related to CNL projects and operations in the Ottawa Valley. Some of the broader CNL issues that have been raised by Indigenous Nations, communities and organizations include historical take up of the lands, concerns around the protection of the environment into the future (following decommissioning), future land use, land transfer and long-term operations, and observations and beliefs that result in fear or anxiety associated with traditional uses occurring adjacent to and near the sites CNL operates. CNL respects and appreciates that broader view and is shifting to a more holistic, relationship-based approach to engagement with each Nation, working closely with AECL, to help address interest and concerns regarding all aspects of the project and CNL operations within this territory.

CNL works closely with AECL on engagement activities with Indigenous Nations, communities and organizations. CNL is working to evolve these relationships beyond the scope of a single project, such as the NPD Closure Project, into long-term, productive relationships built on mutual respect and understanding, and cultivated through ongoing opportunities for dialogue and participation. This also includes, without limitation, employment and contracting opportunities for Indigenous peoples and businesses and opportunities to address areas of concern holistically at CNL's sites. CNL is not able to address questions surrounding the original take up of the lands by the Crown, ownership of the lands, land transfer and future uses of the land. These questions are more appropriately directed to AECL, but CNL commits to help facilitate this dialogue between AECL and interested Indigenous Nations, communities and organizations.

The discussion on long-term relationships and on specific aspects of projects such as the NPD Closure Project will be on-going up to and beyond the Commission Hearing for the NPD Closure Project. Due to the on-going nature of these discussions and relationship, CNL intends to provide a complementary IER TSD as part of the Commission Member Document package for the CNSC Commission hearing on the NPD Closure Project.

9. Planned Future Engagements

As the Project schedule evolves, CNL will continue engagement activities with Indigenous Nations, communities and organizations. The purpose of this section is to identify planned and ongoing tactics to address topics of interest and / or concern expressed by Indigenous Nations, communities and organizations. CNL remains adaptive in its approach and adapt engagement activities as needed.

CNL has identified additional engagement activities that are planned to take place as the NPD Closure Project progresses. In general, these additional activities may include, without limitation:

- involving Indigenous Nations, communities and organizations in development of commitments to be include in the Final EIS submission;
- notifying identified Indigenous Nations, communities and organizations of Final EIS submission;
- sharing updated IERs with identified Indigenous Nations, communities and organizations;
- on-going engagement with identified Indigenous Nations, communities and organizations, including meetings and/or community information sessions to provide project updates, solicit feedback on the project and traditional land use activities;
- obtaining input on the draft follow-up monitoring plans to consider incorporation of Indigenous VCs and traditional knowledge into the EA Follow-up Program being developed;
- involvement in CNL's environmental monitoring, where interested and appropriate programs or procedures are in place, and discussions on environmental activities and findings;
- obtaining input on the draft restoration plan to consider the perspectives from Indigenous peoples who have interest in future use of the land on, and in the vicinity of, the NPD site;
- hosting technical meetings or workshops, upon request, to provide interested parties with more in depth information and opportunities to question subject matter experts on the project;
- sharing with Indigenous Nations, communities and organizations any studies or reports specifically requested, to the extent possible;
- identification of Indigenous Nation, community and organization's needs for capacity assistance to effectively participate in the project through a collaborative work plan;
- participating in various targeted community initiatives, when appropriate, such as educational events, fairs, science fairs and career days;

- on-going NPD Closure Project notifications (e.g., letters, email correspondence, newspaper advertisements, updates to project website); and
- on-going tracking and recording of comments, questions, interest and concerns and other feedback provided by Indigenous Nations, communities and organizations, and providing responses.

CNL is appreciative of the learnings gained during interactions with Indigenous Nations, communities and organizations over the course of the project. In some cases, the relationships are still in early stages, but CNL looks forward to developing a strong, trusted, collaborative relationship with the communities.

CNL remains committed to advancing environmental protection and remediation of CNL sites and believes that the proposed decommissioning path for the NPD facility is a responsible western science-based solution. CNL acknowledge, however, that this solution can become even more effective when it is informed by Indigenous Knowledge Systems, values and perspectives and as such we are committed to collaboratively developing and implementing additional measures, mitigations and solutions throughout the NPD Closure Project with Indigenous peoples. The work done to date is the start of a long journey of engagement and reconciliation and an overarching goal of building stronger relationships with Indigenous Nations, communities and organizations.

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Appendix A Record of DecisionCanadian Nuclear
Safety CommissionCommission canadienne
de sûreté nucléaire**Record of Decision**

In the Matter of

Applicant Canadian Nuclear Laboratories**Subject Decision on the Scope of Environmental
Assessments for Three Proposed Projects at
Existing Canadian Nuclear Laboratories'
Facilities****Date of
Decision March 8, 2017****Canada**

RECORD OF DECISION

Applicant:	Canadian Nuclear Laboratories
Address/Location:	Chalk River Laboratories, 286 Plant Road, Chalk River, Ontario, K0J 1J0
Purpose:	Commission Decision on the Scope of Environmental Assessments for three proposed projects at existing Canadian Nuclear Laboratories' facilities
Project descriptions received:	July 5, 2016
Date of decision:	March 8, 2017
Location:	Canadian Nuclear Safety Commission (CNSC) 280 Slater St., Ottawa, Ontario
Members present:	M. Binder, Chair

Decision: EA Scope Determination

e-Does 5196208
e-Does 5205376

Record of Decision can be found at the following CNSC Link

<http://suretenuclaire.gc.ca/eng/the-commission/pdf/Record%20of%20Decision%20-%20CNL%20Scope%20of%20EA%20Factors%202017.pdf>

Appendix B NPD Project Letter – 2016 July 15

UNRESTRICTED / ILLIMITÉE

July 15, 2016

Attention: Chief Phyllis Williams

Williams Treaties First Nation – Curve Lake First Nation
22 Winookeeda Rd.
Curve Lake, ON K0L 1R0

Reference: Federal Environmental Assessment, Canadian Nuclear Laboratories – Proposed Near Surface Disposal Facility and Nuclear Power Demonstration Closure Projects

Dear Chief Phyllis Williams,

I am writing to invite discussions and determine your interest in engaging with Canadian Nuclear Laboratories (CNL) on two CNL projects. One project proposed for the Chalk River Laboratories (CRL) site and the second occurring at the Nuclear Power Demonstration site in Rolphton, Ontario. These CNL projects may be of interest to you and your community.

The first project is the proposed siting and construction of a Near Surface Disposal Facility (NSDF) to be located and operated at CNL's Chalk River site. The facility will be used for disposal of low-level radioactive waste and other suitable waste streams. This project is identified by the Canadian Environmental Assessment Review (CEAR) number 80122.

The second project, Nuclear Power Demonstration (NPD) Closure project in Rolphton, Ontario, is the proposed in situ (leaving in place) decommissioning approach for the NPD reactor. This project is identified by the CEAR number 80121.

Both projects include federal environmental assessments (EAs) under the Canadian Environmental Assessment Act (CEAA 2012), and regulated under the authority of the Canadian Nuclear Safety Commission (CNSC).

...2

Canadian Nuclear Laboratories

286 Plant Rd
Chalk River, Ontario
Canada K0J 1J0
Telephone: 613-584-3311
Toll Free: 1-866-513-2325

Laboratoires Nucléaires Canadiens

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Chalk River, Ontario
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Téléphone: 613-584-3311
Sans frais: 1-866-513-2325



UNRESTRICTED / ILLIMITÉE

-2-

As an objective of the EA under CEAA 2012, CNL is to identify, minimize or avoid adverse environmental effects before they occur, and incorporate environmental factors into decision-making.

We would like to ensure that representatives of your community are informed of our project and have the opportunity to provide meaningful feedback on the following:

- Whether the project may have environmental effect on any lands and/or resources currently used by Aboriginal peoples for traditional purposes;
- Whether the project may have any perceived impacts on Aboriginal and Treaty Rights;
- Whether local and traditional knowledge can assist in describing the existing environment; and,
- The view of Aboriginal communities on proposed valued ecosystems components (environmental attributes) that have been identified for the assessment.

Information on the status of the ongoing EA's can be found online on the CNSC's website (www.nuclearsafety.gc.ca) and the Canadian Environmental Assessment Agency (CEA Agency) Public Registry (<http://www.ceaa.gc.ca/050/index-eng.cfm>). The CEA Agency also has a Glossary of terms which may be of assistance (<http://www.ceaa.gc.ca/default.asp?lang=En&n=B7CA7139-1>).

We are interested in hearing your views with respect to the projects, and/or any potential adverse impacts that the project activities may have on your community. If you would like more information, please contact me directly at (613) 584-8500 or visit our project websites, www.cnl.ca/nsdf or www.cnl.ca/npd.

Aboriginal involvement in the EA process is important and appreciated. To ensure satisfactory engagement on these projects, if I do not hear from you, I will contact you in the coming weeks to discuss participation in the EA process.

Sincerely,

A handwritten signature in blue ink, appearing to read "Patrick Quinn".

Patrick Quinn
Director, Corporate Communications

Canadian Nuclear Laboratories

Chalk River, Ontario
Canada K0J 1J0
Telephone: 613-584-3311
Toll Free: 1-866-513-2325

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Appendix C NPD Project Letter – 2016 November 10Canadian Nuclear
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Canadiens

UNRESTRICTED/ILLIMITÉE

November 10, 2016

Attention: Norm Odjick

Algonquin Anishinabeg Nation Tribal Council
81 Kichi Miikan
Maniwaki, ON
J9E 3C3

**Reference: Federal Environmental Assessment, Canadian Nuclear Laboratories – Proposed Near Surface
Disposal Facility and Nuclear Power Demonstration Closure Projects**

Dear Norm Odjick,

Further to our letter of July 15, 2016, I would like to express Canadian Nuclear Laboratories' (CNL) interest in exploring the Algonquin Anishinabeg Nation Tribal Council's interests or concerns with respect to two CNL projects. One project, the Near Surface Disposal Facility (NSDF) is proposed for the Chalk River Laboratories site and the second, the Nuclear Power Demonstration (NPD) Closure Project would be occurring on CNL's site by Rolphton, Ontario.

Under the federal Canadian Environmental Assessment Act (CEAA 2012), both projects require Environmental Assessments (EA), which are regulated by the mandate of the Canadian Nuclear Safety Commission (CNSC), the authority governing nuclear facilities and projects in Canada. Information on the status of the EAs can be found in the Canadian Environmental Assessment Agency's Public Registry (<http://www.ceaa.gc.ca/050/index-eng.cfm>). The NSDF project is identified by the Canadian Environmental Assessment Review (CEAR) number 80122 and the NPD Closure Project is identified by the CEAR number 80121.

While both proposed projects would be occurring on federal lands where access is currently restricted, CNL is concerned with developing a better understanding of the Algonquin Anishinabeg Nation Tribal Council's historic and/or modern day use of lands in and/or near both of the project sites.

Please find enclosed updated project information in the form of informational posters. If the Algonquin Anishinabeg Nation Tribal Council is interested, we would also provide you and your community with updates on each of the projects, the potential environmental effects and proposed mitigation and monitoring measures. Should we have further engagement opportunities, CNL is interested in learning about the Algonquin Anishinabeg Nation Tribal Council and any asserted rights, interests or activities your members might undertake in the local or regional areas in proximity to the projects.

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Appendix D NPD Project Letter – 2020 May 06

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2020 May 06

Attention: Janet Stavinga

Algonquins of Ontario
31 Riverside Drive
Pembroke, ON
K8A 8R6

Reference: Federal Environmental Assessment, Canadian Nuclear Laboratories – NPD Closure Project

Dear Janet,

I am writing this letter to provide an update to you and members of the Algonquins of Ontario (AOO) on progress related to the Nuclear Power Demonstration (NPD) Closure Project. Most recently, CNL submitted the revised Environmental Impact Statement (EIS) for the project to Canadian Nuclear Safety Commission (CNSC).

The revised EIS is part of the ongoing federal Environmental Assessment for the NPD Closure Project (CIAR Reference Number 80121). CNL initiated engagement with the AOO at the onset of this Environmental Assessment with a notification letter provided to the AOO on July 15, 2016.

The revised EIS reflects experience from various engagement activities and direct input on the original draft. Comments on the draft EIS were received from the public, federal and provincial regulatory bodies and Indigenous communities. This includes input gathered through engagement with the AOO. The revised EIS is available at: [www.cnl.ca/site/media/Parent/Environmental%20Impact%20Statement-%20NPD%20Closure%20Project%20\(Revised\)_64-509200-ENA-004_REV%201.pdf](http://www.cnl.ca/site/media/Parent/Environmental%20Impact%20Statement-%20NPD%20Closure%20Project%20(Revised)_64-509200-ENA-004_REV%201.pdf)

As part of this submission, CNL has updated and provided to the CNSC the project's Indigenous Engagement Report (IER), which describes the Indigenous communities CNL is engaging with and our findings related to Indigenous practices and the ongoing project. This updated report reflects CNL's work to respond to and incorporate feedback. The current version is available at: www.cnl.ca/site/media/Parent/NPD%20Closure%20Project%20Indigenous%20Engagement%20Report%20-%2064-513130-REPT-001%20Rev.%203.pdf

As the IER is intended to be a living document in that it will be updated over the course of the project based on engagement with Indigenous Peoples, it is CNL's intention to provide a final version of this IER prior to the CNSC Hearing. CNL would be pleased to revise the information in this current draft with any additional input from the AOO.

Canadian Nuclear Laboratories

Chalk River Laboratories
286 Plant Road
Chalk River, Ontario
Canada K0J 1J0
Telephone: 613-584-3311
Toll Free: 1-866-513-2325

Laboratoires Nucléaires Canadiens

Laboratoires de Chalk River
286, rue Plant
Chalk River (Ontario)
Canada K0J 1J0
Téléphone: 613-584-3311
Sans frais: 1-866-513-2325

CNL continues to work with staff and Algonquin Negotiation Representatives of the AOO in developing a Long-Term Relationship Agreement with AECL and CNL. At the same time, CNL wants to continue to work with AOO on any NPD-specific issues. The AOO and CNL have had productive exchanges on the issues raised by AOO on the 2017 draft EIS on NPD and the number of outstanding issues is relatively small.

The following table outlines the status of these discussions on the issues that the AOO has brought up on the NPD Closure Project:

Issue	Status
Technical issues with NPD, including specific interest in the alternative means assessment, site restoration, monitoring, derived release limits at NPD and AOO citizen exposure.	• CNL has provided the Alternative Means Assessment to the AOO for review and is looking forward to AOO comments. • Through the MOU, it has been agreed that site restoration is an issue for the Long-Term Relationship Agreement. • CNL has provided the AOO with three draft monitoring plans for review and is looking forward to AOO comments. • Derived Release Limits for NPD have been discussed with the AOO and as of 2019 September the issues was considered closed by both parties. • To address AOO citizen exposure due to the NPD Closure Project, CNL has included a new Indigenous receptor to model dose of the NPD Closure Project to future AOO citizens.
Algonquin Knowledge and Land Use and its incorporation into the project.	• Between the CNSC and CNL, funding has been provided to the AOO to complete an Algonquin Knowledge Study. CNL is looking forward to receiving information from this study to incorporate into the NPD Closure Project.
Site restoration.	• Through the MOU, it has been agreed that site restoration is an issue for the Long-Term Relationship Agreement. • CNL has agreed to share the site restoration plan for AOO review.
Socio-economic considerations.	• CNL has included a new section on Indigenous Socio-Economics and Health in the revised EIS for the NPD Closure Project. CNL looks forward to discussing the information in this section with the AOO. • Through the MOU, it has been agreed that socio-economic considerations, such as employment, are also an issue for the Long-Term Relationship Agreement.
Environmental monitoring.	• CNL has provided the AOO with three draft monitoring plans for review and is looking forward to AOO comments.
Future land use.	• Through the MOU, it has been agreed that future land use is an issue for the Long-Term Relationship Agreement.
Alternative means.	• CNL has provided the Alternative Means Assessment to the AOO for review and is looking forward to AOO comments.
Indigenous health.	• To address the project's effects on Indigenous health, CNL has included a new Indigenous receptor to model dose of the NPD Closure Project to future AOO citizens. CNL looks forward to discussing this more thoroughly with the AOO.

Issue	Status
Archaeology.	Through ongoing discussions the AOO requested a summary of the Archaeological Assessment. CNL has since provided this. No further work is planned for the NPD site at the moment.

The disposition of the issues above highlight how CNL and the AOO have been working together for the better part of three years. CNL is interested in continual learning about your community and therefore it would appreciate any comments your organization or community has with respect to any aspect of the EIS and Indigenous Engagement Report, particularly those sections where AOO interests are discussed.

We understand that the AOO is at work on the Algonquin Knowledge and Land Use Study and CNL will incorporate results of that work into the final EIS and Indigenous Engagement Report.

And, we ask that you please make us aware if you have any comments, questions and/or corrections for CNL and any additional material or input you may want to provide to CNL. While CNL recognizes that important information will come through the Algonquin Knowledge and Land Use Study and technical comments are currently being addressed through our NPD Technical meetings, the NPD Closure Project team would be interested in hearing about any additional thoughts the AOO might have on the NPD Closure Project, such as:

- Do the AOO have additional information that they would like to provide in the context of traditional territory near the NPD site?
- Do the AOO have any members who currently live close or in reasonable proximity to the NPD site?
- Do the AOO have historical and/or current traditional practices near the NPD site, specifically we are interested in AOO members' traditional uses such as trapping (traditional or commercial), hunting, fishing (traditional or commercial), gathering and practicing cultural ceremonies?
- Do the AOO have sites of ceremonial significance in close proximity or more generally any cultural activities near the NPD site?
- Tell us about any important resources, uses, activities, values and interests to the AOO near the NPD site.
- If there is use in close proximity to the NPD site, is current AOO community use different than historic use and can a description of those difference be provided?
- Let us know of any potential concerns you have with respect to effects and any potential impacts on rights.

CNL is happy to receive feedback from the AOO in whatever format is suitable for the AOO.

To this end, there is a need to continue discussions on these subject areas. I would like to extend an invitation to meet and offer any assistance I can in helping to facilitate a meeting. Due to current circumstances, we understand that any meetings would be conducted via teleconference or an appropriate video conference platform.

CNL is flexible on meeting location, and will be pleased to make arrangements for, and cover the expense related to the meeting proceedings. Please advise on a date that best suits the AOO for such a meeting.

For updates on the NPD Closure Project, please visit www.cnl.ca/NPD. We continue to post new information on the project and the ongoing environmental assessment as it becomes available.

Please do not hesitate to reach out if there are any questions or you would like further information.

Regards,

A handwritten signature in black ink, appearing to read 'M. MacKay', is placed over a light gray grid background.

Mitch MacKay

Manager, Environmental Remediation Management Stakeholder Relations

cc: Mary Ann Dewey-Plante, Atomic Energy of Canada Limited (AECL)
Sarah Dougherty, AOO
Margot Thompson, ERM Stakeholder Relations
Patrick Quinn, Corporate Communications
Brian Wilcox, NPD Closure Project

Appendix E Environmental Stewardship Council (ESC) Agenda and Presentation**2017 June 22 (Agenda and Presentation)**

Environmental Stewardship Council (ESC)
 AGENDA FOR MEETING #34 (DRAFT UNTIL ACCEPTED)
 Thursday, June 22, 2017 – Clarion Hotel, Pembroke, Ontario
 List of Participants noted on page 2

9:15 – 9:30 AM	Refreshments	
9:30 AM	Safety briefing, welcome and introductions	Pat Quinn
9:40 – 9:50 AM	Review of actions, previous meeting record and new business	John Vincett
9:50 – 10:30 AM	CNL Business Update	Mark Lesinski
10:30 – 10:45 AM	Quarterly Environmental Performance Report	George Dolinar
10:45 – 11:00 AM	Bio break	
11:00 – 11:45 AM	Decommissioning & Waste Management Update	Andy Drom/Javed Anderson
11:45 – 12:30 PM	Lunch	
12:30 – 1:00 PM	Nuclear Power Demonstration (NPD) Closure Project Update	Meggan Vickerd
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1:30 – 2:00 PM	Concerned Citizens of Renfrew County Update	Ole Hendrickson
2:00 – 2:15 PM	Bio break	
2:15 – 3:00 PM	Near Surface Disposal Facility Waste Acceptance Criteria	Andy Drom
3:00 – 3:15 PM	In the Community	Nicole LeBlanc
3:15 – 3:30 PM	Recap Review of Actions Next meeting: 2017 October 26	John Vincett

**ESC Participants:**

Bruce Bigham, Deep River Horticultural Society
 Meredith Brown, Ottawa Riverkeeper
 Ron Gervais, City of Pembroke
 James Gibson, Municipalité régionale de comté de Pontiac
 Ole Hendrickson, Concerned Citizens of Renfrew County
 Ken Hooles, Pembroke Area Field Naturalists
 Bob MacKenzie, Upper Ottawa Valley Ducks Unlimited
 John McKay, Four Seasons Conservancy
 Craig Robinson, Old Fort William Cottagers' Association
 Theresa Sabourin, Councillor, Town of Petawawa
 Walter Stack, Renfrew County Council

ESC Alternates: Glenn Doncaster, Town of Deep River

Michelle Perry, Garrison Petawawa
 Murray Rutz, Town of Petawawa
 Melissa Vekeman, Petawawa Research Forest
 Cynthia Williams, Deputy Vice President, Health, Safety, Security and Environment (HSSE)

CNL: Shaun Cotnam, Senior Director, Compliance
 George Dolinar, Environmental Program Authority
 Nicole LeBlanc, Communications Officer, Corporate Communications
 Mark Lesinski, President and CEO
 Pat Quinn, Director, Corporate Communications
 TBD, Director, DWM Science & Technology Transition Advisor
 TBD, Environmental Scientist, Environmental Technologies

Invited Observers: Lisa Donnelly, Canadian Nuclear Safety Commission
 Mohamed Gacem, Canadian Nuclear Safety Commission
 Maude-Émilie Pagé, Atomic Energy of Canada Limited

Facilitator: John Vincett, Public Dialogue Alternatives

Invited Guests: Javed Anderson, CNL
 Jim Buckley, CNL
 Andy Drom, CNL
 Mike Giardini, CNL
 Kari Richardson, Municipalité régionale de comté de Pontiac
 Meggan Vickard, CNL

Absent: Peter Arbour, Petawawa Research Forest
 Kevin Daniels, Vice President, Health, Safety, Security and Environment (HSSE)
 Meghan Hendry, Garrison Petawawa
 Wasif Islam, CRL Compliance and Licensing Division, Canadian Nuclear Safety Commission
 Kurt Kehler, Vice President Decommissioning and Waste Management
 Marc Laurin, Métis Nation of Ontario, North Bay
 Joan Loughheed, Town of Deep River
 Jim Meness, Algonquins of Pikwàkanagàn
 Jed Reinwald, Town of Laurentian Hills

Prepared by: Nicole LeBlanc
 Tel: 613-584-3311 ext. 46138 | Email: nicole.leblanc@cnl.ca



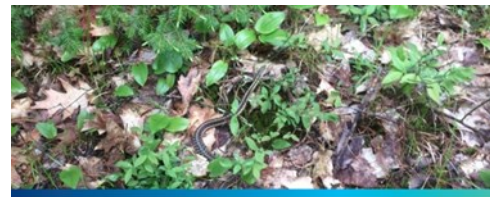
NPD Closure Project

Environmental Stewardship Council

2017 June 22 | Meggan Vickerd | Manager, NPD Operations

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Environmental Performance at NPD

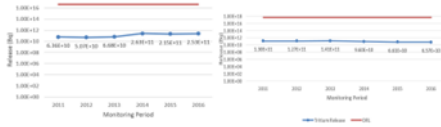
Current NPD site monitoring
Environmental performance reporting
Phase II Environmental Site Assessment
Proposed follow-up monitoring

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Environmental Performance Reporting

Activity monitoring for NPD effluent is trending far below limits - radioactivity is staying in place and decaying away

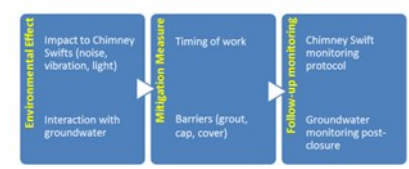


Tritium in air (<1/100,000 of limit) Tritium in liquid (<1/10,000,000 of limit)

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Proposed Follow-up Monitoring



Environmental Effect
Impact to Chimney Swifts (noise, vibration, light)
Interaction with groundwater

Mitigation Measure
Timing of work
Barriers (grout, cap, cover)

Follow-up monitoring
Chimney Swift monitoring protocol
Groundwater monitoring post-closure

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NPD Timeline

NPD Closure Project Environmental Impact Statement will be available for Public Review in Fall 2017

Activity	2016	2017	2018	2019	2020
Decommissioning Planning					
EA and Licensing					
Decommissioning Execution					

NPD Closure Project
EA initiated with the submission of the Project Description: May 5, 2016
CEAA Reference: RB0121
<http://www.ceaa-acee.gc.ca/050/details-eng.cfm?evaluation=80121>

Canadian Nuclear Safety Commission is the Regulatory Authority

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Current NPD Site Monitoring

Ambient radiation monitoring stations near NPD

- Dose rates onsite are comparable with offsite background dose rates

Surface water samples from the Ottawa River

- No distinction between upstream and downstream measurements
- <1/10,000 of the regulatory limit

Soil and vegetation samples around the NPD site

- Vegetation at the base of the stack <1/100 of the regulatory limits
- Everywhere else at natural background levels and <1/1,000 of the regulatory limits



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Phase II Environmental Site Assessment



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Public Engagements

Recent engagement activities

- Third round of Public Information Sessions (22 in total as of May 9)
- Chimney Swift Count Nights with stakeholders
- Meetings with First Nations (Ontario & Quebec)

Upcoming activities

- Participation at summer events
- Presentations to stakeholder groups
- August 12 Open House - tours of NPD
- Ongoing Indigenous engagement
- Submission of the EIS

Continued public interest in:

- History of NPD
- Protection of the Ottawa River
- Chimney Swifts
- Release of non-impacted land back to AECL
- Environmental monitoring



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Chimney Swift Counts



Summary

CNL has been performing site monitoring at NPD for 30 years and has seen no impact on the environment as a result of the facility.

The follow up monitoring proposed will continue to ensure all environmental aspects are considered including the Ottawa River and Species at Risk.

The plan for decommissioning of NPD will ensure there will be no significant impact on the environment now or for future generations.

It's about good environmental stewardship.



Thank you.
Questions?

www.cnl.ca



Environmental Stewardship Council (ESC)
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 TBD, Environmental Scientist, Environmental Technologies

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 Mohamed Gacem, Canadian Nuclear Safety Commission
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Facilitator: John Vincett, Public Dialogue Alternatives

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 Mike Giardini, CNL
 Kari Richardson, Municipalité régionale de comté de Pontiac
 Meggan Vickard, CNL

Absent: Peter Arbour, Petawawa Research Forest
 Kevin Daniels, Vice President, Health, Safety, Security and Environment (HSSE)
 Meghan Hendry, Garrison Petawawa
 Wasif Islam, CRL Compliance and Licensing Division, Canadian Nuclear Safety Commission
 Kurt Kehler, Vice President Decommissioning and Waste Management
 Marc Laurin, Métis Nation of Ontario, North Bay
 Joan Loughheed, Town of Deep River
 Jim Meness, Algonquins of Pikwàkanagàn
 Jed Reinwald, Town of Laurentian Hills

Prepared by: Nicole LeBlanc
 Tel: 613-584-3311 ext. 46138 | Email: nicole.leblanc@cnl.ca

Appendix F NPD Closure Project Introduction Presentation

Why In-situ Disposal?

The existing NPD structure sits 25 metres below grade and is built into the Canadian Shield, making NPD uniquely suited for in-situ disposal.

Removing it from its current location would be difficult and create some avoidable risks.

A custom grout will be used to seal the waste in place ensuring stability and reducing corrosion of the waste material contained within the existing robust concrete structure – keeping the land and water safe.

CNL's plan for the NPD Facility is aligned to Canadian Regulations (CNSC RegDoc 2.11.2 - Decommissioning) which states that:

"in-situ decommissioning may be considered a solution under exceptional circumstances or for legacy sites."

The NPD facility meets the criteria for a legacy site and the proposed approach is protective of workers, the public and the environment.



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Protection of the Ottawa River



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6

Follow-up Monitoring

Follow-up monitoring begins now with the collection of baseline data and will continue through the Decommissioning Execution phase until the end of the institutional control phase.



- Begins after project approval
- Demolition, grouting, installing cap/cover
- Will take "two years"



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- Starts after decommissioning is complete
- Period of active monitoring and surveillance
- Will last 100 years minimum
- Regulatory approval required to end this phase

7

Follow-up Monitoring Plans

There are three monitoring plans:

Effluent: monitoring things that are emitted directly from project activities (e.g. dust)

Environment: monitoring different parts of the environment that may be affected by the project (e.g. Ottawa river)

Groundwater: monitoring the quality of groundwater around the NPD facility



Groundwater monitoring locations



Environmental monitoring locations



Air effluent monitoring



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Appendix G Algonquins of Ontario (AOO) Alternative Means Presentation

Why In-situ Disposal?

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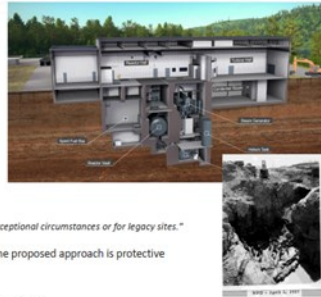
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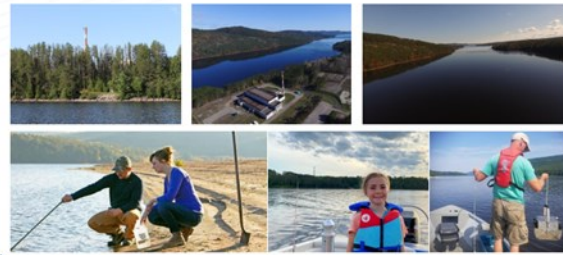


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Protection of the Ottawa River



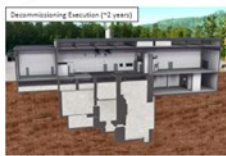
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4

Follow-up Monitoring

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- Begins after project approval
- Demolition, grouting, installing cap/cover
- Will take ~two years

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- Starts after decommissioning is complete
- Period of active monitoring and surveillance
- Will last 100 years minimum
- Regulatory approval required to end this phase

Follow-up Monitoring Plans

There are three monitoring plans:

Effluent: monitoring things that are emitted directly from project activities (e.g. dust)

Environment: monitoring different parts of the environment that may be affected by the project (e.g. Ottawa river)

Groundwater: monitoring the quality of groundwater around the NPD facility



Groundwater monitoring locations



Environmental monitoring locations



Air effluent monitoring

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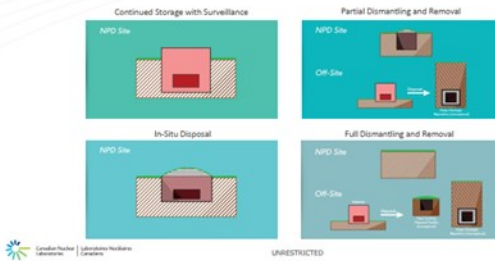
Nuclear Power Demonstration (NPD) Indigenous Engagement Report

64-513130-REPT-001 Rev. 6

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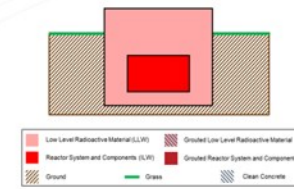
Alternatives Considered

Alternative Options to Decommission the NPD Waste Facility were identified in the 2016 Project Description:



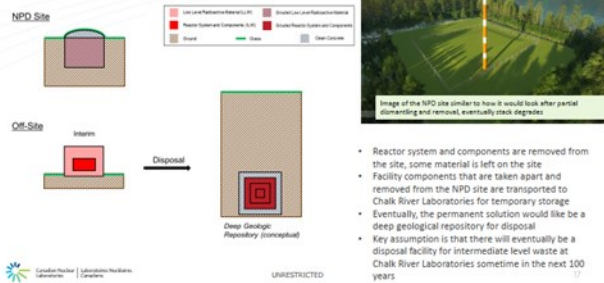
Continued Storage with Surveillance

NPD Site



- Maintain the facility in a safe, regulated state of storage with Surveillance
- Continue with current program of maintenance, monitoring and reporting
- Would continue with a waste facility licence with licence conditions prescribed and overseen by the Canadian Nuclear Safety Commission (CNSC)
- Not a permanent solution, decommissioning NPD cannot be put off forever
- If Storage with Surveillance is chosen now, at some point CNL or the federal government would need to choose another solution

Partial Dismantling and Removal



- Reactor system and components are removed from the site, some material is left on the site
- Facility components that are taken apart and removed from the NPD site are transported to Chalk River Laboratories for temporary storage
- Eventually, the permanent solution would like be a deep geological repository for disposal
- Key assumption is that there will eventually be a disposal facility for intermediate level waste at Chalk River Laboratories sometime in the next 100 years

Full Dismantling and Removal



- Nothing remains at the NPD site
- Facility components are taken apart and removed from the NPD site and transported to Chalk River Laboratories for temporary storage
- Eventually, the permanent solution would like be a deep geological repository for disposal
- Key assumption is that there will eventually be a disposal facility for intermediate level waste at Chalk River Laboratories sometime in the next 100 years

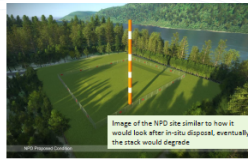
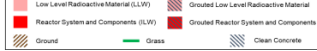
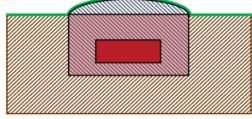
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In Situ Disposal

NPD Site



- Involves grouting the reactor and associated systems in place within the building
- Creating a disposal facility "in situ" at the NPD site
- Above ground structures demolished, and the rubble also grouted within the below grade structures



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How CNL Evaluated Each Alternative Assessment Methodology

- Identification of technical and economically feasible alternative means (or options).
- Identification of effects on Valued Components:
 - Environmental (surface water, aquatic, terrestrial, atmospheric, etc.)
 - Miscellaneous Physical (land and resource use, traffic and transportation)
 - Indigenous Peoples' rights and interests
 - Social (socio-economics),
 - Health (public, worker and non-human biota)
- Consider the possible interactions of the project with the valued components (positive, negative or neutral)
- For each phase of the project complete a comparative evaluation against the baseline option (SWs) to support selection of the preferred option.

Symbol	Explanation
1 Risk	Alternative is associated with more risk than baseline.
2 Risk	Alternative is associated with slightly more risk than baseline.
3 Risk	Alternative is associated with approximately same risk as baseline.
4 Risk	Alternative is associated with slightly less risk than baseline.
5 Risk	Alternative is associated with less risk than baseline.



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Comparison Results from Decommissioning Execution

Alternative Means	Environmental Components											
	Environmental Effects						Miscellaneous Physical Effects		Socio-economic Effects		Effects on Indigenous People	
	Atmospheric Environment	Surface Water Environment	Aquatic Environment	Terrestrial Environment	Geological and Hydrogeological Environment	Vegetation and Land Use	Land Use	Vegetation and Land Use	Physical and Cultural Heritage Resources	Socio-economic Effects	Effects on Indigenous People	Health Effects (normal)
1. Continued Sild												
2. Partial Dismantling and Removal	1	1	1	1	1	1	1	1	1	1	1	1
3. Full Dismantling and Removal	1	1	1	1	1	1	1	1	1	1	1	1
4. In-Situ Disposal	1	1	1	1	1	1	1	1	1	1	1	1



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Comparison Results from Post Closure (Institutional Control Period)

Alternative Means	Environmental Components											
	Environmental Effects						Miscellaneous Physical Effects		Socio-economic Effects		Effects on Indigenous People	
	Atmospheric Environment	Surface Water Environment	Aquatic Environment	Terrestrial Environment	Geological and Hydrogeological Environment	Vegetation and Land Use	Land Use	Vegetation and Land Use	Physical and Cultural Heritage Resources	Socio-economic Effects	Effects on Indigenous People	Health Effects (normal)
1. Continued Sild												
2. Partial Dismantling and Removal	1	1	1	1	1	1	1	1	1	1	1	1
3. Full Dismantling and Removal	1	1	1	1	1	1	1	1	1	1	1	1
4. In-Situ Disposal	1	1	1	1	1	1	1	1	1	1	1	1



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Comparison Results from Decommissioning Execution

Alternative Means	Environmental Components											
	Environmental Effects						Miscellaneous Physical Effects		Socio-economic Effects		Effects on Indigenous People	
	Atmospheric Environment	Surface Water Environment	Aquatic Environment	Terrestrial Environment	Geological and Hydrogeological Environment	Vegetation and Land Use	Land Use	Vegetation and Land Use	Physical and Cultural Heritage Resources	Socio-economic Effects	Effects on Indigenous People	Health Effects (normal)
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2. Partial Dismantling and Removal	1	1	1	1	1	1	1	1	1	1	1	1
3. Full Dismantling and Removal	1	1	1	1	1	1	1	1	1	1	1	1
4. In-Situ Disposal	1	1	1	1	1	1	1	1	1	1	1	1



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Comparison Results from Post Closure (Institutional Control Period)

Alternative Means	Environmental Components											
	Environmental Effects						Miscellaneous Physical Effects		Socio-economic Effects		Effects on Indigenous People	
	Atmospheric Environment	Surface Water Environment	Aquatic Environment	Terrestrial Environment	Geological and Hydrogeological Environment	Vegetation and Land Use	Land Use	Vegetation and Land Use	Physical and Cultural Heritage Resources	Socio-economic Effects	Effects on Indigenous People	Health Effects (normal)
1. Continued Sild												
2. Partial Dismantling and Removal	1	1	1	1	1	1	1	1	1	1	1	1
3. Full Dismantling and Removal	1	1	1	1	1	1	1	1	1	1	1	1
4. In-Situ Disposal	1	1	1	1	1	1	1	1	1	1	1	1



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Comparison Results from Post-Institutional Control

Alternative Means	Environmental Components											
	Environmental Effects						Miscellaneous Physical Effects		Socio-economic Effects		Effects on Indigenous People	
	Atmospheric Environment	Surface Water Environment	Aquatic Environment	Terrestrial Environment	Geological and Hydrogeological Environment	Vegetation and Land Use	Land Use	Vegetation and Land Use	Physical and Cultural Heritage Resources	Socio-economic Effects	Effects on Indigenous People	Health Effects (normal)
1. Continued Sild												
2. Partial Dismantling and Removal	1	1	1	1	1	1	1	1	1	1	1	1
3. Full Dismantling and Removal	1	1	1	1	1	1	1	1	1	1	1	1
4. In-Situ Disposal	1	1	1	1	1	1	1	1	1	1	1	1



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Comparison Results Summary

Alternative Means	Environmental Components											
	Environmental Effects						Miscellaneous Physical Effects		Socio-economic Effects		Effects on Indigenous People	
	Atmospheric Environment	Surface Water Environment	Aquatic Environment	Terrestrial Environment	Geological and Hydrogeological Environment	Vegetation and Land Use	Land Use	Vegetation and Land Use	Physical and Cultural Heritage Resources	Socio-economic Effects	Effects on Indigenous People	Health Effects (normal)
1. Continued Sild												
2. Partial Dismantling and Removal	1	1	1	1	1	1	1	1	1	1	1	1
3. Full Dismantling and Removal	1	1	1	1	1	1	1	1	1	1	1	1
4. In-Situ Disposal	1	1	1	1	1	1	1	1	1	1	1	1



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AOO's Comments on the 2017 Draft EIS related to Alternative Means

Alternative Means were not seriously considered by CNL and requirements of CEAA 2012 have not been addressed adequately.

- CNL's Alternative Means Assessment TSD fully assesses each alternative for NPD. Each alternative was carefully considered and evaluated using a consistent approach and methodology.
- CNL met all regulatory requirements laid out in the CEAA Operational Policy Statement: Addressing "Purpose of" and "Alternative Means".

Insufficient discussion of alternatives to ISD was provided in the 2017 draft EIS

- CNL incorporated additional information from the Alternative Means Assessment TSD into Section 4.2 of the EIS to provide greater clarity on how the AMA was completed and what the results mean.

ISD will not allow for safe unrestricted land use in the future and is not a suitable alternative

- Should the preferred alternative of ISD be approved, <1% of the NPD site (<13 hectares) would be subject to restricted access and following the Institutional Control Period no land restrictions will be required.
- The EIS demonstrates that NPD is suitable for ISD and safe for human health and the environment.
- Interaction between humans and biota with the NPD site are considered and modelled in CNL's postclosure safety assessment which demonstrates that under all scenarios the impact on the public, Indigenous peoples and the environment is negligible and that almost any land use in the future is possible.



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AOO's Comments on the 2017 Draft EIS related to Alternative Means

Examination of alternatives is insufficient - request for quantitative assessment of the impacts of each alternative means on VCS

- CNL has added some quantitative assessments of alternatives to the AMA TSD e.g., projected radiological dose and industrial safety risk to workers for each option.

What changed in CNL's 2020 revised draft EIS and updated Alternative Means Assessment TSD?

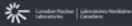
- Quantitative discussion of dose and injury to workers during the decommissioning phase has been added.
- The evaluation now assumes that off-site disposal for waste that is sent to CNL for interim storage becomes available within the Institutional Control time period.
- Risk to the aquatic environment for Options 2-4 updated to consider potential effects from drawing water from the Ottawa River for dust suppression efforts.
- Now includes a Value Component = "Effects on Indigenous Peoples Rights and Interests"



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FEEDBACK and QUESTIONS



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NPD Closure Project

Dr. Todd Butz - Director, HSSE & QA

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NPD's Nation of Onjigwé Meeting: North Bay, ON - 2019 July 22 - 10

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Project Overview

The NPD Closure Project objective is to safely carry out decommissioning of a nuclear power plant and permanently dispose of all legacy materials

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NPD Timeline

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NPD 1962 and 2016

Since shut down much of the non-active equipment was removed

Turbine Hall
Pressure tubes
Control Room

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NPD Site

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NPD Layout

Turbine Hall
Reactor Hall
Boiler Room
Reactor Vault
Spent Fuel Bay

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Key themes from MNO Comments on NPD EIS

- Here are some of the key themes from MNO comments to discuss today:
- Incorporation of the results from the TKLUS
 - Why NPD is suitable for ISD
 - Safety assured during execution of the work and institutional control period
 - Safety Assured over the long-term
 - Protection of non-human biota



Incorporation of the MNO TKLUS into the NPD Project

Aboriginal Engagement Report and EIS to be updated with results of the report

Why NPD is suitable for In-situ Disposal

- Small size of the facility
- Large portion of the facility is below grade in bedrock
- Majority of contamination is in the reactor vault, which is situated in bedrock and protected by the thick concrete vault walls
- The filling with grout achieves isolation of radionuclides
- 30 years of storage with surveillance has reduced the inventory of short lived isotopes
- Waste does not need to undergo multiple handling steps that would be involved in placing the waste into a waste store or remote repository
- No transportation of waste required
- 99.9% of the radioactive material is activated within the reactor vessel steels and zircaloy which will corrode very slowly in the alkaline environment.

Nuclear Industry Experience with ISD

- In-situ disposal being used to dispose of radioactive waste related to the uranium mining industry, such as the Madawaska Mine Loop in Bancroft

North American Examples of ISD Projects

Location	Commenced	Completed	Facility Type	Estimated Radioactivity	Comments
Indian Harbour Peace Valley, Alberta, Canada	1963 1968	1967 2009	200 tHM(20) sodium melting, graphite moderator	1,100-150 kg in mainly calcination products	All Department of Energy (DSE) plans established controls for 100 years. Monitoring wells have been installed to detect any leakage from the vaults. Sampling frequency is now every 2 years.
Peace Harbour Peace Valley, Alberta, Canada	1963 1968	1967 2009	10.1 tHM(20) sodium melting and moderator	6,600-11 kg	The reactor vessel, thermal shield, and piping, and support vessels remain in place.
Baldy Mountain Superior Peace Harbour (SOPH), Peace River	1963 1968	1967 2009	10 tHM(20) sodium melting and moderator	1,000-11 kg	The reactor vessel and other components were removed to place.
Superior Peace Harbour (SOPH), Peace River	1963 1968	1967 2009	10 tHM(20) sodium melting and moderator	1,000-11 kg	The reactor vessel and other components were removed to place.
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ISD in the Non-nuclear Industry

- **Sydney Tar Ponds** - the clean up of the contaminated site was by immobilising the waste in-situ. Cement is being mixed into the contaminated waste to solidify and stabilise it. The solidified areas were covered with an engineered cap.
- **Dockside Green in Victoria British Columbia** - former industrial land in downtown Victoria was contaminated by lead, and is to be reused for residential, office, retail and commercial space. Soil was treated with Portland cement, which was mixed into the soil on site immobilising the contaminants.
- **Surplus Seaway Property near St. Catharines, Ontario** - Remediation of soil impacted with lead and PAH (polycyclic aromatic hydrocarbon). Soil was treated using cement to immobilise the contamination in place.



The NPD Safety Case

Safety Barriers and Features

Containment and Isolation arise from requirements 8 and 9 of IAEA SSR-5, and are the key features of the safety barriers in preventing releases from the disposal facility.

Elements of the facility that provide isolation and containment of the wastes, and generally fall into one of two categories:

1. Engineered Barriers
2. Natural Physical Barriers



The NPD Safety Case

Engineered Barriers

Engineered Barriers

- Relate to the design of the facility
- Prevent inadvertent human intrusion
- Provide containment of wastes (i.e. waste form)
- Reduce water infiltration

The Engineered Barriers are:

- The waste form
- Grouted below-grade monolith
- Concrete Cap and Barrier



The NPD Safety Case

Natural Physical Barriers

The natural safety barriers of the NPDDF consist of the surrounding geology and local hydrogeology.

- The bedrock at the site is ~7.5 m below the surface and mostly consists of quartz and granite gneiss, covered with glacial till.
- The NPDDF is anchored up to 20 m into bedrock
- The simple hydrogeology of the site ensures any releases of radioactivity to the environment are prevented from concentrating in the area
- The extent of the potential area contaminated by the NPDDF is relatively small at few tens of square metres.



The NPD Safety Case

Defence in Depth



Results

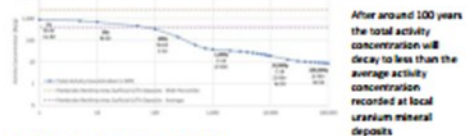
Normal Evolution

Peak hunter dose

- 1×10^{-4} mS/y

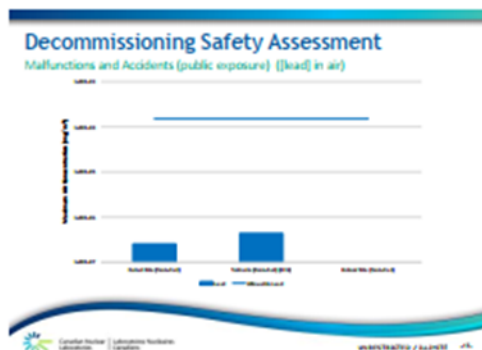
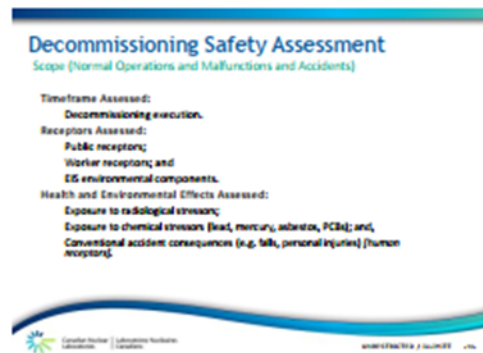
Peak resident dose

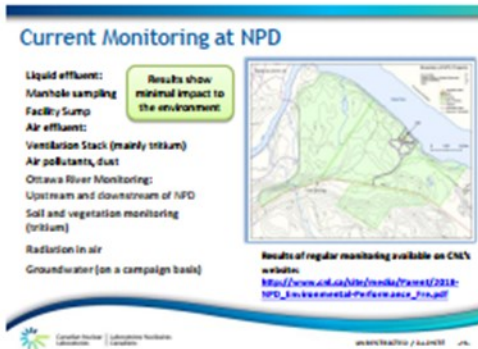
- 4×10^{-4} mS/y



Quebec City background radiation levels are around 1.1 mS/y.







Examples of Monitoring & Surveillance Activities

Document	Decommissioning Execution (DE) Phase	Institutional Control (IC) Phase
Effluent monitoring	- Dust emissions - Discharge emissions	- Dust - Discharge emissions
Environmental monitoring	- Ottawa River water quality - Chimney Swift - Ambient Radioactivity	- Ottawa River water quality - Chimney Swift - Ambient Radioactivity
Groundwater monitoring	Groundwater monitoring at existing and new wells	Groundwater monitoring at existing and new wells
Surveillance	- Building Structural Hazards (Industrial Hygiene) - Confirm integrity of ventilation stack	- Site Drainage (visual inspection) - Inspection of vegetation cover - Transfer ventilation stack integrity

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Groundwater monitoring locations

Background Monitoring: upgradient of the facility to provide a local reference condition.

Perimeter Monitoring: along the groundwater flow path between the facility and Ottawa River to enable the evaluation of groundwater flow, direction and quality downgradient of the facility.

Screen depth of wells will capture groundwater at appropriate depths



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Evaluating the results of monitoring

Results are compared to baseline values/EIS predictions and standard benchmarks including:

- Health Canada Guidelines for Canadian Drinking Water Quality
- Canadian Council of Ministers of the Environment (CCME) Canadian Environmental Quality Guidelines

Tiered System of Evaluating Results

Tier 1: Typically baseline/EIS predictions. If there is an exceedance:

- Data review (tiered evaluation, secondary sampling to confirm exceedance)
- Investigate source of exceedance
- Consider increased monitoring frequency or other environmental monitoring

Tier 2: Generally standard benchmarks and environmental quality guidelines. If there is an exceedance:

- Data review (tiered evaluation, secondary sampling to confirm exceedance)
- Investigate source of exceedance
- Increase monitoring
- Apply additional mitigation measures, consider remediation (if applicable)
- Consider stop work

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Safety Assured over the long-term

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Regulatory Requirements and Guidance

- The focus of the PostSA is to evaluate the potential long-term impact of the NPD in-situ disposal on the health and safety of humans and the environment. This includes:
 - Potential effects of radionuclides
 - Potential effects of hazardous contaminants
- Regulatory requirements and guidance on assessing long-term safety of radioactive waste management is set out in REGDOC-2.11.1



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Post Closure Safety Assessment

Scenarios Identified

- Normal Events:**
 - Institutional control time period is 100 years
 - Reactor vault is not backfilled with grout
 - Collocated and all systems remain in place
- Disruptive Event Scenarios:**
 - Site Investigation (including Institutional Control sensitivity case)
 - Engineering Degradation
 - Surface Erosion
 - Early Glaciation
- Defence-in-Depth Scenarios:**
 - Role of Grout (no grout in the facility)
 - Role of Grout at the Reactor Vault (no grout in the Reactor Vault)
 - Role of Waste Form (sensitivity to corrosion-controlled releases from activated waste)
- Alternative Strategy Cases:**
 - Removal of Collocated
 - Engineering Options (assessed in the Defence-in-Depth cases)
 - Alternative Institutional Control Periods (assessed as part of the Site Investigation scenario)
- "Natural" Cases:**
 - Mass Excavation
 - River Level Fall
 - Stable Contaminated Phase
- Sensitivity Calculations:**
 - Inventory
 - Sorption
 - Increased Groundwater Flow
 - Fast Pathways
 - Resuspension Rates

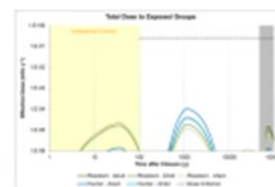
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Results

Normal Evolution

- Peak hunter dose:
 - 1×10^6 mSv/y
 - More than 1,000 times lower than dose criterion
 - Occurs more than 1,000 y after closure
- Peak resident dose:
 - 4×10^6 mSv/y
 - Occurs 1,000 y after closure



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Assessment Improvements

The receptors being considered now include the following:

Existing receptors

- Site Resident
- Hunter/Recreational

New Receptors

- Indigenous Receptor with characteristics based on the findings of the 2017 CNL lifestyle survey
- Indigenous receptor that is near-self-sufficient (hypothetical)
- Deep River/Ottawa Resident (downstream)



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Protection of Non-Human Biota



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Ecological Risk Assessment

Value Components (VCs)

- Based on list of VCs identified in EIS
- Followed selection criteria in N288.6 (CSA 2012)

Aquatic Environment	Terrestrial Environment
• Aquatic Vegetation • Zooplankton • Benthic Invertebrates • Benthic Fish • Pelagic Fish • Birds – Great Blue Heron, Mallard • Mammals – Muskrat • Reptiles – Blanding's Turtle • Amphibians – Green Frog	• Terrestrial Vegetation • Soil Invertebrates • Insects – Monarch Butterfly • Birds – Bald Eagle, Chimney Swift, Puffed Grouse • Small Mammals – Little Brown Bat, Meadow Vole, Short-tailed Shrew • Large Mammals – Black Bear, <u>Caribou</u> • <u>Wolverine</u>, White-tailed Deer • Reptiles – Eastern Hognose Snake

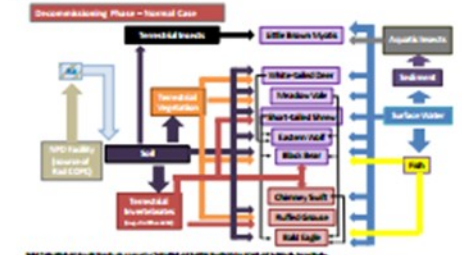


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Ecological Risk Assessment

Conceptual Site Models (CSMs)



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Ecological Risk Assessment

Results (Radiological & Non-Radiological)

Decommissioning Phase:

No undue effects on biota are expected, from normal operation or any of the bounding accident scenarios.

Postclosure Phase:

No undue effects on biota are expected, from any of the post closure scenarios (this includes radiological and non-radiological).



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Thank you.
Questions?



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Appendix H Métis Nation of Ontario (MNO) Follow-up Monitoring Presentation

MNP Follow-Up Monitoring Presentation – 2020 November 9

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Meeting: Métis Nation of Ontario Region 5 and 6 Regional Consultation Committee and Canadian Nuclear Laboratories

Date and Time: November 9, 2020 6:00 p.m. – 8:00 p.m.

Location: Virtual

Métis Nation of Ontario

- Jesse Fieldwebster, Manager, Nuclear Energy Lands Resources & Consultations
- Matt Long, Nuclear Policy Analyst
- Region Consultation Committee members

CNL

- Mitch MacKay, Manager, Stakeholder Relations, Environmental Remediation Management
- Nicole LeBlanc, Communications Specialist, Environmental Remediation Management
- Margot Thompson, Communications Specialist, Environmental Remediation Management
- Brian Wilcox, Director, NPD Closure Project
- Katie Hogue, Manager, Regulatory Affairs, NPD Closure Project
- Juliet Luiz, Environmental Specialist, NPD Closure Project
- Martin Klukas, Environmental Assessment Analyst
- Phil Shantz, Consultant

Time	Details	Lead
6:00 p.m.	Introductions	Jesse/Matt/Mitch/Margot/Nicole
6:05 p.m.	Presentation: • NPD Closure Project Overview ○ Proposed technique ○ Current monitoring program ○ Future plans • Engagement with the MNO to date • Overview of draft follow-up monitoring plans ○ With a focus on MNO feedback on the drafts	Katie Hogue/Juliet Luiz

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Time	Details	Lead
6:45 p.m.	Break and Survey Survey link: https://www.cnl.ca/en/home/environmental-stewardship/npd-closure-project/npd-feedback-form.aspx	Mitch Mackay
7:00 p.m.	Discussion: - What does involvement in monitoring look like from an MNO perspective? - What does this look like from a CNL perspective?	Brian Wilcox
7:30 p.m.	Follow-up and remaining questions	Mitch/Nicole/Margot

Notes:

- Questions will occur throughout presentation.
- Meeting is scheduled for approximately two hours.



Follow-up monitoring overview - Métis Nation of Ontario

Nuclear Power Demonstration Project

2020 November 09

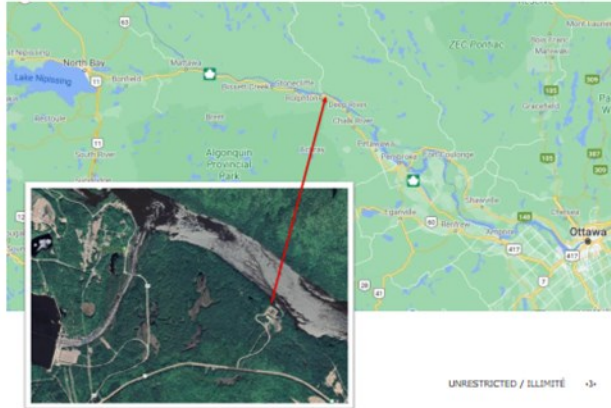
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Presentation outline

- NPD: past, present and future
- Proposed project - in-situ disposal
- Location of the NPD site
- Current monitoring of the environment
- Current project schedule
- What is follow-up monitoring and when does it start and end?
- Key engagements and themes of MNO comments on monitoring
- Details of monitoring
 - What will be monitored
 - Where will monitoring take place
 - How frequently will monitoring take place
 - What happens if monitoring results show unexpected results
 - How will MNO valued components be protected
- Discussion and feedback

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Location of the NPD site



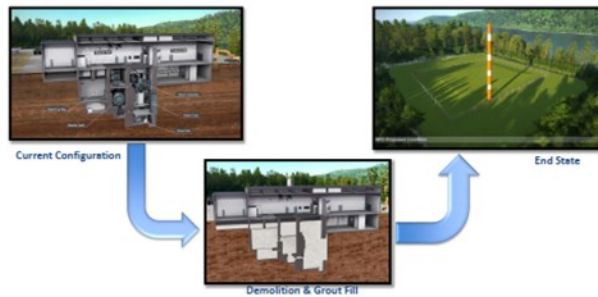
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Nuclear Power Demonstration - Then and Now



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Proposed NPD Waste Disposal Facility



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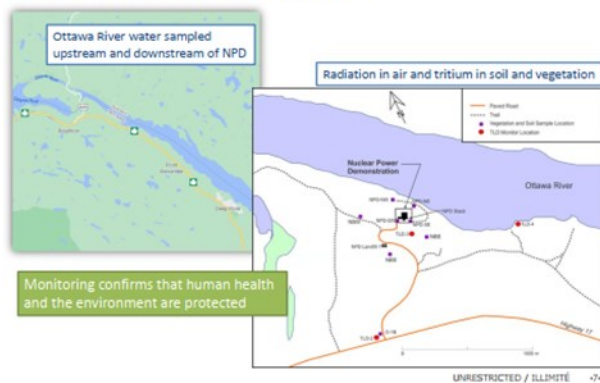
Site Orientation



- Developed area is ~1% of NPD property
- Wetlands present on the NPD site but up-gradient from project site (not affected by project)
- Groundwater in the area generally flows towards the Ottawa River or away from wetlands towards facility

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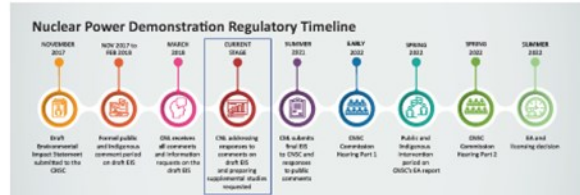
Current monitoring on the NPD site



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Current project schedule

- Federal Environmental Assessment began late 2015; first letter to MNO sent in 2016



- If the project is granted approval on the environmental assessment and licensing decision, decommissioning could begin in 2022, after which a period of institutional control is proposed to begin in 2024 and last at least 100 years

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Summary of engagement

- 2016**
- Introductory discussion on the project
 - Correspondence between the MNO and CNL, with CNL looking for MNO feedback on any potential adverse impacts and the MNO sharing key information about Métis rights and the MNO

- 2017**
- Meeting in Sudbury between MNO and CNL representatives discussing the project
 - CNL shared the 2017 draft EIS and supporting documents

- 2018**
- The MNO submitted comments to the CNSC on the 2017 draft EIS
 - The MNO and CNL held a meeting on the project
 - CNL shared the draft follow-up monitoring plans with the MNO
 - The MNO and CNL signed an MOU

April 2019: CNL sent a partial set of responses to the MNO comments on the draft EIS

November 2019: MNO sent review of these April responses

Sept 2020: CNL sent a full set of responses to the MNO comments on the draft EIS

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Summary of engagement

- 2019**
- The MNO shared a hydrogeological and archaeological review on the project, the MNO Traditional Knowledge and Land Use Study and comments on the draft follow-up monitoring plans
 - CNL shared some of the CNL's responses to the MNO comments on the 2017 draft EIS
 - The MNO shared their review of CNL responses to MNO comments on the 2017 draft EIS
 - CNL and the MNO held a meeting on the comments on the 2017 draft EIS and project updates
 - A meeting and community information session on CNL projects for MNO citizens was held in North Bay

- 2020**
- CNL shared an early version of the revised draft EIS for the project, which incorporated information from the MNO TKLUS with the MNO
 - CNL and the MNO met to discuss a long-term relationship agreement, that would go beyond the scope of the MOU
 - CNL shared a complete set of responses to the MNO comments on the 2017 draft EIS

March 2020: CNL incorporated MNO TKLUS information into the revised draft EIS

Present: CNL is preparing responses for the MNO on:

- MNO review of draft follow-up monitoring plans
- MNO hydrogeological and archaeological review

April 2019: Meeting on Valued Components (VC) and follow-up monitoring

October 2019: Meeting and community information session included a focus on follow-up monitoring

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What is follow-up monitoring?

- Monitoring of the environment to confirm:
 1. That the impact from the project is minimal, as predicted in the EIS
 2. Mitigation measures are working
- Part of the Environmental Assessment Process (results reported to the CNSC)
- Incorporating Indigenous knowledge is an important part of developing monitoring plans



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When does follow-up monitoring start and end?

Follow up monitoring begins now (collection of baseline data) and will continue through the Decommissioning Execution phase until the end of the Institutional Control phase



- Decommissioning Execution 2022 - 2024**
- Demolition, grouting, installing cap & cover
 - Begins after project approval
 - Will take around 2 years



- Institutional Controls 2024 - minimum 2124**
- Starts after decommissioning is complete
 - Period of monitoring and surveillance
 - Will last 100 years minimum
 - Regulatory approval required to end this phase

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Follow-up Monitoring: themes of MNO comments

2017 EIS Comments	Specific comments on follow up monitoring
Effects to fish and fish habitat	Assess bioaccumulation and cumulative effects on aquatic flora and fauna
Need for a fish survey	Complete fish surveys
Lack of baseline data	- Has groundwater characterization data been incorporated into the monitoring plan - Investigate hydraulic connection between groundwater and wetland - Have MNO comments on hydrogeology been incorporated into groundwater monitoring
Follow-up for socio economic and Indigenous Land and Resource Use	
Dust and noise: input into monitoring and mitigation	
Impacts to surface water quality, sediment and wildlife	
	Groundwater monitoring results should be compared to federal (CCME) standards

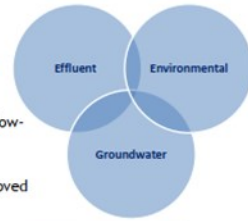
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Where are the details?

Three monitoring plans (to align with Canadian Standards Association)

Plans are in draft. CNL seeking feedback on follow-up monitoring plans.

Plans will be finalized only after project is approved to proceed by the CNSC



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Monitoring during the Decommissioning Execution (DE) Phase



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Monitoring during the Institutional Control (IC) Phase



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Getting into details

Next slides: details on monitoring locations, frequency and parameters for

- Air Quality, Dust
- Noise
- Ottawa River (water, sediment, fish/fish habitat)
- Groundwater
- Vegetation and wildlife

Confirming no impacts to socio-economic effects and Indigenous Land and Resource Use through monitoring of the environment.

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Air Quality monitoring (Decommissioning Execution phase)



Monitoring locations	Monitoring for	How often	Baseline
Guardhouse	Radioactivity Non-radioactive elements (lead, asbestos)	Continuous monitoring, Monthly analysis	Radioactivity (completed 2019). No lead/asbestos in air

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Dust monitoring (Decommissioning Execution phase)



Monitoring locations	Monitoring for	How often	Baseline Monitoring
Guardhouse plus visual monitoring	Dust particle sizes	Continuous monitoring, Monthly analysis	Planned for 2021

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Noise monitoring (Decommissioning Execution phase)



Monitoring locations	Monitoring for	How often	Baseline Monitoring
- NPD site (>10 locations for baseline) - Offsite at Swisha - Main monitoring location is the Guardhouse	Noise in decibels (dB)	While project activities take place	Completed 2020. Typical of a quiet rural area

-20-

Groundwater monitoring (DE - IC phase)



Monitoring locations	13 wells - Before groundwater reaches facility (2 wells) - Between facility and river (11 wells)
Monitoring for	- Radioactivity - Non-radioactive elements (includes pH, mercury, lead, PCBs)
How often	- Typically twice a year 4 times in the year that decommissioning is complete, and when facility is saturated with groundwater
Baseline Monitoring	Planned for 2021

Ottawa River monitoring (DE - IC phase)



Monitoring locations	Monitoring for	How often	Baseline Monitoring
- Offshore of NPD - Upstream of NPD - Downstream of NPD	- Radioactivity - Non-radioactive elements (includes iron, lead, mercury, PCBs, pH)	4 times per year	Planned to start in 2021

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Ottawa River sediment and benthic macroinvertebrates



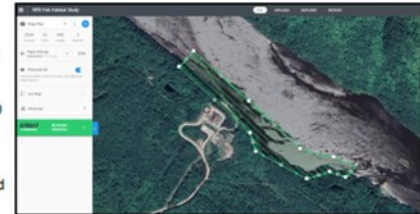
Monitoring locations	Monitoring for	How often	Baseline Monitoring
- Offshore of NPD - Upstream of NPD - Downstream of NPD	- Radioactivity - Non-radioactive elements (includes iron, lead, mercury, PCBs, pH) - benthic	Once for baseline Future monitoring if required ("Triggered" monitoring)	Completed summer 2020

-23-

Ottawa River fish habitat and fish tissue

Baseline Fish Habitat

- Drone survey offshore of NPD (fish habitat features)
- Completed summer 2020
- Awaiting results
- No habitat effects expected from project
- To be repeated at the end of decommissioning



Baseline Fish Tissue

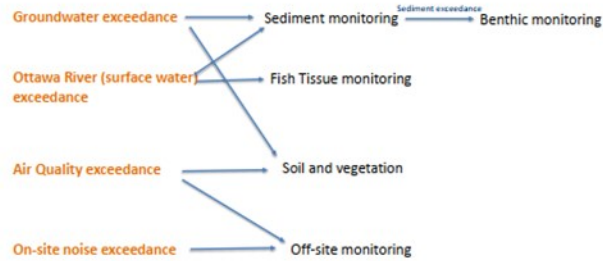
- Upstream of Swisha dam (unaffected by project) and offshore of NPD
- 9-10 fish samples of similar age class
- Monitored for radioactivity and metals (e.g. lead, mercury)
- Details being developed. Planned for 2021
- Future monitoring if surface water monitoring shows unexpected results



"Triggered" monitoring

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'Triggered' monitoring (extra monitoring if needed)



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How are MNO valued species protected?

Valued species from the TKLUS:

Fish

Bass
Northern pike/jackfish
Trout
Walleye
Sturgeon

Animals/Birds

Moose
Rabbit
Partridge
Goose
Grouse
Turkey

Vegetation

Berries (chokecherries, blueberries, raspberries)
Wintergreen
Chaga
Fiddleheads
Trees used for traditional canoe building (cedar, oak, ash, yellow birch)

Monitoring the environment (air, surface water, groundwater) ensures that species living in the environment are protected

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How are MNO valued species protected?

Examples

Moose

- Eats aquatic vegetation/grazes on vegetation
- Protected by monitoring/protecting surface water, groundwater and air quality



Fish

- Swim in the river and eat benthic macroinvertebrates/other fish
- Protected by monitoring/protecting surface water



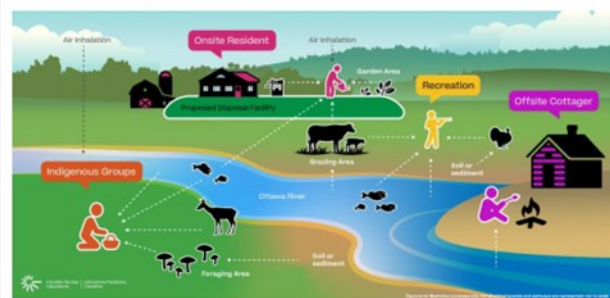
Vegetation

- Exposed to air and uptakes water from the ground
- Protected by monitoring/protecting air quality and groundwater



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Scenarios evaluated in the EIS



No negative effects predicted in the EIS. Follow-up monitoring will confirm this prediction

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What are monitoring results compared to? What happens if we get unexpected results?

Results compared to predicted values in the EIS and government benchmarks (e.g. provincial air quality criteria, Canadian Environmental Quality Guidelines)

Response actions include:

- Monitoring again to confirm results
- Adding more monitoring locations
- Monitor more environmental components (triggered monitoring)
- Pausing work (e.g. if noise is affecting chimney swift behaviour)
- More mitigation measures (e.g. more dust suppression)

Monitoring plans will be reviewed on a regular basis (usually annually). Changes can be made to monitoring plans if needed, to make sure monitoring stays meaningful over the years.

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Discussion and feedback

Questions:

1. What monitoring is most important to the MNO?
2. How does the MNO see being involved with monitoring?
3. What kinds of monitoring activities would help reduce concerns and increase understanding of the NPD Closure Project for MNO citizens?

Please complete the feedback form

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Thank You. Questions?

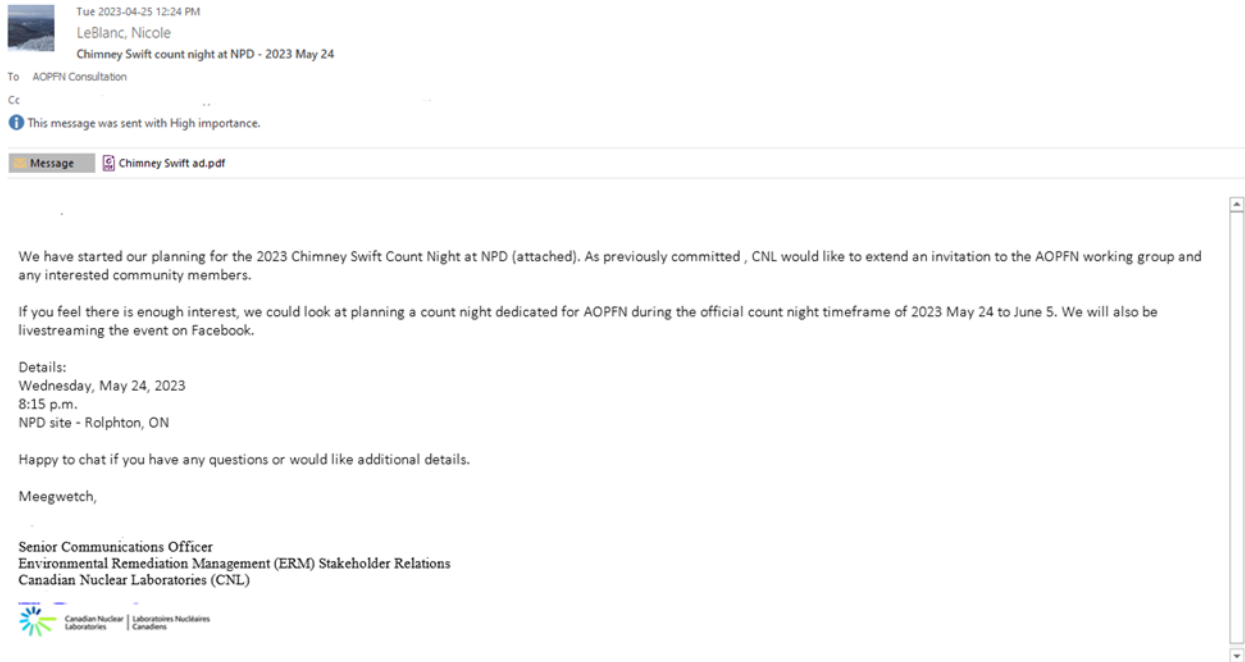
Canadian Nuclear Laboratories
Laboratoires Nucléaires
Canadiens

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EXTRA SLIDES

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Appendix I Event Email Invitation



Appendix J Algonquins of Ontario (AOO) Record of Engagement and Interests and Concerns

This appendix provides a complete record of all engagement between CNL and the AOO from June 2016 to March 2024 (Table J.1). Table J.1 includes the date and method of the communication / engagement, the topics discussed and the role or title of participants. The table also highlights engagements where key EA topics were discussed using a grid with checks. The key EA topics align with “Generic Guidelines for Preparation of an Environmental Impact Statement Pursuant to the Canadian Environmental Assessment Act, 2012” as well as the requirements of REGDOC 3.2.2 “Indigenous Engagement” and guidance specific to NPD provided by the CNSC in January 2021 (e doc # 6467843).

Following the record of engagement is the table of interests and concerns from the previous draft EIS submission (J.2) a mapping of how the summary of interests and concerns were compiled (Table J.3), as well as a summary of interests and concerns raised by AOO (Table O).

Section 4.4.1 of the IER summarizes the engagement activities that have taken place to date between CNL and the AOO.

J.1 Record of Engagement – Algonquins of Ontario (AOO) – 2016 June to 2024 March

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communication
June 24, 2016 Incoming letter	This letter was addressed to the CNSC’s Director, Environmental Assessment Division, from the Algonquins of Ontario (AOO)’s Executive Director, copying the General Manager of the NPD Closure Project. The letter enclosed the AOO’s comments on the Project Description, which outlined the AOO’s preliminary interests in the following: Acknowledgement that the NPD site is in the Algonquin Settlement Area; Protection of the Ottawa River; Protection of Flora and Fauna; Archaeology; Engagement and Communications; Technical; Monitoring.					√				√	√
July 15, 2016 Outgoing letter	This letter from CNL’s Director of Corporate Communications to AOO’s Executive Director introduced the project and requested community input on any potential adverse impacts from project activities. To demonstrate requirements of CEAA, 2012 Section 5(1)(c) the letter requested meaningful feedback on the following: Whether the project may have environmental effect on any lands and/or resources currently used by Aboriginal peoples for traditional purposes; Whether the project may have any perceived impacts on Aboriginal and Treaty Rights; Whether local and traditional knowledge can assist in describing the existing environment; and, The view of Aboriginal communities on proposed valued ecosystems components (environmental attributes) that have been identified for the assessment.				√	√				√	√
August 10, 2016 Meeting	This meeting included CNL representatives (CNL’s Director of Corporate Communications, Communications Officers and the General Manager of the NPD Closure Project and other key project staff) and AOO representatives (Executive Director and Consultation Office and Technical Staff) for discussions on the NPD Closure Project (and the NSDF Project) at the CRL and NPD sites. This visit included a Chimney Swift viewing at the NPD ventilation stack, as well a discussion of particular topics of interest, including alternative means, future use of land, monitoring and VCs.	√	√	√	√					√	
November 07, 2016 Outgoing email	This email to the AOO’s Executive Director from CNL’s Director of Corporate Communications was in follow-up to the phone call of November 03, 2016, and involved a discussion on archaeological work and the possibility of AOO employment as archaeological liaisons.									√	
December 05, 2016 Outgoing letter	This letter to the AOO’s Executive Director from CNL’s Director of Corporate Communications was confirming misunderstanding on archaeological work, offering future opportunities to be involved and proposing moving forward with a work plan. Specific interests discussed included studies to obtain Algonquin traditional knowledge, archaeology and employment.	√			√		√			√	
February 15, 2017 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the AOO’s Executive Director enclosed six requested documents, including compliance and monitoring reports, archaeological information and information on the existing environment at the NPD site.	√								√	
April 12, 2017 Meeting	This meeting between CNL representatives (including the Director of Corporate Communications and communications officers and project staff) and Algonquins of Ontario (including the Executive Director, Algonquin Negotiation Representatives and Consultation and Technical staff) was held in Pembroke to discuss engagements on			√	√					√	√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communication
	the NPD Closure Project and particular interests of the AOO, including: protection of the Ottawa River, capacity, development of a work plan, future land use and EA methodology.										
June 09, 2017 Meeting	This meeting between CNL representatives (including the Director of Corporate Communications, Environmental Protection and project staff) and representatives of the AOO (including four Algonquin Negotiation Representatives) The AOO representatives attended the NPD site to learn more about the project and existing environment. Information shared relating to AOO interests included: protection of the Ottawa River, protection of flora and fauna, alternative means, future use of lands, technical information, VC information, monitoring details and EA methodology.	√	√	√	√				√	√	
June 19, 2017 AOO Community Information Session	This information session for AOO citizens was held in Pembroke. CNL representatives (including the General Manager of the NPD Closure Project and key technical staff, and the Director of Corporate Communications and other communications staff) were on hand to discuss the project, better understand community perspectives and share information. The information session was hosted and advertised by the AOO with approximately 15 AOO members in attendance. Focus topics included specific areas of interest to the AOO, such as: monitoring (current and proposed follow-up), future land use, protection of the Ottawa River, and EA methodology.	√	√	√	√		√		√	√	
November 15, 2017 Outgoing email	This email from CNL's Corporate Communications Director to the AOO's Executive Director enclosed links to the full draft EIS, an interactive "public-friendly" executive summary of the draft EIS, the CNSC's public notice, a short overview of the project and environmental assessment, as well as detailed information on the timing of the environmental assessment process and how to participate in the public comment period.	√	√	√	√	√	√	√	√	√	√
November 17, 2017 Outgoing email	This email CNL's Corporate Communications Director to the AOO's Executive Director enclosed the draft Aboriginal Engagement Report for the NPD Closure Project and asked for community input, per CEAA, 2012 requirements: "CNL would be pleased to update information in this current draft with input from your community."	√	√	√	√	√	√	√	√	√	√
January 30, 2018 Outgoing email	This email from a communications officer with CNL to the AOO's technical consultant (Shared Value Solutions) was to share the complete set of technical support documents to support the AOO's review of the draft EIS.	√	√	√	√		√	√	√	√	
February 22, 2018 Incoming email	This email from the AOO's Communications and Policy Strategist to CNL's Director of Corporate Communications was in follow-up to the conversation of February 7, 2018, and discussed formalizing the engagement relationship between CNL and the AOO. This email explicitly indicated the AOO's interest in a formal agreement between CNL and the AOO.									√	
February 28, 2018 Letter	This email (letter) was addressed to an Environmental Assessment Officer with the CNSC from the AOO's Executive Director, copying CNL's Director of Corporate Communications. The letter enclosed the AOO's comments on the Project Description, which outlined the AOO's interests in the following: Potential effects on traditional land use and Indigenous rights (commercial harvesting); Potential effects on health; Potential socio-economic effects; Potential effects on cultural heritage and archaeological resources; Protection of the Ottawa River; Protection of flora and fauna (environment beyond water); Environmental monitoring; Future land use.	√	√		√	√	√	√	√	√	
May 14, 2018 Meeting	This meeting between CNL's Corporate Communications staff (including the Director of Corporate Communications) and AOO staff (including the Executive Director of the AOO) involved a discussion on developing an MOU between									√	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communication
	CNL and the AOO.										
June 8, 2018 Meeting	This meeting between CNL’s Corporate Communications staff (including the Director of Corporate Communications) and AOO staff (including the Executive Director of the AOO) involved a discussion on developing an MOU between CNL and the AOO.									√	
July 24, 2018	The MOU between the AOO, AECL and CNL related to the NPD Closure Project and NSDF Project was signed.									√	√
October 4, 2018 Meeting	This meeting between representatives of the AOO (including the Executive Director), CNL (including the Director of Corporate Communications) and AECL (including the Director of Communications and Government Reporting) was with respect to developing a long-term relationship agreement (LTRA) between the three parties.									√	
October 10, 2018 Outgoing email	This email from a CNL communications officer to the Executive Director of the AOO was an invitation to an online webinar discussion on October 17, 2018. The webinar consisted of a short presentation on the NPD Closure Project’s scheduling and EIS feedback themes. A Q&A session followed.										√
November 27, 2018 Virtual meeting	This teleconference between representatives of the AOO (including the Executive Director), CNL (including the Director of Corporate Communications) and AECL (including the Director of Communications and Government Reporting) was with regards to the development of an LTRA.									√	
January 18, 2019 Outgoing email	This email from CNL’s Corporate Communications Director to the AOO’s Policy and Strategic Initiatives Advisor enclosing a partial set of responses to the AOO comments on the 2017 draft EIS. These included a focus on alternative means, future land use (site restoration), mitigation and monitoring, traditional land use, VCs and socio-economic interests.	√	√		√	√	√	√	√	√	
April 11, 2019	The AOO and CNL signed a contribution agreement to provide funds for engagement and participation in the EA process for the NPD Closure Project and the NSDF Project.									√	
May 7, 2019 Incoming letter	This letter from the AOO’s Executive Director to CNL’s Corporate Communications Director enclosed a review of CNL’s responses (sent on January 18, 2019) to the AOO comments on the draft EIS (provided on February 28, 2018) done by the AOO consultant on behalf of the AOO, as well as information on the LTRA. In this letter the AOO confirmed that what CNL had proposed for responses to comments regarding the following areas of interest was acceptable: Alternative Means; Future Land Use; Follow-up Monitoring; AKLUS; Socio-economic information; Engagement and communications; Archaeology; Monitoring. The AOO provided specific discussion on why or why not each comment had been addressed to the AOO’s	√	√		√	√	√	√	√	√	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communication
	satisfaction. This letter also mapped out the path forward to resolving the AOO's remaining issues through the LTRA and Technical Working Group.										
June 12, 2019 Meeting	This meeting between Algonquin Negotiation Representatives with the AOO and CNL representatives (including the General Manager of Reactor Decommissioning) was in Deep River and was information session on the AKLUS. The General Manager of Reactor Decommissioning shared a presentation on the project, incorporation of information into the EIS and the current status of the Environmental Assessment. Specific topics covered included: project interactions with the environment (effects), VCs and the AKLUS.	√		√	√		√		√	√	
August 09, 2019 Outgoing email	This email from CNL's Director of Corporate Communications to the AOO's Policy and Strategic Initiatives Analyst and an AOO consultant enclosed nine documents requested by the AOO, including: Alternative Means Assessment; Indigenous Socio-Economic Section of the draft EIS; Draft Effluent Monitoring Plan for the NPD site; Draft Groundwater Monitoring Plan for the NPD site; Draft Environmental Monitoring Plan for the NPD site; DRLs for the NPD site; Phase 1 and Phase 2 Environmental Site Assessments for the NPD site. This closed off further recommendations from the AOO letter of May 7, 2019.	√	√		√		√	√	√	√	
September 9, 2019 Meeting	CNL representatives (including the General Manager of Reactor Decommissioning, the Director of Corporate Communications, the Manager of Stakeholder Relations and an Environmental Specialist with the NPD Closure Project) and AOO representatives (including the AOO's Policy and Strategic Operations Advocate and the AOO consultant staff) belonging to the Planning and Environmental Working Group met in Pembroke to share updates on the project and engagement, as well as clarify remaining steps. In particular, this meeting addressed the specific areas of follow-up the AOO had identified to CNL in the letter of May 7, 2019. These were: Alternative means; Future land use (site restoration); Follow-up monitoring program; VC; Archaeological assessment; Post-closure safety assessment; Site characterization.		√		√		√	√	√	√	
January 15, 2020 Meeting	This meeting between representatives of the AOO (including the Executive Director), CNL (including the Director of Corporate Communications) and AECL (including the Director of Communications and Government Reporting) focused on the development of an LTRA.									√	
In March 2020, the COVID-19 pandemic impacted in-person engagement activities. CNL adapted to the restrictions providing online platforms for virtual meetings, workshops, webinars, Project updates and open houses.											
March 27, 2020	This meeting between representatives of the AOO (including the Executive Director), CNL (including the Director of									√	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communication
Virtual meeting	Corporate Communications) and AECL (including the Director of Communications and Government Reporting) focused on the development of an LTRA.										
April 02, 2020 Virtual meeting	This meeting between representatives of the AOO (including the Executive Director), CNL (including the Director of Corporate Communications) and AECL (including the Director of Communications and Government Reporting) focused on the development of an LTRA.									√	
May 05, 2020 Virtual meeting	This meeting between representatives of the AOO (including the Executive Director), CNL (including the Director of Corporate Communications) and AECL (including the Director of Communications and Government Reporting) focused on the development of an LTRA.									√	
May 06, 2020 Outgoing letter	This letter from CNL’s Manager, Stakeholder Relations to the AOO’s Executive Director enclosed a preliminary version of the 2020 revised draft EIS and an updated IER and indicated an interest in meeting with the AOO. This letter included a list of topics of interest the AOO had brought forward and the status of each. These included: Technical issues; Traditional knowledge; Future land use (site restoration); Socio-economic interests; Monitoring; Alternative means; Indigenous health. Archaeology. The letter also asked for feedback on the following seven questions: Do the AOO have additional information that they would like to provide in the context of traditional territory near the NPD site? Do the AOO have any members who currently live close or in reasonable proximity to the NPD site? Do the AOO have historical and/or current traditional practices near the NPD site, specifically we are interested in AOO members’ traditional uses such as trapping (traditional or commercial), hunting, fishing (traditional or commercial), gathering and practicing cultural ceremonies? Do the AOO have sites of ceremonial significance in close proximity or more generally any cultural activities near the NPD site? Tell us about any important resources, uses, activities, values and interests to the AOO near the NPD site. If there is use in close proximity to the NPD site, is current AOO community use different than historic use and can a description of those difference be provided? Let us know of any potential concerns you have with respect to effects and any potential impacts on rights.	√	√		√	√	√	√	√	√	√
June 02, 2020 Virtual meeting	This meeting between representatives of the AOO (including the Executive Director), CNL (including the Director of Corporate Communications) and AECL (including the Director of Communications and Government Reporting) focused on the development of an LTRA.									√	
June 23, 2020 Virtual meeting	This meeting between representatives of the AOO (including the Executive Director), CNL (including the Director of Corporate Communications) and AECL (including the Director of Communications and Government Reporting) focused on the development of an LTRA.									√	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communication
July 07, 2020 Virtual meeting	This meeting between representatives of the AOO (including the Executive Director), CNL (including the Director of Corporate Communications) and AECL (including the Director of Communications and Government Reporting) focused on the development of an LTRA.									√	
July 20, 2020 Virtual meeting	This meeting between representatives of the AOO (including the Executive Director), CNL (including the Director of Corporate Communications) and AECL (including the Director of Communications and Government Reporting) focused on the development of an LTRA.									√	
July 31, 2020 Incoming letter	This letter from the AOO's Policy and Strategic Operations Advocate to CNL's Manager of Stakeholder Relations was in response to CNL's 2020 May 06 letter which included an update on the AKLUS, a preliminary review of VCs outlined in the draft EIS and to identify the need for capacity to complete a technical review of the draft EIS.				√					√	
August 03, 2020 Virtual meeting	This meeting between representatives of the AOO (including the Executive Director), CNL (including the Director of Corporate Communications) and AECL (including the Director of Communications and Government Reporting) focused on the development of an LTRA.									√	
August 24, 2020 Virtual meeting	This meeting between representatives of the AOO (including the Executive Director), CNL (including the Director of Corporate Communications) and AECL (including the Director of Communications and Government Reporting) focused on the development of an LTRA.									√	
September 11, 2020 Outgoing letter	This letter from CNL's Manager of Stakeholder Relations to the AOO's Policy and Strategic Operations Advocate was in response to the AOO's correspondence of July 31, 2020 and indicated that CNL would be sending a full set of responses to the AOO's comments on the draft EIS soon.									√	
September 21, 2020 Virtual meeting	This meeting between representatives of the AOO (including the Executive Director), CNL (including the Director of Corporate Communications) and AECL (including the Director of Communications and Government Reporting) focused on the development of an LTRA.									√	
September 25, 2020 Outgoing letter	This letter from CNL's Manager of Stakeholder Relations to the AOO's Executive Director enclosed a full set of CNL's responses to the AOO comments on the 2017 draft EIS and indicating interest in meeting with the AOO.	√	√		√	√	√	√	√	√	
September 29, 2020 Virtual meeting	This meeting between representatives of the AOO (including the Executive Director), CNL (including the Director of Corporate Communications) and AECL (including the Director of Communications and Government Reporting) focused on the development of an LTRA.									√	
October 1, 2020 Outgoing email	This email from CNL's Communications Officer to the AOO's Policy and Strategic Initiatives Advisor in follow up to the letter of September 25, 2020 indicating interest in meeting with the AOO.									√	
October 6, 2020 Virtual meeting	This meeting between representatives of the AOO (including the Executive Director), CNL (including the Director of Corporate Communications) and AECL (including the Director of Communications and Government Reporting) focused on the development of an LTRA.									√	
October 7, 2020 Incoming email	This email from the AOO's Policy and Strategic Operations Advocate to CNL's Communications Officer was in response to the earlier correspondence and indicated that the AOO would be reviewing CNL's letter and comments in November 2020.										√
October 30, 2020 Virtual meeting	This meeting between representatives of the AOO (including the Executive Director), CNL (including the Director of Corporate Communications) and AECL (including the Director of Communications and Government Reporting) focused on the development of an LTRA.									√	
November 06, 2020	This meeting between representatives of the AOO (including the Executive Director), CNL (including the Director of									√	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communication
Virtual meeting	Corporate Communications) and AECL (including the Director of Communications and Government Reporting) focused on the development of an LTRA.										
November 26, 2020 Virtual meeting	This meeting between representatives of the AOO (including the Executive Director), CNL (including the Director of Corporate Communications) and AECL (including the Director of Communications and Government Reporting) focused on the development of an LTRA.									√	
November 27, 2020 Virtual meeting	This meeting between representatives of the AOO (including the Executive Director), CNL (including the Director of Corporate Communications) and AECL (including the Director of Communications and Government Reporting) focused on the development of an LTRA.									√	
December 01, 2020 Virtual meeting	This was a meeting of the AOO (including the Executive Director), CNL (including the Director of Corporate Communications) and AECL (including the Director of Communications and Government Reporting) to discuss the issues in the LTRA.									√	
December 02, 2020 Outgoing email	This email from a CNL Communications Officer to the AOO’s Policy and Strategic Operations Advocate followed up on the earlier correspondence from the AOO on October 7, 2020 regarding CNL’s responses to the AOO comments on the draft EIS.									√	
December 09, 2020 Virtual meeting	This was a meeting of the AOO (including the Executive Director), CNL (including the Director of Corporate Communications) and AECL (including the Director of Communications and Government Reporting) to discuss the issues in the LTRA.									√	
December 16, 2020 Incoming letter	This letter from the AOO’s Executive Director to the Director of Corporate Communications for CNL included the final results of the AKLUS. Also included were general and site-specific recommendations for ways in which CNL can avoid, mitigate, or compensate for the potential impacts of the proposed NSDF Project on Algonquin rights and interests. The AOO indicated that there is an expectation that CNL will provide written responses to each of the enclosed comments and recommendations. CNL acknowledged receipt of the AKLUS.	√	√	√	√		√	√	√	√	
December 21, 2020 Outgoing email	This email from CNL’s Communications Officer to the AOO’s Policy and Strategic Operations Advocate offered additional capacity to support the AOO’s continued involvement in the environmental assessment for the NPD Closure Project.									√	√
May 11, 2021 Outgoing email	This email from CNL’s Communications Officer to the AOO’s designated point of contact (AOO consultant) enclosed draft sections of the NPD Closure Project’s latest revision of draft EIS (8.9 and 9.9) for verification of CNL’s incorporation of the AOO’s AKLUS as well as a preliminary list of commitments and indicated interest in meeting to discuss.									√	√
June 9, 2021 Incoming email	This email from the AOO’s designated point of contact (AOO consultant) to a CNL Communications Officer was to indicate the AOO were developing a work plan for participation in remaining aspects of the environmental assessment for the NPD Closure Project, in follow-up to the earlier correspondence.									√	√
June 21, 2021 Outgoing email	This letter from CNL’s Manager of Stakeholder Relations to the AOO’s Executive Director enclosed a draft summary of the AOO’s interests and concerns for the NPD Closure Project for the AOO’s review and verification.									√	√
July 13, 2021 Outgoing email	This email from a CNL Communications Officer to the AOO’s designated point of contact (AOO consultant) was to follow-up on the email of June 9, 2021 to inquire about the development of the work plan and a response to the June 21, 2021 letter on the summary of interests and concerns.										√
July 21, 2021 Outgoing email	This email from a CNL Communications Officer to the AOO’s designated point of contact (AOO consultant) was to follow-up on the email of June 9, 2021 to inquire about the development of the work plan.										√

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July 29, 2021 Incoming email	This email from the AOO's designated point of contact (AOO consultant) to a CNL Communications Officer was to confirm that the proposed budget was under review and that the AOO was managing a high number of consultation and engagement requests.										√
July 30, 2021 Outgoing email	This email from a CNL Communications Officer to the AOO's designated point of contact (AOO consultant) confirmed receipt of the previous email, thanking for the update.										√
August 9, 2021 Incoming letter	This letter from the AOO's Executive Director to the Manager of ERM Stakeholder Relations enclosed the AOO's workplan and budget, requesting support for meaningful participation the NPD Closure Project's environmental assessment.									√	√
August 19, 2021 Outgoing letter	This letter from the Manager of ERM Stakeholder Relations to the AOO's Executive Director confirmed support for the AOO's meaningful participation in the environmental assessment and accepted the proposed workplan and budget.									√	√
August 24, 2021 Incoming email	This email from the AOO's designated point of contact (AOO consultant) to a CNL Communications Officer indicated a need for a one window and coordinated approach for AOO-CNLC engagement on the NSDF and NPD Closure Project.									√	√
August 24, 2021 Outgoing email	This email from a CNL Communications Officer to the AOO's designated point of contact (AOO consultant) indicated an interest to discuss next steps for the NSDF and NPD Closure Project.										√
August 24, 2021 Incoming email	This email from the AOO's designated point of contact (AOO consultant) to a CNL Communications Officer indicated a need for a meeting agenda.										√
August 30, 2021 Outgoing email	This email from a CNL Communications Officer to the AOO's designated point of contact (AOO consultant) was a follow-up requesting a meeting with AOO to discuss and prioritize a schedule of engagement on the NSDF and NPD Closure Project.										√
September 3, 2021 Incoming email	This email from the AOO's designated point of contact (AOO consultant) to the CNL Communications Officer confirmed that AOO was working to find a time to discuss and prioritize a schedule of engagement on the NSDF and NPD Closure Project.										√
September 8, 2021 Outgoing letter	This email from a CNL Communications Officer to the AOO's designated point of contact (AOO consultant) enclosed CNL's responses to the AOO's recommendations from the Final Algonquin Knowledge and Land Use Study (AKLUS) for the NPD Closure Project.	√		√	√				√	√	√
September 28, 2021 Outgoing email	This email from a CNL Communications Officer to the AOO's designated point of contact (AOO consultant) followed up on setting a meeting time to prioritize a schedule of engagement on the NSDF and NPD Closure Project.										√
September 29, 2021 Outgoing email	This email from a CNL Communications Officer to the AOO's back up designated point of contact followed up on setting a meeting time to prioritize a schedule of engagement on the NSDF and NPD Closure Project.										√
October 4, 2021 Incoming email	This email from the AOO's designated point of contact (consultant) to the CNL Communications Officer indicated availability by the AOO to meet during the second week of October to discuss and prioritize a schedule of engagement on the NSDF and NPD Closure Project.										√
October 14, 2021 Virtual meeting	This meeting between the AOO (including the Policy and Strategic Operations Advocate and AOO consultants and AOO staff) and CNL (including the Manager of ERM Stakeholder Relations, Senior Communications Officers and the Manager of Regulatory Approvals for the NPD Closure Project) was to discuss how to prioritize the work plan for the NPD Closure Project and the NSDF Project. A path forward to verify the AOO's interests and concerns for the NPD									√	√

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	Closure Project was also discussed and the AOO agreed to review the interests and concerns by the end of November.										
October 21, 2021 Outgoing Email	This email from CNL Senior Communications Officer to AOO’s Policy and Strategic Operations Advocate was to inform AOO of the decision to postpone the submission of the revised draft EIS in order to enable AOO’s Planning and Environment Working Group and Algonquin and Negotiation Representative (ANR) meeting in November to review and approve the content that CNL is proposing to include in the EIS. This email requested verification in writing that AOO’s concerns and interests regarding the proposed NPD Closure Project had been accurately summarized.									√	√
October 25, 2021 Incoming Email	This email from AOO’s Policy and Strategic Operations Advocate to ERM Communications staff requested more time to review the issues and concerns summary table before meeting in person and confirmed that the AOO would provide comments for November 26, 2021. The AOO attached a copy of their work-back schedule for the Planning and Environment Working Group (PEWG) for 2022.			√						√	√
October 25, 2021 Outgoing Email	This email from CNL Senior Communications Officer to AOO’s Policy and Strategic Operations Advocate was to inform AOO of CNL’s commitment to share the draft NSDF/NPD prioritized schedule which will help to align the NSDF/NPD prioritized schedule with the PEWG work-back schedule. CNL also acknowledged AOO’s need to have more advance notice of discussion topics moving forward and asked AOO if November 30th was appropriate for the next monthly meeting.									√	
October 27, 2021 Incoming Email	This email from AOO’s Policy and Strategic Operations Advocate to a CNL Senior Communications Officer was to inform CNL of their ongoing review of the issues and concerns table, specifically the version of the table that CNL sent AOO in June of 2021, and informed CNL of their intention to continue to review this specific table. A previous email from the CNL ERM Stakeholder Relations team included a less-detailed version of the table. This email was to provide some clarification.										√
October 27, 2021 Outgoing Email	This email from a Senior Communications Officer to AOO’s Policy and Strategic Operations Advocate was to follow up on the previous email to say that CNL welcomes AOO’s review of the full summary and concerns table but acknowledges that there will be more work to do after submission of the draft. The email stated that CNL hopes to come to a mutual agreement on the first two columns of the table in the next month.										√
November 1, 2021 Outgoing Email	This email from a Senior Communications Officer to AOO’s Policy and Strategic Operations Advocate included an attachment of the draft prioritization schedule for review which included some comments from CNL for AOO to review and confirm. This email was to confirm the purpose of the meeting scheduled for November 30, 2021, which is to discuss the summary and concerns table in detail. Finally, this email was to confirm with AOO that CNL accurately understood the review process for the AOO with ANR and PEWG.										√
November 9, 2021 Outgoing Email	This email from a Senior Communications Officer at CNL to AOO’s Policy and Strategic Operations Advocate was to provide consolidated the NSDF and NPD Closure Project priorities for the AOO to confirm receiving. CNL noted that they were seeking the AOO’s feedback on the NSDF and NPD Closure project prioritization schedule and next steps. CNL also noted some other items that they required feedback on and confirmation for regarding the two individual projects.									√	√
November 9, 2021 Incoming Email	This email from AOO’s Policy and Strategic Operations Advocate to a Senior Communications Officer at CNL was to confirm receipt of the previous email and to agree to the items for review noted within. AOO confirmed that they would be reviewing internally and noted that they would respond as soon as possible.										√
November 26, 2021	This email from the AOO’s Policy and Strategic Operations Advocate to a Senior Communications Officer at CNL	√	√							√	√

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Incoming Email	enclosed the AOO's review and comments on the Table of Interests and Concerns.										
November 12, 2021 Incoming Email	This email from AOO's Policy and Strategic Operations Advocate to a Senior Communications Officer at CNL was to follow up on the items outlined in the previous email. AOO noted that they agree to use the November 30 meeting to discuss AOO's comments on the Summary of Interest Table for the NPD Closure Project, clarified the AOO review process in relation to the PEWG, and informed CNL that internal review of the revised work-plan and budget was underway.			√							√
November 30, 2021 Virtual Meeting	This meeting between CNL representatives (including the Manger of ERM Stakeholder Relations, the Manager of Regulatory Approvals for the NPD Closure Project, Communications Officers, a Stakeholder Relations Student, the Director of Indigenous Relations and the Director of the NPD Closure Project) and AOO representatives (including the Policy and Strategic Operations Advocate, the Cultural Heritage Advisor and technical consultants) was to a Monthly Meeting to discuss the NSDF and NPD Closure Projects. It involved discussion on AOO's comments on the interests and concerns table for NPD, and worked on progressing a six month prioritized schedule for a coordinated, one window approach to engagement between the AOO and CNL on the NPD Closure Project and the NSDF Project. CNL shared that it would be resubmitting the revised draft EIS for the NPD Closure Project with the AOO's comments on the interests and concerns table incorporated. The AOO and CNL also confirmed what the next steps were to work through together with respect to AOO participation in the environmental assessment for NPD and how these would be described in the EIS.										√
November 26, 2021 Incoming Email	This email from the AOO's Policy and Strategic Operations Advocate to a Senior Communications Officer at CNL enclosed the AOO's review and comments on the Table of Interests and Concerns.	√	√							√	√
November 30, 2021 Virtual Meeting	This meeting between CNL representatives (including the Manger of ERM Stakeholder Relations, the Manager of Regulatory Approvals for the NPD Closure Project, Communications Officers, a Stakeholder Relations Student, the Director of Indigenous Relations and the Director of the NPD Closure Project) and AOO representatives (including the Policy and Strategic Operations Advocate, the Cultural Heritage Advisor and technical consultants) was to a Monthly Meeting to discuss the NSDF and NPD Closure Projects. It involved discussion on AOO's comments on the interests and concerns table for NPD, and worked on progressing a six month prioritized schedule for a coordinated, one window approach to engagement between the AOO and CNL on the NPD Closure Project and the NSDF Project. CNL shared that it would be resubmitting the revised draft EIS for the NPD Closure Project with the AOO's comments on the interests and concerns table incorporated. The AOO and CNL also confirmed what the next steps were to work through together with respect to AOO participation in the environmental assessment for NPD and how these would be described in the EIS.									√	√
December 6, 2021 Outgoing Email	This email from a Senior Communications Officer at CNL to AOO's Policy and Strategic Operations Advocate enclosed the Minutes of Meeting from the November 30, 2021 meeting for the AOO's review.										√
December 7, 2021 Outgoing Email	This email from a Senior Communications Officer at CNL to AOO's Policy and Strategic Operations Advocate enclosed the revised Table of Interests and Concerns incorporating the AOO's feedback from November 26, 2021, which was discussed at the meeting on November 30, 2021.										√
December 8, 2021 Incoming Emails	These were two emails from the AOO's Policy and Strategic Operations Advocate to a Senior Communications Officer at CNL: one of which confirmed receipt of the Table of Interests and Concerns and the other shared revisions on the Minutes of Meeting.										√
December 9, 2021	These were two phone calls from a Senior Communications Officer at CNL to AOO's Policy and Strategic Operations										√

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Outgoing Phone Calls	Advocate leaving voicemail to follow-up on the minutes of meeting, the Table of Interests and Concerns and the prioritized schedule development.										
December 10, 2021 Incoming email	This email from the AOO's Policy and Strategic Operations Advocate to a Senior Communications Officer at CNL was to coordinate a time to talk.										√
December 13, 2021 Outgoing Phone Call	This phone call from the AOO's Policy and Strategic Operations Advocate to a Senior Communications Officer was a follow-up on a previous phone call. Minutes of meeting, the Table of Interests and Concerns and the prioritized schedule development were discussed. The AOO confirmed they had received the December 7 revised version of the Table of Interests and Concerns and acknowledged that CNL would include this table in the December 2021 EIS submission. The AOO also confirmed that the AOO and CNL had agreed on next steps to finalize the Table of Interests and Concerns before CNL's final EIS submission.										√
December 14, 2021 Outgoing email	This email from a Senior Communication's Officer to AOO's Policy and Strategic Operations Advocate sent a copy of the final Minutes of Meeting from the November 30, 2021 meeting.									√	
December 23, 2021 Outgoing Letter	This letter to the AOO's Executive Director from CNL's Director of Corporate Communications was requesting confirmation if AOO would like to participate in the Diet and Harvest Study by March 15, 2022.										√
January 24, 2022 Meeting Invitation	This meeting invitation, with an amended agenda, was sent by a Senior Communications Advisor to AOO's Policy and Strategic Operations Advocate and Policy and Strategic Initiatives Advisor for January 25, 2022.										√
January 25, 2022 Meeting Invitation	This meeting invitation was amended by a CNL Senior Communications Officer and sent to AOO due to an NSDF Commission Hearing conflict.										√
February 09, 2022 Outgoing email	This email from a Senior Communications Officer to AOO's Policy & Strategic Operations Advocate was to bring up the prioritization schedule and confirm if there is a specific topic that the AOO would like to discuss at the next monthly meeting.										√
February 15, 2022 Outgoing email	This email from AOO's Policy & Strategic Operations Advocate to CNL was to cancel the meeting the week after due to a conflict.										√
March 08, 2022 Outgoing email	This email from a Senior Communication's Officer at CNL to AOO's Policy & Strategic Operations Advocate was to inform AOO of the revised table of interest and concerns and to request that they review the table within the next 2 weeks.										√
March 17, 2022 Outgoing email	This email from a Senior Communications Officer at CNL to AOO's Policy & Strategic Operations Advocate was to inform AOO of a working group meeting scheduled for March 29th from 10:00 a.m. until noon. CNL requested to use that time to hold a workshop on the draft environmental assessment follow-up monitoring program (EAFMP) for the NSDF project.								√		
March 24, 2022 Outgoing email	This email from a Senior Communications Officer at CNL to AOO's Policy & Strategic Operations Advocate was to inform AOO that the NPD Closure Project was working on completing all outstanding comments and that CNL's responses to the AOO comments on the Issues Table (enclosed in the 2020 July 31 letter) are now complete. CNL attached both the original letter from the AOO, dated July 31, 2020, enclosing the AOO's comments on CNL's Issue Table, as well as a separate word document with CNL's responses to the AOO comments.									√	
March 25, 2022 Incoming email	This email from AOO's Policy & Strategic Operations Advocate to CNL was to inform CNL that the proposal was to stand down the next meeting on March 29, 2022 and use the time to internally review the NPD Closure Project Issues Table provided by CNL yesterday.										√
March 25, 2022	This email from a Senior Communications Officer at CNL to AOO's Policy & Strategic Operations Advocate was to										√

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Outgoing email	inform AOO that CNL will be sharing the new Summary Tables of Interests and Concerns, which were adjusted per guidance from the Canadian Nuclear Safety Commission (CNSC), with the AOO next week. CNL offered capacity if AOO was interested in reviewing.										
April 01, 2022 Incoming email	This email from AOO’s Policy & Strategic Operations Advocate to a Senior Communications Officer at CNL was to state the preference to review the updated NPD Issues and Concern table in advance of it being resubmitted to the CNSC in the revised EIS, to verify that it reflects the AOO interests and concerns. AOO asked to clarify the difference in the updated NPD Summary Table of Issues and Concerns to be resubmitted with the EIS that you’ll be sending us, and the “NPD Closure Project CNL responses to the AOO comments on the Issues Table”, as provided on March 24, 2022 (attached in the email).									√	
April 01, 2022 Outgoing email	This email from a Senior Communication’s Officer at CNL to AOO’s Policy & Strategic Operations Advocate was to clarify that contents of the previous email for AOO to review. CNL attached a few draft process diagrams around what CNL is focused on right now with respect to the environmental assessment (EA) for the NPD Closure Project.										√
April 19, 2022 Outgoing email	This email from a Senior Communication’s Officer at CNL to AOO’s Policy & Strategic Operations Advocate was to confirm the April meeting date and to confirm the agenda for the meeting.										√
April 25, 2022 Incoming email	This email from AOO’s Policy & Strategic Operations Advocate to a Senior Communication’s Officer at CNL was to inform CNL of AOO’s need to stand down the April meeting as AOO was still conducting an internal review of the NPD documents shared in early April. AOO noted that they would provide an update to CNL on the path forward as soon as our internal review is complete.									√	√
May 06, 2022 Incoming email	This email from AOO to a Senior Communications Officer at CNL was to confirm receipt of the repackaged NPD EIS summary table of interests and concerns and to confirm that it is consistent with the previous AOO review, the AOO do not request any further amendments to the new Table-C-2.										√
May 06, 2022 Outgoing email	This email from a Senior Communications Officer at CNL to AOO consultation was to thank AOO for the confirmed receipt of the concerns table.									√	√
August 12, 2022 Meeting	This meeting between CNL representatives (including CNL’s Director of Indigenous Relations) and Algonquins of Ontario (including AOO’s Executive Director and Cultural Coordinator). CNL confirmed that the AOO is still interested in in the NSDF and NPD files and that CNL can provide capacity for the AOO. The AOO stated that the ANR working group will be reviewing the NPD Interest and Concerns table to validate responses internally.									√	√
August 12, 2022 Outgoing Email	This email from the Director of Indigenous Relations at CNL to the AOO Executive Director followed up on the August 12 meeting. CNL requested information on the status of the NPD Issues table (shared in July 2022 and commented back and forth on). CNL offered to coordinate a meeting.									√	
August 12, 2022 Incoming Email	This email from the AOO Executive Director to the Director of Indigenous Relations shared an email from May 6, 2022 stating that the AOO has no further comments on the NPD EIS Issues and Concerns Table C2 from CNL document and requested that CNL shared the revised EIS when available and at that time the AOO will consider reviewing it and providing further comments if any.									√	
September 15, 2022 Incoming Email	This email from the Cultural Heritage Advisor at AOO to a Senior Communications Officer at CNL provided the contact for the A Senior Policy Strategist at AOO as the new contact. CNL confirmed receipt.										√
September 15, 2022	This email from the A Senior Policy Strategist at AOO to a Senior Communications Officer at CNL requested an introductory meeting to introduce CNL’s projects, including the NPD Project.										√

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Incoming Email											
September 19, 2022 Outgoing Email	This email from a Senior Communications Officer at CNL to the A Senior Policy Strategist at AOO confirmed the requested meeting and asked if the Senior Policy Strategist was also the contact for the NPD project. A Senior Policy Strategist at AOO confirmed leading on all nuclear files and request a virtual meeting.										√
September 21, 2022 Outgoing Email	This email invitation from a Senior Communications Officer at CNL to a Senior Policy Strategist at AOO for an introduction meeting.										√
September 29, 2022 Outgoing Email	This email from a Senior Communications Officer at CNL to a Senior Policy Strategist at AOO shared a presentation in advance of the September 29, 2022 meeting.										√
September 29, 2022 Meeting	This meeting between CNL representatives (including project staff and communications) and Algonquins of Ontario (including senior Policy Strategist) for staff introductions and introductions to the NPD and NSDF projects.										√
October 03, 2022 Outgoing Letter	This letter addressed to the AOOs Executive Director from CNL’s Director of Indigenous Relations provided a project update and the engagement status with the AOO, CNL noted that the next step to address comments for the AOO to review the final EIS. CNL asked to further discuss CNL’s responses to the AOO’s March 2022 comments. CNL provided a status of the AOO AKLUS and the summary tables of interests and concerns for the EIS. CNL believes that the AKLUS recommendations and the issues lists are already incorporated and consolidated within the summary table of interests and concerns. Therefore, CNL proposes using the September 2022 Commitments table (attached to the letter) going forward. CNL stated that they would offer capacity support for the AOO’s review of the Alternative Means Assessment through the existing MOU. CNL asked that the AOO submit a formal budget request. CNL requested that the AOO respond confirming their agreement to proceed with the engagement activities listed in the letter, or modified engagement activities.									√	√
October 26, 2022 Outgoing Email	This email from a Senior Communications Officer at CNL to the AOO’s Executive Director followed-up on the October 3 letter.									√	√
November 01, 2022 Outgoing Email	Email invitation sent to the AOO to attend the public open houses in the surrounding area of Chalk River Laboratories (CRL). The open house topics included CNL’s Cleanup Function, the Near Surface Disposal Facility Project, the Nuclear Power Demonstration Project and CNL’s Waste Strategy.										√
November 03, 2022 Incoming Email	This email from a Senior Policy Strategist at AOO Senior Communications Officer at CNL requesting a phone call related to the Alternative Means Assessment for the NPD Project.		√								
November 04, 2022 Meeting	This meeting between CNL representatives (including a Senior Communications Officer) and Algonquins of Ontario (including Senior Policy Strategist) discussed the status of the Alternative Means Assessment for the NPD Project.		√								
November 04, 2022 Outgoing Email	This email invitation from a Senior Communications Officer at CNL to a Senior Policy Strategist at AOO was for the November 8, 2022 meeting. The agenda item was to reassess the work plan and budget for the NPD project.										√
November 04, 2022 Outgoing Email	This email invitation from a Senior Communications Officer at CNL to a Senior Policy Strategist at AOO was for a tour of the NPD reactor and shoreline on December 16, 2022.										√
November 08, 2022	This meeting between CNL representatives (including project staff and communications) and Algonquins of Ontario										√

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Meeting	(including Senior Policy Strategist) for discussions on the NPD Closure Project. This meeting was to reassess the work plan and budget for the NPD Closure Project.										
November 08, 2022 Outgoing Email	This email from a Senior Communications Officer at CNL to the AOO (Senior Policy Strategist and Cultural Heritage Advisor) provide follow up from the November 8, 2022 meeting. CNL shared information on Alternative means, Agreements between the AOO and CNL, correspondence related to budget and the actions recorded at the meeting.		√								√
November 08, 2022 Incoming Email	This email from a Senior Policy Strategist at AOO Senior Communications Officer at CNL confirmed receipt of information shared November 8, 2022. AOO requested that the NPD tour be moved to December 13, 2022. CNL confirmed the new date would work and send a calendar invitation.										√
November 11, 2022 Outgoing Email	This email from a Senior Communications Officer at CNL to a Cultural Heritage Advisor at AOO resent the May 6, 2022 correspondence related to the repackaged Interest and Concerns table.									√	
November 15, 2022 Outgoing Email	This email from a Senior Communications Officer at CNL to a Cultural Heritage Advisor at AOO asking the AOO to confirm what table of Interest and Concerns in advance of the next meeting.									√	
November 15, 2022 Open House	Members of the AOO attended the CNL open house in Renfrew. The open house included the NPD project. Staff were present to answer any questions.										√
November 15, 2022 Incoming Email	This email from a Cultural Heritage Advisor at AOO to a Senior Communications Officer at CNL to provide the most up-to-date table of Interest and Concerns. The AOO stated that the table is the larger table, working document between the AOO and CNL and is not constrained by the timeline of the EIS. This is the table the AOO has stated CNL proceed with. The AOO have already stated that we will not re-review the other table. CNL acknowledged.									√	
November 21, 2022 Outgoing Email	This email from a Senior Communications Officer at CNL to the AOO (Senior Policy Strategist and Cultural Heritage Advisor) proposing an agenda for the November 22, 2022 meeting. Proposed agenda: Review issues table; Discussion of proposed commitments / next steps; Review of skeleton work plan and funding; Other items. CNL is looking to confirm that all AOO communities are interested in engaging through the AOO and not directly with CNL ANR meeting on December 8, should CNL plan to attend for presentation on alternative means		√	√						√	
November 22, 2022 Outgoing Email	This email from a Senior Communications Officer at CNL to the AOO (Senior Policy Strategist and Cultural Heritage Advisor) send the draft work plan to discuss at the November 22, 2022 meeting.										√
November 22, 2022 Meeting	This meeting between CNL representatives (including project staff and communications) and Algonquins of Ontario (including Senior Policy Strategist) for discussions on the NPD Closure Project. The project staff and AOO reviewed the Issues and Concerns table, proposed commitments and next steps and reviewed the draft work.									√	
November 22, 2022 Outgoing Email	This email from the Manager of Regulatory Approvals for the NPD project at CNL to the Senior Policy Strategist at AOO provided follow-up from the November 22, 2022 meeting. CNL sent the revised work plan with proposed topics of discussion for our upcoming working group meetings (to end of April 2023). CNL asked AOO to provide feedback on meeting topic suggestions and asked for suggestions for the timing of reoccurring meetings.			√							√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communication
November 28, 2022 Outgoing Email	This email from a Senior Communications Officer at CNL to the AOO's Executive Director advising of the upcoming CNL supply chain event in Pembroke, Ontario. Canadian Nuclear Laboratories in partnership with the AOPFN, County of Renfrew, and Pontiac Regional County Municipality (MRC), will be hosting the "Meet and Greet: CNL Major/Strategic Supply Chain Partners.										√
November 28, 2022 Incoming Email	This email from a Senior Policy Strategist at AOO to a Senior Communications Officer at CNL advised CNL that the AOO's in-person staff meetings in December have been postponed until January and requested that the December 13th, 2022 tour of NPD be postponed. AOO noted they were still available to meeting virtual that day on the AMA. CNL acknowledged the request and sent a meeting invitation for December 13th, 2022.		√								√
December 13, 2022 Virtual Meeting	This meeting between CNL representatives (including Communications Officers and the NPD Manager of Regulatory Approvals) and Algonquins of Ontario (including AOO's Senior Policy Strategist). CNL and AOO discussed the Alternative Means Assessment, the I&C table and the work plan was edited in the meeting.		√		√				√		√
December 13, 2022 This email from CNL to AOO	Email invitation for a meeting on 08 February 2023 for the AOO Working Group Meeting: CF 48-2 NPD Closure Project.										√
December 19, 2022 This email from CNL to AOO	This email from a CNL Senior Communications Officer to the Senior Policy Strategist at AOO including attachments of Valued Components (VCs) Environmental Impact Statement (EIS) sections and references in preparation for the January 2023 discussion on VCs.				√						
December 20, 2022 Virtual Meeting	This meeting between CNL representatives (including Communications Officers and the NPD Manager of Regulatory Approvals) and Algonquins of Ontario (including AOO's Senior Policy Strategist) to discuss NPD Alternative Means Assessment, Importance of water, and additional details on the socio-economic study.		√		√				√	√	
January 10, 2023 Outgoing Email	This email from a CNL Senior Communications Officer to the Senior Policy Strategist at AOO containing Valued Components material for the meeting on 11 January 2023.				√						√
January 11, 2023 Virtual Meeting	This meeting between CNL representatives (including Communications Officers and the NPD Manager of Regulatory Approvals), Algonquins of Ontario (including AOO's Senior Policy Strategist) and AECL to discuss AOO Valued Components (VCs), and how VCs are represented in the NPD Environmental Impact Statement and AOO Question and Answer period on NPD. CNL agreed to create a VC summary table to better explain how AOO identified VCs are included, assessed, protected and that protection verified through CNL's proposed project.				√		√		√	√	
January 13, 2023 Outgoing Email	This email from a CNL Communications Officer to the Senior Policy Strategist at AOO containing technical responses CNL has sent the AOO. This includes the draft EIS comments and July 2020 technical response to assist AOO in the review of the NPD draft Environmental Impact Statement (EIS).										√
January 13, 2023 Incoming email	This email from a CNL Communications Officer to the Senior Policy Strategist at AOO confirming receipt of attachments to assist AOO in the review of the NPD draft Environmental Impact Statement (EIS).										√
January 20, 2023 Outgoing Email	This email from a CNL Communications Officer to the Senior Policy Strategist at AOO providing the next steps for the new submission date of the NPD Environmental Impact Statement (EIS). CNL proposed the next steps would be to continue working together to ensure the AOO's interests and concerns are reflected in the EIS by CNL ensuring the incorporation of the AOO identified Valued Components (VCs) in the EIS; this includes a summary table which will be consistent with the information provided from the AKLUS. CNL will also present on the Alternative Means Assessment and provide a project update to the ANRs. CNL will also discuss the AKLUS implications at the February working group meeting. And CNL and AOO will continue to work together to ensure that AOO concerns related to the				√						√

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	protection of water are alleviated and to ensure that socio-economic values are considered.										
January 24, 2023 Outgoing Email	This email from a CNL Communications Officer to the Senior Policy Strategist at AOO following up on an action item from the 2023 January 11 Working Group meeting to set up a meeting to discuss the Algonquin Knowledge Land Use Study (AKLUS).										√
January 27, 2023 Telephone call	A phone call from AOO's Senior Policy Strategist to a CNL Communications Officer discussing the presentation for the 2023 February 09 ARN meeting.		√								
January 27, 2023 Outgoing Email	This email from a CNL Communications Officer to the Senior Policy Strategist at AOO providing the updated version of the presentation for the ANR meeting on the Alternative Means Assessment.		√								
January 31, 2023 Email correspondence (4 emails)	Emails between CNL and AOO confirming logistics of the CF-48-2 NPD Closure Project-AMA Deck for Review presentation.		√								
February 06, 2023 Email correspondence	Emails between a CNL Communication Officer and the Senior Policy Strategist at AOO with final confirmation of the 2023 February 08 meeting.										√
February 08, 2023 Virtual Meeting	This meeting was between CNL representatives (including Communications Officers and the NPD Manager of Regulatory Approvals) and Algonquins of Ontario (including AOO's Senior Policy Strategist, Consultation Coordinator and Cultural Heritage Researcher and Coordinator). CNL and the AOO discussed the AKLUS Recommendation and Responses, during the discussion the AOO shared some of the context for the AKLUS recommendations and concerns. CNL invited the AOO for a tour of the site and discussed CNL's participation in the upcoming Algonquin Negotiation Representative (ANR) meeting.		√		√	√	√		√		√
February 09, 2023 Virtual Meeting	CNL was invited to present at the Algonquin Negotiation Representative (ANR) Infrastructure Working Group meeting. CNL gave a presentation on the Alternative Means Assessment and answered questions from the ANRs.		√								√
February 09, 2023 Outgoing Email	This email from AOO to CNL with thanks for attending the 2023 February 08 meeting, and an invitation to the 2023 March 09, AOO Infrastructure Working Group meeting.										√
February 14, 2023 Outgoing Email	This email from a CNL Communication Officer and the Senior Policy Strategist at AOO with a summary of the Algonquin Knowledge Land Use Study (AKLUS) results and CNL's updated responses to the AKLUS recommendations and the draft commitment list that was shared in 2022 October. AOO Confirmed receipt.					√					√
February 21, 2023 Outgoing Email	This email from the NPD Manage of Regulatory Approval to the Senior Policy Strategist at AOO shared the summary table of how each of the AOO's VCs is included, assessed, protected and that protection verified through CNL's proposed project. CNL requested feedback on the sample row provided before completing the table.				√		√				
February 23, 2023 Outgoing Email	This email from a CNL Communication Officer and the Senior Policy Strategist at AOO concerning follow-up action from the 2023 February 11 NPD meeting with a summary table of how each of the VCs is included, assessed, and protected and that protection verified through CNL's proposed project.				√						
February 23, 2023 Incoming Telephone Call	Telephone call from AOO's Senior Policy Strategist to a CNL Communications Officer to discuss the March working group agenda and attendance.										√
February 27, 2023	Telephone call from a CNL Communications Officer to AOO's Senior Policy Strategist to confirm that CNL had										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communication
Outgoing Telephone Call	proposed topics for the March meeting. The AOO confirmed that they would review the proposed agenda by CNL and would comment on any changes required.										
March 02, 2023 Incoming Telephone Call	Call from AOO’s Senior Policy Strategist to a CNL Communications Officer to cancel the ARN presentation on 2023 March 9, and confirm topics for the 2023 March, 8 working group meeting. The AOO also tentatively invited CNL to the AOO ANR meeting on 2023 April 18 (in person).										√
March 08, 2023 Virtual Meeting	This meeting was between CNL representatives (including a CNL Communications Officer, the NPD Manager of Regulatory Approvals and staff) and Algonquins of Ontario (including AOO’s Senior Policy Strategist, Consultation Coordinator and Cultural Heritage Researcher, Coordinator and Financial Manager). CNL and AOO discussed providing comments on the AKLUS (and reviewed by items would be addressed by the LTRA), reviewed the VC summary chart, planned for the May meeting to be on commitments.				√	√			√	√	√
March 08, 2023 Outgoing Email	This email from CNL Communications officer to AOO’s Senior Policy Strategist to confirm that CNL accurately captured action items from the 2023 March 08 meeting.										√
March 09, 2023 Emails	Emails between the AOO’s Senior Policy Strategist and CNL Communications officer to confirm Algonquin Knowledge Land Use Study (AKLUS) documentation for AOO distribution to the Working Group.										√
March 10, 2023 Outgoing Email	This email from CNL Communications Officer to the AOO’s Senior Policy Strategist with a follow-up to the 2023 March 08 meeting; CNL provided the AOO with related emails to the AOO funding request and CNL's responses to AOO questions in the meeting.										√
March 14, 2023 Outgoing Email	This email from CNL Senior Communications Officer to the AOO’s Senior Policy Strategist with CNL's Indigenous Relations Procurement Strategy.										√
March 27, 2023 Outgoing Email	This email from CNL Communications Officer to the AOO’s Senior Policy Strategist touching base on outstanding questions regarding the VCs Summary table, Fiscal Year invoices and review of the AKLUS. CNL also wanted to confirm the topics for discussion for the upcoming 2023 April 12 meeting and the work plan.				√	√					√
April 03, 2023 Outgoing Email	This email from a CNL Communications Officer to the AOO’s Senior Policy Strategist to follow up with an email previously send on 2023 March 27 where no response was received from the AOO.										√
April 03, 2023 Outgoing Email	This email from CNL Communications Officer to the AOO’s Senior Policy Strategist AOO to follow up again with an email previously send on 2023 March 27, where no response was received from the AOO. The AOO Project consultation advisor confirmed the meeting date of 2023 April 12.										√
April 11, 2023 Telephone Call	Telephone call between a CNL Communications Officer and the AOO’s Senior Policy Strategist to re-schedule the 2023 April 12 working group meeting and the estimated timeline for the Algonquin Knowledge Land Use Study (AKLUS) and the AOO review of VCs chart would likely be submitted by the end of 2023 April.										√
April 11, 2023 Outgoing Email	This email from CNL Communications Officer and AOO’s Senior Policy Strategist to confirm the re-schedule of the 2023 April 12 Working Group meeting at the AOO's request, and to find a date that works with the AOO to reschedule. AOO responded with 4 possible dates.										√
April 19, 2023 Virtual Meeting	This meeting was between CNL representatives (including a CNL Communications Officer, the NPD Manager of Regulatory Approvals and AECL) and Algonquins of Ontario (including AOO’s Senior Policy Strategist, Consultation Coordinator and Cultural Heritage Researcher Coordinator). AOO provided an update on conducting a Socio-Economic Study. CNL provided the AOO a presentation on Indigenous Health and addressed concerns raised.									√	
May 03, 2023 Outgoing emails	This email between AOO Senior Policy Strategist and CNL Communications officer is to confirm the meeting agenda for the 2023 May 10 AOO- CNL Working Group Meeting to discuss CF 48-2 NPD Closure Project. AOO confirmed the										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communication
	topic for the meeting are commitments and the socio-economic study and that Shared Valued Solutions (SVS) will also be attending the meeting. AOO also added their appreciation for CNLs hard work on the AOO commitments chart.										
May 04, 2023 Telephone Call from CNL to AOO	Telephone call between AOO Senior Policy Strategist and CNL Communications officer to discuss upcoming 2023 May meeting. AOO informed CNL that they have hired a new senior manager, and they will be ready to discuss the AKLUS and that SVS will be coming to the first portion of the 2023 May working group meeting and that the AOO will also be ready to talk about the VC chart at the 2023 May meeting.	√		√		√					√
May 04, 2023 Incoming email	Email from the AOO Senior Policy Strategist to a CNL Communications Officer sharing a copy of the sample AOO VC summary table with edits from the AOO Cultural Heritage Researcher and Coordinator for CNL review.				√					√	
May 04, 2023 Incoming email	Email from the AOO Senior Policy Strategist to a CNL Communications Officer with a copy of the AOO AKLUS document with edits from the AOO Cultural Heritage Researcher and Coordinator for CNL review.					√				√	
May 10, 2023 Meeting	This meeting is between representatives of CNL (including the Senior Communications Officer, Communications Officer, Indigenous Engagement Coordinator and Manager, NPD Regulatory Approvals) and AOO (Including, Senior Policy Strategist and Cultural Heritage Coordinator)) to discuss NSDF updates, the Socio-Economic Study, VC table update and the AKLUS recommendations and commitment language drafting.				√	√				√	
May 15, 2023 Outgoing email	This email from a CNL Communications Officer to the AOO Senior Policy Strategist following up on action items noted during the 2023 May AOO/CNL working group. CNL sent the AOO, a copy of the presentation from the April 19th working group meeting, the revised work plan to reflect the changes to the June 14th working group meeting and the emails related to the AOO funding request and CNL’s response. CNL also outlined their outstanding action items.										√
May 17, 2023 Outgoing email	This email from a CNL Communications Officer to the AOO Senior Policy Strategist seeking validation of the AOO I&C Table. CNL respectfully requested a response by 2023 June 20. AOO confirmed receipt.									√	
June 07, 2023 Outgoing email	This email from a CNL Communications Officer to AOO Senior Policy Strategist is to provide AOO with a simplified Commitments table. CNL also identified that the next step would be reviewing the table at the next working group and welcomed feedback and/ or comments.			√							√
June 08, 2023 Incoming email	The AOO notified CNL that they hired a new Executive Director.										√
June 14, 2023 Meeting	This meeting is between representatives of CNL (including the Senior Communications Officer, Indigenous Engagement Coordinator, Manager, NPD Regulatory Approvals and Decommissioning and Environmental Specialist) and AOO (Including, Senior Policy Strategist, Director and Cultural Heritage Researcher and Coordinator) to discuss NPD Project next steps and identify funding. The AOO to share the proposal for the socio-economic study. Both parties reviewed CNL’s incorporation of comments on Commitments 3 & 9, and the I&C table and identify commitments that address next steps in the final column of the table.			√	√					√	
June 14, 2023 Incoming email	This email from AOO Senior Policy Strategist to CNL Senior Communications is to provide CNL with a copy of the AOO proposed construction/mitigation measures prepared by the AOO Cultural Heritage Researcher and Coordinator.										√
June 15, 2023 Incoming email	This email from CNL Indigenous Engagement Coordinator to the AOO Senior Policy Strategist provided the AOO with the actions captured at the 2023 June 14 NPD Closure Project Monthly Meeting. AOO confirmed receipt of the email.										√
June 16, 2023 Incoming email	This email from CNL Senior Communications officer to AOO Senior Policy Strategist is to provide the AOO with the summary of AOO valued components that were previously agreed on.										√
July 04, 2023	This email from CNL Communications officer to AOO Senior Policy Strategist is to provide the AOO with the draft						√			√	√

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		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communication
Emails	agenda for the Wednesday, July 12th AOO-NPD monthly meeting. On the draft agenda is the review of Commitments and the Table of Interests and Concerns next steps and validation. AOO confirmed the agenda and noted they would invite Shared Value Solutions to attend briefly while discussing the Socio-Economic Study commitment. CNL also asked if AOO is still interested in the tour and AOO confirmed.										
July 12, 2023 Meeting (Virtual)	This meeting is between representatives of CNL (including the Communications Officer, Indigenous Engagement Coordinator, Manager, NPD Regulatory Approvals and Decommissioning and Environmental Specialist, and Manager Communications and Engagement) and AOO (Including, Senior Policy Strategist, and Cultural Heritage Researcher and Coordinator) to discuss NSDF, NPD Project next step, summer 2023 NPD site tour and AOO/NPD commitments.						√			√	
July 12, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to AOO Senior Policy Strategist is to provide the AOO with the actions captured at the 2023 July 12 NPD Closure Project Monthly Meeting. AOO confirmed receipt of the email.										√
July 12, 2023 Outgoing Email	This email from CNL Communications Officer to AOO Senior Policy Strategist is to provide the AOO an updated version of the AOO NPD workplan.										√
July 14, 2023 Outgoing Email	This email from CNL Communications Officer to AOO Senior Policy Strategist is to provide the AOO with an updated version of the AOO Interest and Concerns table and the commitments table.									√	
July 17, 2023 Outgoing Email	This email from CNL Communications Officer to AOO Senior Policy Strategist is to request that due to resourcing, the AOO NPD site tour be moved to 2023 August 15. AOPFN confirmed date change.										√
July 25, 2023 Outgoing Email	This email from CNL Communications Officer to AOO Senior Policy Strategist is to propose a draft agenda for the 2023 August 15 NPD site tour.										√
July 27, 2023 Outgoing Email	This meeting is between CNL Communications Officer and AOO Senior Policy Strategist is to discuss NPD text and language edits.						√			√	√
August 01, 2023 Outgoing Email	This email from CNL Communications Officer to AOO Senior Policy Strategist is to confirm the logistics of the 2023 August 15 NPD Site tour.										√
August 09, 2023 Outgoing Email	This email from CNL Communications Officer to AOO Senior Policy Strategist is to confirm the logistics of the 2023 August 15 NPD Site tour, and to provide the AOO with the draft agenda for the tour. CNL also requested AOO staff names for who is attending the tour. AOO confirmed the six staff would be attending.										√
August 09, 2023 Telephone Call	This phone call from AOO Senior Policy Strategist to CNL Communications Officer is to discuss the logistics of the 2023 August 15 NPD tour and invoicing.										√
August 10, 2023 Telephone Call	This email from CNL Communications Officer to AOO Senior Policy Strategist is to provide AOO with the funding-related information requested during the call on 2023 August 09.										√
August 15, 2023 Tour	CNL hosted an AOO-NPD site tour on 2023 August 15 NPD. Participants included CNL (Manager, Communications and Engagement, Indigenous Engagement Coordinator, Manager NPD Regulatory Approvals,) and AOO (Including Senior Policy strategist, Executive director, Meeting Coordinator, Sr. Communications Strategist, Cultural and Heritage Researcher & Coordinator and Fisheries and Wildlife Management Advisor)						√		√	√	√
August 15, 2023 Outgoing Email	This email from CNL Manager, Communications and Engagement to AOO Cultural and Heritage Researcher and Coordinator is to provide AOO with links to the 2022 CRL and 2021 NPD environmental reports.										√
August 16, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to AOO is to provide them with the actions from the 2023 August 15 AOO NPD Site Tour.										√
August 22, 2023 Outgoing Email	This email from CNL Communications Officer to AOO is to provide them with the presentation and photos cleared by CNL security for release. CNL also provided the link to the CNL YouTube page to view the walking tour-type videos of										√

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	NPD.										
August 22, 2023 Outgoing Email	This email from CNL Communications Officer to AOO is to provide them with the Benthic Invertebrates Study. AOO Senior Project Development Manager thanked CNL for the NPD Site tour and informed CNL that being onsite to see the remaining infrastructure, vegetation and ground water wells really helped to put commitments into perspective. AOO also noted that they will be sending the vegetation survey report in the coming week.										√
September 01, 2023 Outgoing Email	This email from CNL Communications Officer to the AOO is to provide the AOO with the draft agenda for the 2023 September 13 monthly working group.										√
September 13, 2023 Meeting	This meeting between CNL (including the Manager of Communications and Engagement Manager, of NPD, Decommissioning and Environmental Specialist, Communications Officer and Indigenous engagement coordinator,), AECL (including Director of Communications, Manager of Communications and Engagement), and AOO (Senior Project Development Manager, and Cultural and Heritage Researcher and Coordinator) is to discuss the NSDF pre-constructions commitments, Additional site visit and any follow up from the 2023 August tour, Introduction to monitoring current and planned, and November ANR meeting.								√		√
September 14, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to AOO Senior Policy Strategist is to provide the AOO with the actions captured at the 2023 September 13 NPD Closure Project Monthly Meeting. AOO confirmed receipt of the email.										√
September 19, 2023 Incoming Email	This email from AOO Senior Project Development Manager is to provide CNL with a copy of the AOO-NPD Site visit field notes, as well as the date for the 2023 November AOO- ANR Monthly working group. CNL thanked AOO for the field note files.									√	√
September 26, 2023 Outgoing Email	This email from CNL Communications Officer to the AOO is to confirm the dates of the 2023 October AOO - CNL monthly meeting. The meeting date was confirmed for 2023 October 18th.										√
October 06, 2023 Outgoing Email	This email from CNL Communications Officer to the AOO is to provide a response to AOO's question about rainwater in the NPD Stack. CNL provided a written answer to this question.										√
October 16, 2023 Outgoing Email	This email from CNL Communications Officer to the AOO is to provide the AOO with the draft agenda for the 2023 October 18 monthly working group meeting on NPD.										√
October 17, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to AOO is to provide an invite to the 2023 October 20 Career Fair being held In Pembroke. AOO confirmed receipt of the invitation and noted it was distributed to ANRs and Algonquin Businesses.										√
October 18, 2023 Meeting	This meeting is between CNL (including the Communications Officer, Indigenous Engagement Coordinator, Manager, Communications and Engagement, Manager, NPD Regulatory Approvals, Decommissioning and Environmental Specialist Communications Officer) and the AOO (including, Executive Director, Senior Policy Strategist, and Cultural Heritage Researcher and Coordinator). This meeting was to discuss the NSDF Footprint and NSDF commitments, NPD, and the 2023 November ANR meeting										√
October 18, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to AOO is to provide the actions from the 2023 October 18 AOO - CNL monthly meeting.										√
October 18, 2023 Outgoing Email	This email from CNL Communications Officer to the AOO is to provide the AOO with the draft slide deck for the 2023 November ANR Meeting.										√

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November 03, 2023 Outgoing Email	This email from CNL communications officer to the AOO is to provide the draft agenda for the 2023 November 08 Monthly Working group meeting.										√
November 07, 2023 Incoming Email	This email from AOO Senior Project Development Manager to CNL Communications Officer is to inform CNL that the 2023 November ANR meeting is cancelled. The AOO noted that working group meetings will be placed on hold.										√
November 28, 2023 Webinar	AOO representatives attended the webinar NPD – Planning for Site Restoration.										√
December 05, 2023 Outgoing Email	This email from CNL Communications Officer to AOO Senior Project Development Manager is to confirm if the NPD Closure Project is still on hold. AOO confirmed that the ANRs have not yet convened and asked to postpone until the New Year.										√
January 04, 2024 Outgoing Email	This email from CNL Communications Officer to AOO Senior Project Development Manager is to confirm the 2024 January AOO - CNL Monthly NPD Meeting scheduled for 2024 January 10. AOO informed CNL that the meeting should be postponed and noted their interest in beginning discussions on the management of archaeological resources. CNL proposed a meeting to discuss logistics.									√	√
January 10, 2024 Meeting	This meeting between AOO (including, Senior Project Development Manager, Cultural Heritage Researcher and Coordinator, Natural Resource and Cultural Strategist, and Cultural Heritage Advisor), and CNL (Including Acting Director, Indigenous Engagement Coordinator, Decommissioning and Environmental Specialist, and Communications Officer) is to discuss the AOO - CNL Archeological Management Workshop.									√	√
January 10, 2024 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to AOO is to provide the actions from the 2024 January 10 AOO - CNL Archeological Resource Management Workshop Planning meeting.										√
January 16, 2024 Outgoing Email	This email from CNL Communications Officer to AOO Senior Project Development Manager is to confirm the dates for the 2024 spring AOO - CNL Archeological Resource Management Workshop. CNL proposed 5 dates. AOO confirmed that 2 of the options proposed were suitable.									√	√
January 17, 2024 Incoming Email	This email from AOO Senior Project Development Manager to CNL is to provide the draft article on AOOs visit to NPD.										√
January 18, 2024 Outgoing Email	This email from CNL NPD Closure Project Director to AOO Senior Project Development Manager provided notes and suggestions on the draft article on AOOs visit to NPD.										√
February 09, 2024 Outgoing Email	This email from CNL Communications Officer to AOO Senior Project Development Manager is to confirm the AOO - CNL 2024 February 14 NPD Meeting. AOO confirmed the meeting date.										√
February 14, 2024 Meeting	This meeting is between representatives of CNL (including the Communications Officer, Director, NPD, Decommissioning and Environmental Specialist, and Manager and Director of Communications and Engagement, NPD environmental Analyst) and AOO (including, Senior Project Development Manager and Cultural Heritage Researcher and Coordinator, and Project Consultation Advisor) to act as the February monthly NPD meeting. Discussion included, NPD Invoicing, updating the NPD Workplan, and a meeting date for Cultural Heritage workshop.									√	√
February 14, 2024 Outgoing Email	This email from CNL Communications Officer to AOO Senior Project Development Manager with follow up on a few of the action items noted at the meeting on 2024 February 14. CNL attached a field monitoring schedule.										√
February 15, 2024 Outgoing Email	This email from CNL Communications Officer to AOO Senior Project Development Manager provided the requested 2023 meeting dates, who attended the meetings and the topics. AOO confirmed receipt.										√
February 21, 2024	This email exchange between the AOO Senior Project Development Manager and a CNL Communications Officer										√

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Emails	shared information about 2022 meeting dates.										
March 05, 2024 Outgoing Email	This email from a CNL Communications Officer to AOO Senior Project Development Manager is to postpone the monthly meeting being held on 2024 March 12 due to March Break. CNL noted focusing on the draft Project Specific Contribution Agreement and workplan for the AOO in the meantime. AOO confirmed the cancellation.										v

J.2 Interests and Concerns from 2020 – Algonquins of Ontario (AOO)

Topic	AOO Key Interests and Concerns	How CNL is addressing the interest/concern	Impact on the EIS	Status of this Concern and Next Steps
Algonquin Settlement Area	Request by the AOO that a statement be placed in the Project Description acknowledging that the NPD site is in the Algonquin Settlement Area.	- CNL fully acknowledges that NPD is located in the AOO Settlement Area. - In 2017 November, CNL sent the AOO notification of the online posting of the NPD 2017 draft EIS and encouraged AOO to review. - In 2018 February, the AOO submitted formal comments on the 2017 draft EIS. The AOO did not repeat concerns expressed in the 2016 Project Description with respect to acknowledgement of the Algonquin Settlement Area. - In 2020 May, CNL shared the 2020 March revised draft EIS which included content in Section 6.2.4.2 for AOO asserted rights and title for the Settlement Area, including NPD.	Changes have been made throughout the EIS (Section 6.2, Section 8.9 and Table C-2) identifying that the NPD site is located within the unceded AOO Settlement Area	- CNL considers this concern addressed by revisions to the EIS. - As of 2021 November 26, CNL understands that this concern is outstanding from AOO's perspective until review of the revised draft EIS is completed.
Alternatives	- In 2018 February, the AOO submitted formal comments on the 2017 draft EIS. - The AOO is of the opinion that CNL has provided insufficient discussion of alternatives to ISD in its 2017 draft EIS. (see CNL PI-58) - The AOO have raised a concern about the suitability of ISD as an alternative. (see CNL PI-301) - It is AOO's position that CNL has failed to adequately address the requirements of CEAA 2021. - The AOO has requested that CNL provide a quantitative assessment of the impacts of each alternative means on VCs.	- The Alternative Means Assessment TSD was provided to the AOO consultant (Shared Value Solutions) in 2018 January to support their review of the 2017 draft EIS. - As requested by AOO, the Alternative Means TSD was shared again to AOO in 2019 August. - At a meeting with the AOO ANRs in 2019 September, a summary of the Alternative Means for the project was presented. - In 2020 September, CNL provided draft dispositions to CNL PI-58 and CNL PI-301 by letter to AOO (relevant sections of the EIS are indicated as part of the comment responses). - The AOO indicated in their letter in 2020 July that still require time to review and respond to the Alternative means Assessment.	- In response to the AOO's concern, CNL has added some quantitative assessment of alternatives to the Alternative Means Assessment Technical Support Document (TSD), for example, the projected radiological dose and Industrial Safety risk to workers for each option. - CNL also incorporated additional information from the Alternative Means Assessment Technical Support Document into the revised draft EIS (Section 4.2) to provide greater clarity on how the alternative means was completed and what the results mean. - The revised Alternative Means TSD (64-509200-ASD-002 Revision 1) continues to identify ISD as the preferred means for decommissioning the NPD reactor. - CNL has considered national and international standards and guidelines and continues to believe that the NPD facility has characteristics that support ISD.	- As of 2021 November 26, CNL understands that this concern is outstanding from AOO's perspective in part because the AOO has not yet completed their review of the Alternative Means Assessment. - The 2021/22 work plan established jointly by CNL and AOO identifies activities for the AOO to provide technical feedback on CNL's responses to the registry comments and the Alternative Means Assessment. - CNL proposes a focused workshop on Alternative Means as required following the technical review.
Archaeology	- In their comments on the NPD Project Description, the AOO stated the significance of archaeological resources within their claim area. - In 2018 February, the AOO submitted formal comments on the 2017 draft EIS: - AOO indicated they were not provided adequate notice to participate in the Stage 1 Archaeological Assessment field visit and requested notice and capacity to participate in future archaeological activities. (see CNL PI-151). - The AOO expressed interest in a long-term archaeological agreement with CNL, which would	- Archaeological resources were included in discussions between the AOO and CNL, from their initial meeting in 2016 August. - As requested in the initial AOO comments on the Project Description, the AOO were provided the NPD Closure Project's Archaeological Assessment following its completion in 2016 December. - In 2019 January, CNL provided draft dispositions to CNL PI-151, CNL PI-213, CNL PI-214 and CNL PI-294 by letter to AOO (relevant sections of the EIS are indicated as part of the comment responses). - In response to follow-up between the AOO and CNL on the AOO's comments on the draft EIS, CNL shared an	- The NPD EIS includes a summary of the archaeological assessment (Section 8.11.4) and describes Indigenous Cultural Resources and Ceremonies (Section 8.9.3). The 2021 revised draft EIS references the AKLUS Report. - CNL describes proposed mitigation measures that will be employed if undocumented archaeological resources are discovered during the project in Section 9.9.3.2 of the EIS. - The EIS does not predict any adverse residual effects on the socio-economic environment (Section 9.11.3.3) or traditional land and resource use (Section 9.9.3.3) (encompassing archaeological resources).	- CNL considers that this concern is substantially addressed through AOO's closure of this item in their letter of 2019 May. - As of 2021 November 26, CNL understands that this concern is outstanding from AOO's perspective until they are able to complete their review of the revised draft EIS and CNL's response to the AKLUS recommendations. - This topic will also continue to be addressed through the LTRA, which formalizes the long term relationship between the AOO and CNL, to ensure

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	involve additional field research to be conducted in collaboration with the AOO. (see CNL PI-213). ○ The AOO note that Algonquins used the area prior to European contact, and therefore, there may be areas of significance to AOO. (see CNL PI-214). ○ The AOO have requested an archaeological monitor for oversight activities at the NPD site. (see CNL PI-294). • Within the AKLUS report (received 2020 December), participants identified the following concerns with respect to cultural impacts: ○ Changes, past and present, to accessing important Algonquin cultural sites. ○ A historic family village site near the NPD site. ○ The need for long-term nuclear waste storage and the risk of the project activity impacts to ancestral values. • In the recommendations of the AKLUS report (received 2020 December), the AOO propose: ○ CNL funding to conduct further archaeological assessments across the NPD property. ○ Protection of areas of archaeological potential during Project decommissioning. ○ Development of stop-work process and ○ Development of a sustainable archaeological research program.	overview presentation of the archaeological work at the NPD site (2019 September). • In 2020 September, CNL shared again the dispositions to CNL PI-151, CNL PI-213, CNL PI-214 and CNL PI-294 by letter to AOO (relevant sections of the EIS are indicated as part of the comment responses). • In 2021 September CNL responded to the recommendations from the AKLUS report.		adequate future engagement around archaeological resources at the NPD site. • The 2021/22 work plan established jointly by CNL and AOO identifies discussion of the AKLUS results, recommendations and CNL responses as a priority activity.
Communication, Engagement and Relationship	• The AOO commented that the only AOO community identified to be consulted with was AOPFN (reference to the Consultation Process Interim Measures Agreement). • All 10 AOO communities are to be included under the umbrella of the AOO. • The AOO requested that CNL and AECL enter into negotiations with the AOO to establish a LTRA. • The AOO has requested that as part of LTRA discussions, future consultation, engagement, accommodations, monitoring and oversight and communications be included (this would be engagement beyond the current projects). • The AOO has requested that as part of LTRA discussions employment, training, contracting, and other economic interests be included (this would include NPD). • In February 2018, the AOO submitted formal comments on the 2017 draft EIS: ○ The AOO request continued engagement using best practices. (see CNL PI-140).	• Since 2016 CNL has carried out extensive engagement with the AOO, implemented a Memorandum of Understanding (MOU), and carried out engagement activities and Long-Term Relationship Agreement (LTRA) discussions with the AOO in the form that the AOO has requested. ○ In 2018, AECL, CNL, and the AOO signed a tri-partite MOU. Together the parties have agreed to work together on items of mutual interest related to CNL operations and projects. ○ CNL and AECL have agreed with AOO's request that the LTRA include provisions on future consultation, engagement, and communications. ○ CNL and AECL have agreed with AOO's request that the LTRA include provisions on employment, training, contracting, and other economic opportunities. ○ It has been agreed by all parties that the LTRA is not project-specific but intended to cover AECL / CNL operations in the Algonquin Settlement Area.	• All 10 AOO communities are identified in Section 6.2.2 of the EIS and in Table 3-1 of the IER. They are more extensively described in Section 3 of this IER. • Section 6.2 4.2.1 of the EIS summarizes CNL engagement with AOO	• For the NPD Closure Project, CNL believes the concern about AOO's involvement is partially addressed with development of the long term relationship agreement. • As of 2021 November 26, CNL understands that this concern is outstanding from AOO's perspective until technical reviews are completed, issues are resolved or addressed and project commitments are established. • CNL and AOO have jointly developed a workplan for 2022 that identifies activities including AKLUS discussion, technical review and targeted workshops to resolve interests and concerns and develop project commitments. • Finalize the long term relationship agreement (anticipated for early 2022).

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	○ The AOO request an AOO-specific Aboriginal Engagement Plan that includes establishing a clear communication protocol between CNL and the AOO, provides a schedule for engagement opportunities, and identifies what opportunities will be provided for further input on the project (see CNL PI-154). ○ The AOO request AECL / CNL establish an LTRA with AOO (see CNL PI-156). ○ The AOO request that CNL and AECL commit to discussing future use and ownership of the NPD property and obtaining a Record of Site condition under O. reg. 153/04 to initiate the land transfer process.	○ LTRA topics of consideration include consultation and engagement, economic opportunities, future land uses, and environmental and cultural heritage stewardship and monitoring, etc. ○ CNL has provided funding to AOO to assist in participation of the development of the LTRA. ● In 2017 June, CNL held an AOO open house to which the AOO invited the entire AOO membership. AOO issues and concerns topics covered at the open house included: monitoring (current and proposed follow-up), future land use, protection of the Ottawa River and EA methodology. Approximately 15 AOO members attended. ● CNL has discussed contracting opportunities and provided connections to CNL Procurement staff. ● In 2019 January, CNL provided draft dispositions to CNL PI-140, CNL PI-154 and CNL PI-156 by letter to AOO (relevant sections of the EIS are indicated as part of the comment responses). In 2019 May, the AOO responded that current actions proposed for these comments are satisfactory. ● In 2021 May, CNL offered further support to the AOO to ensure this was not a barrier to meaningful participation in the EA for the NPD Closure Project. ● On 2021 August 09, CNL received a work plan and budget from the AOO for continued meaningful participation in the EA for the NPD Closure Project. ● On 2021 August 19, CNL confirmed capacity support for the AOO. ● In 2021 October, the AOO and CNL met to discuss the prioritization of engagement on the NSDF Project and the NPD Closure Project to facilitate the AOO’s desired “one-window” approach for engagement with CNL. ● In 2021 November, CNL provided a draft consolidated (between the projects), schedule for engagement to the AOO for review. ● On 2021 November 26, CNL received a number of comments on interests and concerns from the AOO, which CNL incorporated into the revised draft EIS.		
EA Methodology and Process	● In 2018 February, the AOO submitted formal comments on the 2017 draft EIS. Several were related to the EA Methodology and Process and topics of interest included: ○ Identification of potential project-environment interactions. (see CNL PI-118).	● In response to AOO’s request that CNL employ a lower threshold for determination of significant adverse residual effects, CNL has offered to review all environmental effects of the project with AOO and the thresholds for determination of significance of adverse residual effects.	● Relevant natural disasters for the NPD Disposal Facility are described in Section 8.12 of the revised draft EIS and a summary of the effects of the environment on the project is given in Section 9.14 of the 2020 revised draft EIS. Additional details and a range of scenarios that encompass the potential impacts from extreme weather and natural hazards are examined in the Decommissioning Safety	● As of 2021 November 26, CNL understands that this concern is outstanding from AOO’s perspective until they are able to complete their review of the revised draft EIS and CNL’s response to the registry comments. ● CNL and AOO have jointly developed a workplan for 2022 that identifies activities

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	- Extreme weather and natural hazard contingency planning. (see CNL PI-265). - Cumulative effects. (see CNL PI-270). - Determination of Significance of adverse residual effects. (see CNL PI-276).	In 2020 September, CNL provided draft dispositions to CNL PI-118, CNL PI-265, CNL PI-270 and CNL PI-276 by letter to AOO (relevant sections of the EIS are indicated as part of the comment responses).	Assessment TSD and the PostSA TSD. In all cases the predicted doses from these events were estimated to be well below the relevant dose criterion. - Section 9.13 of the 2020 revised draft EIS provides the process for evaluating cumulative effects and the assessment of cumulative effects for the NPD Closure Project. The EIS predicts a minor residual effect to SAR bats and therefore cumulative effects to SAR bats are evaluated using reasonably foreseeable developments. The EIS concludes that no cumulative effects to SAR bats are anticipated. - The 2020 revised EIS does predict one residual effect which is that demolition and grouting would cause the removal of the residence / hibernaculum of a small number of SAR bats (Section 9.6.3.5).	including AKLUS discussion, technical review and targeted workshops to resolve interests and concerns and develop project commitments. CNL proposes a workshop with the AOO to review the methodology for determining significance of effects.
End State, Site Restoration and Future Use of the Land	- In 2018 February, the AOO submitted formal comments on the 2017 draft EIS. Several were related to end state, site restoration and future use of the land; topics of concern and interest included: - Interest in having Algonquin community members participate in revegetation activities and long-term environmental monitoring. - Request for consultation and engagement on the site restoration plan and involvement of Algonquin community members in its associated activities (see CNL PI-86). - Recommendation that CNL/AECL enter formal discussion with AOO regarding potential land transfer arrangements (see CNL PI-136). - Impacts to Ottawa River shoreline (see CNL PI-261). - Long-term liability of the site beyond decommissioning. - Consideration of future socio-political changes that might impact land use. - Within the AKLUS report (received 2020 December), participants identified the following concerns and interests related to end state, site restoration and future use of the land: - Concern regarding potential impacts to fish, wildlife and plant species of importance to Algonquins. - Request that these fish, wildlife and plant species of importance to Algonquins are protected, monitored and that recommendations from the AKLUS are adhered to for each.	- In 2019 January, CNL provided draft dispositions to CNL PI-86, CNL PI-136 and CNL PI-261 by letter to AOO and in 2020 September, CNL provided updated dispositions (relevant sections of the EIS are indicated as part of the comment responses). - CNL has committed to sharing the draft restoration plan for AOO review once it is developed. - As follow up on CNL PI-136, CNL shared the Environmental Site Assessment Reports for NPD. - In their letter 2020 July, the AOO indicated that site restoration is a topic discussed as part of LTRA negotiations. - In 2021 August CNL responded to AOO comments on Environmental Site Assessment submitted in 2020 July. - In 2021 August CNL responded to the recommendations from the AKLUS report. - CNL has committed to sharing the draft restoration plan for feedback once it is available.	- General plans for restoration and end state are described in Section 4.3.1.9 of the revised draft EIS. - Future land use and land transfer are topics included as part of LTRA discussions and must include AECL. - Effects to the shoreline are evaluated as part of the Surface Water Environment. There will not be any changes or disturbance of the Ottawa River shoreline from NPD Closure Project activities. The EIS does not predict any adverse residual effects on the Surface Waste Environment (Section 9.3.3.5).	- As of 2021 November 26, CNL understands that this concern is outstanding from AOO's perspective. - CNL will share responses to the AOO's comments on the Environmental Site Assessment Report in 2021 December. - CNL will share the draft restoration plan for review once it is complete. - CNL will follow up with the AOO to understand in more detail the recommendations proposed by AOO from the final AKLUS. - CNL and AOO have jointly developed a workplan for 2022 that identifies activities including AKLUS discussion, technical review and targeted workshops to resolve interests and concerns and develop project commitments. - Finalize the LTRA (anticipated for early 2022).

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	- Request that Algonquin community members are provided opportunities to participate in follow-up monitoring and restoration work. - The AOO request that CNL and AECL commit to discussing future use and ownership of the NPD property and obtaining a Record of Site condition under O. reg. 153/04 to initiate the land transfer process. - The AOO has reviewed and provided comments on the Environmental Site Assessments as they relate to future use of the land.			
Monitoring	- The AOO has requested more generally that it wants a role in future environmental and cultural heritage stewardship and monitoring for the CRL and NPD sites. - In 2018 February, the AOO submitted formal comments on the 2017 draft EIS. Several were related to Monitoring and topics of interest and concern included: - As stewards of the lands and waters, the AOO request that CNL provide opportunities for direct involvement in CNL's EnvP program (see CNL PI-282). - Transparency of the monitoring process and inclusion of Algonquin community members to build confidence in the monitoring program (see CNL PI-283). - As stewards of the lands and waters, the AOO request CNL provide opportunities for the AOO and Algonquin community members to play an active role in all monitoring of the NPD site (see CNL PI-284). - Request that CNL provide the following monitoring plans to the AOO for their review and comment: surface water, groundwater, terrestrial environment, restoration, archaeological and AOO-specific environmental effects (see CNL PI-290 and CNL PI-292). - Monitoring of the terrestrial environment (see CNL PI-291). - Monitoring of effects on traditional land and resource use (see CNL PI-293). - Concern regarding the lack of baseline monitoring for benthic invertebrates, water quality, and contaminants in fish tissues. - Request for the installation of a monitoring well and collections system downgradient of the NPD site. - Request that CNL create an Environmental Review Board to promote the effective participation of AOO within the environmental management and monitoring programs for the NPD project.	- Through the LTRA, CNL has agreed with AOO's request to be involved in future stewardship and monitoring activities. - In 2019 January, CNL provided draft dispositions to CNL PI-282, CNL PI-283, CNL PI-284, CNL PI-290, CNL PI-291 and CNL PI-293 by letter to AOO (relevant sections of the EIS are indicated as part of the comment responses). In 2019 May, the AOO responded that they had partially accepted these responses but would like to receive the draft follow-up monitoring plans for review, comment / discussion. - CNL shared the draft follow-up monitoring plans with AOO for comment in 2019 August. - In 2020 September, CNL provided updated dispositions to the comments noted above and a disposition to CNL PI-292 by letter to AOO (relevant sections of the EIS are indicated as part of the comment responses). - In 2021 August CNL provided responses to AOO's comments on the draft follow-up monitoring plans and DRLs submitted in 2020 July. - In 2021 September CNL responded to the recommendations from the AKLUS report. - CNL has committed to involving Indigenous communities in its environmental monitoring programs and hosting workshops in fall 2021 to gather feedback on the draft follow-up monitoring plans.	- CNL has indicated that it is willing to involve all Indigenous communities in its monitoring programs (Section 6.2.4.4.2). - The follow up monitoring program is described at a high level in Section 12 of the revised draft EIS with significant details developed compared to the 2017 draft EIS. These details come through the development of the 3 drafts follow up monitoring plans for effluent, environment and groundwater. - CNL is seeking to incorporate input from Indigenous communities, the public and stakeholders before finalizing the EA Follow-up Program (EIS Section 12).	- As of November 26, 2021, CNL understands that this concern is outstanding from AOO's perspective. - CNL will share responses to the AOO's comments on the follow-up monitoring plans in December 2021. - CNL will follow up with the AOO to understand in more detail the recommendations proposed by AOO from the final AKLUS. - CNL and AOO have jointly developed a workplan for 2022 that identifies activities including AKLUS discussion, technical review and targeted workshops to resolve interests and concerns and develop project commitments.

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	• In 2020 July, the AOO submitted technical comments on the follow-up monitoring plans. Concerns and interests identified in this review included: ○ A request for funding of an Algonquin Country foods survey and monitoring program designed to monitor species harvested and gathered by Algonquins. ○ A request for funding to expand the Kichi-Sibi Guardians environmental monitoring program. ○ A request that CNL undertake annual monitoring of sediment and benthic macroinvertebrates with active participation by AOO Kichi-Sibi Guardians. ○ A request for vegetation monitoring once every five years during the Institutional Controls Phase. ○ Inclusion of effectiveness monitoring of SAR mitigation measures included in the environmental follow-up monitoring plan. ○ Concern about the release of radionuclides to the environment. ○ Concerns about how the DRL report is used in the development of the effluent follow-up monitoring plan. ○ Interest in better understanding the post-closure modelling. ○ A recommendation to include monitoring metrics that evaluate cumulative impacts from multiple stressors. ○ A recommendation that CNL maintain at least 5 monitoring wells downgradient of each landfill. ○ Concerns related to mercury in groundwater. ○ Concerns about the groundwater sampling frequency. ○ An interest in reviewing annually the follow-up monitoring reporting providing the AOO an important opportunity to understand and evaluate the monitoring activities and environmental performance of the project. ○ A concern that the draft follow-up monitoring plans lack clarity on how exceedances are addressed and how the AOO will be informed of any such exceedance. ○ A concern about adaptive management of the follow up monitoring plans, specifically changes that would reduce frequency of sampling and how these changes are communicated.			

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	• Within the AKLUS report (received 2020 December) participants identified the following concerns and interests related to monitoring and several recommendations related to monitoring were made: ○ Potential for contamination to waterways, plants fish and wildlife. ○ Bioaccumulation of contaminants in plant fish and wildlife species. ○ Impacts to SAR. ○ Safety of harvesting and gathering and consuming harvested and gathered foods. ○ Potential impacts to fish, wildlife and plant species of importance to Algonquins (a list of species of importance is provided in the AKLUS). ○ Request that species of importance to Algonquins are monitored, protected and that recommendations from the AKLUS are adhered to for each (a list of species of importance is provided in the AKLUS). ○ Proposal for a holistic, Algonquin-specific follow-up program approach to monitoring that recognizes the interdependencies between ecological, socio-economic, community and cultural health. ○ A repeated request for funding of an Algonquin Country foods survey and monitoring program designed to monitor species harvested and gathered by Algonquins.			
Protection of the Ottawa River	• AOO expressed that the protection of the Ottawa River is of extremely high priority to AOO. • In 2018 February, the AOO submitted formal comments on the 2017 draft EIS. Several were related to Protection of the Ottawa River and topics of interest included: ○ Release of radionuclides. (see CNL PI-7). ○ Drainage systems. (see CNL PI-32). ○ Wash out pit. (see CNL PI-84). ○ Historic water discharges. (see CNL PI-178, CNL PI-179 and CNL PI-233). • Within the AKLUS report participants identified the following concerns related to protection of the Ottawa River: ○ Loss of connection and use of lands and waters. ○ Proximity of the project to the Kichi-Sìbì. ○ Potential for contamination to waterways, plants and animals.	• In 2018, in response to public and Indigenous concerns, CNL ceased the practise of discharging liquid effluent from the facility sumps to the Ottawa River, and arranged for water to be sent to the Waste Treatment Centre at the CRL site. • In 2020 September, CNL provided draft dispositions to CNL PI-7, CNL PI-32, CNL PI-84, CNL PI-178, CNL PI-179 and CNL PI-233 by letter to AOO (relevant sections of the EIS are indicated as part of the comment responses). • In 2021 September CNL responded to the recommendations from the AKLUS report.	• Section 4.1 of the EIS highlights the in-design mitigation measures that act to isolate and contain the waste inventory within the NPD Disposal Facility to ensure protection of the surrounding environment including the Ottawa River. • Mitigation measures for the protection of surface water (Section 9.3.3.2) (including the Ottawa River) have been updated and expanded from the 2017 draft EIS. • Based on AOO feedback, the project scope (EIS Section 4.3.1.3) has been clarified with improved definition of requirements for the wash out pit. • CNL has also provided additional explanation in Section 8.3.3 of the 2020 revised draft EIS to clarify the history and basis for monitoring of the wells area sump. • The EIS does not predict any adverse residual effects on the surface water environment (encompassing the Ottawa River) (Section 9.3.3.5).	• As of 2021 November 26, CNL understands that this concern is outstanding from AOO’s perspective. • CNL will share responses to the AOO’s comments on the follow-up monitoring plans in 2021 December. • CNL will follow up with the AOO to understand in more detail the recommendations proposed by AOO from the final AKLUS. • CNL and AOO have jointly developed a workplan for 2022 that identifies activities including AKLUS discussion, technical review and targeted workshops to resolve interests and concerns and develop project commitments.

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	○ Impacts to the shoreline, and appropriate mitigation accommodation. ○ Lack of modelling to show contamination from groundwater reaching the Kichi-Sibi.			
Protection of Flora and Fauna	● AOO expressed the importance of flora and fauna to their communities, culture and Aboriginal Rights. ● The AOO seek to be further consulted and engaged on all future biological studies and continuing dialogue with CNL regarding their comments and recommendations from previous technical reviews. ● In 2018 February, the AOO submitted formal comments on the 2017 draft EIS. Several were related to protection of flora and fauna: ○ Concern regarding the lack of rationale for establishing the Terrestrial Environment regional study area (RSA). ○ Concern regarding the methodology used to characterize the baseline conditions at the NPD site (see CNL PI-120, CNL PI-159, CNL PI-186, CNL PI-188, CNL PI-189 and CNL PI-195). ○ Impacts to SAR including American eel and lake sturgeon. ○ Potential impacts to Chimney Swifts and avian species at risk (SAR) (see CNL PI-239 and CNL PI-269). ○ Potential impacts to migratory birds and their habitat (see CNL PI-240). ○ Potential impacts to reptilian SAR and the use of exclusion fencing (see CNL PI-243). ○ Potential impacts to wetland ecosystems by dust from demolition activities. ○ Lack of details regarding the exact locations of Project activities that could impact terrestrial vegetation and wetlands. ○ Concern regarding potential exposure of contaminants to fish. ○ Ecological Risk Assessment (see CNL PI-221, see CNL PI-340, CNL PI-341, CNL PI-342 and CNL PI-343). ● Within the AKLUS report participants identified the following interests and concerns related to protection of flora and fauna: ○ Loss of connection and use of lands and waters. ○ Potential for contamination to waterways, plants fish and wildlife. ○ Bioaccumulation of contaminants in fish species. ○ Impacts to SAR.	● CNL has completed additional site characterization since issuing the 2017 draft EIS. ● In 2019 January, CNL provided draft dispositions to CNL PI-195 by letter to AOO (relevant sections of the EIS are indicated as part of the comment responses). ● In 2019 May, Indigenous communities and the public were invited to participate in the National Chimney Swift Roost Counts. ● As requested by AOO, the Phase 1 and Phase 2 Environmental Site Assessments for the NPD site were shared with the AOO in 2019 August. ● In 2020 May, Indigenous communities and the public were invited to NPD's virtual Chimney Swift count night. ● In the summer of 2020, CNL completed sediment and benthic invertebrate sampling and fish habitat surveys to establish the baseline for follow-up monitoring. ● In 2020 September, CNL provided draft dispositions to CNL PI-120, CNL PI-159, CNL PI-186, CNL PI-189, CNL PI-221, CNL PI-239, CNL PI-240, CNL PI-243, CNL PI-269, CNL PI-340, CNL PI-341, CNL PI-342 and CNL PI-343 by letter to AOO (relevant sections of the EIS are indicated as part of the comment responses). An updated disposition was also provided for CNL PI-195. ● In 2021 September CNL responded to the recommendations from the AKLUS report.	● Table 5.2-2 of the EIS has been revised. Any reference to contaminants being screened out because they are due to past NPD operations has been removed. The table has been updated to reflect the more comprehensive Environmental Site Assessment results which include consideration of contaminants from past activities. ● Section 8.5.3.1 of the revised draft EIS now includes a summary of how the discrete areas of contamination identified in the Environmental Site Assessment were handled. ● Mitigation measures for the protection of flora and fauna are primarily outlined in Sections 9.6.3.2 (Terrestrial Environment). The 2020 revised draft EIS included additional mitigations related to milkweed (important habitat for monarch butterflies), migratory birds, bats, chimney swifts and milksnakes. Additional mitigations beyond those outlined in the 2020 revised draft EIS will be included in the 2021 revised draft EIS. ● The revised Ecological Risk Assessment TSD (64-509200-ASD-004 Revision 2) is now a standalone report and includes a clearer description of the method (in response to AOO formal comments on 2017 draft EIS). The EcoRA TSD continues to predict no effects on biota. ● The 2020 revised draft EIS does predict one residual effect which is that demolition and grouting would cause the removal of the residence / hibernaculum of a small number of SAR bats. However, no other residual effects for the terrestrial environment are predicted (Section 9.6.3.5).	● As of 2021 November 26, CNL understands that this concern is outstanding from AOO's perspective. ● CNL will share responses to the AOO's comments on the follow-up monitoring plans in 2021 December. ● CNL will follow up with the AOO to understand in more detail the recommendations proposed by AOO from the final AKLUS. ● CNL and AOO have jointly developed a workplan for 2022 that identifies activities including AKLUS discussion, technical review and targeted workshops to resolve interests and concerns and develop project commitments.

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	○ Safety of harvesting and gathering consuming harvested and gathered foods. ○ Potential impacts to fish, wildlife and plant species of importance to Algonquins (a list of species of importance is provided in the AKLUS). ○ Request that species of importance to Algonquins are monitored, protected and that recommendations from the AKLUS are adhered to for each (a list of species of importance is provided in the AKLUS). ○ A repeated request for funding of an Algonquin Country foods survey and monitoring program designed to monitor species harvested and gathered by Algonquins.			
Socio-Economic	● In 2018 February, the AOO submitted formal comments on the 2017 draft EIS. Several were related to socio-economic interests. (see CNL PI-209, CNL PI-258, CNL PI-259 and CNL PI-295). These concerns include: ○ Lack of an assessment of the socio-economic conditions and effects the project will have on Algonquin community members interacting with the NPD project. ○ Concern regarding residual nuisance effects that could impact economic livelihood opportunities of Algonquin community members and lack of mitigation measures for these. ○ Concern regarding the limited list of socio-economic VCs. ○ Concern regarding the adequacy of the effects assessment, specifically the lack of key socio-economic and community well-being components in the assessment. ○ Lack of information on how CNL will engage the AOO in developing employment and procurement opportunities. ○ Concern regarding the absence of a socio-economic effects monitoring plan. ○ Lack of accommodations and compensation to address impacts to the Kichi-Sibi. ● In particular, the AOO indicated an interest in CNL including a description of the socio-economic conditions for Indigenous communities that CNL is interacting with, a description of socio-economic interactions and their effects, a complete assessment including socio-economic indicators, and a description of planned monitoring and mitigating for socio-economic effects.	● In 2019 January, CNL provided draft dispositions to CNL PI-209, CNL PI-258, CNL PI-259, and CNL PI-295 by letter to AOO (relevant sections of the EIS are indicated as part of the comment responses). The AOO sent a letter responding to these dispositions in May 2019, indicating satisfaction with CNL’s disposition of the comments related to socio-economic interests, with specific recommendations. ● In 2019 August, CNL shared the content for the new Section on Indigenous socio-economics with the AOO. ● In 2020 May, CNL shared the 2020 March revised draft EIS which included the new Section on Indigenous socio-economics. ● In their letter 2020 July, the AOO indicated that socio-economic considerations are being discussed as part of our LTRA negotiations. ● In 2020 September, CNL shared again the dispositions to CNL PI-209, CNL PI-258, CNL PI-259 and CNL PI-295 by letter to AOO (relevant sections of the EIS are indicated as part of the comment responses).	● CNL added additional content to the EIS to address these interests: Section 8.10 and 9.10 Indigenous Socio-Economic and Health (included in the March 2020 revised draft EIS). ● Section 9.10.1.2 of the EIS describes the interactions of the Indigenous Socio-Economic environment and the project as well as proposed mitigations. ● The EIS does not predict any adverse residual effects on Indigenous socioeconomics or health (Section 9.10.1.4 and 9.10.2.4).	● As of 2021 November 26, CNL understands that this concern is outstanding from AOO’s perspective. ● CNL will share responses to the AOO’s comments on the Aboriginal socio-economic section of the EIS in 2021 December. ● CNL will follow up with the AOO to understand in more detail the recommendations proposed by AOO from the final AKLUS. ● CNL and AOO have jointly developed a workplan for 2022 that identifies activities including AKLUS discussion, technical review and targeted workshops to resolve interests and concerns and develop project commitments.

Topic	AOO Key Interests and Concerns	How CNL is addressing the interest/concern	Impact on the EIS	Status of this Concern and Next Steps
	- Within the AKLUS report, participants identified the following interests and concerns related to socio-economics: - Request that a socio-economic accommodation plan is developed to address concerns with cumulative effects and unavoidable impacts.			
Technical	- In 2018 February, the AOO submitted formal comments on the 2017 draft EIS. Several were technical topics: - PostSA TSD and Indigenous Health, including verification with the AOO that models of AOO citizen exposure and dose are accurate for use in the development of critical group scenarios and resource use. (see CNL PI-232, CNL PI-251, CNL PI-310, CNL PI-336, CNL PI-337 and CNL PI-338). - Emissions - noise, dust, air. (see CNL PI-254, CNL PI-227, CNL PI-228 and CNL PI-109). - Technical suitability of cement (and natural analogues) and the batch plant construction details. (see CNL PI-44 and CNL PI-241). - DRLs. (see CNL PI-320). - Lack of dispersion modelling for discharges from the wells area sump and for groundwater seepage. - Amendments required to the EcoRA to incorporate second iteration of models and re-interpretation of results. - Inadequate screening process for radionuclides included in the EcoRA based on the lack of a dose coefficient. - Lack of reporting on doses to no-human species in Table 2.16 of the EcoRA. - The AOO provided specific comments on DRLs in 2020 July. The following interests and concerns were identified: - A request for additional information on how CNL has grouped radionuclides and a request to establish DRLs for all nuclides known to be in the reactor vault. - The need to include groundwater as a transport pathway for the derivation of DRLs. - Adoption of a model that has an adequate sample size and considers the Algonquin lifestyle in its calculation of exposure / dose to the critical group. - Concerns about exclusion of certain foods from the ingestion modelling. - A recommendation to model a critical group with exposure pathways dominated by resources from	- In 2019 January, CNL provided draft dispositions to CNL PI-109, CNL PI-251, CNL PI-254, and CNL PI-320 by letter to AOO (relevant sections of the EIS are indicated as part of the comment responses). The AOO sent a letter responding to these dispositions in 2019 May, indicating that they had partially accepted CNL's responses and asking to review the follow-up monitoring plans and DRL report. - CNL shared the draft follow-up monitoring plans with AOO for comment in 2019 August. - CNL shared the NPD DRL report with AOO in 2019 August. - In the 3rd iteration of the PostSA TSD (64-508760-ASD-005) issued in 2020 March, CNL included within the model an Indigenous receptor. The exposure profile was developed based on an Aboriginal Lifestyle Characterization completed for the NWMO. This study considered traditional Indigenous lifestyles pre-contact. - In 2020 September, CNL provided draft dispositions to CNL PI-232, CNL PI-310, CNL PI-336, CNL PI-337, CNL PI-338, CNL PI-227, CNL PI-228, CNL PI-41 and CNL PI-241 by letter to AOO (relevant sections of the EIS are indicated as part of the comment responses). - CNL has developed a draft effluent monitoring plan (shared with the AOO in 2019 August) that describes the monitoring of emissions for the NPD Closure Project. - DRLs are used for routine effluent releases from a facility. They are not used for decommissioning of the NPD reactor. This is covered in the post closure safety assessment.	- The predicted peak dose to the Indigenous receptor (from the 3rd iteration PostSA) is 0.0004 mSv/yr which is 500 times less than the dose criterion. The analysis demonstrates that under all scenarios the impact on the public, Indigenous and the environment is negligible. - In response to comments from the AOO and others, the revised draft EIS now includes a comprehensive discussion of natural analogues (Section 4.1.2), including cement, and their relevance to the project. - The 2020 revised draft EIS includes the preferred location for the batch plant in Section 4.3.1.2 which is not predicted to have any effect on terrestrial vegetation or wetland areas (the area was previously disturbed and is well away from wetlands). - Section 9.2.3 of the EIS provides the mitigation measures and monitoring for dust and noise and the draft follow up monitoring plans provide details for monitoring of hazardous substances. - The EIS does not predict any adverse residual effects on the aquatic (Section 9.4.3.3) or terrestrial environment (Section 9.6.3.3) as a result of potential emissions during the NPD Closure Project.	- As of 2021 November 26, CNL understands that this concern is outstanding from AOO's perspective. - CNL will share responses to the AOO's comments on the Derived Release Limits in 2021 December. - CNL and AOO have jointly developed a workplan for 2022 that identifies activities including AKLUS discussion, technical review and targeted workshops to resolve interests and concerns and develop project commitments.

Topic	AOO Key Interests and Concerns	How CNL is addressing the interest/concern	Impact on the EIS	Status of this Concern and Next Steps
	hunting, trapping, fishing and gathering of berries and medicinal plants. ○ A concern about the maximum atmospheric deposition in relation to the location of the critical group. ○ A concern about the quality of the data used for NPD DRLs.			
Algonquin Knowledge, Land and Resource Use and Cultural Impacts	• The AOO identified the need for traditional knowledge to be incorporated into the EIS. • The AOO requested funding for an Algonquin Knowledge and Land Use Study (AKLUS). • In 2018 February, the AOO submitted formal comments on the 2017 draft EIS. Several were related to traditional knowledge, land and resource use and cultural impacts. These concerns include: ○ Concern regarding residual nuisance effects that could impact land use access for traditional practices and lack of mitigation. ○ Lack of adequate notice and capacity resources for the AOO to participate in the Stage 1 Archaeological Assessment field visit. ○ Lack of AOO-specific mitigation measures for cultural resources, harvesting locations, and areas of traditional ecological knowledge of significance. ○ Lack of AOO-specific environmental effects monitoring plan and program for protecting and mitigating potential impacts on areas of traditional land use areas of cultural significance. ○ Concern regarding accommodation and compensation of trapline holders within the RSA. • Within the AKLUS report, participants identified the following concerns with respect to traditional land and resource use and cultural impacts: ○ Impacts to SAR including American eel and lake sturgeon. ○ Loss of connection to and use of Lands and Water. ○ Proximity of the project to the Kichi-Síbi. ○ Potential for contamination to waterways, plants and animals. ○ Concerns about the safety of harvesting and consuming harvested foods. ○ Changes, past and present, to accessing important Algonquin cultural sites. ○ The need for long-term nuclear waste storage and the risk of the project activity impacts to ancestral values.	• CNL has sent 2 targeted letters asking specific questions of AOO to align with the requirements of CEAA 2012 Section 5.1 (c). • CNSC and CNL have contributed funds for the AOO to undertake an AKLUS which was completed in 2020 December. • CNL has acknowledged that only a limited amount of general information currently exists in secondary sources on Algonquin traditional use in the Ottawa Valley. • The EIS has assumed traditional uses do occur adjacent to the NPD site, whether on the Ottawa River or outside the restricted / fenced area. • CNL has also assumed that in the future there is an interest to re-establish traditional use activities on the NPD site. • In 2019 January, CNL provided a draft disposition to CNL PI-208 by letter to AOO (relevant section of the EIS is indicated as part of the comment response). The AOO sent a letter responding to this dispositions in 2019 May, indicating that they had partially accepted CNL's response and that AOO were working to complete the AKLUS. • In 2020 September, CNL shared an updated disposition to CNL PI-208 by letter to AOO (relevant sections of the EIS are indicated as part of the comment responses). • In 2021 May CNL shared the proposed content from the AKLUS that CNL intends to include in the 2021 revised draft EIS. • In 2021 June the AOO responded to the 2021 May email enclosing this content and confirmed that they were working on a budget and work plan. • In 2021 July CNL followed up with the AOO on the correspondence of May and June. • In 2021 September CNL responded to the recommendations from the AKLUS report.	• The 2020 revised draft EIS included expanded description of traditional uses in Section 8.9 and new traditional use VCs were added and evaluated (Section 9.9). • Content from the AKLUS report will be added to the 2021 revised draft EIS. • The EIS does not predict any adverse residual effects on the traditional land and resource use (Section 9.9.3.3).	• As of 2021 November 26, CNL understands that this concern is outstanding from AOO's perspective. • CNL will follow up with the AOO to understand in more detail the recommendations proposed by AOO from the final AKLUS. • CNL and AOO have jointly developed a workplan for 2022 that identifies activities including AKLUS discussion, technical review and targeted workshops to resolve interests and concerns and develop project commitments.

Topic	AOO Key Interests and Concerns	How CNL is addressing the interest/concern	Impact on the EIS	Status of this Concern and Next Steps
	- Request that species of importance to Algonquins are monitored, protected and that recommendations from the AKLUS are adhered to for each (a list of species of importance is provided in the AKLUS). - Proposal for a holistic, Algonquin-specific follow-up program approach to monitoring that recognizes the interdependencies between ecological, socio-economic, community and cultural health. - A repeated request for funding of an Algonquin Country foods survey and monitoring program designed to monitor species harvested and gathered by Algonquins. The AKLUS also outlined mitigation measures for Algonquin land use and occupancy values that were identified to address concerns regarding potential impacts of the NPD project.			
Valued Components	- Throughout engagement activities and correspondence between the AOO and CNL the AOO indicated interest in specific Valued Components (as recently as 2020 July). - The AOO have expressed interests and concerns in Valued Components related to the NPD Closure Project in their comments on the draft EIS (2017) (see CNL PI-124, CNL PI-127, CNL PI-128 and CNL PI-129). These concerns include: - Concern regarding the narrow list of species included in the list of VCs, including species under Traditional Land Use, and Terrestrial Environment and fish species (particularly, piscivorous fish species and species of importance to the AOO). - Lack of clear engagement of Indigenous peoples on the selection of candidate VCs. - Concern regarding the limited list of socio-economic VCs. - In their letter to CNL in July of 2020 the AOO requested that CNL include the following VCs in their draft EIS and IER: - Fish: lake trout, sauger, muskellunge (fishing). - Mammals: beaver, marten, mink, .otter, rabbit / hare, fox (trapping); elk (hunting) - Vegetation: specification of key berry species including cranberries, blueberries, raspberries and service berries (gathering). - Mammals: muskrat, (trapping); black bear (hunting). - Birds: bald eagle (cultural significance); waterfowl and grouse (hunting).	- CNL has sent 2 targeted letters asking specific questions of AOO to align with the requirements of CEAA 2012 Section 5.1 (c). - In January 2019, CNL provided draft dispositions to CNL PI-124, CNL PI-127, CNL PI-128 and CNL PI-129 by letter to AOO (relevant section of the EIS is indicated as part of the comment response). The AOO sent a letter responding to these dispositions in 2019 May, recommending updates to VCs based on AKLUS results. - CNL has included Valued Components that have been added from Indigenous feedback in Section 6.3.2 of the EIS – specifically in Table 6.3-1(a) and Table 6.3-2, VCs identified by AOO through their AKLUS are listed. - In 2020 September, CNL shared an updated dispositions to the AOO comments noted above by letter to AOO (relevant sections of the EIS are indicated as part of the comment responses). - In 2021 September CNL responded to the recommendations from the AKLUS report. - CNL has committed to assess any new VCs to ensure they are considered in the EIS effects assessment.	- With respect to the Valued Components indicated by the AOO, some were not found in the EIS previously and some were represented by species that CNL was already evaluating as Valued Components. Tables 6.3-1 and 6.3-2 of the EIS highlights how valued components identified by AOO are represented by the species that are evaluated in the NPD EIS. - The revised draft EIS included expanded description of traditional uses in Section 8.9 and new traditional use VCs were added and evaluated (Section 9.9). Section 9.9 describes the Valued Components related to Traditional Land Use, including the rationale, the mitigation, monitoring and follow-up activities related to the Traditional Land Use Valued Components. - Section 9.6.3.2 describes the mitigation, monitoring and follow up activities for the Terrestrial Environment Valued Components. - The EIS does not predict any adverse residual effects to traditional land and resource use (Section 9.9.3.3). - The 2020 revised draft EIS does predict one residual effect which is that demolition and grouting would cause the removal of the residence/hibernaculum of a small number of SAR bats. However, no other residual effects for the terrestrial environment are predicted (Section 9.6.3.5).	- As of 2021 November 26, CNL understands that this concern is outstanding from AOO’s perspective until they are able to complete their review of the revised draft EIS and CNL’s response to the registry comments. - CNL will follow up with the AOO to understand in more detail the recommendations proposed by AOO from the final AKLUS. CNL and AOO have jointly developed a workplan for 2022 that identifies activities including AKLUS discussion, technical review and targeted workshops to resolve interests and concerns and develop project commitments.

Topic	AOO Key Interests and Concerns	How CNL is addressing the interest/concern	Impact on the EIS	Status of this Concern and Next Steps
	- Within the AKLUS report, participants identified a number of features within proximity to the NPD Closure Project including: - Habitat for wildlife (e.g., moose, white-tailed deer, bear, fox, wolf, five-lined skink and wild turkey). - Habitat for plants (e.g., oak, pine, birch, many other medicines). - Cultural sites (e.g., burial sites, historically significant sites, spiritual sites). - Commercial trapping. - Spawning habitat. - Wildlife and harvesting and fishing areas. - Plant and Natural materials gathering areas. - SAR habitat. - Travel routes. - Overnight locations. - Boat launches or landings. - The AKLUS recommendations also identified an interest to conduct a collaborative CNL-AOO VC gap analysis between the findings of the AKLUS and revised draft EIS.			

J.3 Mapping of AOO Key Interests and Concerns

Topic	Key Interests and Concerns	Specific feedback provided by the AOO on this interest/concern
1. Algonquin Knowledge, Land and Resource Use and Cultural Impacts	(a) Algonquin traditional knowledge should be collected and incorporated into the EIS. It is important to the AOO that CNL solicit and use the AOO’s community-specific knowledge in order to properly characterize current site conditions, develop scenarios that accurately represent potential future uses of the site, and ensure that species and traditional uses are properly considered by the project. This is a project-specific concern.	In its comments on the 2017 draft EIS, the AOO identified the need for traditional knowledge to be incorporated into the EIS. Through the contribution agreement between the AOO and CNL, the AOO requested funding for an Algonquin Knowledge and Land Use Study (AKLUS). The AKLUS report identified the recommendations and concerns with respect to traditional land and resource use and cultural impacts, including a request for funding of an Algonquin Country foods survey and monitoring program designed to monitor species harvested and gathered by Algonquins.
1. Algonquin Knowledge, Land and Resource Use and Cultural Impacts	(b) Impact on ability to practice traditional activities. As stewards of the lands and waters, it is important to the AOO that the environment around the site of the NPD Closure Project, including flora and fauna, are protected, and that the rights and interests of AOO members are upheld in relation to the environment (i.e., hunting, trapping, gathering, fishing and cultural ceremonies). This is a project-specific concern.	In its comments on the 2017 draft EIS, the AOO raised concerns about residual nuisance effects that could impact land use access for traditional practices and lack of mitigation measures. With respect to traditional land and resource use and cultural impacts, the AKLUS report identified the following concerns: - Loss of connection to and use of lands and water; - Safety of harvesting and consuming harvested foods; - Changes, past and present, in access to important Algonquin cultural sites. The AKLUS report identified recommendations and concerns with respect to traditional land and resource use and cultural impacts, including a request for funding of an Algonquin Country foods survey and monitoring program designed to monitor species harvested and gathered by Algonquins.
1. Algonquin Knowledge, Land and Resource Use and Cultural Impacts	(c) Safety of harvested and gathered foods. It is important to the AOO that the environment, including the flora and fauna, is protected, and to ensure that the rights and interests of AOO members are upheld.	Within the AKLUS report, participants identified concerns about the safety of harvesting and gathering, and of consuming harvested and gathered foods. The AKLUS recommendations also included a request for funding of an Algonquin Country foods survey and

Topic	Key Interests and Concerns	Specific feedback provided by the AOO on this interest/concern
	This is both a site-wide and project-specific concern.	monitoring program designed to monitor species harvested and gathered by Algonquins.
1. Algonquin Knowledge, Land and Resource Use and Cultural Impacts	(d) Lack of AOO-specific mitigation measures, monitoring program, accommodation and compensation measures. It is important to the AOO that species of importance are monitored and protected in a way that recognizes the interdependencies between ecological, socio-economic, community and cultural health. It is also important to the AOO to accommodate and/or compensate those who may experience adverse impacts from the project. This is both a site-wide and project-specific concern.	The AOO submitted formal comments on the 2017 draft EIS. These comments included concerns about: - Lack of AOO-specific mitigation measures for cultural resources, harvesting locations, and areas of traditional ecological knowledge of significance; - Lack of AOO-specific environmental effects monitoring plan and program for protecting and mitigating potential impacts on areas of traditional land use areas of cultural significance; - Concern regarding accommodation and compensation of trapline holders within the Regional Study Area. The AKLUS report identified the following concerns with respect to traditional land and resource use and cultural impacts: - Request that species of importance to Algonquins are monitored, protected and that recommendations from the AKLUS are adhered to for each (a list of species of importance is provided in the AKLUS); - Proposal for a holistic, Algonquin-specific follow-up program approach to monitoring that recognizes the interdependencies between ecological, socio-economic, community and cultural health. The AKLUS report also outlined mitigation measures for Algonquin land use and occupancy values that were identified to address concerns regarding potential impacts of the NPD Closure Project.
1. Algonquin Knowledge, Land and Resource Use and Cultural Impacts	(e) Concern about balancing the need for long-term nuclear waste storage and the risk of impacts to ancestral or Algonquin values. It is important to the AOO that CNL provide information and commitments that will encourage further engagement and address community members' perception of risk to ancestral values, including particular species and traditional knowledge and land use activities. This is a project-specific concern.	The AKLUS report identified concerns about the balance between the need for long-term nuclear waste storage and the risk of the project activities impacting ancestral values. Note: the risk of the project impacts on ancestral values is discussed in Row 4(a) below.
2. Unceded Algonquin traditional territory	(a) The AOO would like recognition in the EA that the NPD site is within the unceded Algonquin traditional territory. This is important to the AOO because this area is part of ongoing land claim negotiations. This is both a site-wide and project-specific concern.	In its comments on the 2016 Project Description, the AOO requested that a statement be included in the Project Description acknowledging that the NPD site is in the unceded Algonquin traditional territory.
3. Alternatives	(a) Concern about the suitability of In-situ disposal (ISD). It is important to the AOO that future users of land on the NPD site are protected. This is a project-specific concern.	In its comments on the 2017 draft EIS, the AOO raised a concern about the suitability of ISD as an alternative.
3. Alternatives	(b) Concern that the EIS does not provide enough information on the alternatives to ISD. It is important to the AOO that they have enough information to be able to evaluate the alternatives. This is a project-specific concern.	The AOO submitted formal comments on the 2017 draft EIS. Some were related to provision of information on alternative means: - The AOO expressed the opinion that CNL has provided insufficient discussion of alternatives to in-situ disposal in its 2017 draft EIS; - It is AOO's position that CNL has failed to adequately address the requirements of CEAA, 2012; - The AOO has requested that CNL provide a quantitative assessment of the impacts of each alternative means on VCs.
4. Archaeology and Cultural Heritage	(a) Concerns about the impact of the project on features of cultural importance. It is important to the AOO to that its members are aware of any remaining Algonquin cultural heritage resources on the NPD site, and these resources be preserved. It is also important that the AOO be given the opportunity to be involved in any future archaeological activities at the site. This is a project-specific concern.	In its comments on the NPD Project Description, the AOO stated the significance of archaeological resources within their claim area. The AOO submitted formal comments on the 2017 draft EIS. Several were related to archaeology:

Topic	Key Interests and Concerns	Specific feedback provided by the AOO on this interest/concern
		• AOO indicated it was not provided adequate notice to participate in the Stage 1 Archaeological Assessment field visit and requested notice and capacity to participate in future archaeological activities; • The AOO expressed interest in a long-term archaeological agreement with CNL, which would involve additional field research to be conducted in collaboration with the AOO; • The AOO note that Algonquins used the area prior to European contact, and therefore, there may be areas of significance to AOO; • The AOO have requested an archaeological monitor for oversight activities at the NPD site. The AKLUS report identified the following concerns with respect to traditional land and resource use and cultural impacts: • Changes, past and present, to accessing important Algonquin cultural sites; • Access to a historic family village site near the NPD site; • Balancing the need for long-term nuclear waste storage and risk of the project activity impacts to ancestral values. Note: the need for long-term nuclear waste storage is discussed in Row 1(d) above. In the recommendations of the AKLUS report, the AOO propose: • CNL funding to conduct further archaeological assessments across the NPD site; • Protection of areas of archaeological potential during decommissioning activities; • Development of a stop-work process; • Development of a sustainable archaeological research program.
5. Accidents & Malfunctions	(a) Contingency plans for extreme weather and natural hazards that may impact or damage the NPD facility. It is important to the AOO that CNL demonstrate that it has planned for the potential impacts of flooding and other extreme weather events, because the frequency and intensity of such events is expected to increase due to climate change. This is a project-specific concern.	In its comments on the 2017 draft EIS, the AOO expressed concern about extreme weather and natural hazard contingency planning.
6. Engagement	(a) Continued meaningful engagement using best practices. It is important to the AOO that its members be meaningfully engaged on the project, because the project is located within the unceded Algonquin traditional territory. This is a project-specific concern.	In its comments on the 2017 draft EIS, the AOO requested continued engagement using best practices. In addition, at the start of the project, the AOO communicated that it wanted to ensure that engagement occurred with all 10 communities that are included under the umbrella of the AOO, not just AOPFN.
6. Engagement	(b) Establishment of an AOO-specific Aboriginal Engagement plan and a Long-Term Relationship Agreement (LTRA). It is important to the AOO that formal plans and agreements are in place with CNL because they provide opportunities for the AOO to discuss all the issues that are important to them related to CNL operations. This is a site-wide concern.	The AOO submitted formal comments on the 2017 draft EIS. Several were related to communication, engagement and engagement, including: • The AOO request an AOO-specific Aboriginal Engagement Plan that includes establishing a clear communication protocol between CNL and the AOO, provides a schedule for engagement opportunities, and identifies what opportunities will be provided for further input on the project; • The AOO request that AECL/CNL enter into negotiations with the AOO to establish a LTRA; • The AOO has requested that future consultation, engagement, accommodations, monitoring and oversight, and communications be included as part of LTRA discussions; this refers to engagement beyond that in support of current projects; • The AOO has requested that as part of LTRA discussions employment, training, contracting, and other economic interests be included as part of LTRA discussions; this includes NPD.

Topic	Key Interests and Concerns	Specific feedback provided by the AOO on this interest/concern
7. EA Process and Methodology	(a) Concern about the process for identifying potential project-environment interactions: technical decisions should be explained clearly and peer-reviewed. It is important to the AOO that the decisions taken by technical staff are transparent and traceable. The AOO feel that the use of peer review would ensure that technical decisions are supported by evidence and correct interpretations. This is a project-specific concern.	In its comments on the 2017 draft EIS, the AOO sought additional technical detail and explanation on how CNL had identified potential project-environment interactions.
7. EA Process and Methodology	(b) Interest in additional cumulative effects analysis: - Releases from NPD, CRL and other sources along the Ottawa River; - Overall NPD site, including all sources of contamination. Information about cumulative effects is important to the AOO because the AOO is interested in the overall protection of the Kichi-Sibi and the NPD site, not just the impacts of a single project. This is a project-specific concern.	In its comments on the 2017 draft EIS, the AOO requested that an analysis of cumulative effects be conducted for the releases from the NPD site and those from CRL and other industries and cities on the Ottawa River. The AOO also requested an assessment of cumulative effects of the overall NPD site, including all sources of contamination (landfills, wetlands, stored materials, etc.). The AKLUS report included a recommendation requesting an Algonquin led cumulative effects assessment.
7. EA Process and Methodology	(c) Concerns about the methodology for determination of significance of adverse residual effects. It is important to the AOO that events with the potential for a high level of effects are carried through the assessment as far as is reasonable. This is a project-specific concern.	In its comments on the 2017 draft EIS, the AOO expressed a concern about the methodology used for determination of significance of adverse residual effects. The AOO requests that CNL employs a lower threshold for the determination of significant adverse residual effects.
8. End State, Site Restoration and Future Use of the Land	(a) Engagement/consultation on end state, site restoration and future land use of the site. It is important to AOO that its members be engaged/consulted meaningfully, not just informed, on end state, site restoration and future land use. Additionally, it is important to the AOO that the end state of the NPD site is safe for future land users. This is both a site-wide and a project-specific concern.	The AOO submitted formal comments on the 2017 draft EIS. Several were related to end state, site restoration and future use of the land; topics of concern and interest included: - Request for consultation and engagement on the site restoration plan and involvement of Algonquin community members in associated activities; - Recommendation that CNL/AECL enter formal discussion with AOO regarding potential land transfer arrangements. In the AKLUS report, the AOO request that CNL and AECL commit to discussing future use and ownership of the NPD property and obtaining a Record of Site condition under O. Reg. 153/04 to initiate the land transfer process. In addition, the AOO has reviewed and provided comments on the Environmental Site Assessments (ESA) as they relate to future use of the land.
8. End State, Site Restoration and Future Use of the Land	(b) Participation in activities related to end state, site restoration and future land use of the site. Involvement is important to the AOO, to ensure transparency and promote confidence in these activities. This is both a site-wide and project-specific concern.	The AOO submitted formal comments on the 2017 draft EIS. Several were related to end state, site restoration and future use of the land; topics of concern and interest included: - Interest in having Algonquin community members participate in revegetation activities and long-term environmental monitoring; - Request for consultation and engagement on the site restoration plan and involvement of Algonquin community members in its associated activities; - In the AKLUS report, the AOO request that Algonquin community members are provided opportunities to participate in follow-up monitoring and restoration work.
8. End State, Site Restoration and Future Use of the Land	(c) Impact of future socio-political changes on land use. It is important to the AOO that CNL fully consider and assess the impacts of potential future socio-political conditions. This is both a site-wide and project-specific concern.	In their comments on the 2017 draft EIS, the AOO expressed concern over how CNL considered future socio-political changes that might impact land use.
8. End State, Site Restoration and	(d) Long-term liability of the site beyond decommissioning. The AOO have concerns about the long-term integrity of the concrete vault, facility exterior walls and	The AOO submitted formal comments on the 2017 draft EIS. Several were related to end state, site restoration and future use of the land. One topic of concern was the long-term liability of the site beyond decommissioning.

Topic	Key Interests and Concerns	Specific feedback provided by the AOO on this interest/concern
Future Use of the Land	foundations. The AOO considers activities using the seven generation lens and thus is concerned about who will be responsible if environmental events (such as earthquakes) affect the facility over the long term. It is important to the AOO that the end state of the NPD site is safe for future land users. This is a project-specific concern.	
9. Environmental Effects and Mitigation Measures	(a) Potential impacts to Ottawa River shoreline and to fish, wildlife and plants. This is of interest to the AOO because the Kichi-Sibi and these species are of particular importance to the AOO. This is a project-specific concern.	In their comments on the 2017 draft EIS, the AOO expressed concern about restoration of the Ottawa River shoreline. The AKLUS report identified concerns and interests related to end state, site restoration and future use of the land, including: - Concern about potential impacts to fish, wildlife and plant species of importance to Algonquins; - Request that fish, wildlife and plant species of importance to Algonquins be protected and monitored, and that recommendations from the AKLUS are adhered to for each species. Impacts to the shoreline, and appropriate mitigation or accommodation.
10. Indigenous Health	(a) PostSA TSD and Indigenous Health. It is important to AOO that the Algonquin lifestyle is accurately reflected when predicting radiation doses to AOO citizens. This is a project-specific concern.	The AOO submitted formal comments on the 2017 draft EIS. The incorporation of the Algonquin lifestyle in CNL's PostSA TSD and the assessment of Indigenous health were technical aspects identified by the AOO. The AOO was seeking verification that models of AOO citizen exposure and doses are representative and accurate for use in the development of critical group scenarios and resource use.
11. Monitoring	(a) Participation in activities related to environmental and cultural heritage stewardship and monitoring. Involvement is important to AOO to ensure transparency and promote confidence in these activities. This is both a site-wide and project-specific concern.	The AOO has requested more generally that it wants a role in future environmental and cultural heritage stewardship and monitoring for the CRL and NPD sites. The AOO submitted formal comments on the 2017 draft EIS. Several were related to monitoring, and topics of interest and concern included: - Request that CNL provide opportunities for direct involvement in CNL's EnvP program for the AOO, as the AOO are stewards of the lands and waters. Transparency in the monitoring process and inclusion of Algonquin community members to build confidence in the monitoring program; - Request that CNL provide opportunities for the AOO and Algonquin community members to play an active role in all monitoring of the NPD site, as the AOO are stewards of the lands and waters; - Request that CNL create an Environmental Review Board to promote the effective participation of AOO within the environmental management and monitoring programs for the NPD Closure Project.
11. Monitoring	(b) Review of the CNL's draft follow-up monitoring plans. It is important to the AOO that it has an opportunity to provide input into monitoring details (e.g., frequency, location, parameters) This is a project-specific concern.	The AOO submitted formal comments on the 2017 draft EIS. Several were related to monitoring, and topics of interest and concern included: - Request that CNL provide the following monitoring plans to the AOO for their review and comment: surface water, groundwater, terrestrial environment, restoration, archaeological and AOO-specific environmental effects; - Monitoring of the terrestrial environment; - Monitoring of effects on traditional land and resource use; - Request for the installation of a monitoring well and collections system downgradient of the NPD site. The AOO submitted technical comments on the draft follow-up monitoring plans. Concerns and interests identified in this review included:

Topic	Key Interests and Concerns	Specific feedback provided by the AOO on this interest/concern
		• Interest in better understanding the post-closure modelling; • Concerns about the groundwater sampling frequency.
11. Monitoring	(c) AOO recommendations and requests for additional monitoring. Implementing these requests would provide additional assurances to AOO community members, and others, who may resume using the site for a range of uses in the future. This is a project-specific concern.	In their comments on the 2017 draft EIS, the AOO expressed concern regarding the lack of baseline monitoring for benthic invertebrates, water quality, and contaminants in fish tissues. The AOO submitted technical comments on the draft follow-up monitoring plans. Concerns and interests identified in this review included: • Concerns related to mercury in groundwater; • Request for funding of an Algonquin Country foods survey and monitoring program designed to monitor species harvested and gathered by Algonquins; • Request for funding to expand the Kichi-Sibi Guardians environmental monitoring program; • Request that CNL undertake annual monitoring of sediment and benthic macroinvertebrates with active participation by AOO Kichi-Sibi Guardians; • Request for vegetation monitoring once every five years during the Institutional Controls Phase; • Inclusion of effectiveness monitoring of SAR mitigation measures in the draft Follow-up Environmental Monitoring Plan; • Recommendation that CNL maintain at least five monitoring wells downgradient of each landfill. The AKLUS report identified the following concerns and interests and made several requests and recommendations related to monitoring: • Safety of harvesting and gathering and consuming harvested and gathered foods; • Request that species of importance to Algonquins are monitored, protected and that recommendations from the AKLUS are adhered to for each (a list of species of importance is provided in the AKLUS); • Proposal for a holistic, Algonquin-specific follow-up program approach to monitoring that recognizes the interdependencies between ecological, socio-economic, community and cultural health; • Request for funding of an Algonquin Country foods survey and monitoring program designed to monitor species harvested and gathered by Algonquins.
11. Monitoring	(d) Monitoring Plan design and implementation and communication of changes. As long-term stewards and users of the land, it is important to the AOO to be actively involved in oversight of the NPD area. This is a project-specific concern.	The AOO submitted technical comments on the draft follow-up monitoring plans. Concerns and interests identified in this review included: • Concern about how the derived release level (DRL) report is used in the development of the draft Follow-up Effluent Monitoring Plan; • Recommendation to include monitoring metrics that evaluate cumulative impacts from multiple stressors; • Interest in reviewing annually the follow-up monitoring reporting, which would provide an important opportunity for the AOO to understand and evaluate the monitoring activities and environmental performance of the project; • Concern that the draft follow-up monitoring plans lack clarity on how exceedances are addressed and how the AOO will be informed of an exceedance; • Concern about adaptive management of the draft follow-up monitoring plans, specifically changes that would reduce frequency of sampling and how these changes would be communicated.
12. Protection of the Ottawa River	(a) Contamination in the Ottawa River and the environment. As stewards of the lands and waters, it is important to the AOO that the environment, including flora and	The AOO submitted formal comments on the 2017 draft EIS. Several comments were related to protection of the Ottawa River; topics of interest included:

Topic	Key Interests and Concerns	Specific feedback provided by the AOO on this interest/concern
	fauna are protected. AOO expressed that the protection of the Ottawa River is of extremely high priority to AOO. This is a project-specific concern.	- Washout pit (an engineered catchment that collect surface water from equipment washout); - Historic water discharges; - Protection of the Ottawa River with a specific interest in drainage systems. The AOO’s technical comments on the draft follow-up monitoring plans included concern about release of radionuclides to the environment. The AKLUS report identified the following concerns related to monitoring: - Proximity of the project to the Kichi-Sibi; - Potential for contamination to waterways, plants, fish and wildlife. The AKLUS report identified a concern that there is a lack of modelling to understand how contamination from groundwater reaches the Kichi-Sibi.
13. Protection of Flora and Fauna	(a) Potential impacts to habitat and biota, and related follow-up program elements. As stewards of the lands and waters, it is important to the AOO that the environment around the site of the NPD Closure Project including flora and fauna, are protected, and that the rights and interests of AOO members are upheld in relation to the environment (i.e., hunting, trapping, gathering, fishing and cultural ceremonies). This is a project-specific concern.	The AOO’s technical comments on the draft follow-up monitoring plans included concern about release of radionuclides to the environment. The AOO submitted formal comments on the 2017 draft EIS. Several were related to protection of flora and fauna: - Potential impacts to migratory birds and their habitat; - Potential impacts to wetland ecosystems by dust from demolition activities; - Lack of details regarding the exact locations of project activities that could impact terrestrial vegetation and wetlands; - Concern about potential exposure of contaminants to fish; - Ecological Risk Assessment. The AKLUS report identified the following concerns and interests related to the protection of flora and fauna, and requests for monitoring: - Potential for contamination of waterways, plants, fish and wildlife; - Bioaccumulation of contaminants in fish species; - Potential impacts to fish, wildlife and plant species of importance to Algonquins (a list of species of importance is provided in the AKLUS); - Request that species of importance to Algonquins are monitored and protected, and that recommendations from the AKLUS are adhered to for each (a list of species of importance is provided in the AKLUS).
13. Protection of Flora and Fauna	(b) Species at Risk. AOO expressed the importance of flora and fauna to their communities, culture and Aboriginal Rights and Title. This is a project-specific concern.	The AOO submitted formal comments on the 2017 draft EIS. Several comments were related to protection of flora and fauna: - Impacts to SAR including American eel and lake sturgeon; - Potential impacts to Chimney Swifts and avian species at risk (SAR); - Potential impacts to reptilian SAR and the use of exclusion fencing. The AKLUS report identified a concern about impacts to SAR.
14. Socio-economic	(a) Lack of assessment of Indigenous socio-economic conditions and effects. The AOO consider this information and assessment necessary in order to understand the extent of the socio-economic conditions of AOO communities’ socio-economic and how those may be influenced by NPD Closure Project activities.	The AOO submitted formal comments on the 2017 draft EIS. Several were related to socio-economic interests; concerns include:

Topic	Key Interests and Concerns	Specific feedback provided by the AOO on this interest/concern
	This is a project-specific concern.	- Lack of an assessment of the socio-economic conditions and effects the project will have on Algonquin community members interacting with the NPD Closure Project; - Concern regarding residual nuisance effects that could impact economic livelihood opportunities of Algonquin community members and lack of mitigation measures for these effects; - In particular, the AOO indicated an interest in CNL including a description of the socio-economic conditions for Indigenous communities that CNL is interacting with, a description of socio-economic interactions and their effects, a complete assessment including socio-economic indicators, and a description of planned monitoring and mitigating for socio-economic effects.
14. Socio-economic	(b) The EIS is missing some key Indigenous socio-economic and well-being components (VCs) and interactions. It is important to the AOO that all potential interactions and impacts be considered in order to fully evaluate the effects of the project on AOO citizens. This is a project-specific concern.	The AOO submitted formal comments on the 2017 draft EIS. Several were related to socio-economic interests, including: - Concern regarding the limited list of socio-economic VCs; - Concern regarding the adequacy of the effects assessment, specifically the lack of key socio-economic and community well-being components in the assessment.
14. Socio-economic	(c) Lack of plans for monitoring of socio-economic effects, accommodations and compensation. It is important to the AOO that CNL work with its members to develop a plan for monitoring socio-economic effects of the project, to ensure that potential negative effects are minimized and that positive effects are fully realized. AOO believes that plans are needed for AOO citizens to be adequately accommodated and compensated for any impacts experienced as a result of the project. This is both a site-wide and a project-specific concern.	The AOO submitted formal comments on the 2017 draft EIS. Several were related to socio-economic interests, including: - Concern about the absence of a socio-economic effects monitoring plan; - Lack of accommodations and compensation to address impacts to the Kichi-Sibi. The AKLUS report included a recommendation requesting that a socio-economic accommodation plan be developed to address concerns about cumulative effects and unavoidable impacts.
14. Socio-economic	(d) The EIS does not discuss employment or procurement opportunities for the AOO. It is important to the AOO to understand the way in which CNL plans to engage the AOO in developing employment and procurement opportunities for the proposed project. This is both a site-wide and project-specific concern.	In their comments on the 2017 draft EIS, the AOO expressed concern about a lack of information on how CNL will engage the AOO in developing employment and procurement opportunities.
15. Technical	(a) Derived Release Limits (DRLs). It is important to AOO to review the DRLs to ensure they comply with relevant standards and that the critical group reflects the Algonquin lifestyle. This is a site-wide concern.	The AOO submitted formal comments on the 2017 draft EIS, including a technical comment related to derived release limits (DRLs). The AOO provided specific comments on DRLs in July 2020. The following interests and concerns were identified: - A request for additional information on how CNL has grouped radionuclides and a request to establish DRLs for all nuclides known to be in the reactor vault; - The need to include groundwater as a transport pathway for the derivation of DRLs; - Adoption of a model that has an adequate sample size and considers the Algonquin lifestyle in its calculation of exposure/dose to the critical group; - Concerns about exclusion of certain foods from the ingestion modelling; - A recommendation to model a critical group with exposure pathways dominated by resources from hunting, trapping, fishing and gathering of berries and medicinal plants; - A concern about the maximum atmospheric deposition in relation to the location of the critical group; - A concern about the quality of the data used for NPD DRLs.

Topic	Key Interests and Concerns	Specific feedback provided by the AOO on this interest/concern
15. Technical	(b) Emissions and discharges. It is important to the AOO that emissions in the atmospheric environment of contaminants are properly assessed, and are mitigated and monitored as appropriate. This is a project-specific concern.	The AOO submitted formal comments on the 2017 draft EIS. The comments involved several technical topics, including: - Emissions - noise, dust, air; - Lack of dispersion modelling for discharges from the wells area sump and for groundwater seepage.
15. Technical	(c) Technical suitability of cement and batch plant construction details. It is important to the AOO that the cement used for the project is appropriate and scientifically defensible. It is also important to understand the locations of project activities so that potential effects on terrestrial vegetation and wetlands are properly assessed. This is a project-specific concern.	The AOO comments on the 2017 draft EIS, included comments related to the technical suitability of cement (and natural analogues) and the batch plant construction details.
15. Technical	(d) Ecological Risk Assessment methodology and revisions. As stewards of lands and waters, it is important to the AOO that the environment, wildlife, and plants are protected. This is a project-specific concern.	The AOO submitted formal comments on the 2017 draft EIS. Several were technical comments on the Ecological Risk Assessment, including: - A request to amend the EcoRA to incorporate second iteration of models and re-interpretation of results; - A concern that the screening process of exclusion of radionuclides in the EcoRA based on the lack of a dose coefficient is unfounded; - A lack of reporting on doses to non-human species in Table 2.16 of the EcoRA.
15. Technical	(e) Terrestrial Study Area Rationale It is important to the AOO that the rationale for selecting the terrestrial regional study area is clearly provided, as the baseline description of the terrestrial environment is critical for understanding the current state of VCs and evaluating the project-related effects. This is a project-specific concern.	The AOO submitted formal comments on the 2017 draft EIS. Several were related to protection of flora and fauna: Concern about the lack of rationale for establishing the terrestrial environment regional study area.
16. Valued Components	(a) Engagement, input and participation in VC selection. It is important to the AOO that CNL provide opportunities for meaningful engagement on VCs to ensure that the VCs incorporate species important to traditional users of the land. This is a project-specific concern.	In its comments on the 2017 draft EIS, the AOO expressed concern about the lack of clear engagement of Indigenous peoples on the selection of candidate VCs for the NPD Closure Project. The AKLUS recommendations identified an interest in conducting a collaborative CNL-AOO VC gap analysis between the findings of the AKLUS and revised draft EIS.
16. Valued Components	(b) Concerns regarding the limited VCs selected for the NPD Closure Project and recommendations for VCs to be included. This topic is of interest to the AOO because these species are features of particular importance to the AOO. This is a project-specific concern.	In its comments on the 2017 draft EIS, the AOO expressed interests and concerns related to VCs selected for the NPD Closure Project. Concerns included: - Concern about the narrow list of species on the list of VCs, including species under Traditional Land Use, and Terrestrial Environment and fish species (particularly, piscivorous fish species and species of importance to the AOO); - Concern about the limited list of socio-economic VCs. Throughout engagement activities and correspondence between the AOO and CNL, the AOO indicated interest in specific VCs. In a July 2020 letter to CNL, the AOO requested that CNL include the following VCs in the draft EIS and IER: - Fish: lake trout, sauger, muskellunge (fishing); - Mammals: beaver, marten, mink, otter, rabbit/hare, fox (trapping); elk (hunting); - Vegetation: key berry species including cranberries, blueberries, raspberries and service berries (gathering); - Mammals: muskrat, (trapping); black bear (hunting); - Birds: bald eagle (cultural significance); waterfowl and grouse (hunting). The AKLUS report identified a number of features within proximity to the NPD Closure Project, including:

Topic	Key Interests and Concerns	Specific feedback provided by the AOO on this interest/concern
		• Habitat for wildlife (e.g., moose, white-tailed deer, bear, fox, wolf, five-lined skink and wild turkey); • Habitat for plants (e.g., oak, pine, birch, many other medicines); • Cultural sites (e.g., burial sites, historically significant sites, spiritual sites); • Commercial trapping; • Spawning habitat; • Wildlife and harvesting and fishing areas; • Plant and natural materials gathering areas; • SAR habitat; • Travel routes; • Overnight locations; • Boat launches or landings.

Table J.4 below summarizes the interests and concerns that the AOO have raised on the NPD Closure Project up to March 2024, through comments submitted on the Project Description (June 2016), comments submitted on the 2017 draft EIS to the CNSC, comments submitted directly to CNL or through direct discussion and engagement between AOO and CNL.

The submission by the AOO on the Project Description can be found online: [Comments on the project description for NPD from Algonquins of Ontario](#)

The full submission of AOO comments on the 2017 draft EIS can also be found online: [Comments on the 2017 draft EIS for NPD from Algonquins of Ontario](#). These comments were summarized by CNSC and included as part of the CNL Table: Consolidated Public and Indigenous Groups’ Comments on the Nuclear Power Demonstration Closure Project Draft EIS: [IAA - NPD - Consolidated Public and Indigenous Comments](#) (April 2018).

Table J.4 has five columns:

- Column 1 identifies the topic, i.e., the subject area the key interest(s) or concern(s) falls under.
- Column 2 presents a key interest or concern, why it is important to the Indigenous Nation, community or organization, and connects it to a project aspect or an Aboriginal or treaty right wherever possible. This may be a summary of multiple related interests or concerns that have been expressed by the Indigenous Nation, community or organization.
- Column 3 summarizes CNL’s response or conclusions as well as CNL’s efforts to address this key interest or concern
- Column 4 identifies where in the EIS the key interest or concern is addressed, and whether any changes were made to the EIS in response to the interest/concern. If these changes resulted in a different outcome in the EIS, this is also discussed;
- Column 5 summarizes the “Status” of the key interest or concern and the anticipated Next Steps towards achieving resolution of the key interest or concern. Not all concerns can be quickly or easily resolved, as some concerns go beyond the scope of the EA process, or there may divergent perspectives on certain interests or concerns. Note: this column does not, unless specifically confirmed by the Indigenous Nation, community or organization, mean that they have verified that the interest or concern has been dealt with to their satisfaction.

The Summary of AOO *Key Interests and Concerns* are the result of collaborative development through the AOO/CNL Working Group, with validation of the status and next steps occurring at the AOO Working Group level through focused discussions in June and July of 2023. Note that validation of the interests and concerns was already achieved with the AOO in May 2022. Regular Algonquin Negotiation Representatives (ANR) meetings have not been occurring since March of 2023 and therefore the updates have not been reviewed and vetted by the ANRs. As soon as regular ANR meetings resume, taking into consideration the priorities and availability of the ANRs, the AOO/CNL Working Group will bring the updates to the ANR Table for validation.

J.4 AOO Key Interests and Concerns

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA Process	Status of the Concern
1. Algonquin Knowledge, Land and Resource Use and Cultural Impacts	(a) Algonquin traditional knowledge should be collected and incorporated into the EIS. It is important to the AOO that CNL solicit and use the AOO’s community-specific knowledge in order to properly characterize current site conditions, develop scenarios that accurately represent potential future uses of the site, and ensure that species and traditional uses are properly	CNL sent two letters asking specific questions of AOO to align with the requirements of CEAA (2012) Section 5(1)(c). These questions included: • Do you have any members that currently practice traditional activities such as, trapping, hunting, fishing and/or gathering, near the two projects? • Does [the AOO], or any members, have sites of ceremonial significance in close proximity [of NPD], or more generally, any cultural activities near [the NPD site]?	<u>Where is this topic discussed in the EIS?</u> Section 8.9 of the EIS presents information about traditional land and resource use, including specific information about the AOO (Section 8.9.2.2.3). Section 9.9 of the EIS assesses risk to traditional land and resource use VCs. Section 9.1.1.1 of the EIS presents the future exposure scenarios and groups that are considered in the PostSA. The EIS and supporting studies have assumed that traditional	<u>Status:</u> Resolved. CNL believes that this concern has been addressed through its support of the AKLUS and incorporation of results into the EIS. <u>Next steps:</u> CNL and AOO will continue refining project commitments. A final issues resolution meeting validating the close-out of this interest and confirming commitments is expected to

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA Process	Status of the Concern
	considered by the project. This is a project-specific concern.	The CNSC and CNL have contributed funds for the AOO to undertake an AKLUS, which was completed in December 2020. CNL has responded in writing to AOO comments on this topic, citing relevant sections of the EIS as part of the comment responses and has also responded in writing to recommendations from the AKLUS. CNL met twice with the AOO in 2023 to discuss the AKLUS recommendations and the parties are working to translate these to project commitments where appropriate. CNL incorporated the description of traditional land and resource use, and Indigenous valued components from the AKLUS into the EIS. This revised content was shared with AOO in May 2021, and CNL indicated to AOO that the revised content would be included in the 2021 draft EIS. AOO, AECL and CNL have signed a tri-partite Memorandum of Understanding (MOU) since these comments were received. One of the areas of mutual interest and concern is further discussion on incorporating AOO traditional land uses and resource values into the EA processes going forward. To this end, CNL has made improvements to the EIS that reflect further consideration and incorporation of the AOO traditional land and resource use values. The EIS includes information obtained from the AKLUS report. CNL sees opportunities in upcoming meetings within the MOU framework to discuss and endeavour to resolve these issues. <u>CNL Response:</u> In discussions with AOO, CNL agreed that traditional knowledge from the AOO and other Indigenous Nations, communities and organizations should be integrated into the EIS. CNL has contributed funding to the preparation of an AKLUS by the AOO and has integrated the findings and concerns into the EIS. CNL is supportive of the proposal for a comprehensive Country Foods survey to better understand and quantify Algonquins’ consumption of wildlife, fish and plants near the NPD site. CNL recognizes how such a study can support long-term monitoring programs. The NSDF and NPD Projects have already provided capacity to the Algonquin community closest to the NPD site (the AOPFN (AOPFN)) in order to execute an AOPFN Harvest and Diet study. CNL has added an Indigenous receptor group to the PostSA Technical Supporting Document (TSD). The predicted peak dose to an Indigenous receptor (from the 3rd iteration PostSA) is 0.0004 mSv/yr which is 500 times less than the dose criterion. The analysis demonstrates that the impact on the public, Indigenous and the environment is negligible.	uses do occur adjacent to the NPD site, whether on the Ottawa River or outside the restricted/fenced area. CNL has also assumed that in the future there is an interest to re-establish traditional use activities on the NPD site. <u>What changes have been made (and where)?</u> CNL has integrated the AKLUS findings and concerns into the EIS. Specifically, CNL expanded the description of traditional uses in Section 8.9 of the EIS and added and evaluated new traditional land and resource use VCs in Sections 6.3 and 9.9 of the EIS to ensure that AOO traditional knowledge becomes an integral component of the EIS and in CNL’s consideration of potential effects. CNL added content from the AKLUS report to Sections 6.3 and 8.9 of the EIS. The EIS update includes additional detail on the VC-related engagement process and how Indigenous interests have been incorporated into the VCs selected for the NPD Closure Project.	occur later in 2023.
1. Algonquin Knowledge, Land and Resource Use and Cultural Impacts	(b) Impact on ability to practice traditional activities. As stewards of the lands and waters, it is important to the AOO that the environment around the site of the NPD Closure Project, including flora and fauna, are protected, and that the rights and interests of AOO members are upheld in relation to the environment (i.e., hunting, trapping, gathering, fishing and cultural ceremonies). This is a project-specific concern.	AOO, AECL and CNL have signed a tri-partite Memorandum of Understanding (MOU) to support the negotiation of a Long-Term Relationship Agreement (LTRA). One of the areas of mutual interest and concern is environmental and cultural heritage monitoring programs, including joint monitoring, to ensure that the environment is adequately protected and the rights and interests of the AOO are upheld. CNL has responded in writing to AOO comments on this topic, citing relevant sections of the EIS as part of the comment responses and has also responded in writing to recommendations from the AKLUS. CNL met twice with the AOO in 2023 to discuss the AKLUS recommendations and the parties are working to translate these to project commitments where appropriate. CNL and the AOO are exploring site access, including the perception of barriers to site access and nearby important cultural sites for the AOO members, to determine	<u>Where is this topic discussed in the EIS?</u> The EIS discusses concerns about potential loss of connection to land and water (e.g., feeling of discomfort or concern), and loss of land and water use in Section 9.9.5. Nuisance effects during construction activities are assessed in the Decommissioning Safety Assessment (DecomSA) TSD and summarized in Section 9.2 (atmospheric environment), Section 9.9 (traditional land and resource use) and Section 9.10 (Indigenous socio-economic conditions) of the EIS. Monitoring of nuisance effects is discussed in Section 12 of the EIS. General plans for restoration and end state, including access	<u>Status:</u> Ongoing. See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status CNL believes that this concern has been addressed through its commitment to involving the AOO in the long-term monitoring for the NPD Closure Project. <u>Next Steps</u> CNL and AOO have established the following commitments which will help to address this concern: AOO-4 – Site Visit and Survey Work

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA Process	Status of the Concern
		an approach for culturally appropriate risk communications. <u>CNL Response:</u> CNL acknowledges AOO’s concerns about the long-term safety of the NPD site and the potential impacts on the rights of the AOO, and other Indigenous Nations, communities and organizations, to practice traditional activities around the NPD site. CNL has assessed potential nuisance effects related to dust and noise, loss of connection to the land, safety of harvesting and consuming local foods, and changes to access to the land; no significant adverse effects were identified in the assessment. CNL notes that the final end state is the only time when changes to access will occur; the final end state of the NPD site will be an improvement from current conditions. To instill confidence in the EIS findings and the effectiveness of the follow-up monitoring, CNL will involve the AOO and other Indigenous Nations, communities and organizations in the monitoring program, which aims to confirm whether the EIS predications around potential effects are accurate and to develop mitigation measures as needed. The PostSA TSD addresses the potential for concerns about loss of connection to land and water, and about food safety. The PostSA and EIS (and other supporting studies) have demonstrated that in the long-term, there are not scientifically based data concerns about the accessibility or safety of the NPD site, based on several different future use scenarios, including self-sufficient Indigenous receptors. The proposed activities will result in an enhancement of the NPD site from current conditions and may lead to an increase of wildlife and therefore improve the ability to practice traditional activities at the NPD site. These findings, which will be confirmed by monitoring, are anticipated to reduce concerns about loss of connection to land and water, and about food safety. Involvement of the AOO in monitoring (discussed in row 9(a)) will help to ensure transparency and lend confidence to monitoring activities and results, and in turn, the findings of the EIS. CNL’s Public Information Program aims to enhance engagement with Indigenous peoples and address any potential feelings of loss of connection to and use of lands and water. With respect to monitoring species harvested and gathered by Algonquins: CNL has ensured that these species are captured in our valued components (VCs) and considered for monitoring as appropriate. In discussions with AOO, CNL agreed that traditional knowledge from the AOO and other Indigenous Nations, communities and organizations should be integrated into the EIS. CNL has contributed funding to the preparation of an AKLUS by the AOO and has integrated the findings and concerns into the EIS. CNL is supportive of the proposal for a comprehensive Country Foods survey to better understand and quantify Algonquins’ consumption of wildlife, fish and plants near the NPD site. CNL recognizes how such a study can support long-term monitoring programs. The NSDF and NPD Projects have already provided capacity to the Algonquin community closest to the NPD site (the AOPFN (AOPFN)) in order to execute an AOPFN Harvest and Diet study.	considerations, are described in Section 4.3.1.9 of the EIS. Section 8.9 of the EIS presents information about traditional land and resource use, including specific information about the AOO (Section 8.9.2.2.3). Section 9.9 of the EIS assesses risk to traditional land and resource use VCs. Section 9.1.1.1 of the EIS. presents the future exposure scenarios and groups that are considered in the PostSA TSD. The EIS and supporting studies have assumed that traditional uses do occur adjacent to the NPD site, whether on the Ottawa River or outside the restricted/fenced area. CNL has also assumed that in the future there is an interest to re-establish traditional use activities on the NPD site. <u>What changes have been made (and where)?</u> CNL added discussion of loss of connection to and use of lands and water to Section 6.3 (interests and concerns related to VCs) and new Sections 9.3.1.1, 9.6.1.1, and 9.9.1.1 within the EIS. CNL has integrated the AKLUS findings and concerns into the EIS. Specifically, CNL expanded the description of traditional uses in Section 8.9 of the EIS and added and evaluated new traditional land and resource use VCs in Sections 6.3 and 9.9 within the EIS to ensure that AOO traditional knowledge becomes an integral component of the EIS and in CNL’s consideration of potential effects. CNL added content from the AKLUS report to Sections 6.3 and 8.9 within the EIS. The EIS update includes additional detail on the VC-related engagement process and how Indigenous interests have been incorporated into the VCs selected for the NPD Closure Project.	Provide an opportunity to and support pre-decommissioning site visit(s). Provide capacity for a baseline plant inventory survey. AOO-5 – Participation in monitoring and sharing of results CNL is committed to involve all interested Indigenous Nations, communities and organizations in the NPD Closure Project Follow-up Monitoring Program. On an annual basis, CNL and AOO will review together environmental monitoring results from the NPD site. CNL can share results with the AOO annually through to the end of the Institutional control period. AOO-1 – Socio-Economic Considerations, Monitoring and Mitigations Provide capacity to the AOO to undertake a socio-economic study with results captured in a subsequent revision of the Indigenous Engagement Report. Study recommendations will be implemented in CNL’s project plans after collaborative review by CNL and the AOO. CNL and AOO will identify opportunities to improve CNL’s monitoring and mitigations to ensure traditional knowledge is incorporated and that interdependencies between ecological, socio-economic, community and cultural health are recognized. AOO-10 – Ongoing Collaboration CNL is committed to continuing the working group with AOO to promote continued open communication, information sharing and education including collaborating on the development of communications and engagement material for various audiences (e.g., AOO staff, ANRs and specific communities).

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA Process	Status of the Concern
1. Algonquin Knowledge, Land and Resource Use and Cultural Impacts	(c) Safety of harvested and gathered foods. It is important to the AOO that the environment, including the flora and fauna, is protected, and to ensure that the rights and interests of AOO members are upheld. This is both a site-wide and project-specific concern.	CNL gained a better understanding of the reasons for AOO’s desire for funding for an Algonquin Country foods survey from a January 2022 follow-up discussion between AOO and CNL on AKLUS recommendations. The AOO wants to ensure that the lifestyle of the broader Algonquin Community is accurately represented and considered in CNL’s PostSA TSD. CNL and AOO are working to develop project commitments to address outstanding concerns. AOO, AECL and CNL have signed a tri-partite Memorandum of Understanding (MOU) to support the negotiation of an LTRA. One of the areas of mutual interest and concern is environmental and cultural heritage monitoring programs, including joint monitoring, to ensure that the environment is adequately protected and the rights and interests of the AOO are upheld. CNL has responded in writing to recommendations from the AOO AKLUS and has discussed the AKLUS recommendations as part of the January 2022 working group meeting and additional meetings early in 2023. The parties are working to translate the AKLUS recommendations to project commitments where appropriate. In April 2023, CNL also provided an overview of the Indigenous receptor evaluated as part of the environmental assessment for the project. <u>CNL Response:</u> CNL is supportive of the proposal for a comprehensive Country Foods survey to better understand and quantify Algonquins’ consumption of wildlife, fish and plants near the NPD site. CNL recognizes how such a study can support long-term monitoring programs. The NSDF and NPD Projects have already provided capacity to the Algonquin community closest to the NPD site (the AOPFN (AOPFN)) in order to execute an AOPFN Harvest and Diet study. CNL has assessed potential effects related to the safety of harvesting and consuming local foods, and no significant adverse effects were identified in the assessment.	<u>Where is this topic discussed in the EIS?</u> Mitigation measures for the protection of flora and fauna are primarily outlined in Sections 9.6.3.2. <u>What changes have been made (and where)?</u> Table 5.2-2 of the EIS has been revised. Any reference to contaminants being screened out because they are due to past NPD operations has been removed. The table has been updated to reflect the more comprehensive Environmental Site Assessment results that include consideration of contaminants from past activities. Changes have been made to Section 8.5.3.1 to include a summary of how the discrete areas of contamination identified in the Environmental Site Assessment were handled. Changes have been made to Section 9.6.3.2 to include additional mitigations related to milkweed (important habitat for monarch butterflies), migratory birds, bats, chimney swifts and milksnakes. The revised EcoRA TSD is now a standalone report and includes a clearer description of the method (in response to AOO formal comments on 2017 draft EIS). The EcoRA TSD continues to predict no undue effects on biota.	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status. CNL believes that this concern has been partially addressed through sharing information about the Indigenous receptor. CNL has assessed potential effects related to the safety of harvesting and consuming local foods, and no significant adverse effects were identified in the assessment. <u>Next Steps</u> CNL and AOO have established the following commitments which will help to address this concern: AOO-4 – Site Visit and Survey Work Provide an opportunity to and support pre-decommissioning site visit(s). Provide capacity for a baseline plant inventory survey. AOO-5 – Participation in monitoring and sharing of results CNL is committed to involve all interested Indigenous Nations, communities and organizations in the NPD Closure Project Follow-up Monitoring Program. On an annual basis, CNL and AOO will review together environmental monitoring results from the NPD site. CNL can share results with the AOO annually through to the end of the Institutional control period. AOO-1 – Socio-Economic Considerations, Monitoring and Mitigations Provide capacity to the AOO to undertake a socio-economic study with results captured in a subsequent revision of the Indigenous Engagement Report. Study recommendations will be implemented in CNL’s project plans after collaborative review by CNL and the AOO. CNL and AOO will identify opportunities to improve CNL’s monitoring and mitigations to ensure traditional knowledge is incorporated and that interdependencies between ecological, socio-economic, community and cultural health are recognized. AOO-10 – Ongoing Collaboration CNL is committed to continuing the working group with AOO to promote continued open communication, information sharing and education including collaborating on the development of communications and engagement material for various audiences (e.g., AOO staff, ANRs and specific communities).

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1. Algonquin Knowledge, Land and Resource Use and Cultural Impacts	(d) Lack of AOO-specific mitigation measures, monitoring program, accommodation and compensation measures. It is important to the AOO that species of importance are monitored and protected in a way that recognizes the interdependencies between ecological, socio-economic, community and cultural health. It is also important to the AOO to accommodate and/or compensate those who may experience adverse impacts from the project. This is both a site-wide and project-specific concern.	CNL has responded in writing to AOO comments on this topic, citing relevant sections of the EIS as part of the comment responses and has also responded in writing to recommendations from the AKLUS. CNL presented a brief overview of the draft follow-up monitoring plans to the AOO Planning and Environment Working Group in September 2019, and AOO provided comments on these plans in 2020 July. CNL and the AOO are holding a workshop to further discuss the draft follow-up monitoring plans for the NPD Closure Project in 2022. CNL and the AOO will discuss the AOO’s interests in developing an AOO specific environmental effects monitoring plan. CNL and the AOO will also discuss protection and mitigation efforts to help ensure that AOO traditional land and resource use and areas of cultural significance are respected. AOO, AECL and CNL have signed a tri-partite Memorandum of Understanding (MOU) since these comments were received. One of the areas of mutual interest and concern is further discussion on incorporating AOO traditional land uses and resource values into the EA processes going forward. To this end, CNL has made improvements to the EIS that reflect further consideration and incorporation of the AOO traditional land and resource use values. The EIS includes information obtained from the AKLUS report. CNL sees opportunities in upcoming meetings within the MOU framework to discuss and endeavour to resolve these issues. <u>CNL Response:</u> CNL has added and assessed additional Indigenous land and resource use VCs in the EIS, including those identified by the AOO. The EIS considers potential effects on trapping and notes that trapping does not occur on the NPD site. As such, CNL does not anticipate any impacts to trapline holders, and consequently, accommodation or compensation is not needed. However, CNL is open to discussing the NPD project with trapline holders within the Regional Study Area, and to further discussion with AOO about AOO-specific mitigation measures and follow-up programs.	<u>Where is this topic discussed in the EIS?</u> Tables 6.3-1 and 6.3-2 of the EIS highlight how VCs identified by AOO are reflected in the species that are evaluated in the NPD EIS. Section 8.9 of the EIS presents information about traditional land and resource use, including specific information about the AOO obtained from the AKLUS report (Section 8.9.2.2.3). Section 9.9 of the EIS assesses risk to traditional land and resource use VCs. Mitigation and monitoring are discussed in Sections 10 and 12 within the EIS. <u>What changes have been made (and where)?</u> CNL expanded the description of traditional uses in Section 8.9 of the EIS and added and assessed additional traditional land and resource use VCs in Sections 6.3 and 9.9 of the EIS. CNL added content from the AKLUS report to Sections 6.3 and 8.9 of the EIS. The EIS update includes additional detail on the VC-related engagement process and how Indigenous interests have been incorporated into the VCs selected for the NPD Closure Project.	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status. CNL believes that this concern has been addressed by revisions to the EIS and through its commitment to involving the AOO in the long-term monitoring for the NPD Closure Project. <u>Next Steps</u> CNL and AOO have established the following commitments which will help to address this concern: AOO-5 – Participation in monitoring and sharing of results CNL is committed to involve all interested Indigenous Nations, communities and organizations in the NPD Closure Project Follow-up Monitoring Program. On an annual basis, CNL and AOO will review together environmental monitoring results from the NPD site. CNL can share results with the AOO annually through to the end of the Institutional control period. AOO-1 – Socio-Economic Considerations, Monitoring and Mitigations Provide capacity to the AOO to undertake a socio-economic study with results captured in a subsequent revision of the Indigenous Engagement Report. Study recommendations will be implemented in CNL’s project plans after collaborative review by CNL and the AOO. CNL and AOO will identify opportunities to improve CNL’s monitoring and mitigations to ensure traditional knowledge is incorporated and that interdependencies between ecological, socio-economic, community and cultural health are recognized. AOO-10 – Ongoing Collaboration CNL is committed to continuing the working group with AOO to promote continued open communication, information sharing and education including collaborating on the development of communications and engagement material for various audiences (e.g., AOO staff, ANRs and specific communities).
1. Algonquin Knowledge, Land and Resource Use and Cultural Impacts	(e) Concern about balancing the need for long-term nuclear waste storage and the risk of impacts to ancestral or Algonquin values. It is important to the AOO that CNL provide information and commitments that will encourage further engagement and address community members’ perception of risk to ancestral values, including particular species and	CNL has responded in writing to AOO recommendations from the AKLUS. CNL met with the AOO and gave 5 presentations from 2016 to 2019, providing information and seeking input related to Alternative Means and/or In-Situ Disposal. CNL met again with the AOO in 2023 and provided a summary of the alternatives considered. <u>CNL Response:</u> CNL acknowledges that some AOO community members have concerns about the perceived tradeoff between the need for a solution to legacy waste and the risk of impacts from the NPD project as the proposed solution.	<u>Where is this topic discussed in the EIS?</u> Section 4.1 of the EIS discusses the purpose and rationale of the NPD Closure project. Effects during the Post-institutional Controls phase are assessed in the PostSA, and the EIS discusses effects to traditional land and resource use in Section 9.9.3 . The EIS concludes that there are adverse residual effects on traditional land and resource use. <u>What changes have been made (and where)?</u>	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status. CNL believes that this concern has been addressed through regular sharing of information about project alternatives. <u>Next Steps</u>

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA Process	Status of the Concern
	traditional knowledge and land use activities. This is a project-specific concern.	Although waste at the NPD site is currently in safe storage, over time, the risk associated with this interim solution increases. That is why CNL is committed to addressing AECL’s nuclear legacy liabilities through permanent solutions. CNL believes that dealing with the waste now, rather than passing the problem on to future generations, is the responsible approach. CNL has assessed the suitability of in-situ disposal (ISD) for NPD, and the resulting EIS shows that such disposal is safe for human health and the environment in the short term and long term. Design features make it conducive to disposing of the material in place. The proposed activities will result in an enhancement of the NPD site from current conditions. The waste is already at the site, and the proposed project will make the site safer. The assessment findings do not show impacts to ancestral values._	No changes to the EIS have been made in response to this concern.	CNL and AOO have established the following commitments which will help to address this concern: AOO-10 – Ongoing Collaboration CNL is committed to continuing the working group with AOO to promote continued open communication, information sharing and education including collaborating on the development of communications and engagement material for various audiences (e.g., AOO staff, ANRs and specific communities). AOO-5 – Participation in monitoring and sharing of results CNL is committed to involve all interested Indigenous Nations, communities and organizations in the NPD Closure Project Follow-up Monitoring Program. On an annual basis, CNL and AOO will review together environmental monitoring results from the NPD site. CNL can share results with the AOO annually through to the end of the Institutional control period.
2. Unceded Algonquin Traditional Territory	(a) The AOO would like recognition in the EA that the NPD site is within unceded Algonquin traditional territory. This is important to the AOO because this area is part of ongoing land claim negotiations. This is both a site-wide and project-specific concern.	CNL has updated language throughout the EIS to reflect this information (see details in previous column). Subsequent to its comments on the Project Description, the AOO submitted formal comments on the 2017 draft EIS. The AOO did not repeat concerns expressed in the 2016 Project Description with respect to acknowledgement of the unceded Algonquin traditional territory. CNL shared the draft EIS (Rev. 1) with the AOO in May 2020, which included content in Section 6.2.4.2 for AOO asserted rights and title for the unceded Algonquin traditional territory, including NPD. <u>CNL Response:</u> CNL fully acknowledges that NPD is located in the unceded Algonquin traditional territory.	<u>Where is this topic discussed in the EIS?</u> The NPD site is identified as unceded Algonquin traditional territory throughout the EIS. <u>What changes have been made (and where)?</u> Section 6.2.4.2 now includes the following text: “The NPD site is located within the unceded Algonquin traditional territory. The Algonquins of Ontario have asserted existing Indigenous rights and title throughout the unceded Algonquin traditional territory, including the NPD site.” Changes have been made to Section 6.2, Section 8.9 and Appendix C to identify that the NPD site is located within the unceded Algonquin Territory.	<u>Status:</u> Resolved. CNL believes that this concern has been addressed by revisions to the EIS. <u>Next steps:</u> A final issues resolution meeting validating the close-out of this interest is expected to occur later in 2023.
3. Alternatives	(a) Concern about the suitability of In-situ disposal (ISD). It is important to the AOO that future users of land on the NPD site are protected. This is a project-specific concern.	To address these concerns, CNL added additional assessment to the Alternative Means TSD (details in next column). At a meeting with the AOO ANRs in September 2019, a summary of the Alternative Means for the project was presented and there was an opportunity for questions and discussion on this topic. CNL has responded in writing to AOO comments on this topic, citing relevant sections of the EIS as part of the comment responses. CNL met with the AOO Infrastructure Working Group (including several ANRs) in 2023 to provide a summary of the alternatives considered and engaged in active discussions with the ANRs. This group also received a third party summary review on CNL’s Alternative Means Assessment (AMA). CNL has received no follow-up questions/concerns on this topic. <u>CNL Response:</u> In discussions with the AOO, CNL agreed that protection of future land users is an important concern and has addressed it. CNL has assessed the suitability of ISD for NPD, and the EIS demonstrates that such disposal is safe for human health and the environment in the short term and long term.	<u>Where is this topic discussed in the EIS?</u> Alternative means are discussed in the Alternative Means Assessment TSD (64-509200-ASD-002 Revision 1) and Section 4.2 of the EIS. <u>What changes have been made (and where)?</u> CNL enhanced the assessment of alternatives in the AMA TSD; for example, the projected radiological dose and Industrial Safety risk to workers for each alternative means was presented. This assessment has shown that ISD is safer than the removal alternative means. The revised Alternative Means TSD continues to identify ISD as the preferred means for decommissioning the NPD reactor.	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status. CNL believes that this concern has begun to be addressed through regular sharing of information about project alternatives. <u>Next steps:</u> CNL and AOO have established the following commitments which will help to address this concern: AOO-10 – Ongoing Collaboration CNL is committed to continuing the working group with AOO to promote continued open communication, information sharing and education including collaborating on the development of communications and engagement material for various audiences (e.g., AOO staff, ANRs and specific communities).

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		CNL has considered national and international standards and guidelines and continues to believe that the NPD facility has characteristics that support ISD. CNL acknowledges the expressed interest by AOO for future unrestricted land use. Should the preferred alternative of ISD be approved, it is important to note that the land subject to restricted access is less than 1% of the total area of the NPD site (2.53 of 385 hectares). Furthermore, after the Institutional Control period (during which CNL will monitor the site), there will be no land restrictions.		
3. Alternatives	(b) Concern that the EIS does not provide enough information on the alternatives to ISD. It is important to the AOO that they have enough information to be able to evaluate the alternatives. This is a project-specific concern.	In response to this concern, CNL added additional assessment to the Alternative Means TSD and expanded the discussion in the EIS (details in next column). At a meeting with the AOO ANRs in September 2019, a summary of the Alternative Means for the project was presented and there was an opportunity for questions and discussion on this topic. CNL has responded in writing to AOO comments on this topic, citing relevant sections of the EIS as part of the comment responses. The AOO indicated in November 2021 that they still require time to review the AMA. CNL met with the AOO Infrastructure Working Group (including several ANRs) in 2023 and provided a summary of the alternatives considered. This group also received a third party summary review on CNL’s AMA. CNL has received no follow-up questions/concerns on this topic. <u>CNL Response:</u> CNL prepared the AMA following the framework laid out in the Canadian Environmental Assessment Agency (CEAA) Operational Policy Statement: Addressing “Purpose of” and “Alternative Means” under the <i>Canadian Environmental Assessment Act, 2012 (CEAA, 2015)</i>. CNL acknowledges that the AOO has requested more details on the strengths and weaknesses of each alternative.	<u>Where is this topic discussed in the EIS?</u> Alternative means are discussed in the Alternative Means Assessment TSD (64-509200-ASD-002 Revision 1) and Section 4.2 of the EIS. <u>What changes have been made (and where)?</u> CNL has included additional information from the AMA TSD in Section 4.2 of the EIS to provide greater clarity on how the AMA was completed and what the results mean. In addition, both the Alternative Means TSD and Section 4.2 of the EIS were updated to assess the projected radiological dose and industrial safety risk to workers for each option.	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status. CNL believes that this concern has been addressed by revisions to the EIS and through regular sharing of information about project alternatives. <u>Next steps:</u> CNL and AOO have established the following commitments which will help to address this concern: AOO-10 – Ongoing Collaboration CNL is committed to continuing the working group with AOO to promote continued open communication, information sharing and education including collaborating on the development of communications and engagement material for various audiences (e.g., AOO staff, ANRs and specific communities).

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4. Archaeology and Cultural Heritage	(a) Concerns about the impact of the project on features of cultural importance. It is important to the AOO to that its members are aware of any remaining Algonquin cultural heritage resources on the NPD site, and these resources be preserved. It is also important that the AOO be given the opportunity to be involved in any future archaeological activities at the site. This is a project-specific concern.	CNL’s archaeology consultant determined that there was no potential for archaeological discoveries on the Site Study Area (where project activities will take place), because that area was completely disturbed during site construction. However, in response to concerns expressed by the AOO, CNL did conduct a Stage 1 Archaeological Assessment of the remainder of the NPD site. CNL shared the results of the Stage 1 Archaeological Assessment with the AOO and provided a summary and overview presentation of the archaeology work. CNL has responded in writing to AOO comments on this topic, citing relevant sections of the EIS as part of the comment responses and has also responded in writing to recommendations from the AKLUS. A January 2022 follow-up discussion between AOO and CNL on AKLUS recommendations gave CNL a better understanding of AOO’s concerns on this topic, including the possibility of the project impeding access to a nearby historic cultural site. AOO requested a stop-work process; CNL and AOO are working to develop project commitments to address this concern. AOO, AECL and CNL have signed a tri-partite Memorandum of Understanding (MOU) to support the negotiation of an LTRA. One of the areas of mutual interest and concern is environmental and cultural heritage monitoring programs, including joint monitoring, to ensure that the environment is adequately protected and the rights and interests of the AOO are upheld. <u>CNL Response:</u> CNL has conducted a Stage 1 archaeological assessment and shared the results with the AOO. No further archaeological work is planned for NPD.	<u>Where is this topic discussed in the EIS?</u> Indigenous cultural resources and ceremonies, including the presence of Algonquin Cultural Sites and features, are discussed in in Section 8.9.3 of the EIS. Section 8.11.4 of the EIS summarizes the Archaeology TSD, including the findings of the Stage 1 archaeological assessment. <u>What changes have been made (and where)?</u> CNL updated several sections of the EIS in response to AOO comments and to include information from the AKLUS Report (Sections 6.2, 6.3, 8.9, 9.9 of the EIS). Changes have been made to Section 6.2.4.2 of the EIS to include information on CNL and AOO’s work to progress towards an LTRA. Changes have been made to Section 9.9.3.2 to include proposed mitigation measures that will be employed if undocumented archaeological resources are discovered during the project. The EIS does not predict any adverse residual effects from the project on the Indigenous socio-economic environment (Section 9.10.1.6) or traditional land and resource use (Section 9.9.3.3), including access to cultural sites. As such, no changes to these sections were required.	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status. CNL believes that these have been addressed through AOO’s closure of this item in its letter of May 2019 and CNLs responses to AKLUS recommendations. <u>Next steps:</u> CNL and AOO have established the following commitments which will help to address this concern: AOO-3 – Cultural Protection CNL is committed to joint review by CNL, AOO and mutually respected 3rd party SMEs of company and project specific cultural protection procedures/activities with AOO against best practice and consideration of Indigenous Knowledge. If needed a project specific cultural protection plan is developed to address any gaps identified. This topic may also be addressed through a future LTRA, to ensure adequate future engagement around archaeological resources at the NPD site.
5. Accidents & Malfunctions	(a) Contingency plans for extreme weather and natural hazards that may impact or damage the NPD facility. It is important to the AOO that CNL demonstrate that it has planned for the potential impacts of flooding and other extreme weather events, because the frequency and intensity of such events is expected to increase due to climate change. This is a project-specific concern.	CNL has responded in writing to AOO comments on this topic, citing relevant sections of the EIS as part of the comment responses. <u>CNL Response:</u> CNL has assessed the probabilities and potential impacts of flooding, seismic activity, above-ground natural hazards and extreme temperature change, and has concluded that these events will have no undue effects on people or the environment around the site. The NPD site has an Emergency Procedure that will remain in place and be updated as required throughout the Decommissioning Execution and Institutional Controls phases of this project. This procedure focuses on the prevention, mitigation of, preparedness for, response to, and recovery from a wide range of abnormal and emergency conditions including fires, floods, hazardous spills, loss of power, earthquakes, and tornados. The Emergency Procedure also defines the actions of specific staff/roles in such events. Following any of these emergency events, as soon as it is safe for staff to do so, site and facility condition are evaluated, and any necessary actions will be taken to make repairs. The NPD Emergency Procedure is developed and maintained in accordance with CNL’s company-wide Emergency Preparedness Program that has been accepted to meet the CNSC’s requirements (under RegDoc 2.10.1 - <i>Nuclear Emergency Preparedness and Response</i>). Further, throughout all project phases (Decommissioning Execution, Institutional Controls and Post-Institutional Controls) CNL has assessed the probabilities and potential impacts of flooding, seismic activity, above-ground natural hazards and	<u>Where is this topic discussed in the EIS?</u> Section 8.12 of the EIS discusses the relevant natural disasters to which NPD may be exposed. Section 9.14 of the EIS discusses the potential effects on the project of climate change, forest fires, floods, earthquakes, severe weather such as tornados, lightning strikes, ice storms, and changes to the Ottawa River. Additional details and a range of scenarios that encompass the potential impacts from extreme weather and natural hazards are examined in the DecomSA TSD and the PostSA TSD. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this concern.	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status. CNL believes that this concern has been substantially addressed through its response to specific comments on this topic received from AOO. <u>Next Steps</u> CNL and AOO have established the following commitments which will help to address this concern: AOO-10 – Ongoing Collaboration CNL is committed to continuing the working group with AOO to promote continued open communication, information sharing and education including collaborating on the development of communications and engagement material for various audiences (e.g., AOO staff, ANRs and specific communities). This topic may also be addressed through a future LTRA, to ensure adequate sharing of emergency response planning at the community level.

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		extreme temperature change, and has concluded that these events will have no undue effects on people or the environment around the site.		
6. Engagement	(a) Continued meaningful engagement using best practices. It is important to the AOO that its members be meaningfully engaged on the project, because the project is located within the unceded Algonquin traditional territory. This is a project-specific concern.	CNL heard AOO’s request for ongoing engagement and, since 2016, has carried out extensive engagement with the AOO, and has implemented a Memorandum of Understanding (MOU) to progress towards an LTRA. For CNL, meaningful engagement involves listening to the community’s concerns and making real changes as appropriate, for example: • Addition of VC to the project’s VC list • Changes to monitoring plan (see row later in this table) • Commitments to participation of Indigenous Nations, communities and organizations in future monitoring activities (see row later in this table) • Commitments to involving Indigenous Nations, communities and organizations in the site restoration plan. CNL has responded in writing to AOO comments on this topic, citing relevant sections of the EIS as part of the comment responses. <u>CNL Response:</u> CNL has committed to open, transparent and continuing engagement with the AOO. The AOO leadership takes responsibility for communicating with all 10 communities under the AOO umbrella. By directing all its communications through the AOO, CNL ensures that all 10 AOO communities are included. <u>Engagement Highlights:</u> In June 2017, CNL held an AOO-specific open house to which the AOO invited its entire membership. AOO issues and concerns topics covered at the open house included: monitoring (current and proposed follow-up monitoring), future land use, protection of the Ottawa River, and EA methodology. Approximately 15 AOO members attended. In 2019 and into 2020 CNL responded in writing to the AOO’s specific comments on the EIS and shared correspondence that tracked resolved and outstanding issues on topics of interest and concern to AOO. During the latter part of 2020 and the first half of 2021, AOO capacity and priorities precluded regular engagement on the NPD Closure Project. In May 2021, CNL offered further support to the AOO to ensure capacity was not a barrier to meaningful participation in the EA for the NPD Closure Project. The 2022 work plan developed collaboratively between AOO and CNL includes capacity to support continued meaningful participation in the EA for the NPD Closure Project. In the fall of 2021, CNL shared with and sought input from AOO on the summary list of interests and concerns and overall support for CNL’s 2021 EIS submission. To allow AOO time to respond and provide feedback, CNL delayed its EIS submission. In October 2021, the AOO and CNL met to discuss the prioritization of engagement on the NSDF Project and the NPD Closure Project to facilitate the AOO’s desired “one-window” approach for engagement with CNL on the projects. A consolidated draft schedule was prepared by CNL in November 2021 and shared with AOO for review. At the January 25, 2022, meeting the two parties reviewed the schedule together, made edits and discussed the timeline for engagement activities during the first half of 2022. Capacity challenges at the AOO prevented progress on the work plan during most of 2022. However, in November 2022 in response to reach out by CNL and improved resource availability the AOO re-engaged on the NPD Project. Since that time the two parties have been meeting on a monthly (or more frequent) basis – total of 9	<u>Where is this topic discussed in the EIS?</u> All 10 AOO communities are identified in Section 6.2.2 of the EIS (Antoine Algonquin First Nation; AOPFN; Algonquin Nation Kijicho-Manito Madaouskarini; Bonnechere Algonquin First Nation; Algonquins of Greater Golden Lake First Nation; Mattawa/North Bay Algonquin First Nation; Ottawa Algonquin First Nation; Shabot Obaadjiwan First Nation; Snimikobi (Ardoch) (Beaver Creek) Algonquin First Nation; and Whitney Area Algonquins. These communities are described in greater detail in Section 3 of the IER. Section 6.2.4.2 of the EIS summarizes CNL engagement with AOO to date and describes the collaborative work of CNL and AOO to progress towards an LTRA. <u>What changes have been made (and where)?</u> Changes have been made to Section 6.2.4.2.1 to reflect new and planned engagement activities to support the AOO’s meaningful participation in the EA process.	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status. CNL believes that these concerns are substantially addressed through AOO’s closure of this item in its letter of May 2019 and regular ongoing engagement. <u>Next steps:</u> CNL and AOO have established the following commitments which will help to address this concern: AOO-10 – Ongoing Collaboration CNL is committed to continuing the Working Group with AOO to promote continued open communication, information sharing and education including collaborating on the development of communications and engagement material for various audiences (e.g., AOO staff, ANRs and specific communities). This topic may also be addressed through a future LTRA to enable continued meaningful engagement between the AOO and CNL on the NPD Closure Project.

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		meetings between November 2022 and the end of April 2023. Thus far CNL and AOO have discussed the following outstanding concerns: Alternative Means, Valued Components, the AKLUS results and Indigenous Health. Additional meetings are planned for the remainder of 2023 to discuss the remaining outstanding interests: socio-economics, monitoring and end-state. The May 2023 Working Group meeting transitioned to formulating commitments for outstanding areas of concern. CNL expects to close-out all remaining concerns at a final issues resolution meeting in late 2023.		
6. Engagement	(b) Establishment of an AOO-specific Aboriginal Engagement plan and a Long-Term Relationship Agreement (LTRA). It is important to the AOO that formal plans and agreements are in place with CNL because they provide opportunities for the AOO to discuss all the issues that are important to them related to CNL operations. This is a site-wide concern.	In 2018, the AOO, AECL and CNL signed a tri-partite Memorandum of Understanding (MOU) to guide dialogue between the parties on matters of mutual interest. More specifically, the MOU was intended to be a vehicle to work towards the development of an LTRA amongst the parties. The MOU identified the need for both a Technical Group to deal with the NPD Closure Project and an LTRA Working Group that would advance an LTRA amongst the parties. The MOU broadly identified potential topic areas for the LTRA. Over 2019 and 2020, a Terms of Reference and work plan was developed for the LTRA. The LTRA intended to cover such topics as: AOO involvement in environmental and cultural monitoring and stewardship; employment / training; contracting; communications; consultation; etc. The LTRA also intended to cover the interests of all three parties with respect to both the CRL and NPD sites as well as other further projects and/or initiatives across the unceded Algonquin traditional territory. The LTRA discussions are relevant to NPD as it is expected that certain project specific initiatives and commitments will be implemented or realized through this agreement. Since 2020, discussion on the LTRA have not progressed. The parties are still working together on the NPD Closure Project and other projects, but LTRA discussions have not been prioritized. <u>CNL Response:</u> CNL acknowledges AOO’s request for formal, AOO-specific engagement plans and agreements. CNL supports a “one-window” approach to all engagement activities (encompassing all projects, not just NPD) (work continues within the AOO/CNL Monthly Working Group for the NPD Closure Project, which includes a six-month look-ahead schedule and prioritization schedule). CNL believes that building a long-term relationship with the AOO can enable future consultation, engagement, accommodations, monitoring and oversight, communications, employment, training, contracting, and other economic interests. <u>Engagement Highlights</u> In 2018, AECL, CNL, and the AOO signed a tripartite MOU. The parties have agreed to work together on items of mutual interest related to CNL operations and projects. It has been agreed by all parties that a future LTRA may include provisions on future consultation, engagement, and communications. It has been agreed by all parties that a future LTRA may include provisions on employment, training, contracting, and other economic opportunities. It has been agreed by all parties that an LTRA would not be project-specific but intended to cover CNL operations in the unceded Algonquin traditional territory.	<u>Where is this topic discussed in the EIS?</u> Section 6.2.4.2 of the EIS summarizes CNL engagement with AOO to date and describes the collaborative work of CNL and AOO to progress towards an LTRA. <u>What changes have been made (and where)?</u> Changes have been made to Sections 6.2, 6.3, 8.9, 9.9, 12 in response to AOO comments and to reflect developments in the relationship between AOO and CNL.	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status. CNL believes the concern about AOO’s involvement is partially addressed with development of the LTRA. It is noted that the establishment of community-specific Engagement plans and LTRAs extend beyond the scope of CEAA (2012) and the EA for the NPD Closure Project. <u>Next steps:</u> CNL and AOO have established the following commitments which will help to address this concern: AOO-10 – Ongoing Collaboration CNL is committed to continuing the Working Group with AOO to promote continued open communication, information sharing and education including collaborating on the development of communications and engagement material for various audiences (e.g., AOO staff, ANRs and specific communities). The parties are continuing discussion on an LTRA.

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		LTRA topics of consideration could include consultation and engagement, economic opportunities, future land uses, and environmental and cultural heritage stewardship and monitoring. CNL has provided funding to AOO to assist in progression towards an LTRA. CNL has discussed contracting opportunities and provided connections to CNL Procurement staff. The 2022 work plan developed collaboratively between AOO and CNL includes capacity to support continued meaningful participation in the EA for the NPD Closure Project. In October 2021, the AOO and CNL met to discuss the prioritization of engagement on the NSDF Project and the NPD Closure Project to facilitate the AOO’s desired “one-window” approach for engagement with CNL on the projects. A consolidated draft schedule was prepared by CNL in November 2021 and shared with AOO for review. At the January 25, 2022 meeting the two parties reviewed the schedule together, made edits and discussed the timeline for engagement activities during the first half of 2022. Capacity challenges at the AOO prevented progress on the work plan during most of 2022. However, in November 2022 in response to reach out by CNL and improved resource availability the AOO re-engaged on the NPD Project. Since that time the two parties have been meeting on a monthly (or more frequent) basis – total of 9 meetings between November 2022 and the end of April 2023. Thus far CNL and AOO have discussed the following outstanding concerns: Alternative Means, Valued Components, the AKLUS results and Indigenous Health. Additional meetings are planned for the remainder of 2023 to discuss the remaining outstanding interests: socio-economics, monitoring and end-state. The May 2023 Working Group meeting transitioned to formulating commitments for outstanding areas of concern.		
7. EA Process and Methodology	(a) Concern about the process for identifying potential project-environment interactions: technical decisions should be explained clearly and peer-reviewed. It is important to the AOO that the decisions taken by technical staff are transparent and traceable. The AOO feel that the use of peer review would ensure that technical decisions are supported by evidence and correct interpretations. This is a project-specific concern.	CNL has responded in writing to AOO comments on this topic, citing relevant sections of the EIS as part of the comment responses. <u>CNL Response:</u> CNL understands the AOO concerns about the subjectiveness of the development of the project-environment interactions matrix. The project-environment interactions matrix follows EA guidance and was developed with input from the technical experts involved in the preparation of TSDs. CNL’s approach to identifying interactions for the matrix was to include all potential interactions, even those that may be considered “borderline.” For each of the potential interactions identified, CNL is required to provide rationale in the EIS if it is not carried forward into later steps of the effects assessment. The interactions matrix is subject to review and comment from internal and external experts, and through public, stakeholder, and Indigenous engagement efforts. The 2017 EIS was reviewed by a Federal-Provincial Technical Review Team (consisting of the Canadian Nuclear Safety Commission, Environment and Climate Change Canada, Health Canada, Ontario Ministry of Environment, Conservation and Parks, Government of Quebec), members of the public and Indigenous Nations, communities and organizations. CNL addressed these comments and updated the EIS.	<u>Where is this topic discussed in the EIS?</u> Section 5.2.2 of the EIS discusses the development of the project-environment interactions matrix. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this comment.	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status. CNL believes that this concern has been substantially addressed through its response to specific comments on this topic received from AOO. <u>Next Steps</u> CNL and AOO have established the following commitments which will help to address this concern: AOO-10 – Ongoing Collaboration CNL is committed to continuing the Working Group with AOO to promote continued open communication, information sharing and education including collaborating on the development of communications and engagement material for various audiences (e.g., AOO staff, ANRs and specific communities). CNL and AOO will review together the technical topic responses and identify any remaining gaps. Resolution of any gaps identified will be a topic of a dedicated discussion

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA Process	Status of the Concern
				at the Working Group level.
7. EA Process and Methodology	(b) Interest in additional cumulative effects analysis: - Releases from NPD, CRL and other sources along the Ottawa River - Overall NPD site, including all sources of contamination Information about cumulative effects is important to the AOO because the AOO is interested in the overall protection of the Kichi-Sibi and the NPD site, not just the impacts of a single project. This is a project-specific concern.	CNL has responded in writing to AOO comments on this topic, citing relevant sections of the EIS as part of the comment responses. <u>CNL Response:</u> CNL acknowledges AOO’s concern about the effects on the Kichi-Sibi and NPD site from various activities in the past, present and future. CEAA (2012) requires that a cumulative effects assessment be carried out for any residual adverse effects identified in the EIS. Since it was determined that no adverse residual effects are expected to occur from the NPD project (such as to Kichi-Sibi water quality), there is no potential for the occurrence of cumulative effects, including no potential for synergistic and / or additive effects. These other requested analyses extend beyond the scope of CEAA (2012) and the EA for the NPD Closure Project.	<u>Where is this topic discussed in the EIS?</u> Section 9.13 of the EIS describes the process for evaluating cumulative effects and presents CNL’s assessment of cumulative effects for the NPD Closure Project. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this concern.	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status. CNL believes that this concern has been substantially addressed through its response to specific comments on this topic received from AOO. <u>Next Steps</u> CNL and AOO have established the following commitments which will help to address this concern: AOO-2 – Restoration Planning CNL will collaborate with AOO to ensure that the site restoration plan incorporates in its design traditional values, habitat protection and replanting species of cultural significance (e.g., medicines) as appropriate. CNL to coordinate a tri-party discussion (AOO, AECL, and CNL) about future access to the NPD site including the exclusion zone (undisturbed forested lands that surround the facility). CNL and AOO will review together the technical topic responses and identify any remaining gaps. Resolution of any gaps identified will be a topic of a dedicated discussion at the Working Group level.
7. EA Process and Methodology	(c) Concerns about the methodology for determination of significance of adverse residual effects. It is important to the AOO that events with the potential for a high level of effects are carried through the assessment as far as is reasonable. This is a project-specific concern.	CNL has responded in writing to AOO comments on this topic, citing relevant sections of the EIS as part of the comment responses. In response to AOO’s request that CNL employ a lower threshold for determination of significant adverse residual effects, CNL has offered to present all environmental effects of the project to AOO and explain the process and thresholds for determination of significance of adverse residual effects. <u>CNL Response:</u> CNL acknowledges the AOO’s concerns about the methodology of determining significance of residual effects. The criteria used for the evaluation of significance are from CNSC REGDOC 2.9.1 (2020), Environmental Protection: Environmental Principles, Assessments and Protection Measures. CNL has offered to present to AOO its findings on the environmental effects of the project and explain the process and thresholds for determination of significance of adverse residual effects.	<u>Where is this topic discussed in the EIS?</u> Section 9.1.2 of the EIS explains the methodology used for the determination of significance of residual effects. It also presents the criteria used for the evaluation of significance, which are from CNSC REGDOC 2.9.1 (2020), Environmental Protection: Environmental Principles, Assessments and Protection Measures. Section 11 of the EIS, Conclusion on Significance, discusses the assessment findings. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this concern.	<u>Status:</u> Resolved. CNL believes that this concern has been substantially addressed through its response to specific comments on this topic received from AOO. <u>Next Steps</u> CNL and AOO will review together the technical topic responses and identify any remaining gaps. Resolution of any gaps identified will be a topic of a dedicated discussion at the Working Group level.
8. End State, Site Restoration and Future Use of the Land	(a) Engagement/consultation on end state, site restoration and future land use of the site. It is important to AOO that its members be engaged/consulted meaningfully, not just informed, on end state, site restoration and future land use. Additionally, it is important to the AOO that the end state of the NPD site is safe for future land users. This is both a site-wide and a project-specific	CNL acknowledges AOO’s request for ongoing engagement and consultation related to site restoration and future land use. AOO, AECL and CNL have signed a tri-partite Memorandum of Understanding (MOU) to support the negotiation of an LTRA. One of the areas of mutual interest and concern is land – rehabilitation and remediation programs. CNL has responded in writing to AOO comments on this topic, citing relevant sections of the EIS as part of the comment responses and has also responded in writing to recommendations from the AKLUS and comments on the ESA studies. CNL will be engaging the AOO in the process to develop a Draft Restoration Plan with	<u>Where is this topic discussed in the EIS?</u> General plans for restoration and end state are described in Section 4.3.1.9 of the EIS. Section 6.2.4.2 of the EIS discusses CNL’s engagements efforts to date and path forward for continued meaningful engagement and describes the collaborative work to progress towards an LTRA. <u>What changes have been made (and where)</u> CNL provided additional detail related to restoration of the	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status. CNL believes that this concern has been partially addressed through its response to specific comments on this topic received from AOO. <u>Next steps:</u>

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	concern.	AOO. <u>CNL Response:</u> CNL has completed a Phase II Environmental Site Assessment (ESA) to characterize soil, groundwater and sediment for chemicals of potential concern and has provided an evaluation against federal and provincial environmental standards for residential/parkland and commercial/industrial land uses. The Phase 2 ESA is consistent with the requirements defined in O. Reg. 153/04 and is sufficient for the purposes of due diligence. A Record of Site Condition (RSC) is not required as part of this work. In the event of a sale or transfer of lands, any outstanding documentation needed to move this forward (e.g., RSC, as required) would be prepared at that time. CNL has indicated its commitment to continued meaningful engagement with AOO about site restoration, end state and future land use of the site.	site following decommissioning in Section 4.3.1.9 . Additionally, changes have been made to Sections 6.2 to include the current status of engagement with the AOO related to this concern As the topic of potential land transfer agreements involves AECL and is focused on activities that extend beyond the scope of CEAA (2012) and the EA for the NPD Closure Project, the EIS is not expected to change as a result of this concern.	CNL and AOO have established the following commitments which will help to address this concern: AOO-2 – Restoration Planning CNL will collaborate with AOO to ensure that the site restoration plan incorporates in its design traditional values, habitat protection and replanting species of cultural significance (e.g., medicines) as appropriate. CNL to coordinate a tri-party discussion (AOO, AECL, and CNL) about future access to the NPD site including the exclusion zone (undisturbed forested lands that surround the facility). AOO-4 – Site Visit and Survey Work Provide an opportunity to and support pre-decommissioning site visit(s). Provide capacity for a baseline plant inventory survey. This topic may also be addressed through a future LTRA to ensure adequate future engagement with the AOO in longer-term environmental stewardship and monitoring activities.
8. End State, Site Restoration and Future Use of the Land	(b) Participation in activities related to end state, site restoration and future land use of the site. Involvement is important to the AOO, to ensure transparency and promote confidence in these activities. This is both a site-wide and project-specific concern.	CNL acknowledges AOO’s interest in participating in revegetation activities and environmental monitoring, and in ongoing consultation related to site restoration and future land use. The AOO, AECL and CNL have signed a tri-partite Memorandum of Understanding (MOU) to support the negotiation of an LTRA. One of the areas of mutual interest and concern is land – rehabilitation and remediation programs. CNL has responded in writing to AOO comments on this topic, citing relevant sections of the EIS as part of the comment responses and has also responded in writing to recommendations from the AKLUS. CNL will share the Draft Restoration Plan with AOO for review once it is developed. <u>CNL Response:</u> CNL is committed to providing opportunities for AOO community members to participate in activities related to site restoration, end state and future land use of the site, including monitoring programs. At the project level, follow-up monitoring for the NPD Closure Project will include monitoring of environmental components critical to the AOO.	<u>Where is this topic discussed in the EIS?</u> General plans for restoration and end state are described in Section 4.3.1.9 of the EIS. Section 6.2.4.2 of the EIS discusses involvement of the AOO in the monitoring program and describes the collaborative work to progress towards an LTRA. Section 12 of the EIS discusses how feedback from Indigenous Nations, communities and organizations has been incorporated into the draft follow-up monitoring plans and will continue to be used in the refinement of the plans. <u>What changes have been made (and where)?</u> Changes have been made to Sections 6.2, 6.3, 8.9 and 9.9 of the EIS in response to AOO comments and to include new information from the AKLUS Report. No changes have been made to the EIS regarding participation in these activities.	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status. CNL believes that this concern has been partially addressed through its response to specific comments on this topic received from AOO. <u>Next steps:</u> CNL and AOO have established the following commitments which will help to address this concern: AOO-2 – Restoration Planning CNL will collaborate with AOO to ensure that the site restoration plan incorporates in its design traditional values, habitat protection and replanting species of cultural significance (e.g., medicines) as appropriate. CNL to coordinate a tri-party discussion (AOO, AECL, and CNL) about future access to the NPD site including the exclusion zone (undisturbed forested lands that surround the facility). AOO-4 – Site Visit and Survey Work Provide an opportunity to and support pre-decommissioning site visit(s). Provide capacity for a baseline plant inventory survey. This topic may also be addressed through a future LTRA, to enable AOO involvement in longer-term environmental stewardship and monitoring activities.
8. End State, Site Restoration and Future Use of the Land	(c) Impact of future socio-political changes on land use. It is important to the AOO that CNL fully consider and assess the impacts of potential future socio-political conditions. This is both a site-wide and project-specific concern.	CNL heard AOO’s concern about the impact of future socio-political changes on land use and addressed it in the responses to AOO comments. <u>CNL Response:</u> As shown in the PostSA TSD, CNL’s development of scenarios includes consideration of relevant future changes in land use. These could arise from various future situations including changes to socio-political conditions. Specifically, hypothetical future presence of a full-time self-sufficient Indigenous potential exposure group	<u>Where is this topic discussed in the EIS?</u> The evaluation of FEPs in the PostSA TSD considers relevant future changes in land use, for example, under FEP 1.4 Future Human Actions and FEP 1.4.2 Social and Institutional Developments. FEP 1.4.2 looks at the changes in social patterns and degree of local government, planning and regulation. Potentially significant social and institutional	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status. CNL believes this concern has been addressed by revisions to the EIS. <u>Next steps:</u>

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		(PEG) at the NPD site has been assessed. The analysis demonstrates that under all scenarios, the impact on the public, Indigenous and the environment is negligible.	developments include: changes in planning controls and environmental legislation; demographic change and urban development; changes in land use; and loss of records or societal memory of the facility location and hazards. <u>What changes have been made (and where)?</u> In response to AOO comments, a full-time self-sufficient Indigenous potential exposure group has been added to the PostSA TSD and EIS. The analysis demonstrates that under all scenarios, impact on the public, Indigenous and the environment is negligible.	CNL and AOO have established the following commitments which will help to address this concern: AOO-2 – Restoration Planning CNL will collaborate with AOO to ensure that the site restoration plan incorporates in its design traditional values, habitat protection and replanting species of cultural significance (e.g., medicines) as appropriate. CNL to coordinate a tri-party discussion (AOO, AECL, and CNL) about future access to the NPD site including the exclusion zone (undisturbed forested lands that surround the facility). This topic may also be addressed through a future LTRA.
8. End State, Site Restoration and Future Use of the Land	(d) Long-term liability of the site beyond decommissioning. The AOO have concerns about the long-term integrity of the concrete vault, facility exterior walls and foundations. The AOO considers activities using the seven generation lens and thus is concerned about who will be responsible if environmental events (such as earthquakes) affect the facility over the long term. It is important to the AOO that the end state of the NPD site is safe for future land users. This is a project-specific concern.	CNL heard AOO’s concern about long-term liability of the site and addressed it in its responses to AOO comments. CNL has developed monitoring programs that extend into the Institutional Controls period, to ensure that the public, Indigenous and the environment are protected. <u>CNL Response:</u> CNL, as the licensee, is responsible for conducting ongoing monitoring and maintenance of the site during the Institutional Controls period. The PostSA TSD demonstrates that the impact on the public, Indigenous and the environment is negligible, under all scenarios, beyond the Institutional Controls period.	<u>Where is this topic discussed in the EIS?</u> This topic will be discussed as part of the LTRA with the participation of AECL as the owner of the NPD site. However, the long-term liability of the site extends beyond the scope of CEAA (2012) and the EA for the NPD Closure Project. Therefore, it is not discussed in the EIS. <u>What changes have been made (and where)?</u> No changes were made in the EIS related to long-term liability.	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status. CNL believes that this concern has been partially addressed through its response to specific comments on this topic received from AOO. It is noted that this topic extends beyond the scope of CEAA (2012) and the EA for the NPD Closure Project. <u>Next steps:</u> CNL and AOO have established the following commitments which will help to address this concern: AOO-10 – Ongoing Collaboration CNL is committed to continuing the Working Group with AOO to promote continued open communication, information sharing and education including collaborating on the development of communications and engagement material for various audiences (e.g., AOO staff, ANRs and specific communities). AOO-5 – Participation in monitoring and sharing of results CNL is committed to involve all interested Indigenous Nations, communities and organizations in the NPD Closure Project Follow-up Monitoring Program. On an annual basis CNL and AOO will review together environmental monitoring results from the NPD site. CNL can share results with the AOO annually through to the end of the Institutional Control period. This topic may also be addressed through a future LTRA, to ensure adequate sharing of emergency response planning at the community level.
9. Environmental Effects and Mitigation Measures	(a) Potential impacts to Ottawa River shoreline and to fish, wildlife and plants. This is of interest to the AOO because the Kichi-Sibi and these species are of particular importance to the AOO.	CNL acknowledges AOO’s concern about impacts to species of importance and has responded in writing to AOO comments and AKLUS recommendations. The NPD Closure Project is not expected to adversely impact the shoreline. <u>CNL Response:</u> In discussions with AOO, CNL agreed that protection of the Ottawa River shoreline	<u>Where is this topic discussed in the EIS?</u> Effects to the shoreline are evaluated in the EIS as part of the Surface Water Environment discussion. There will not be any changes to or disturbance of the Ottawa river shoreline from NPD Closure Project activities. The EIS does not predict any	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status. CNL believes this concern has been addressed by revisions

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	This is a project-specific concern.	and fish, wildlife, and plants is important. The EIS demonstrated there are no predicted adverse impacts from the project on the Ottawa River shoreline or on any fish, wildlife or plants. Follow-up monitoring for the NPD Closure Project will include monitoring of environmental components that the AOO has identified as important.	adverse residual effects on the Surface Water Environment (Section 9.3.3.5). The EIS does not predict any adverse residual effects on the aquatic environment (Section 9.4.3.3) or the terrestrial environment (Section 9.6.3.3) resulting from potential emissions during the NPD Closure project. CNL has developed mitigation measures and draft follow-up monitoring plans for the protection of the Kichi-Sibi (Sections 9.3.3.2 and 12.3 of the EIS) and for the protection of flora and fauna (Sections 9.4.3.2 and 9.6.3.2 and 12.3 within the EIS). <u>What changes have been made (and where)?</u> Changes have been made to Sections 6.2, 6.3, 8.9, 9.6 and 9.9 of the EIS in response to AOO comments and to include new information from the AKLUS Report. Specific mitigation measures that were added in response to comments include activities to exclude bats from accessing the facility, and activities to protect monarch butterflies (such as sweeping of work areas, avoiding vegetation removal during periods of monarch presence, and reseedling with milkweed). These are outlined in Sections 9.6.3.2 and 9.6.3.3 of the EIS. Changes have been made to Section 9.3.3.2 to update and expand mitigation measures for the protection of surface water, including the Kichi-Sibi. In response to AOO comments, CNL also revised the draft Follow-up Environmental Monitoring Plan to address the specific interests and concerns expressed by the AOO: annual sediment monitoring and monitoring of SAR mitigation measures (Section 12.3 of the EIS).	to the EIS. <u>Next steps:</u> CNL and AOO have established the following commitments which will help to address this concern: AOO-5 – Participation in monitoring and sharing of results CNL is committed to involve all interested Indigenous Nations, communities and organizations in the NPD Closure Project Follow-up Monitoring Program. On an annual basis, CNL and AOO will review together environmental monitoring results from the NPD site. CNL can share results with the AOO annually through to the end of the Institutional Control period. AOO-4 – Site Visit and Survey Work Provide an opportunity to and support pre-decommissioning site visit(s). Provide capacity for a baseline plant inventory survey. AOO-10 - Ongoing Collaboration CNL is committed to continuing the Working Group with AOO to promote continued open communication, information sharing and education including collaborating on the development of communications and engagement material for various audiences (e.g., AOO staff, ANRs and specific communities). AOO-2 – Restoration Planning. CNL will collaborate with AOO to ensure that the site restoration plan incorporates in its design traditional values, habitat protection and replanting species of cultural significance (e.g., medicines) as appropriate.
10. Indigenous Health	(a) PostSA TSD and Indigenous Health. It is important to AOO that the Algonquin lifestyle is accurately reflected when predicting radiation doses to AOO citizens. This is a project-specific concern.	CNL has responded in writing to AOO comments on this topic, citing relevant sections of the EIS as part of the comment responses. In the 3 rd iteration of the PostSA TSD issued in March 2020, CNL included a Potential Exposure Group consisting of a family of self-sufficient Indigenous receptors in the NPD Area. The exposure profile in the postclosure period was developed based on a traditional Indigenous lifestyle, pre-European contact (SENES 2014). This lifestyle results in a more cautious dose estimate than that based on current-day lifestyle, where some food is store-bought and likely not from the contaminated area. In April 2023, CNL made a presentation to the AOO Working Group summarizing how the Indigenous lifestyle is evaluated through the PostSA TSD looking specifically at how an Indigenous person might interact with the land and biota at and surrounding the NPD site. <u>CNL Response:</u> CNL has added an Indigenous receptor group to the PostSA TSD (see below). The predicted peak dose to an Indigenous receptor (from the 3 rd iteration PostSA) is 0.0004 mSv/yr which is 500 times less than the dose criterion. The analysis demonstrates that the impact on the public, Indigenous and the environment is negligible. AOO involvement in monitoring activities will help to promote confidence in	<u>Where is this topic discussed in the EIS?</u> The EIS presents the PostSA results for the Indigenous receptor group in Section 9.10.2 . <u>What changes have been made (and where)?</u> An Indigenous receptor was added to the human health assessment in the PostSA TSD and EIS.	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status. CNL believes that they have addressed this concern, with revisions to the EIS and technical discussion on this topic. <u>Next steps:</u> CNL and AOO have established the following commitments which will help to address this concern: AOO-10 – Ongoing Collaboration CNL is committed to continuing the Working Group with AOO to promote continued open communication, information sharing and education including collaborating on the development of communications and engagement material for various audiences (e.g., AOO staff, ANRs and specific communities). This topic may also be addressed through a future LTRA, to enable AOO’s involvement in longer-term environmental

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		verifying EIS predictions. SENES Consultants. 2014. <i>Aboriginal Lifestyle Characterization</i> . NWMO TR-2014-13. June.		stewardship and monitoring activities at the NPD site.
11. Monitoring	(a) Participation in activities related to environmental and cultural heritage stewardship and monitoring. Involvement is important to AOO to ensure transparency and promote confidence in these activities. This is both a site-wide and project-specific concern.	CNL has responded in writing to AOO comments on this topic, citing relevant sections of the EIS as part of the comment responses and has also responded in writing to recommendations from the AKLUS, and the AOO comments on draft follow-up monitoring plans. CNL has committed to involving Indigenous Nations, communities and organizations in its environmental monitoring programs. The AOO, AECL and CNL have signed a tri-partite Memorandum of Understanding (MOU) to support the negotiation of an LTRA. One of the areas of mutual interest and concern is environmental and cultural heritage monitoring programs, including joint monitoring, to ensure that the environment is adequately protected and the rights and interests of the AOO are upheld. <u>CNL Response:</u> CNL is committed to providing opportunities for AOO community members to participate in monitoring activities. At the project level, follow-up monitoring for the NPD Closure Project will include monitoring of environmental components critical to the AOO such as monitoring of surface water, groundwater and air quality. CNL is committed to a country foods study involving the AOO, as requested by the AOO, to verify project assumptions, and to build confidence/trust in the project's activities and the long-term performance of the closed facility. CNL is committed to co-developing a project specific cultural and heritage protection plan (CHPP) with the AOO.	<u>Where is this topic discussed in the EIS?</u> CNL has indicated in Section 6.2.4.2.3 that it is willing to involve the AOO in its monitoring programs. <u>What changes have been made (and where)?</u> No changes have been made to the EIS regarding participation in these activities. However, the shared activities are a topic of the LTRA.	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status. CNL believes that they have addressed this concern in its response to EIS comments and by initial commitment discussions. <u>Next steps:</u> CNL and AOO have established the following commitments which will help to address this concern: AOO-4 – Site Visit and Survey Work Provide an opportunity to and support pre-decommissioning site visit(s). Provide capacity for a baseline plant inventory survey. AOO-5 – Participation in monitoring and sharing of results CNL is committed to involve all interested Indigenous Nations, communities and organizations in the NPD Closure Project Follow-up Monitoring Program. On an annual basis, CNL and AOO will review together environmental monitoring results from the NPD site. CNL can share results with the AOO annually through to the end of the Institutional Control period. AOO-1 – Socio-Economic Considerations, Monitoring and Mitigations Provide capacity to the AOO to undertake a socio-economic study with results captured in a subsequent revision of the Indigenous Engagement Report. Study recommendations will be implemented in CNL's project plans after collaborative review by CNL and the AOO. CNL and AOO will identify opportunities to improve CNL's monitoring and mitigations to ensure traditional knowledge is incorporated and that interdependencies between ecological, socio-economic, community and cultural health are recognized. AOO-10 – Ongoing Collaboration CNL is committed to continuing the Working Group with AOO to promote continued open communication, information sharing and education including collaborating on the development of communications and engagement material for various audiences (e.g., AOO staff, ANRs and specific communities).
11. Monitoring	(b) Review of the CNL's draft follow-up monitoring plans. It is important to the AOO that it has an opportunity to provide input into monitoring details (e.g., frequency, location, parameters) This is a project-specific concern.	CNL has responded in writing to AOO comments on this topic, citing relevant sections of the EIS as part of the comment responses and has also responded in writing to AOO comments on draft follow-up monitoring plans. CNL has committed to involving Indigenous Nations, communities and organizations in its environmental monitoring programs Working Group discussion is planned for summer 2023 to hear additional feedback on the draft follow-up monitoring plans. <u>CNL Response:</u> CNL shared the draft follow-up monitoring plans with AOO for comment in August	<u>Where is this topic discussed in the EIS?</u> The follow up monitoring program is described at a high level in Section 12 of the EIS. <u>What changes have been made (and where)?</u> Changes have been made to Section 12 to include significant details from the 3 draft follow-up monitoring plans for effluent, environment and groundwater developed since the 2017 EIS.	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status. CNL believes that this concern is addressed. AOO has provided review comments on the draft follow-up monitoring plans and CNL has provided responses. <u>Next Steps</u>

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		2019. The planned monitoring proposed in the draft follow-up monitoring programs includes SAR and SAR habitat monitoring, as well as potential vegetation monitoring only if there is an unexpected result in groundwater monitoring.		CNL and AOO have established the following commitments which will help to address this concern: AOO-5 – Participation in monitoring and sharing of results CNL is committed to involve all interested Indigenous Nations, communities and organizations in the NPD Closure Project Follow-up Monitoring Program. On an annual basis, CNL and AOO will review together environmental monitoring results from the NPD site. CNL can share results with the AOO annually through to the end of the Institutional Control period. AOO-1 – Socio-Economic Considerations, Monitoring and Mitigations Provide capacity to the AOO to undertake a socio-economic study with results captured in a subsequent revision of the Indigenous Engagement Report. Study recommendations will be implemented in CNL’s project plans after collaborative review by CNL and the AOO. CNL and AOO will identify opportunities to improve CNL’s monitoring and mitigations to ensure traditional knowledge is incorporated and that interdependencies between ecological, socio-economic, community and cultural health are recognized.
11. Monitoring	(c) AOO recommendations and requests for additional monitoring. Implementing these requests would provide additional assurances to AOO community members, and others, who may resume using the site for a range of uses in the future. This is a project-specific concern.	AOO, AECL and CNL have signed a tri-partite Memorandum of Understanding (MOU) to support the negotiation of an LTRA. One of the areas of mutual interest and concern is environmental and cultural heritage monitoring programs, including joint monitoring, to ensure that the environment is adequately protected and the rights and interests of the AOO are upheld. As part of the LTRA the AOO will have the opportunity to make recommendations on environmental and cultural monitoring that would address ecological-community health inter-dependencies of importance to the AOO. <u>CNL Response:</u> Follow-up monitoring for the NPD Closure Project will include monitoring of environmental components critical to the AOO. To supplement baseline data, a study of sediment, benthic invertebrates and fish habitat features was undertaken upstream, adjacent to and downstream of the NPD site in 2020, and the report was provided to the AOO. The study determined that the Ottawa River benthic invertebrate community near NPD is healthy and typical of what is observed in many large, soft-bottomed, relatively deep river systems. This study can be repeated when decommissioning is complete, to verify if the project has had an impact. CNL is planning to regularly monitor the Ottawa River water quality before the project begins. CNL is willing to discuss fish tissue sampling with the AOO and review past studies of fish tissue in the NPD area. A very small amount of mercury remains in the NPD facility (estimated to be less than 0.01 kg from past leaks of instruments like thermometers). Because mercury is detected in the facility sump liquid, it is one of the parameters that will be monitored in groundwater and surface water. Regarding AOO's requests for annual vegetation monitoring to confirm the contamination pathway around the grouted facility, and annual monitoring of	<u>Where is this topic discussed in the EIS?</u> The follow up monitoring program is described at a high level in Section 12 of the EIS. <u>What changes have been made (and where)?</u> Changes have been made to Section 12 of the EIS to include significant details from the three draft follow-up monitoring plans for effluent, environment and groundwater developed since the 2017 EIS. The benthos and fish habitat survey is important baseline data for the follow-up monitoring program. The results of this study have been incorporated into Section 8.3 and Section 8.4 of the EIS. The results reinforce the baseline presented for both the surface water and aquatic environments.	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status. CNL believes that they have substantially addressed this concern in their response to EIS comments and by revisions to the EIS. <u>Next Steps:</u> CNL and AOO have established the following commitments which will help to address this concern: AOO-5 – Participation in monitoring and sharing of results CNL is committed to involve all interested Indigenous Nations, communities and organizations in the NPD Closure Project Follow-up Monitoring Program. On an annual basis, CNL and AOO will review together environmental monitoring results from the NPD site. CNL can share results with the AOO annually through to the end of the Institutional Control period. AOO-1 – Socio-Economic Considerations, Monitoring and Mitigations Provide capacity to the AOO to undertake a socio-economic study with results captured in a subsequent revision of the Indigenous Engagement Report. Study recommendations will be implemented in CNL’s project plans after collaborative review by CNL and the AOO. CNL and AOO will identify opportunities to improve CNL’s monitoring and mitigations to ensure traditional

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		sediment and benthic macroinvertebrates immediately offshore of NPD, CNL believes that the planned monitoring is sufficient, i.e. monitoring vegetation around groundwater monitoring wells only if there is an unexpected result in groundwater monitoring, and undertaking sediment monitoring if there is an unexpected result in either groundwater or surface water monitoring. CNL has committed to involving Indigenous Nations, communities and organizations in its environmental monitoring programs and to hosting workshops in spring 2022 to further discuss draft follow-up monitoring plans.		knowledge is incorporated and that interdependencies between ecological, socio-economic, community and cultural health are recognized. CNL is committed to continuing the Working Group with AOO. It is understood that work progressed through the AOO/ CNL Working Group may lead to refinements of commitments in the future.
11. Monitoring	(d) Monitoring Plan design and implementation and communication of changes. As long-term stewards and users of the land, it is important to the AOO to be actively involved in oversight of the NPD area. This is a project-specific concern.	CNL has responded in writing to AOO comments on this topic, citing relevant sections of the EIS as part of the comment responses and has also responded in writing to recommendations from the AKLUS, and the AOO comments on draft follow-up monitoring plans. CNL has committed to involving Indigenous Nations, communities and organizations in its environmental monitoring programs and Working Group discussion is planned for summer 2023 to hear additional feedback on the draft follow-up monitoring plans. CNL is open to discussing with the AOO the preferred ways of AOO involvement in monitoring plan design, implementation and communication of changes. <u>CNL Response:</u> Follow-up monitoring for the NPD Closure Project will include monitoring of environmental components critical to the AOO. There is no long-term effluent monitoring at NPD that will require the use of DRLs. Once the project enters the Institutional Controls phase, the only effluents are minor releases from maintenance activities, and DRLs are no longer used. Doses to receptors during the Post-Institutional Controls phase are assessed in the PostSA TSD. The PostSA TSD also assesses dose to an Indigenous receptor group. The assessment demonstrates that the impact on the public, Indigenous and the environment is negligible. CNL is committed to sharing the results of annual follow up monitoring with the AOO and communicating the changes to the program resulting from adaptive management throughout the monitoring period.	<u>Where is this topic discussed in the EIS?</u> The follow up monitoring program is described at a high level in Section 12 of the EIS. <u>What changes have been made (and where)?</u> - CNL has committed to updating the draft follow-up monitoring plans based on AOO feedback to provide clarity that mitigation measures will be implemented in the event of an exceedance. - The draft follow-up monitoring plans remain draft and CNL is seeking feedback from all Indigenous Nations, communities and organizations and the public. These plans will not be finalized until the CNSC renders a decision for the project.	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status. CNL believes that this concern has been partially addressed through its response to specific comments on this topic received from AOO. <u>Next Steps</u> CNL and AOO have established the following commitments which will help to address this concern: AOO-5 – Participation in monitoring and sharing of results CNL is committed to involve all interested Indigenous Nations, communities and organizations in the NPD Closure Project Follow-up Monitoring Program. On an annual basis, CNL and AOO will review together environmental monitoring results from the NPD site. CNL can share results with the AOO annually through to the end of the Institutional Control period. AOO-1 – Socio-Economic Considerations, Monitoring and Mitigations Provide capacity to the AOO to undertake a socio-economic study with results captured in a subsequent revision of the Indigenous Engagement Report. Study recommendations will be implemented in CNL’s project plans after collaborative review by CNL and the AOO. CNL and AOO will identify opportunities to improve CNL’s monitoring and mitigations to ensure traditional knowledge is incorporated and that interdependencies between ecological, socio-economic, community and cultural health are recognized. CNL is committed to continuing the Working Group with AOO. It is understood that work progressed through the AOO/ CNL Working Group may lead to refinements of commitments in the future.
12. Protection of the Ottawa River	(a) Contamination in the Ottawa River and the environment. As stewards of the lands and waters, it is important to the AOO that the environment, including flora and fauna are protected. AOO expressed that the protection of the Ottawa River	CNL has responded in writing to AOO comments on this topic, citing relevant sections of the EIS as part of the comment responses and has also responded in writing to recommendations from the AKLUS, and the AOO comments on draft follow-up monitoring plans. In 2018, CNL ceased the practice of discharging liquid effluent from the facility sumps to the Ottawa River in response to public and Indigenous concerns and arranged instead for water to be sent to the Waste Treatment Centre at the CRL	<u>Where is this topic discussed in the EIS?</u> The follow-up monitoring program is described at a high level in Section 12 of the EIS. Section 4.1 of the EIS highlights the in-design mitigation measures that act to isolate and contain the waste inventory within the NPD Disposal Facility to ensure protection of the	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status. CNL believes that they have addressed this concern in their response to EIS comments and by revisions to the EIS.

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	is of extremely high priority to AOO. This is a project-specific concern.	site. CNL has committed to involving Indigenous Nations, communities and organizations in its environmental monitoring programs and to hosting workshops in spring 2022 to gather feedback on the draft follow-up monitoring plans. <u>CNL Response:</u> The potential for contamination to reach the Ottawa river is assessed in the EIS and is supported by long term modelling and detailed groundwater modelling. The EIS predicts no effects to surface water (including the Ottawa river) and follow up monitoring will be implemented to confirm these predictions. CNL has added information to the EIS about the washout pit and historic water discharges from the wells area sump. Monitoring results capture the effects of historic activities. Groundwater modelling was conducted for the NPD site. The PostSA TSD incorporates the results of groundwater modelling and, where necessary, uses conservative assumptions, (e.g., the tile drains remain functional and serve as a faster pathway to the Ottawa River), and considers the tile drains to have failed (so that the facility resaturates more quickly). The PostSA TSD concludes that no residual effects are expected from potential contaminant migration in groundwater. The tile drain system is expected to fail at some point during the Institutional Controls phase.	surrounding environment, including the Ottawa River. The EIS does not predict any adverse residual effects on the surface water environment (encompassing the Ottawa River) (Section 9.3.3.5). Groundwater modelling has been conducted in the Groundwater Modelling TSD. <u>What changes have been made (and where)?</u> Changes have been made to Section 12 to include significant details from the 3 draft follow-up monitoring plans for effluent, environment and groundwater developed since the 2017 EIS. Mitigation measures for the protection of surface water, including the Ottawa River, in Section 9.3.3.2 have been updated and expanded. Based on AOO feedback, the project scope (Section 4.3.1.3) has been clarified with improved definition of requirements for the washout pit. CNL has also provided additional explanation in Section 8.3.3 to clarify the history and basis for monitoring of the wells area sump. CNL will review data from facility characterization activities that were completed after the draft Follow-up Effluent Monitoring Plan was prepared. CNL will ensure that the draft Follow-up Effluent Monitoring Plan takes into consideration all radionuclides that may be released from demolition of the reactor building.	<u>Next Steps</u> CNL and AOO have established the following commitments which will help to address this concern: AOO-10 – Ongoing Collaboration CNL is committed to continuing the Working Group with AOO to promote continued open communication, information sharing and education including collaborating on the development of communications and engagement material for various audiences (e.g., AOO staff, ANRs and specific communities). Future dialogue may include dedicated discussions with SMEs on the importance of water. AOO-1 – Socio-Economic Considerations, Monitoring and Mitigations Provide capacity to the AOO to undertake a socio-economic study with results captured in a subsequent revision of the Indigenous Engagement Report. Study recommendations will be implemented in CNL’s project plans after collaborative review by CNL and the AOO. CNL and AOO will identify opportunities to improve CNL’s monitoring and mitigations to ensure traditional knowledge is incorporated and that interdependencies between ecological, socio-economic, community and cultural health are recognized.
13. Protection of Flora and Fauna	(a) Potential impacts to habitat and biota, and related follow-up program elements. As stewards of the lands and waters, it is important to the AOO that the environment around the site of the NPD Closure Project including flora and fauna, are protected, and that the rights and interests of AOO members are upheld in relation to the environment (i.e., hunting, trapping, gathering, fishing and cultural ceremonies). This is a project-specific concern.	CNL has completed additional site characterization since issuing the 2017 draft EIS. CNL undertook baseline studies of benthic macroinvertebrate, sediment quality and water quality in the Ottawa River in the summer of 2020. Samples were taken upstream, downstream and adjacent to the NPD facility. CNL has responded in writing to AOO comments on this topic, citing relevant sections of the EIS as part of the comment responses and has also responded in writing to recommendations from the AKLUS, and the AOO comments on draft follow-up monitoring plans. CNL has included the AOO VC species in the EIS <u>CNL Response:</u> As shown in the EIS, there are no adverse impacts from the project on the Ottawa River or to any fish, birds, wildlife or plants within the terrestrial, riparian and aquatic ecosystems. Monitoring results capture the effects of historic release of radionuclides. CNL will follow Environment and Climate Change Canada guidance for the protection of migratory birds and their habitat. CNL will undertake continuous air monitoring to ensure that the wetlands are protected. The EIS demonstrates that there are no predicted adverse impacts from the project on the Ottawa River shoreline or onto any fish, wildlife or plants. Follow-up monitoring for the NPD Closure Project will include monitoring of environmental components that the AOO has identified as important. At the project level, follow-up monitoring for the NPD Closure Project will include monitoring of environmental components critical to the AOO.	<u>Where is this topic discussed in the EIS?</u> The follow up monitoring program is described at a high level in Section 12 of the EIS. CNL has indicated that it is willing to involve the AOO in its monitoring programs (Section 6.2.4.2.3). Section 6.3 of the EIS discusses VCs identified by Indigenous Nations, communities and organizations and shows how they are included or represented in the EIS. <u>What changes have been made (and where)?</u> The EIS was updated with significant details developed compared to the 2017 draft EIS. These details come through the development of the 3 draft follow-up monitoring plans for effluent, environment and groundwater. Changes have been made to Section 4.3.1.2 to include the preferred location for the batch plant, which is not predicted to have any effect on terrestrial vegetation or wetland areas, as the area was previously disturbed and is well away from wetlands.	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status. CNL believes that they have addressed this concern in their response to EIS comments and by revisions to the EIS. <u>Next Steps</u> CNL and AOO have established the following commitments which will help to address this concern: AOO-4 – Site visit ad survey work Provide an opportunity to and support pre-decommissioning site visit(s). Provide capacity for a baseline plant inventory survey. AOO-5 – Participation in monitoring and sharing of results CNL is committed to involve all interested Indigenous Nations, communities and organizations in the NPD Closure Project Follow-up Monitoring Program. On an annual basis, CNL and AOO will review together environmental monitoring results from the NPD site. CNL can share results with the AOO annually through to the end of the Institutional Control period. AOO-10 – Ongoing Collaboration CNL is committed to continuing the Working Group with AOO to promote continued open communication,

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				information sharing and education including collaborating on the development of communications and engagement material for various audiences (e.g., AOO staff, ANRs and specific communities).
13. Protection of Flora and Fauna	(b) Species at Risk. AOO expressed the importance of flora and fauna to their communities, culture and Aboriginal Rights and Title. This is a project-specific concern.	CNL has responded in writing to AOO comments on this topic, citing relevant sections of the EIS as part of the comment responses and has also responded in writing to recommendations from the AKLUS. In 2019, 2020, 2021 and 2023, Indigenous Nations, communities and organizations and the public were invited to participate in the National Chimney Swift Roost Counts. <u>CNL Response:</u> Impacts to Species at Risk (SAR) are assessed using the SAR VCs selected. Lake sturgeon, listed as Threatened under COSEWIC, is included as a VC and is assessed in Section 9.4.3. The American eel is represented as a benthic fish receptor in the Ecological Risk Assessment (EcoRA) TSD. In the EcoRA TSD, additional protective measures were applied, such as adding an extra safety factor to the radiological benchmarks for SAR species and selecting chemical benchmarks protective at the individual level. CNL has developed a number of mitigation measures to ensure the protection of biota, including SARs. Some of the planned measures are specific to the protection of specific SARs, such as chimney swifts and bald eagles.	<u>Where is this topic discussed in the EIS?</u> Potential impacts to SAR are assessed using the SAR VCs selected in the EIS, which include the bald eagle (Section 9.6.3). Lake sturgeon, listed as Threatened under COSEWIC, is included as a VC and is assessed in Section 9.4.3 . <u>What changes have been made (and where)?</u> CNL has included additional mitigation measures related to migratory birds and avian and herpetofauna species at risk in Section 9.6.3.2 of the EIS	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status. CNL believes that they have addressed this concern in their response to EIS comments and by revisions to the EIS. <u>Next Steps</u> CNL and AOO have established the following commitments which will help to address this concern: AOO-4 – Site visit ad survey work Provide an opportunity to and support pre-decommissioning site visit(s). Provide capacity for a baseline plant inventory survey. AOO-5 – Participation in monitoring and sharing of results CNL is committed to involve all interested Indigenous Nations, communities and organizations in the NPD Closure Project Follow-up Monitoring Program. On an annual basis, CNL and AOO will review together environmental monitoring results from the NPD site. CNL can share results with the AOO annually through to the end of the Institutional Control period. AOO-10 – Ongoing Collaboration CNL is committed to continuing the Working Group with AOO to promote continued open communication, information sharing and education including collaborating on the development of communications and engagement material for various audiences (e.g., AOO staff, ANRs and specific communities).
14. Socio-economic	(a) Lack of assessment of Indigenous socio-economic conditions and effects. The AOO consider this information and assessment necessary in order to understand the extent of the socio-economic conditions of AOO communities’ socio-economic and how those may be influenced by NPD Closure Project activities. This is a project-specific concern.	CNL has responded in writing to AOO comments on this topic, citing relevant sections of the EIS as part of the comment. CNL has revised the EIS to include Indigenous socio-economic and well-being receptors, assess project interactions, describe current Indigenous socio-economic and well-being conditions (based on information provided by the AOO and other Indigenous Nations, communities and organizations) and assess the potential impacts of the project on Indigenous socio-economics and health, including nuisance effects. Mitigation measures, monitoring and follow-up activities are also discussed. CNL provided AOO with digital access to the EIS, which includes a new section on Aboriginal health and socio-economic factors. CNL has also offered support to the AOO to complete a socio-economic study. Results to be available late in 2023. <u>CNL Response:</u> CNL has acknowledged this gap and revised the EIS and Indigenous Engagement Report (IER) to include sections on Indigenous socio-economics and health. These sections aim to include the interests of Indigenous Nations, communities and organizations, such as the AOO, in the consideration of the potential impacts of the NPD Closure Project. The EIS and IER conclude that there are no adverse residual effects predicted to the Indigenous Socio-economic environment.	<u>Where is this topic discussed in the EIS?</u> Sections 8.10 and 9.10 of have been added to the EIS to focus on Indigenous Socio-economic and Health and introduce specific Indigenous receptors. Section 8.10 summarizes current conditions, and Section 9.10 assesses potential effects. Section 10.3 of the EIS describes mitigation measures to minimize effects to Indigenous socio-economic conditions and health, including outlining the process to be followed in the event of discovering previously undocumented archaeological resources, limiting off-site transportation to Highway 17 and site roads, limiting construction activities to between 7 a.m. and 7 p.m. wherever possible, etc. <u>What changes have been made (and where)?</u> CNL added Sections 8.10 and 9.10 (discussed above) to the EIS as a result of these comments. Changes have been made to Section 5.2.4 (Valued Components) to reflect the new environmental components, sub-categories and receptors.	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status. CNL believes this concern will be substantially addressed by completion of the socio-economic study and review of study results as they pertain to potential impacts from the project. <u>Next steps:</u> CNL and AOO have established the following commitments which will help to address this concern: AOO-1 – Socio-Economic Considerations, Monitoring and Mitigations Provide capacity to the AOO to undertake a socio-economic study with results captured in a subsequent revision of the Indigenous Engagement Report. Study recommendations will be implemented in CNL’s project plans after collaborative review by CNL and the AOO. CNL and AOO will identify opportunities to improve CNL’s monitoring and mitigations to ensure traditional

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			Changes have been made to Section 10.3 to include mitigation measures for the new Indigenous socio-economic and health receptors. CNL also added new sections to the IER to cover Indigenous socio-economic and health factors and to include the new Indigenous receptors.	knowledge is incorporated and that interdependencies between ecological, socio-economic, community and cultural health are recognized.
14. Socio-economic	(b) The EIS is missing some key Indigenous socio-economic and well-being components (VCs) and interactions. It is important to the AOO that all potential interactions and impacts be considered in order to fully evaluate the effects of the project on AOO citizens. This is a project-specific concern.	CNL has responded in writing to AOO comments on this topic, citing relevant sections of the EIS as part of the comment responses. CNL has revised the EIS to include consideration of potential interactions of the project with numerous Indigenous well-being and health components, such as population and demographics, economy and employment, housing and infrastructure, Indigenous resident use and enjoyment of property, decision-making, the health of members of the public, and worker receptors. With the addition of these new interactions, CNL can assess the effects of the project on components that are important to AOO and other Indigenous Nations, communities and organizations. CNL provided AOO with digital access to the EIS, which includes a new section on Aboriginal health and socio-economic factors. CNL has also offered support to the AOO to complete a socio-economic study. Results to be available late in 2023. <u>CNL Response:</u> CNL has acknowledged this gap and revised the EIS and IER to include specific consideration of project interactions with Indigenous socio-economics and health. To address the gap, CNL has now included Indigenous socio-economic and Indigenous health environmental compartments and carrying them through the interactions matrix, description of current conditions, and evaluation of effects.	<u>Where is this topic discussed in the EIS?</u> Section 5.2.2 of the EIS shows the revised Interactions Matrix, which includes the new Indigenous socio-economic and well-being receptors. Section 5.2.4 of the EIS describes the new Indigenous socio-economic and well-being compartments and VCs. Sections 8.10 and 9.10 of the EIS have been added to focus on Indigenous socio-economic and Health, including introduction of specific Indigenous receptors. Section 8.10 summarizes current conditions, and Section 9.10 assesses potential effects. Section 10.3 of the EIS presents mitigation measures to minimize effects to Indigenous socio-economic conditions and health. <u>What changes have been made (and where)?</u> CNL revised the interactions matrix (Section 5.2.2 of the EIS) to include the new Indigenous socio-economic and well-being receptors. Changes have been made to Section 5.2.4 (Valued Components) to reflect the new environmental components, sub-categories and receptors. CNL added Sections 8.10 and 9.10 (discussed above) to the EIS as a result of these comments. Changes have been made to Section 10.3 to include mitigation measures for the new Indigenous socio-economic and health receptors. CNL also added new sections to the IER to cover Indigenous socio-economic and health factors and include the new Indigenous receptors.	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status. CNL believes this concern will be substantially addressed by completion of the socio-economic study and review of study results to assess gaps in the VCs selected to assess impacts to socio-economics. <u>Next steps:</u> CNL and AOO have established the following commitments which will help to address this concern: AOO-1 – Socio-Economic Considerations, Monitoring and Mitigations Provide capacity to the AOO to undertake a socio-economic study with results captured in a subsequent revision of the Indigenous Engagement Report. Study recommendations will be implemented in CNL’s project plans after collaborative review by CNL and the AOO. CNL and AOO will identify opportunities to improve CNL’s monitoring and mitigations to ensure traditional knowledge is incorporated and that interdependencies between ecological, socio-economic, community and cultural health are recognized.
14. Socio-economic	(c) Lack of plans for monitoring of socio-economic effects, accommodations and compensation. It is important to the AOO that CNL work with its members to develop a plan for monitoring socio-economic effects of the project, to ensure that potential negative effects are minimized and that positive effects are fully realized. AOO believes that plans are needed for AOO citizens to be adequately accommodated and compensated for any impacts experienced as a result of the project. This is both a site-wide and a project-specific concern.	CNL has responded in writing to AOO comments on this topic, citing relevant sections of the EIS as part of the comment responses. AOO, AECL and CNL have signed a tri-partite Memorandum of Understanding (MOU) to support the negotiation of an LTRA. One of the areas of mutual interest and concern is environmental and cultural heritage monitoring programs, including joint monitoring, to ensure that the environment is adequately protected and the rights and interests of the AOO are upheld. <u>CNL Response:</u> CNL is of the opinion it has assessed accurately all of the pathways associated with the NPD Closure Project, compliant with CEAA (2012). The EIS did not predict effects to socio-economic VCs. Therefore, no specific Indigenous socio-economic monitoring activities, compensation, or accommodations have been identified. Monitoring in other environmental components will confirm the EIS predictions (i.e.,	<u>Where is this topic discussed in the EIS?</u> Section 6.2.4.2 of the EIS presents information on the work to progress developing an LTRA. Sections 8.10 and 9.10 of the EIS have been added to focus on Indigenous socio-economic conditions, including economy and employment. Section 8.10 summarizes current economic and employment conditions, and Section 9.10 assesses potential effects and discusses CNL’s plan to fully realize the potential for economic and employment benefits to Indigenous Nations, communities and organizations. <u>What changes have been made (and where)?</u> No changes were made to the EIS in response to this concern.	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status. <u>Next steps:</u> CNL and AOO have established the following commitments which will help to address this concern: AOO-9 – Economic Participation and Benefit CNL is committed to improved economic participation and benefits for Indigenous peoples from its projects. CNL recognizes that there is an opportunity to improve in this area. CNL will continue working with the AO to improve systems that support economic participation and benefits. CNL will review together with AOO the scope and activities

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA Process	Status of the Concern
		that no effects are expected in the Indigenous socio-economic environment). CNL is open to discussing socio-economic monitoring measures during construction activities with the AOO and other Indigenous Nations, communities and organizations. CNL is committed to working with the AOO to identify barriers for accessing economic opportunities from the project, mitigation of those barriers and ways to monitor the degree to which Algonquins are able to take advantage of benefits of the project.		for the NPD project and share contracting and employment opportunities. AOO-10 – Ongoing Collaboration CNL is committed to continuing the Working Group with AOO to promote continued open communication, information sharing and education including collaborating on the development of communications and engagement material for various audiences (e.g., AOO staff, ANRs and specific communities). This topic may also be addressed through a future LTRA to enable AOO's involvement in employment and procurement opportunities.
14. Socio-economic	(d) The EIS does not discuss employment or procurement opportunities for the AOO. It is important to the AOO to understand the way in which CNL plans to engage the AOO in developing employment and procurement opportunities for the proposed project. This is both a site-wide and project-specific concern.	CNL has revised the EIS to include consideration of Indigenous economic and employment opportunities as part of the new assessment of Indigenous socio-economics. AOO, AECL and CNL have signed a tri-partite Memorandum of Understanding (MOU) to support the negotiation of an LTRA. The areas of mutual interest and concern include: contracting opportunities, employment considerations and economic impact awareness. CNL has been working with Indigenous Nations, communities and organizations on facilitating such economic and contracting opportunities. CNL has responded in writing to AOO comments on this topic, citing relevant sections of the EIS as part of the comment responses. <u>CNL Response:</u> CNL has provided information to AOO on the processes involved in Indigenous employment and procurement for the project. CNL is committed to improved economic participation and benefits for Indigenous peoples from its projects. CNL recognizes that there is an opportunity to improve in this area and has developed an Indigenous Procurement Strategy.	<u>Where is this topic discussed in the EIS?</u> Section 5.2.4 of the EIS describes the new Indigenous socio-economic VCs, which include Indigenous economy and employment. Section 6.2.4.2 of the EIS describes the work to progress towards an LTRA. Sections 8.10 and 9.10 of the EIS have been added to focus on Indigenous socio-economic conditions, including economy and employment. Section 8.10 summarizes current economic and employment conditions, and Section 9.10 assesses potential effects and discusses CNL's plan to fully realize the potential for economic and employment benefits to Indigenous Nations, communities and organizations. CNL will proactively seek, engage, and support discussion on issues and opportunities. <u>What changes have been made (and where)?</u> Changes have been made to Section 5.2.4 (Valued Components) to include economy and employment as a VC under the new Indigenous socio-economic compartment. CNL added Sections 8.10 and 9.10 (discussed above) to the EIS as a result of these comments.	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status. CNL believes that they have addressed this concern, with revisions to the EIS and recent work to develop an Indigenous Relations Procurement Strategy. It is noted that employment or procurement opportunities extend beyond the scope of CEAA (2012) and the EA for the NPD Closure Project. <u>Next steps:</u> CNL and AOO have established the following commitments which will help to address this concern: AOO-9 – Economic Participation and Benefit CNL is committed to improved economic participation and benefits for Indigenous peoples from its projects. CNL recognizes that there is an opportunity to improve in this area. CNL will continue working with the AO to improve systems that support economic participation and benefits. CNL will review together with AOO the scope and activities for the NPD project and share contracting and employment opportunities. AOO-10 – Ongoing Collaboration CNL is committed to continuing the Working Group with AOO to promote continued open communication, information sharing and education including collaborating on the development of communications and engagement material for various audiences (e.g., AOO staff, ANRs and specific communities). This topic may also be addressed through a future LTRA to enable AOO's involvement in employment and procurement opportunities.
15. Technical	(a) Derived Release Limits (DRLs). It is important to AOO to review the DRLs to ensure they comply with relevant standards and that the critical group reflects the Algonquin lifestyle. This is a site-wide concern.	CNL has responded in writing to AOO comments on the topic of DRLs. <u>CNL Response:</u> There is no long-term effluent monitoring at NPD that will require the use of DRLs. Once the project enters the Institutional Controls phase, the only effluents are minor releases from maintenance activities, and DRLs are no longer used. Doses to receptors during the Post-Institutional Controls phase are assessed in the PostSA TSD. The PostSA TSD also assesses dose to an Indigenous receptor group.	<u>Where is this topic discussed in the EIS?</u> The DRL report is beyond the scope of CEAA (2012) and the EA for the NPD Closure Project. <u>What changes have been made (and where)?</u> The DRL report is not part of the scope of the EA submission, and no changes were made.	<u>Status:</u> Resolved. Although the DRL Report extends beyond the scope of CEAA (2012) and the EA for the NPD Closure Project. CNL is following up on this issue with the AOO. <u>Next Steps</u> CNL and AOO will review together the technical topic responses and identify any remaining gaps. Resolution of

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA Process	Status of the Concern
		The assessment demonstrates that the impact on the public, Indigenous and the environment is negligible.		any gaps identified will be a topic of a dedicated discussion at the Working Group level.
15. Technical	(b) Emissions and discharges. It is important to the AOO that emissions in the atmospheric environment of contaminants are properly assessed and are mitigated and monitored as appropriate. This is a project-specific concern.	CNL has responded in writing to AOO comments on this topic, citing relevant sections of the EIS as part of the comment responses. In 2018, CNL ceased the practice of discharging liquid effluent from the facility sumps to the Ottawa River in response to public and Indigenous concerns and arranged instead for water to be sent to the Waste Treatment Centre at the CRL site. <u>CNL Response:</u> The EIS describes noise and dust mitigation measures, and monitoring is planned as part of the EA follow-up monitoring. Air releases of substances that will not be removed from the facility prior to decommissioning are assessed in the DecomSA TSD and are below relevant criteria. The EIS does not predict any adverse residual effects on the aquatic or terrestrial environment as a result of potential emissions during the NPD Closure Project.	<u>Where is this topic discussed in the EIS?</u> Section 9.2.3 of the EIS provides the mitigation measures and monitoring for dust and noise; the draft follow-up monitoring plans provide details for monitoring of hazardous substances during decommissioning activities that may make them airborne. Section 4.3.1.2 of the EIS includes the preferred location for the batch plant, which is not predicted to have any effect on terrestrial vegetation or wetland areas, as the area was previously disturbed and is well away from wetlands. Air releases are assessed in Sections 8.5.2.1 and 8.6.1 of the DecomSA TSD. Section 9.2.3 of the EIS provides the mitigation measures and monitoring for dust and noise. The EIS does not predict any adverse residual effects on the aquatic (Section 9.4.3.3) or terrestrial environment (Section 9.6.3.3) as a result of potential emissions during the NPD Closure Project. The PostSA TSD includes dispersion modelling for groundwater discharge in the Ottawa River <u>What changes have been made (and where)?</u> The EIS was updated to include additional information about PCBs removal. Changes have been made to Section 12 to include significant details from the 3 draft follow-up monitoring plans for effluent, environment and groundwater developed since the 2017 EIS, including monitoring of hazardous substances.	<u>Status:</u> Resolved. CNL believes that they have addressed this concern, with revisions to the EIS. <u>Next steps:</u> CNL and AOO will review together the technical topic responses and identify any remaining gaps. Resolution of any gaps identified will be a topic of a dedicated discussion at the Working Group level.
15. Technical	(c) Technical suitability of cement and batch plant construction details. It is important to the AOO that the cement used for the project is appropriate and scientifically defensible. It is also important to understand the locations of project activities so that potential effects on terrestrial vegetation and wetlands are properly assessed. This is a project-specific concern.	CNL has responded in writing to AOO comments on this topic, citing relevant sections of the EIS as part of the comment responses. <u>CNL Response:</u> Comparing Roman concrete and the grout to be used in the NPD facility (a mixture of blast furnace slag, Portland cement, and sand), shows the similarities between both materials. The NPD grout fill will be 90% blast furnace slag, which is a pozzolanic material similar to the volcanic ash used in Roman cements. Due to the depth below surface, the grouted facility will also not experience freeze-thaw cycles and will be at a relatively constant ground temperature. The natural cements have also been exposed to a wide range of climate conditions over millions of years, which encompasses multiple periods of climate change and the effects of continental drift. The project has prepared a Cementitious Materials Synthesis Report that provides additional technical information and research supporting the performance of the concrete to understand how it will behave. The PostSA accounts for the degradation of concrete over time, and the PostSA results show that doses to receptors are below regulatory criteria, and that the NPD Closure Project is safe in the short-term and the long-term. The preferred location for the batch plant is not predicted to have any effect on terrestrial vegetation or wetland areas, as the area was previously disturbed and is well away from wetlands.	<u>Where is this topic discussed in the EIS?</u> Natural analogues are discussed in Section 4.1.2 of the EIS. Batch plant construction details are discussed in Section 4.3.1.2 of the EIS. <u>What changes have been made (and where)?</u> In response to comments from the AOO and others, the EIS now includes an updated discussion of natural analogues (Section 4.1.2), including cement, and their relevance to the project. The preferred location for the batch plant was added to Section 4.3.1.2 of the EIS. This location is not predicted to have any effect on terrestrial vegetation or wetland areas, as the area was previously disturbed and is well away from wetlands.	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status. CNL believes that they have addressed this concern, with revisions to the EIS. <u>Next steps:</u> CNL and AOO have established the following commitments which will help to address this concern: AOO-7 – Details of the Batch Plant CNL is committed to providing the construction details for the batch plant wash-out pit to the AOO once they are available and will review together with AOO to understand any concerns. CNL and AOO will review together the technical topic responses and identify any remaining gaps. Resolution of any gaps identified will be a topic of a dedicated discussion at the Working Group level.
15. Technical	(d) Ecological Risk Assessment methodology and revisions.	CNL has responded in writing to AOO comments on this topic, citing relevant sections of the EIS as part of the comment responses.	<u>Where is this topic discussed in the EIS?</u> The EIS uses the results of the EcoRA in the assessment of	<u>Status:</u> Resolved. CNL believes that they have addressed this concern, with

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA Process	Status of the Concern
	As stewards of lands and waters, it is important to the AOO that the environment, wildlife, and plants are protected. This is a project-specific concern.	<u>CNL Response:</u> The EcoRA has been revised to incorporate the latest results from the safety assessments and to report doses to non-human biota. To compensate for the lack of dose coefficients for these radionuclides, a conservative approach was taken in the revised EcoRA TSD where the lowest No Effect Concentrations were used as the screening criteria. The concentrations of these radionuclides in all environmental media for all credible PostSA scenarios were below the No Effect Concentrations.	exposure-related effects (both radiological and non-radiological) to biota in the aquatic and terrestrial environmental components (Sections 9.4 and 9.6) <u>What changes have been made (and where)?</u> The EcoRA has been revised to directly incorporate the latest results from the safety assessments and to report doses to non-human biota in the main EcoRA report. Table 2.16 has been removed from the EcoRA, however, the risk to non-human biota from a flood is still discussed.	revisions to the EIS. <u>Next steps:</u> CNL and AOO will review together the technical topic responses and identify any remaining gaps. Resolution of any gaps identified will be a topic of a dedicated discussion at the Working Group level.
15. Technical	(e) Terrestrial Study Area Rationale It is important to the AOO that the rationale for selecting the terrestrial regional study area is clearly provided, as the baseline description of the terrestrial environment is critical for understanding the current state of VCs and evaluating the project-related effects. This is a project-specific concern.	CNL has responded in writing to AOO comments on this topic, citing relevant sections of the EIS as part of the comment responses and has also responded in writing to recommendations from the AKLUS, and the AOO comments on draft follow-up monitoring plans. <u>CNL Response:</u> The intent of the Regional Study Area is to capture the area within which the potential effects of the NPD Closure Project may interact with the effects of other projects, resulting in the potential for cumulative effects. Specifically, the terrestrial Regional Study Area was established to capture areas where other projects may take place (e.g., the des Joachims dam at Rolphton Ontario and the Chalk River Laboratories site), in order to assess any cumulative effects from projects at those sites.	<u>Where is this topic discussed in the EIS?</u> Section 8.6.1 presents the spatial boundaries selected by CNL to assess potential effects to the terrestrial environment. <u>What changes have been made (and where)?</u> Changes have been made to Section 8.6.1 to include additional rationale for the selection of the terrestrial Regional Study Area.	<u>Status:</u> Resolved. CNL believes that they have addressed this concern, with revisions to the EIS. <u>Next steps:</u> CNL and AOO will review together the technical topic responses and identify any remaining gaps. Resolution of any gaps identified will be a topic of a dedicated discussion at the Working Group level.
16. Valued Components	(a) Engagement, input and participation in VC selection. It is important to the AOO that CNL provide opportunities for meaningful engagement on VCs to ensure that the VCs incorporate species important to traditional users of the land. This is a project-specific concern.	CNL has engaged with the AOO by seeking input on VCs, providing funds to support the AKLUS, incorporating additional VCs in the EIS, sharing the update with the AOO and requesting feedback on it. CNL has sent two targeted letters asking specific questions of the AOO to align with the requirements of <i>CEAA</i> (2012) Section 5(1)(c). These questions included: - Do you have any members that currently practice traditional activities such as, trapping, hunting, fishing and/or gathering, near the two projects? - Does [the AOO], or any members, have sites of ceremonial significance in close proximity [of NPD], or more generally, any cultural activities near [the NPD site]? CNL has responded in writing to AOO comments on this topic, citing relevant sections of the EIS as part of the comment responses and has also responded in writing to recommendations from the AKLUS. At the request of AOO, CNL has prepared a summary table that maps AOO VCs to those VCs used in CNL’s assessment. This table also shows how the project is protective of each VC, whether any potential impacts have been identified and how CNL will monitor to confirm those VCs remain protected. <u>CNL Response:</u> The EIS outlines how Indigenous engagement and input has influenced the VCs used in the assessment. CNL added VCs to the EIS in response to AOO feedback (see row below). CNL has and continues to engage with the AOO on resolving interests and concerns related to VCs and on developing project commitments.	<u>Where is this topic discussed in the EIS?</u> The EIS now includes a section on Indigenous engagement related to VC selection (Section 6.3.1.1) <u>What changes have been made (and where)?</u> The EIS update includes additional detail on the VC-related engagement process and how Indigenous interests have been incorporated into the VCs selected for the NPD Closure Project.	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status. CNL believes that they have addressed this concern, with revisions to the EIS and the VC mapping exercise. <u>Next steps:</u> CNL and AOO have established the following commitments which will help to address this concern: AOO-6 – Valued Components CNL will continue to engage with the AOO on the topic of Valued Components (VCs) as long as there is interest from the AOO. At the AOO’s request, CNL has shared a VC mapping table that provides the intersection of VCs identified through the AOO AKLUS with the VC’s used in CNL’s assessment. AOO-10 – Ongoing Collaboration CNL is committed to continuing the Working Group with AOO to promote continued open communication, information sharing and education including collaborating on the development of communications and engagement material for various audiences (e.g., AOO staff, ANRs and specific communities).
16. Valued Components	(b) Concerns regarding the limited VCs selected for the NPD Closure Project and recommendations for VCs to be included. This topic is of interest to the AOO because these	CNL has sent two targeted letters asking specific questions of the AOO to align with the requirements of <i>CEAA</i> (2012) Section 5(1)(c). These questions included:	<u>Where is this topic discussed in the EIS?</u> The EIS includes expanded description of traditional uses in Section 8.9 . Section 9.9 describes the VCs related to Traditional Land Use.	<u>Status:</u> Ongoing See Note at the top of this table – the AOO/CNL Working Group want this to be recognized as a positive descriptor of status.

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA Process	Status of the Concern
	species are features of particular importance to the AOO. This is a project-specific concern.	- Do you have any members that currently practice traditional activities such as, trapping, hunting, fishing and/or gathering, near the two projects? - Does [the AOO], or any members, have sites of ceremonial significance in close proximity [of NPD], or more generally, any cultural activities near [the NPD site]? CNL has included VCs from Indigenous feedback in Section 6.3.2 of the EIS – specifically in Tables 6.3-1(a) and 6.3-2; VCs identified by AOO through the AKLUS are listed and where necessary mapped to representative species to show how they are considered in CNL’s assessment. CNL has responded in writing to AOO comments on this topic, citing relevant sections of the EIS as part of the comment responses and has also responded in writing to recommendations from the AKLUS. At the request of AOO, CNL has prepared a summary table that maps AOO VCs to those VCs used in CNL’s assessment. This table also shows how the project is protective of each VC, whether any potential impacts have been identified and how CNL will monitor to confirm those VCs remain protected. <u>CNL Response:</u> CNL considers all of the VCs identified by AOO. Some VCs are considered directly (i.e., either added to, or already in, the EIS), and some are considered via representative species. CNL also considers the features identified by AOO in their AKLUS. The EIS assesses effects to these VCs and no impacts are predicted.	Section 9.6.3.2 describes the mitigation, monitoring and follow up activities for the Terrestrial Environment VCs. Tables 6.3-1 and 6.3-2 of the EIS highlight how VCs identified by AOO are represented by the species that are evaluated in the NPD EIS. <u>What changes have been made (and where)?</u> The EIS was updated to show how the VCs identified by the AOO are included or represented by species that are evaluated in the NPD EIS. Some VCs are considered directly (i.e., either added to or already in the EIS), and some are considered via representative species. The EIS was updated to include an expanded description of traditional uses and to describe the VCs related to Traditional Land Use, including the rationale, mitigation, monitoring and follow-up activities related to the Traditional Land Use VCs. CNL added new sections and VCs for the Indigenous socio-economic environment.	CNL believes that they have addressed this concern, with revisions to the EIS and VC mapping exercise. <u>Next steps:</u> CNL and AOO have established the following commitments which will help to address this concern: AOO-6 – Valued Components CNL will continue to engage with the AOO on the topic of Valued Components (VCs) as long as there is interest from the AOO. At the AOO’s request, CNL has shared a VC mapping table that provides the intersection of VCs identified through the AOO AKLUS with the VC’s used in CNL’s assessment. AOO-10 – Ongoing Collaboration CNL is committed to continuing the Working Group with AOO to promote continued open communication, information sharing and education including collaborating on the development of communications and engagement material for various audiences (e.g., AOO staff, ANRs and specific communities).

Appendix K Algonquins of Pikwàkanagàn First Nation (AOPFN) Record of Engagement and Interests and Concerns

This appendix provides a complete record of all engagement between CNL and AOPFN from June 2015 to March 2024 (Table K.1). Table K.1 includes the date and method of the communication / engagement, the topics discussed and participants. The table also highlights engagements where key EA topics were discussed. The key EA topics align with “Generic Guidelines for Preparation of an Environmental Impact Statement Pursuant to the Canadian Environmental Assessment Act, 2012” as well as the requirements of REGDOC 3.2.2 “Indigenous Engagement” and guidance specific to NPD provided by the CNSC in January 2021 (e-doc # 6467843).

Following the record of engagement is a mapping of how the summary of interests and concerns were compiled (Table K.2), as well as a summary of interests and concerns raised by AOPFN (Table K.3).

Section 4.4.2.1 of the EIS summarizes the engagement activities that have taken place to date between CNL and the AOPFN.

K.1 Record of Engagement with Algonquins of Pikwàkanagàn First Nation (AOPFN)

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
December 01, 2015 Meeting	This meeting between AOPFN representatives (including the Chief, five councillors and AOPFN staff members) and CNL representatives (including the CEO, the Vice-President of Human Resources, the General Manager of Health, Safety, Security and Environment, the Vice President of Corporate Affairs, the Vice President of Decommissioning and Waste Management, the Director of the proposed NSDF, and Corporate Communications staff) was held at the CRL site and the NPD Closure Project was introduced within the context of a larger vision of the new contractor company. The meeting agenda included: Welcome and Introductions. CNL Vision 2026; AOPFN Overview; CNL Human Resources Overview; Site tour.										√
July 15, 2016 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the AOPFN Chief introduced the project and requested community input on any potential adverse impacts from project activities. To demonstrate requirements of CEAA, 2012 Section 5(1)(c), the letter requested meaningful feedback on the following: Whether the project may have environmental effect on any lands and/or resources currently used by Aboriginal peoples for traditional purposes; Whether the project may have any perceived impacts on Aboriginal and Treaty Rights; Whether local and traditional knowledge can assist in describing the existing environment; and, The view of Aboriginal communities on proposed valued ecosystems components (environmental attributes) that have been identified for the assessment.				√	√				√	√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
December 22, 2016 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the AOPFN Chief inquired about asserted rights and traditional activities in the region around CRL. To demonstrate requirements of CEAA 2012 Section 5(1)(c), the letter requested a better understanding of AOPFN’s historic and/or modern-day use of lands in and/or near both of the projects and asked the following questions: Does the AOPFN have traditional territory or reserve lands near the NSDF and/or NPD Closure Project? What is the history of the AOPFN using the areas around the two projects? Do you have any members of the AOPFN that currently live in close or reasonable proximity to either of the projects? Do you have any members that currently practice traditional activities such as, trapping, hunting, fishing and/or gathering, near the two projects? Does the AOPFN, or any members, have sites of ceremonial significance in close proximity to either of the two sites, or more generally, any cultural activities near either of the two sites? CNL also indicated interested in learning more about the AOPFN and any asserted rights, interests or activities members might undertake in the local or regional areas in proximity to the project.				√	√				√	√
January 10, 2017 Incoming letter	This letter from the AOPFN Chief to CNL’s Director of Corporate Communications was advising CNL that the AOPFN were engaged in discussions with the federal government and advised CNL not to finalize any plans at this point.					√					√
November 15, 2017 Outgoing email	This email from a CNL communications officer to the AOPFN Chief enclosed links to the full draft EIS, an interactive “public-friendly” executive summary of the draft EIS, the CNSC’s public notice, a short overview of the project and the environmental assessment, as well as detailed information on the timing of the EA process and how to participate in the public comment period.	√	√	√	√	√	√	√	√	√	
November 17, 2017 Outgoing email	This email from a CNL communications officer to the AOPFN Chief enclosed the draft Aboriginal Engagement Report for the NPD Closure Project and stated, per CEAA, 2012 requirements: “CNL would be pleased to update information in this current draft with input from your community.”	√	√	√	√	√	√	√	√	√	√
May 16, 2019 Outgoing email	This email from a CNL communications officer to the AOPFN Chief was an invitation to participate in the National Roost Monitoring Program at the NPD site for evening bird counts, on May 22, May 26, May 30, May 30, and June 03, to help monitor and understand Chimney Swift spring migration.										√
May 2019 Outgoing correspondence	This correspondence between the AOPFN representative on the ESC and a communications officer with CNL included the details of the June 20, 2019, ESC meeting.										√
June 12, 2019 Outgoing email	This email from a CNL communications officer to the AOPFN Chief was an invitation to an online webinar discussion on June 17, 2019, that focuses on how IAEA guidance is applied to the NPD Closure Project. A Q&A discussion followed.										√
June 18, 2019 Outgoing email	This email from a CNL communications officer to the AOPFN Chief was an invitation to a bi-monthly breakfast briefing on June 26, 2019. The topic of discussion was Protecting the Chimney Swifts at NPD. A Q&A discussion followed.										√
July 25, 2019 Outgoing email	This email from a CNL communications officer to the AOPFN Chief was an invitation to NPD public open houses on August 1 and 8, 2019. These included the option of a chimney swift roost count viewing. The open houses provided an opportunity to talk about the project with CNL subject matter experts and access information on all aspects of the project and the environmental assessment.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
July 2019 Outgoing correspondence	This correspondence between the AOPFN representative on the ESC and a communications officer with CNL included the details and invitation to the NPD Open Houses held at the facility on held on August 01, 2019, and August 08, 2019, which incorporated an Indigenous cultural ceremony led by an Indigenous CNL staff member.										√
September 11, 2019 Outgoing email	This email from a CNL communications officer to the AOPFN Chief was an invitation to the third Breakfast Briefing on September 18, 2019. The topic of discussion was NPD Engineering Challenges. A Q&A discussion followed.										√
September 24, 2019 Outgoing email	This email from a CNL communications officer to the AOPFN Chief was an invitation to an online webinar discussion on September 30, 2019. The topic was engineering challenges of the NPD Closure Project. A Q&A discussion followed.										√
September 2019 Outgoing correspondence	This correspondence between the AOPFN representative on the ESC and a communications officer with CNL included the details of the October 24, 2019, ESC meeting.										√
In March 2020, the COVID-19 pandemic impacted in-person engagement activities. CNL adapted to the restrictions providing online platforms for virtual meetings, workshops, webinars, Project updates and open houses.											
March 06, 2020 Incoming letter	This letter from the AOPFN's Consultation Coordinator to CNL's Director of Corporate Communications was to invite the NPD Closure Project and NSDF Project staff to a community meeting on 2020 April 07 to provide a project overview/update followed by a question period.										√
March 13, 2020 Incoming email	This email from the AOPFN's Consultation Coordinator to a CNL Communications Officer was to postpone the 2020 April 07 community meeting due to COVID-19.										√
April 23, 2020 Incoming email	This email from the AOPFN Consultation Coordinator to a CNL Communications Officer was to request six documents related to the NPD Closure Project's draft EIS.	√	√	√	√	√	√	√	√	√	
April 29, 2020 Outgoing email	This email from CNL communications staff to the AOPFN Consultation Coordinator was enclosing the requested six documents on the NPD Closure Project as well as a preliminary version of the revised draft EIS for review.	√	√	√	√	√	√	√	√	√	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
May 06, 2020 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the AOPFN Chief enclosed a preliminary version of the 2020 revised draft EIS and an updated IER and indicated an interest in meeting with the AOO. This letter included a list of topics of interest the AOO had brought forward and the status of each. These included: Technical issues; Traditional knowledge; Future land use (site restoration); Socio-economic interests; Monitoring; Alternative means; Indigenous health; Archaeology. The letter also asked for feedback on the following seven questions: Do the Algonquin of Pikwàkanagàn First Nation have additional information that they would like to provide in the context of traditional territory near the NPD site? Do the Algonquin of Pikwàkanagàn First Nation have any members who currently live close or in reasonable proximity to the NPD site? Do the Algonquin of Pikwàkanagàn First Nation have historical and/or current traditional practices near the NPD site, specifically we are interested in members’ traditional uses such as trapping (traditional or commercial), hunting, fishing (traditional or commercial), gathering and practicing cultural ceremonies? Do the Algonquin of Pikwàkanagàn First Nation have sites of ceremonial significance in close proximity or more generally any cultural activities near the NPD site? Tell us about any important resources, uses, activities, values, and interests to the Algonquin of Pikwàkanagàn First Nation near the NPD site. If there is use in close proximity to the NPD site, is current community use different than historic use and can a description of those difference be provided? Let us know of any potential concerns you have with respect to effects and any potential impacts on rights.	√	√		√	√	√	√	√		
May 11, 2020 Outgoing email	This email from a CNL communications officer to the AOPFN Consultation Coordinator was to follow-up to see if the AOPFN had any questions on the material to support their review of the revised draft EIS.										√
May 11, 2020 Incoming email	This email from the AOPFN’s Consultation Coordinator to a CNL communications officer was in response to the previous email and stated that at this time there was no further information needed.										√
May 13, 2020 Incoming letter	This letter from AOPFN’s Chief to CNL’s Manager of Stakeholder Relations was confirming interest in direct AOPFN-CNL engagement and an LTRA for the NSDF Project and the NPD Closure Project.									√	
June 03, 2020 Virtual meeting	This meeting was an initial meeting between AOPFN representatives, including the Consultation Coordinator and consultants, and CNL representatives, from the NPD Closure Project team (including the Director and Manager of Regulatory Approvals) and ERM Stakeholder Relations (including the Manager of Stakeholder Relations and two communications officers), to discuss the development of a project-specific contribution agreement between AOPFN and CNL. Actions were recorded and next dates were suggested.									√	√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
June 24, 2020 Virtual meeting	This meeting was the second meeting between CNL staff (including ERM Stakeholder Relations manager and communications officers and NPD Closure Project staff, including the Director and Manager of Regulatory Approvals) and AOPFN representatives (including the consultation coordinator and consultants) to discuss the development of a contribution agreement between AOPFN and CNL. Actions were updated and new ones recorded, next dates were suggested.									✓	
July 09, 2020 Virtual meeting	This meeting was the third meeting between CNL staff (including ERM Stakeholder Relations manager and communications officers and NPD Closure Project staff, including the Director and Manager of Regulatory Approvals) and AOPFN representatives (including the consultation coordinator and consultants) to discuss the development of a contribution agreement between AOPFN and CNL. Actions were updated and new ones recorded, next dates were suggested.										✓
July 17, 2020 Incoming letter	This letter from the Chief of AOPFN to the Project Director for the NPD Closure Project enclosed the AOPFN comments on a preliminary version of the 2020 revised draft EIS. Key interests and concerns from these comments focused on the following: Alternative Means Assessment and In-situ Disposal; Baseline characterization; Consultation, Engagement and Communications; EA process and methodology; End state and future land use; Environmental monitoring; Indigenous content within EIS; Effects on Indigenous rights; Traditional Knowledge, Land and Resource Use and Cultural Impacts; Valued Components.		✓		✓	✓			✓	✓	
July 23, 2020 Virtual meeting	This meeting was the fourth meeting between CNL staff CNL staff (including ERM Stakeholder Relations manager and communications officers and NPD Closure Project staff, including the Director and Manager of Regulatory Approvals) and AOPFN representatives (including the consultation coordinator and consultants) to discuss the development of a contribution agreement between AOPFN and CNL. Actions were updated and new ones recorded, next dates were suggested.									✓	✓
August 13, 2020 Virtual meeting	This meeting was the fifth meeting between CNL staff (including ERM Stakeholder Relations manager and communications officers and NPD Closure Project staff, including the Director and Manager of Regulatory Approvals) and AOPFN representatives (including the consultation coordinator and consultants) to discuss the development of a contribution agreement between AOPFN and CNL. Actions were updated and new ones recorded, next dates were suggested.										✓
August 26, 2020 Virtual meeting	This meeting was the sixth meeting between CNL staff (including ERM Stakeholder Relations manager and communications officers and NPD Closure Project staff, including the Director and Manager of Regulatory Approvals) and AOPFN representatives (including the consultation coordinator and consultants) to discuss the development of a contribution agreement between AOPFN and CNL. Actions were updated and new ones recorded, next dates were suggested.									✓	

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		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
September 10, 2020 Contribution agreement	The contribution agreement between CNL and the AOPFN, focused on supporting AOPFN to participate in the environmental assessment process for the NPD Closure Project (as well as the NSDF Project), was finalized and signed.										√
September 23, 2020 Virtual meeting	This meeting was the first working group meeting between CNL staff (including ERM Stakeholder Relations manager and communications officers and NPD Closure Project staff, including the Director and Manager of Regulatory Approvals) and AOPFN representatives (including the consultation coordinator and consultants). This meeting established working group guidelines and determined topics for 2020 October and November.					√				√	√
October 02, 2020 Incoming letter	This letter from the AOPFN Chief to the Director of the NPD Closure Project enclosed the AOPFN AKLUS Final Report on the NPD Closure Project.					√				√	√
October 09, 2020 Incoming email	This email from the AOPFN Consultation Coordinator to a CNL communications officer sharing copies of the Requests for Proposals (RFP) for Culture and Rights and Diet and Harvest studies. CNL acknowledged receipt of the RFPs.									√	√
October 23, 2020 Virtual meeting	This meeting was an introductory meeting between CNL staff (including ERM Stakeholder Relations manager and communications officers and NPD Closure Project staff, including the Director and Manager of Regulatory Approvals) and AOPFN representatives (including the consultation coordinator and consultants) and the AOPFN Advisory Committee (made up of AOPFN community members). This meeting focused on an introduction to CNL as a corporation.									√	√
November 23, 2020 Outgoing email	This email from a CNL communications officer to the AOPFN Consultation Coordinator enclosed a letter detailing how the AKLUS, Harvest and Diet study and Culture and Rights study would be used in the IER and enclosing an excerpt of the NPD Closure Project’s draft EIS that incorporated aspects of the AKLUS into the revised draft EIS to be submitted in December 2020.				√	√				√	√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
November 27, 2020 Virtual meeting	This meeting between (CNL staff (including ERM Stakeholder Relations manager and communications officers and NPD Closure Project staff, including the Director and Manager of Regulatory Approvals) and AOPFN representatives (including the consultation coordinator and consultants) and the AOPFN Advisory Committee (made up of AOPFN community members) was focused on an overview of the NPD Closure Project. The presentation focused on the following: Overview of in-situ disposal; NPD waste inventory; Project timeline; Current monitoring; VC; Effects on humans; Follow-up monitoring. Questions from the AAC included the following: How can we as a nation know that it is Low Level Waste (LLW) stored at NPD? Better understanding needed of the difference between the NPD site and the CRL site. What is relatively safe to CNL? Is there any other facility using this system (in-situ)? How old are the disposal sites that are using in-situ? What is the contingency plan if the in-situ bursts? Is this the only waste on the site (for this project)? Are there ground water wells onsite? Has any other site been considered for the waste (e.g. other provinces)? Is there permanent below ground monitoring? Valued Components are so broad and complicated, curious to how CNL evaluated those? How does CNL look at the historical use of land by the First Nations people? How does CNL evaluate what AOPFN needs will be in the future (20, 50, 100 years)? Is the stack producing heat? Is that why the Chimney Shifts are using it in their migration? Will lead shielding be a part of the construction of the facility? Any consideration been given to an impact benefit agreement with AOPFN?	v		v	v	v			v	v	

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November 30, 2020 Virtual meeting	This meeting was the first working group meeting CNL staff (including ERM Stakeholder Relations manager and communications officers and NPD Closure Project staff, including the Director and Manager of Regulatory Approvals) and AOPFN representatives (including the consultation coordinator and consultants) that was focused on the NPD Closure Project; the focus of discussion was the revised draft EIS comments and draft dispositions. The following actions arose from the discussion on the comments and dispositions: CNL to send the AOPFN the NPD document that specifies what baselines were conducted, where the sites are and what has been done in each area. The Project to verify any remaining baseline monitoring that needs to be completed and will update AOPFN. The Project to provide clarification of additional baseline studies for migratory waterfowls. CNL to provide AOPFN with the online link to the NPD Closure Project documents. CNL to provide AOPFN with the three draft follow-up monitoring plans. CNL to share draft restoration plan with the AOPFN upon completion.	√	√	√	√	√			√	√	
December 14, 2020 Incoming email	This email from the AOPFN Consultation Coordinator to a CNL Communications Officer included revised comments/responses on (NPD) draft EIS from the 2020 November 30 working group meeting.										√
December 17, 2020 Virtual meeting	This meeting was the second working group meeting between CNL staff (including ERM Stakeholder Relations manager and communications officers and NPD Closure Project staff, including the Director and Manager of Regulatory Approvals) and AOPFN representatives (including the consultation coordinator and consultants) that was focused on the NPD Closure Project; the focus of discussion was the revised draft EIS comments and draft dispositions. The following actions arose from the discussion on the comments and dispositions: CNL to send Valued Components table from the revised draft EIS as well as the introductory text that references the new species added. AOPFN to provide example of a Chance Find Procedure. AOPFN to review the scope of the three AOPFN studies and identify which gaps will be addressed. Identify remaining socio-economic impacts to re-assess based on input from AOPFN. AOPFN to identify status of cultural training and is it available to CNL. AOPFN to identify potential elements of monitoring and risk communication; what could that look like. AOPFN to provide CNL with examples of existing guardian programs.				√				√	√	√
January 05, 2021 Incoming email	This email from the AOPFN Consultation Coordinator to a CNL communications officer requested that the 2021 January 21 working group meeting agenda change and focus on the NSDF Project as AOPFN has a strict timeline with the CNSC on the NSDF Project. AOPFN will forward an agenda. CNL acknowledged working group meeting topic change. Note that the next few meetings were focused on the NSDF Project.										√
May 05, 2021 Virtual meeting	This virtual meeting between CNL (including the Manager of Stakeholder Relations and the Director of Corporate Communications), AECL (including the Director of Communications and Government Reporting), and the AOPFN (including the Consultation Coordinator and two consultants) involved discussions on developing an LTRA.										√
May 11, 2021 Outgoing email	This email from CNL's Communications Officer to the AOPFN's consultation coordinator enclosed draft sections of the NPD Closure Project's latest revision of draft EIS (8.9 and 9.9) for verification of CNL's incorporation of the AOPFN's AKLUS as well as a preliminary list of commitments and indicated interest in meeting to discuss.									√	√

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May 12, 2021 Virtual meeting	This virtual meeting between CNL (including the Manager of Stakeholder Relations and the Director of Corporate Communications), AECL (including the Director of Communications and Government Reporting), and the AOPFN (including the Consultation Coordinator and two consultants) involved discussions on developing an LTRA.									√	√
May 20, 2021 Virtual meeting	This virtual meeting between CNL (including the Manager of Stakeholder Relations and the Director of Corporate Communications), AECL (including the Director of Communications and Government Reporting), and the AOPFN (including the Consultation Coordinator and two consultants) involved discussions on developing an LTRA.									√	√
May 26, 2021 Virtual meeting	This virtual meeting between CNL (including the Manager of Stakeholder Relations and the Director of Corporate Communications), AECL (including the Director of Communications and Government Reporting), and the AOPFN (including the Consultation Coordinator and two consultants) involved discussions on developing an LTRA.									√	√
June 1, 2021 Incoming email	This email from the AOPFN's consultation coordinator was to request an NPD Closure Project meeting focus for the last week in June.									√	√
June 21, 2021 Outgoing letter	This letter from CNL's Manager of Stakeholder Relations to the AOPFN Chief enclosed a draft summary of the AOPFN's interests and concerns for the NPD Closure Project for the AOPFN's review and verification.									√	√
June 29, 2021 Virtual meeting	This meeting between CNL staff (including the Manager of Regulatory Approvals for the NPD Closure Project and the ERM Stakeholder Relations Manager and communications officers) and the AOPFN consultation coordinator and consultants included discussion on a work plan for the project, the preliminary draft commitments and the summary of interests and concerns. Actions brought forward at this meeting included: CNL to forward sections of interest of EIS to AOPFN for review and feedback. CNL to set up meeting in mid-July with AOPFN to discuss submission of implications letter for the three studies and feedback on AKLUS content in the traditional use section. AOPFN to draft a list of commitments sought for the project, like what was done for NSDF.									√	√
July 6, 2021 Outgoing email	This email from a CNL Communications Officer to the Consultation Coordinator for the AOPFN enclosed the updated subsections that had incorporated the AKLUS information (8.9 and 9.9) for the AOPFN's review.	√			√			√		√	√
July 8, 2021 Emails	This email correspondence between a CNL communications officer and the Consultation Coordinator for the AOPFN involved meeting coordination for the Algonquin Advisory Committee meeting.										√
July 13, 2021 Outgoing email	This email from a CNL Communications Officer to the Consultation Coordinator for the AOPFN was to coordinate the AAC meeting in July.										√
July 15, 2021 Incoming email	This email from the AOPFN Consultation Coordinator to a CNL Communications Officer enclosed the agenda for the AAC meeting.										√
July 19, 2021 Outgoing email	This email from a CNL Communications Officer to the Consultation Coordinator for the AOPFN was to coordinate the AAC meeting in July.										√
July 21, 2021 Virtual meeting	This virtual meeting between CNL (including the Manager of Stakeholder Relations and the Director of Corporate Communications), AECL (including the Director of Communications and Government Reporting), and the AOPFN (including the Consultation Coordinator and two consultants) involved discussions on developing an LTRA.									√	√

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July 22, 2021 Virtual meeting	This meeting between CNL representatives (including the Manager of Regulatory Approvals for the NPD Closure Project and the ERM Stakeholder Relations Manager and communications officers) and AOPFN representatives (including the consultation coordinator and consultants) and the AOPFN Advisory Committee (made up of AOPFN community members) included an updated overview of the NPD Closure Project and a discussion of the interests and concerns that CNL have heard to date from the AOPFN. The AOPFN expressed interest in the following topic areas: Species at risk (including the Chimney Swifts); Long term monitoring of the site; Long term safety of the facility; What-ifs.		√	√	√			√	√	√	√
July 26, 2021 Virtual meeting	This meeting between CNL representatives (including the Manager of Regulatory Approvals for the NPD Closure Project and the ERM Stakeholder Relations Manager and communications officers) and AOPFN representatives (including the consultation coordinator and consultants) was a working group meeting where the AOPFN provided an overview of the implications of each of the following three studies, as well as the AOPFN Principles and Requirements document: AKLUS, Diet and Harvest Study and Culture and Rights Study.			√		√				√	
July 30, 2021 Incoming email	This email from the AOPFN Consultation Coordinator enclosed the AOPFN's comments on the updated subsections that had incorporated the AKLUS information (8.9 and 9.9).	√			√			√		√	√
August 4, 2021 Incoming email	This email from the AOPFN Consultation Coordinator to CNL's Communications Officer enclosed the AOPFN's comments on the Table of Interests and Concerns that CNL shared in June 2021.	√	√		√					√	
August 11, 2021 Incoming email	These two emails from the AOPFN Consultation Coordinator to CNL's Communications Officer enclosed the Diet and Harvest Study Report for the NPD Closure Project and the Culture and Rights Study Report for the NPD Closure Project. Each report came with a covering letter, as well.				√	√				√	
August 13, 2021 Incoming email	These two emails from the AOPFN Consultation Coordinator to a CNL Communications Officer enclosed the implications letter, discussing the implications of each of the following three studies: AKLUS, Diet and Harvest Study and Culture and Rights Study.				√	√				√	
August 16, 2021 Outgoing email	This email from a CNL Communications Officer to the Consultation Coordinator for the AOPFN enclosed CNL edits to the transcript of the CNL AAC July 22, 2021 meeting.									√	√
August 31, 2021 Outgoing email	This email from a CNL Communications Officer to the Consultation Coordinator for the AOPFN enclosed the revisions to the Table of Interests and Concerns based on feedback from the AOPFN for the AOPFN's review.	√	√		√	√	√	√	√	√	
August 31, 2021 Incoming email	This email from the AOPFN Consultation Coordinator to CNL's Communications Officer enclosed the AOPFN's comments on the CNL's commitment table and commitments sought by AOPFN in relation to Nuclear Power Demonstration Closure project for review that CNL shared June, 2021.						√			√	
September 1, 2021 Incoming email	This email from the AOPFN Consultation Coordinator to CNL's Communications Officer was to coordinate an Algonquin Advisory Committee meeting on September 21 to discuss the four alternative means included in the alternative means assessment and to present materials on "what if" scenarios associated with the environmental effects of the project.		√							√	

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September 2, 2021 Virtual Meeting	This meeting between CNL representatives (including the Manager of Regulatory Approvals for the NPD Closure Project and the ERM Stakeholder Relations Manager and communications officers) and AOPFN representatives (including the Project Administrator, the Consultation Coordinator and consultants) involved discussions of the interests and concerns summary table. The following actions were recorded: CNL to provide Table of Contents for December 2020 revised draft EIS to AOPFN to determine additional sections to review; CNL to confirm three draft follow-up monitoring plans; CNL to confirm “targeted letters” for AOPFN; CNL to send Indigenous section for review; CNL to resend updated 8.9 and 9.9; CNL to send 8.10 and 9.10; AOPFN to verify implementation of final edits on I&C table; CNL to propose commitments text and send to AOPFN in advance of September 27; CNL to coordinate bi-weekly working group meetings starting in October; AOPFN to review Indigenous section from draft EIS.	√		√	√				√	√	
September 2, 2021 Outgoing email	This email from a CNL Communications Officer to the AOPFN Consultation Coordinator followed up on action items from the September 2, 2021 meeting, including: the table of contents from the December 2020 revised draft Environmental Impact Statement, the three draft follow-up monitoring plans and the three targeted letters referenced in the summary of interests and concerns.	√		√	√				√	√	
September 9, 2021 Incoming email	This email from the AOPFN Consultation Coordinator to CNL’s Communications Officer enclosed the updated Table of Interests and Concerns. The AOPFN provided comments with recommended revisions to the table.									√	
September 9, 2021 Incoming email	This email from the AOPFN Consultation Coordinator to CNL’s Communications Officer enclosed a document of advice from AOPFN on what type of things CNL should be prepared to discuss and present at the AAC meeting in September 2021.		√								√
September 13, 2021 Virtual Meeting	This virtual meeting between CNL (including the Manager of Stakeholder Relations and the Director of Corporate Communications), AECL (including the Director of Communications and Government Reporting), and the AOPFN (including the Consultation Coordinator and two consultants) involved discussions on developing an LTRA.										√
September 17, 2021 Outgoing email	This email from the CNL Manager of Regulatory Approvals for the NPD Closure Project to the AOPFN Consultation Coordinator enclosed the Alternatives slide deck for the September 21, 2021 AAC Meeting. CNL committed to sending a second deck covering ‘What-If’s’. The AOPFN acknowledged receipt.		√								
September 17, 2021 Outgoing email	This email from a CNL Communications Officer to the Consultation Coordinator for the AOPFN to follow-up on the working group meeting of September 2, 2021. The email enclosed the most current versions of key sections from the EIS, for the AOPFN’s review and verification of sufficiency of CNL’s incorporation of information from the AKLUS, Diet and Harvest Study, and the Culture and Rights Study. The key sections sent included the revised Table of Interests and Concerns, EIS Section 6.0 Indigenous Engagement (excerpt), EIS Sections 8.9 Description of the Existing Environment, Traditional Land and Resource Use and 9.9 Assessment & Mitigation of Environmental Effects, Traditional Land and Resource Use and the EIS Appendix (excerpt). CNL requested feedback by October 6, 2021.					√					√
September 20, 2021 Outgoing email	This email from a CNL Communications Officer to the Consultation Coordinator for the AOPFN enclosed the ‘What-If’s’ slide deck for the September 21, 2021 Algonquin Advisory Committee (AAC) meeting									√	

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September 21, 2021 Virtual Meeting	This meeting between CNL representatives (including the Manager of Regulatory Approvals for the NPD Closure Project and the ERM Stakeholder Relations Manager and communications officers), AOPFN representatives (including the consultation coordinator, project administrator and consultants) and the AOPFN Advisory Committee (made up of AOPFN community members) involved discussions of the four alternative means included in the alternative means assessment. The AAC had several questions, which were discussed at the meeting, including the following: With the removal of certain components on a percentage basis, how much is left? What is the risk potential for contamination on the grounds during removal? What is the importance of keeping a stack? Has anything changed in the EIS since 2020? Can this land be used for traditional use after clean up?		√	√	√	√				√	
September 22, 2021 Outgoing email	This email from a CNL Communications Officer to the Project Administrator and the Consultation Coordinator with the AOPFN was to coordinate next steps following the AAC meeting.										√
September 24, 2021 Incoming email	This email from the AOPFN Project Administrator to a CNL Communications Officer was in follow-up to the AAC meeting on Alternative Means and stated that, “AOPFN's position remained that any aspects of the EIS that deals with potential impacts on AOPFN rights or the resources they rely upon, including the alternative means assessment, should both integrate those study findings - in ways verified by AOPFN - and reflect AOPFN perspectives.” The email also stated that it was, “AOPFN's strong preference, as stated previously, is that those discussions, reviews and revisions occur prior to refiling of the EIS, not afterward.”		√	√		√				√	
September 24, 2021 Outgoing email	This email from a CNL Communications Officer to the AOPFN Project Administrator was to confirm a meeting date and the delay of the commitments that were to be shared in advance of the next meeting.									√	√
September 27, 2021 Virtual Meeting	This meeting between CNL staff (including ERM Stakeholder Relations manager and communications officers and NPD Closure Project staff, including the Director and Manager of Regulatory Approvals) and AOPFN representatives (including the Consultation Coordinator and consultants) that was focused on the NPD Closure Project; the focus of discussion was developing project commitments. Specific actions that came forward were: CNL to provide project timeline of activities; CNL to add additional resourcing aspects to timing column; AOPFN provides descriptions for priority scale 'priority level'.			√	√					√	√
September 28, 2021 Outgoing email	This email from a CNL Communications Officer to the AOPFN Project Administrator was to confirm a meeting date.										√
October 4, 2021 Emails	These emails between the Project Administrator for the AOPFN and a Senior Communications Officer with CNL were to coordinate a meeting on October 5.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
October 5, 2021 Virtual Meeting	This meeting between CNL representatives (including the Manager of Regulatory Approvals for the NPD Closure Project and the ERM Stakeholder Relations Manager and communications officers) and AOPFN representatives (including the consultation coordinator and consultants) and the AOPFN Advisory Committee (made up of AOPFN community members) provided an overview of What-ifs and effects of the environment on the project. Actions recorded at the meeting included: CNL to share the newest version (2019) of the Annual Dose Report with the AOPFN. CNL will flag more Indigenous participation in future studies as a topic for future discussion. CNL to share air monitor and off-site reading information from previous ACC meeting with members. CNL to share information on dose rate from NPD presently and in the future in addition to comparison to the dose rate over time for the other options. CNL to share a copy of the Annual Dose Report of animals with AOPFN. CNL to share information on the past post-closure safety assessment & current environmental monitoring (to cover off-site and downstream topics). CNL to share a copy of the slide deck to members of the AOPFN.		✓	✓	✓				✓	✓	
October 5, 2021 Emails	These emails between the Consultation Coordinator for the AOPFN and a Senior Communications Officer with CNL were to confirm upcoming receipt of the AOPFN review of NPD EIS content.										✓
October 6, 2021 Incoming email	This email from the Consultation Coordinator for the AOPFN to a Senior Communications Officer with CNL enclosed the AOPFN comments on the revised draft EIS documents CNL provided on September 17, 2021 (Section 8.9, 9.9 and 6, as well as the record of engagement and Table of Interests and Concerns). As well, the AOPFN indicated that CNL's plan to resubmit the draft EIS in October was not agreeable to the AOPFN, highlighting several areas of work that the AOPFN would like to see progressed, prior to resubmission.	✓	✓	✓	✓	✓				✓	✓
October 6, 2021 Outgoing email	This email was sent from a CNL Communications Officer to the AOPFN's Consultation Coordinator was to confirm receipt of the previous email.										✓
October 7, 2021 Virtual Meeting	This meeting between CNL staff (including ERM Stakeholder Relations manager and communications officers and NPD Closure Project staff, including the Director and Manager of Regulatory Approvals) and AOPFN representatives (including the consultation coordinator and consultants) that was focused on the NPD Closure Project; this was the second meeting to discuss project commitments.									✓	
October 13, 2021 Outgoing Email	This email was sent from a CNL Communications Officer in response to an email sent on October 6, 2021 enclosing revisions, including new interests to the Table of Interests and Concerns. This email reiterated the ongoing committal to address and resolve these concerns; this email enclosed the revised Table of Interests and Concerns and requested that AOPFN Consultation confirm the addition of two columns that encapsulate two added interests of AOPFN in the Table of Interests and Concerns.									✓	
October 14, 2021 Virtual Meeting	This virtual meeting between CNL (including the Manager of Stakeholder Relations and the Director of Corporate Communications), AECL (including the Director of Communications and Government Reporting), and the AOPFN (including the Consultation Coordinator and two consultants) was to discuss the AOPFN's cultural protection program.										✓
October 14, 2021 Incoming Email	This email from AOPFN Consultation to the ERM Stakeholder Relations team contained a memo and identified support on the approach that the AOPFN proposed to address their perspective on the Alternative Means identified by CNL.		✓							✓	

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October 19, 2021 Outgoing Email	This email from a CNL Senior Communications Staff was to arrange a phone call to consult with AOPFN Consultation Coordinator pertaining to the NPD Closure Project EIS Submission before the Working Group Meeting on October 20, 2021.										√
October 20, 2021 Virtual Meeting	This meeting between CNL representatives (including the Manager of Regulatory Approvals for the NPD Closure Project and the ERM Stakeholder Relations Manager and Communications Officers) was to discuss the delay of the NPD Closure Project EIS Submission to December 2021 and map out a mutually agreeable path forward for the inclusion of complimentary material from the AOPFN in the revised draft EIS. Discussion on the NPD Closure Project commitments also continued.			√						√	
October 22, 2021 Outgoing Email	This email from Senior Communications Staff to AOPFN was to follow-up from the NPD Closure Project Commitments meeting on October 20, 2021 to draft the path forward on EIS submission, specifically to address AOPFN concerns on language and content of the Draft EIS. The email enclosed an action plan, the most recently revised Table of Interests and Concerns for the AOPFN and the most recently updated list of VCs.		√	√	√					√	
October 29, 2021 Incoming Email	This email from the AOPFN Consultation Coordinator to CNL asked for CNL's response to AOPFN's request for funds for an AOPFN Alternative Means Assessment and whether CNL was willing to revisit the Contribution Agreement for aspects of the proposed work that exceed the originally envisioned scope of engagement.		√	√						√	
October 29, 2021 Outgoing Email	This email from the NPD Manager of Regulatory Approvals to the AOPFN Consultation Coordinator responded CNL was committed to funding the AOPFN Alternative Means Assessment (AMA), including the AOPFN words as is, and to amending the contribution agreement as necessary.									√	
November 2, 2021 Incoming Email	This email from AOPFN's Consultation to NPD's Manager of Regulatory Approvals responded to CNL's questions regarding the first point in the previous email. AOPFN Consultation directed CNL to an email that was sent on October 14, 2021 that included a Statement of Work (SOW) and the costs for an AOPFN AMA approach.										√
November 2, 2021 Outgoing Email	This email from NPD's Manager of Regulatory Approvals informed AOPFN Consultation of CNL's commitment to provide requested funds for an AOPFN Alternative Means Assessment perspective gathering process as outlined in the SOW shared on October 14, 2021.										√
November 2, 2021 Incoming Email	This email from AOPFN's Consultation Coordinator to a Communication Officer at CNL responded to CNL's October 22, 2021 email for Attachment 1 associated with additional tasks CNL hopes to accomplish during November 2021. AOPFN's response included timelines by which AOPFN would need documents and meetings with CNL, as well as costs over and above the existing Contribution Agreement for particular activities. AOPFN requested CNL to send AOPFN an email confirming the additional requested funding to be built into a CA amendment so that AOPFN's work could start effective immediately. AOPFN noted that the field work would not be conducted until Spring 2022 and that costs were not included in the attachment.										√
November 4, 2021 Outgoing Email	This email from a Communications Officer at CNL to AOPFN's Consultation Coordinator was regarding the current addition of funds to the contribution agreement for NPD Closure Project activities.										√
November 4, 2021 Incoming Email	This email from AOPFN's Consultation Coordinator to a CNL Communications Officer approved CNL to add a new schedule to the Contribution Agreement Amendment.										√

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November 4, 2021 Outgoing Email	This email from a Communications Officer at CNL to AOPFN’s Consultation Coordinator was in response to AOPFN’s November 2 email to confirm that the requested additional funding would be built into a Contribution Amendment Agreement. This email was also to coordinate the meetings identified in AOPFN’s November 2 email in addition to arranging another meeting to discuss the clarification of language in the summary of interests and concerns table. Meeting dates were proposed for both meetings. CNL also confirmed that they would send the sections of the EIS that were identified in the November 2 email by the end of the week.										√
November 4, 2021 Outgoing Email	This email from a Communications Officer at CNL to AOPFN’s Consultation Coordinator was regarding the contribution agreement amendment.										√
November 4, 2021 Incoming Email	This email from AOPFN’s Consultation Coordinator to a Communications Officer at CNL was to request that CNL send their draft comments and responses to AOPFN as soon as possible and proposed alternative meeting dates for the commitments meeting. AOPFN informed CNL of their availability to meet to discuss the Table of Interests and Concerns. AOPFN offered to meet sooner for the working group meeting if CNL were available.										√
November 4, 2021 Outgoing Email	This email from a Communications Officer at CNL to AOPFN’s Consultation Coordinator was to inform AOPFN that they had consulted with NPD’s Manager of Regulatory Approvals and that CNL would send the draft commitments on November 8, 2021. CNL asked AOPFN if it would still work to meet on the Friday.										√
November 4, 2021 Incoming Email	This email from AOPFN’s Consultation Coordinator to a Communications Officer at CNL was to confirm a meeting date on commitments.										√
November 4, 2021 Outgoing Email	This email from a Communications Officer at CNL to the AOPFN’s Consultation Coordinator was to confirm proposed meeting dates.										√
November 4, 2021 Incoming Email	This email from AOPFN’s Consultation Coordinator was to confirm proposed meeting dates.										√
November 5, 2021 Outgoing Email	This email from a Senior Communications Officer at CNL to AOPFN’s Consultation Coordinator was to provide the most up to date versions of: the AOPFN-CNL NPD EIS Action Plan, the Table of Interests and Concerns for the AOPFN, EIS Sections 4.2, 6.2.4.3, 6.3.2, 9.9, and 11, for the AOPFN to add text.	√	√	√	√	√				√	√
November 9, 2021 Outgoing Email	This email from a Senior Communications Officer at CNL to AOPFN’s Consultation Coordinator and Project Administrator shared CNL’s original draft commitments in addition to the updated draft commitments as of November 8, 2021.									√	√
November 15, 2021 Virtual Meeting	This was the AOPFN/CNL Working Group Meeting. This meeting between CNL representatives (including the Manager of Regulatory Approvals for the NPD Closure Project and the ERM Stakeholder Relations Manager and Communications Officers was to go through proposed project commitments together. Where possible, some commitments were established to be included in the Table of Interests and Concerns “Next Steps” column found in the December 2021 revised draft EIS.									√	√
November 17, 2021 Incoming Email	This email from the AOPFN Project Administrator and Consultant to a CNL Communications Officer was to recommend some items for the agenda for the AOPFN Sub-working Group Meeting with CNL on Friday November 19, 2021.										√
November 18, 2021 Outgoing Email	This email from a CNL Communications Officer to the AOPFN Project Administrator and Consultant, was to inform AOPFN of a few items to add to the agenda for the AOPFN Sub-working Group Meeting with CNL on Monday November 22, 2021.									√	√

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November 18, 2021 Incoming Email	This email from the AOPFN Project Administrator and Consultant to a CNL Communications Officer was to recommend that the discussion on Friday, November 19 be revised to include an initial walk through on the Table of Interests and Concerns to make sure that both parties are on the same page for Monday's discussion.									✓	✓
November 19, 2021 Outgoing Email	This email from a CNL Communications Officer to the AOPFN Project Administrator and Consultant, was to send a copy of the agenda for the meeting on Monday, November 22, 2021. The email also contained the most recent draft of AOPFN Table of Interests and Concerns for the NPD Closure Project.									✓	✓
November 19, 2021 Virtual Sub-Working Group Meeting	This meeting was between the AOPFN (Project Administrator and Consultant) and CNL representatives (including the Manager of Regulatory Approvals for the NPD Closure Project and a Senior Communications Officer). Preliminary feedback from the AOPFN on the Table of Interests and Concerns was discussed, as well as an agenda for the meeting on November 22, 2021.									✓	✓
November 22, 2021 Virtual Monthly Working Group Meeting	This meeting was between the AOPFN (Project Administrator, Consultation Coordinator and Consultants) and CNL representatives (including the Manager of Regulatory Approvals for the NPD Closure Project and the ERM Stakeholder Relations Manager and Communications Officers). At this meeting the AOPFN's feedback on the Table of Interests and Concerns was discussed and CNL edited language and flagged outstanding issues..	✓	✓	✓	✓	✓				✓	✓
November 23, 2021 Outgoing Email	This email from a CNL Communications Officer to AOPFN Consultation Coordinator shared an updated version of the Table of Interests with AOPFN's proposed language and feedback from the working group meeting incorporated for confirmation.										✓
November 26, 2021 Incoming Email	This email from AOPFN Consultation Coordinator to Communications Officers with CNL attached the following documents with AOPFN's edits and additional text for inclusion in the revised draft EIS included: Table of Interests and Concerns; Section 6.2.4.3 Engagement (AOPFN); Section 6.3.2 Valued Components Identified by Indigenous peoples/Communities; Section 4.2 on Alternative Means; Section 9.9 on Traditional Lands and Resources Use; Section 11 on Assessment Summary.		✓	✓	✓	✓				✓	
November 29, 2021 Outgoing email	This email from a CNL Communications Officer to AOPFN Consultation Coordinator acknowledged receipt of the AOPFN materials for inclusion in the revised draft EIS.										✓
December 10, 2021 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator attached the revisions to Schedule E of the Contribution Agreement Amendment incorporated for their review. CNL asked AOPFN to review and confirm the revisions CNL has incorporated and final costs associated to the NPD Closure Project activities, and return it to CNL so that they can send in to CNL's Legal team for stamp and then back to AOPFN for a final signature.										✓
December 10, 2021 Incoming email	This email from the AOPFN Consultation Coordinator to a CNL Senior Communications Officer was to note that AOPFN had reviewed the changes and agreed with them. AOPFN directed CNL to proceed with the process.										✓
December 13, 2021 Outgoing email	This email from a CNL Communications Officer to the AOPFN Consultation Coordinator attached the stamped Contribution Agreement Amendment for AOPFN signature. CNL noted that once it is signed, it can be returned for CNL signature and then CNL will return the final signed Contribution Agreement Amendment back to AOPFN.										✓
December 15, 2021 Incoming email	This email from the AOPFN Consultation Coordinator to a CNL Senior Communications Officer acknowledged receipt of the amended Contribution Agreement. AOPFN noted that they would return a signed copy to CNL.										✓

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December 17, 2021 Incoming email	This email from the AOPFN consultant to a CNL Senior Communications officer requested some information to give to the AAC.										√
December 20, 2021 Outgoing email	This email from a CNL Senior Communications officer to the AOPFN consultant was to note that AOPFN will receive a response the week of January 4, 2022.										√
December 21, 2021 Outgoing email	This email from the AOPFN Acting Consultation Coordinator to CNL’s Manager of Regulatory Affairs for the NPD Project was to inform CNL that AOPFN is looking forward to resuming our engagement with the Environment team at CNL in the new year. AOPFN noted that they are currently working on 2 items for AOPFN review before they can set a meeting date with CNL: 1) Refining a list of questions related to Risk Communications, and 2) A first draft of the recommended Guardians Training Modules schedule related to CNL sites. AOPFN noted that they would be in contact the week of January 10, 2022 to find a meeting date for both parties.										√
December 22, 2021 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator attached the stamped Contribution Agreement Amendment for AOPFN signature. CNL noted that once both parties sign the agreement the final signed Contribution Agreement Amendment back to AOPFN.										√
December 23, 2022 Outgoing letter	This letter addressed to the AOPFN Consultation Coordinator from CNL’s Director of Corporate Communications requesting permission from the AOPFN (AOPFN) to use results of the AOPFN Diet and Harvest Study to update airborne and liquid release limits for the Chalk River Laboratories site. The AOPFN agreed that CNL could use the data provided in the AOPFN Diet and Harvest Report for other Environmental Purposes such as estimating dose to Indigenous Nations, communities and organizations , supporting updates to Derived Release rates etc.										√
January 04, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator stated that CNL be willing to provide a letter of support for the Guardian program funding application.										√
January 04, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator attached the signed Contribution Agreement amendment for the AOPFN’s records.										√
January 07, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator informed AOPFN that there would be another delay in getting AOPFN responses.										√
January 14, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN consultant attached responses to AOPFN’s questions regarding the AAC.										√
January 17, 2022 Outgoing email	This email from a CNL Senior Communications officer to the AOPFN Consultation Coordinator enclosed a draft of an engagement schedule outlining activities from the contribution agreement for discussion at the AOPFN-CNL monthly meeting.										√
January 19, 2022 Working Group Meeting	This meeting was between the AOPFN (Project Administrator and Consultants) and CNL representatives (including the Manager of Regulatory Approvals for the NPD Closure Project and the ERM Stakeholder Relations Manager and Communications Officers). At this meeting focus was on the Contribution and draft of an engagement schedule outlining activities from the contribution agreement.										√
January 26, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Project Administrator provided information about the early history of Chalk River Laboratories via a resource from the Deep River-based Society for the Preservation of Canada’s Nuclear Heritage (SPCNH).										√

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January 27, 2022 Incoming email	This email from the AOPFN Project Administrator to a CNL Senior Communications Officer attached a draft Engagement Schedule with AOPFN comments for review.										v
February 13, 2022 Incoming email	This email from the AOPFN consultant to a CNL Senior Communications ask for the below information for the February 22, 2022 AOPFN Advisory Committee meeting. 1. Can CNL provide a plain language information package on how ISD has been implemented at other sites in the past and what effects have been encountered during subsequent monitoring? 2. CNL is requested to provide exact information about how large the overall NPD site is (the whole AECL owned area, in hectares), and how large in hectares is the area shown in the images provided previously (the impacted area that will be subject to the Decommissioning). 3. CNL is requested to provide an estimation, for each of Alternatives 2, 3 and 4, of how long fencing will likely be kept around the decommissioned facility. And, if the fenced in area (in hectares) will differ between any of these alternatives, please provide that information as well. 4. CNL is requested to provide an estimation, for each of Alternatives 2, 3 and 4, of how long monitoring of the site will continue into the future. If there are differences in the type and intensity of monitoring required, this should be identified as well. 5. CNL is requested to provide an estimation, for each of Alternatives 2, 3 and 4, how long in months or years the active decommissioning stage would take (i.e., how long it would take to complete everything up to the end state (minus removal of the stack, which is a longer-term activity). 6. CNL is requested to provide an estimation of how many a. truckloads and b. mass of radioactive materials are still in the NPD site, and how much of that (broken down if possible to low level vs. intermediate level waste) will be removed in Alternative 2 (the only active Alternative that neither takes all the materials out or leaves all the materials in situ).		v								
February 15, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator was to clarify and propose new agenda items for the next meeting on February 23, 2022.										v
February 15, 2022 Outgoing email	This email from the CNL Manager of Regulatory Approvals for the NPD Project to the AOPFN consultant attached CNL's responses to the questions asked via email on February 13, 2022		v								
February 10, 2022 Working group meeting	This meeting was between the AOPFN (Project Administrator and Consultants) and CNL representatives (including the Manager of Regulatory Approvals for the NPD Closure Project and the ERM Stakeholder Relations Manager and Communications Officers). At this meeting focus was on the NSDF EAFM however NPD staff we present.										v
March 08, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator was to inform AOPFN that CNL is revising how they present the summary table of interests and concerns to address a request from the Canadian Nuclear Safety Commission (CNSC). CNL requested that AOPFN confirm whether they would like to verify that the revised table still reflects their interests and concerns, focusing on the new column that ties their interest/concern to the project or Aboriginal and treaty right, and identify why it is of concern to your community.									v	
March 09, 2022 Outgoing email	This email from the AOPFN Consultation to a CNL Senior Communications Officer acknowledging receipt of the revised summary table of interest and concerns. AOPFN stated that they do not have additional time and funds to commit to this exercise at this time. CNL acknowledged the AOPFN email and noted it as an agenda item for the next working group meeting.									v	

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March 11, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator shared the proposed agenda for the March 17, 2022 working group meeting for AOPFN approval. The agenda included: Review updated Master Engagement Schedule (CNL commits to sending the updated schedule by end of day Monday, March 14) Cross reference Contribution Agreement funding activities to Master Engagement Schedule Status of NPD Commitments Status of NPD Project interest and concerns tables CNL committed to send AOPFN the updated Master Engagement Schedule by end of day Monday, March 14 for review prior to the Thursday meeting.									√	
March 14, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator sent the updated Master Engagement Schedule for AOPFN review prior to the Thursday meeting. CNL incorporated AOPFN edits and comments and hopes to finalize the schedule at the March 17, 2022 meeting.									√	√
March 16, 2022 Incoming email	This email from the AOPFN Project Administrator to a Senior Communications Officer accepted the agenda sent on March 11, 2022 and proved the names of who will be participating in the meeting.										√
March 17, 2022 Working Group Meeting	This meeting was between the AOPFN (Project Administrator and Consultants) and CNL representatives (including the Manager of Regulatory Approvals for the NPD Closure Project and the ERM Stakeholder Relations Manager and Communications Officers). At this meeting focus was on the AOPFN’s feedback on the Table of Interests and Concerns was, CNL edited language and flagged outstanding issues.									√	√
March 17, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator discussed the new summary table of interests and concerns for the NPD Closure Project. CNL was under the impression that AOPFN was not going to review the tables, this is different than recent communication with the Canadian Nuclear Safety Commission (CNSC). CNL asked AOPFN to confirm if they would like to review the tables, what the timeline would be for that review and if capacity is needed.									√	
March 29, 2022 Incoming email	This email from the AOPFN Consultation Coordinator to a CNL Senior Communications Officer clarified that when the AOPFN met with the CNSC March 23, 2022 that AOPFN gave the same response to them as CNL on March 09, 2022. AOPFN noted that would clarify with the CNSC									√	
April 08, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator attached the repackaged summary table of interests and concerns. The updates to the table are based on feedback from the CNSC on the December 2021 draft EIS submission package. CNL noted AOPFN’s comments about resourcing issues and offered to assist in any way.									√	
April 19, 2022 Incoming email	This email from the AOPFN Consultation Coordinator to a CNL Senior Communications Officer provided CNL the estimated costs in relation to the CNL/AOPFN 2022 Master Engagement Schedule. CNL confirmed receipt.										√
April 26, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator attached the updated master engagement schedule based on the last working group meeting.										√

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April 28, 2022 Incoming email	This email from the AOPFN Consultation Coordinator to a CNL Senior Communications Officer attached the final version of the Nuclear Power Demonstration Project Decommission Alternative Means Assessment report on behalf of the AOPFN. CNL confirmed receipt.		√								
May 06, 2022 Outgoing email	Email invitation to the AOPFN to the CNL Industry Day at the Chalk River Laboratories on Thursday, June, 2, 2022 to promote the broader engagement between CNL’s nuclear industry partners and our local supply chain. AOPFN confirmed that a member would be attending.										√
May 11, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator requested AOPFN to confirm if they would be reviewing the “repackaged” table of interests and concerns before the NPD Closure Project resubmits their revised draft Environmental Impact Statement (EIS). CNL offered a meeting in June 2022 to review and discuss the table.									√	
May 11, 2022 Incoming email	This email from the AOPFN Consultation Coordinator to a CNL Senior Communications Officer attached the master engagement schedule for review.										√
May 11, 2022 Incoming email	This email from the AOPFN consultant to a CNL Senior Communications Officer was in response to CNL’s May 11, 2022 email regarding a review of the table of interests and concerns. AOPFN confirmed that they could review the table and provide comments by June 24, 2022 and that CNL provide capacity. AOPFN requested the table be sent again.									√	
June 01, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN consultant confirmed AOPFN’s review plan for the interest and concerns table. CNL offered a meeting June 27, 2022 to review the AOPFN comments as a group.									√	
June 01, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN consultant attached the most recent summary table of interests and concerns. CNL also sent a table (labeled “IC mapping”) that shows how the interests and concerns that the AOPFN reviewed and revised in late 2021 are represented in the “repackaged” table.									√	
June 14, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN working group cancel the June 16, 2022 meeting.									√	
June 14, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN working group proposed a working group meeting on June 27, 2022. CNL proposed the following agenda: AOPFN Alternative Means Assessment for the NPD Closure Project AOPFN review of the NPD Closure Project Interests and Concerns Table Master Engagement Schedule and Budget for 2022 (CNL to provide update to this schedule tomorrow) CNL would also be able to discuss any relevant updates on the LTRA. CNL sent a meeting invitation.		√							√	√
June 27, 2022 Working group meeting	This meeting was between the AOPFN (Project Administrator and Consultants) and CNL representatives (including the Manager of Regulatory Approvals for the NPD Closure Project and the ERM Stakeholder Relations Manager and Communications Officers). CNL and the AOPFN discussed the AOPFN AMA, the AOPFN’s review of the NPD Closure Project Interests and Concerns Table and updates to the engagement schedule.		√							√	√
June 27, 2022 Outgoing email	This email from the Manager of Regulatory Approvals for the NPD Project at CNL to the AOPFN consultant stated that CNL is looking forward to receiving AOPFN’s review of the revised summary table of interests and concerns. CNL offered a meeting to discuss the comments.									√	

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June 27, 2022 Incoming email	This email from the AOPFN Consultation Coordinator to the Manager of Regulatory Approvals for the NPD Project at CNL attached AOPFN’s marginal comments and track changes on the Summary of Interests and Concerns document for review. AOPFN noted that it could not endorse this table as adequate for resubmission purposes until such time as column 2, in particular, is revised. AOPFN stated that column two did not accurately reflect the concerns and that CNL had classified the status of some of the issues.									√	
June 28, 2022 Incoming email	This email from the AOPFN Consultation Coordinator to a CNL Senior Communications Officer asked for clarification if CNL is to provide the Master Schedule and budget back to AOPFN.										√
June 28, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator attached the attached the master engagement schedule and budget for 2022. CNL is agreeable to the budget proposed by the AOPFN and it will be confirmed through a contribution agreement amendment. CNL asked for more detailed on the on-site data collection at NPD, we are looking for a more detailed list of activities associated with budget.									√	√
July 05, 2022 Outgoing email	This email from the Manager of Regulatory Approvals for the NPD Project at CNL to the AOPFN Consultation Coordinator thanked AOPFN for the feedback on the repackaged Table of Interests and Concerns. To clarify the purpose of the table CNL requests a sub-working group meeting with the AOPFN. CNL noted the feedback related to status of resolution and next steps for several of the interests and concerns and we will update these accordingly in the summary table.									√	
July 13, 2022 Incoming email	This email from the AOPFN Consultation Coordinator to a CNL Senior Communications Officer provided the request for information about the detailed list of activities for the on-site seasonal survey for review. AOPFN does not any other comments on the Master schedule, and proposed a meeting towards the end of July to discuss next steps required.										√
July 13, 2022 Incoming email	This email from the AOPFN Consultation Coordinator to a CNL Senior Communications Officer proposed dated for the July 2022 working group meeting. AOPFN asked CNL to send the updated master engagement schedule for the contribution agreement.										√
July 14, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator requested information about the cost breakdown for the onsite seasonal survey. CNL attached the survey budget and engagement schedule for reference.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
July 14, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator confirmed the below dates for engagement activities. CNL – AOPFN working group meeting – July 28, 2022 (10 a.m. – 12 noon) Proposed agenda for next working group meeting: Prioritization schedule touch base - has the NSDF hearing changed any priorities? Do we need a sub working group for any activities? Discussion on AOPFN’s review of the NPD Closure Project Interests and Concerns Table TBD Two-day (NSDF and NPD) summer inventory walk down date range – August 15 – 17, 2022 NSDF and NPD site tours with the working group – August 16, 2022 Two-day (NSDF and NPD) fall inventory walk down date range – October 3 – 7, 2022 CNL noted that CNL’s legal counsel will be drafting a Contribution Agreement Amendment which will include an appendix which will include an updated schedule of activities.										√
July 22, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator confirming dates for the summer and fall inventories. CNL asked to confirm August 17, 2022 and October 5, 2022 for the NPD inventory dates. CNL also proposed the below agenda and asked AOPFN to confirm. Agenda for AOPFN – CNL working group site tour (NSDF/NPD) on August 16, 2022; Prioritization schedule touch base; Any need for a sub working group; Discussion on AOPFN’s review of the NPD Closure Project Interests and Concerns Table; Other.									√	√
July 28, 2022 Working group meeting	This meeting was between the AOPFN (Consultation Coordinator and Consultants) and CNL representatives (including the Manager of Regulatory Approvals for the NPD Closure Project and the ERM Stakeholder Relations Manager and Communications Officers). The focus of this meeting was the presentation and discussion of the AOPFN’s Alternative Means Assessment. AOPFN and CNL discussed how the AMA could be integrated into the EIS. AOPFN and CNL discussed updated to the engagement schedule and AOPFN’s review of the repackaged Interests and Concerns Table. CNL committed to sending the AOPFN and updated engagement schedule and existing comments on the three EAFMPs									√	√
August 02, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator to coordinate the site inventory collection and walk down with the AOPFN knowledge keepers at the NPD site on August 17 2022. CNL asked if the knowledge keepers would be interested in a facility tour.										√
August 01, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator noted the action items from the July 27, 2022 working group meeting. CNL attached the updated master engagement schedule for review.										√
August 04, 2022 Incoming email	This email from the AOPFN Project Administrator to a CNL Senior Communications Officer acknowledged receipt of the engagement schedule and introduced a new Project Coordinator who will be working on CNL files.										√
August 05, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator requested the list of participants for the AOPFN knowledge keeper visit to the NPD site.										√
August 05, 2022 Incoming email	This email from the AOPFN Project Coordinator to a CNL Senior Communications Officer provided the names of the participants for the AOPFN knowledge keeper visit to the NPD site.										√

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August 05, 2022 Incoming email	This email from the AOPFN Consultation Coordinator to a CNL Senior Communications Officer declined the facility tour during the AOPFN knowledge keeper visit to the NPD site.										√
August 05, 2022 Incoming email	This email from the AOPFN Consultation Coordinator to a CNL Senior Communications Officer attached the updated master schedule and list of actions. CNL acknowledged receipt and confirmed they would respond to comments.										√
August 05, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator requesting a pre-collection meeting with the knowledge keepers and CNL Environmental Protections staff.										√
August 05, 2022 Outgoing telephone call	Telephone call from a CNL Senior Communications Officer to the AOPFN Project Coordinator to discuss the AOPFN knowledge keeper visit to the NPD site.										√
August 08, 2022 Incoming email	This email from the AOPFN Project Coordinator to a CNL Senior Communications Officer provided updated on participants for the AOPFN knowledge keeper visit to the NPD site. CNL acknowledged and offered a meeting in advance.										√
August 10, 2022 Incoming email	This email from the AOPFN Project Lead, Economic Development Department to a CNL Senior Communications Officer confirmed another participant for the AOPFN knowledge keeper visit to the NPD site. AOPFN also confirmed they would follow up about a meeting before the inventory.										√
August 10, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Project Lead, Economic Development Department informed AOPFN that a pre-job meeting is now going to be held the morning of each day for your convenience. AOPFN acknowledged.										√
August 10, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Project Lead, Economic Development Department provided a registration link for the AOPFN knowledge keeper visit to the NPD site.										√
August 12, 2022 Incoming email	This email from the AOPFN Project Lead, Economic Development Department to a CNL Senior Communications Officer requesting CNL supply specific equipment for the AOPFN knowledge keeper visit to the NPD site. CNL acknowledged.										√
August 15, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Project Lead, Economic Development Department ask for confirmation on the participant for the AOPFN knowledge keeper visit to the NPD site. AOPFN acknowledged.										√
August 17, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator proposed rescheduling the Working Group NSDF/NPD site tour. AOPNF cancelled the meeting August 11, 2022.										√
August 172022 Site inventory	AOPFN knowledge keeper and AOPFN’s consultant and CNL representatives (include environmental protection staff, NPD Project staff and ERM Stakeholder Relations) conducted the site inventory. The purpose of these field visits are to support AOPFN in the identification of their cultural and environmental values prior to possibly obtain authorization to proceed by the Canadian Nuclear Safety Commission (CNSC) with the NPD site closure. CNL staff assisted with environmental data collection, supported species identification, and answered questions regarding the NPD closure project and biodiversity monitoring as requested. The day started with a pre inventory meeting to discuss the plan for the day.								√		√
August 23, 2022 Incoming email	This email from the AOPFN Project Administrator to a CNL Senior Communications Officer requested the contact of the NPD team lead. CNL provide the contact for the Manager of Regulatory Approvals for the NPD Project.										√

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September 07, 2022 Incoming email	This email from the AOPFN Project Administrator to a CNL Senior Communications Officer requested to move the monthly working group meeting by a week. CNL and AOPFN corresponded about a new meeting date.										√
September 15, 2022 Incoming email	This email from the AOPFN Project Administrator to a CNL Senior Communications Officer requested to plan the working group tour of NPD for October 04, 2022. CNL acknowledged.										√
September 16, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Project Administrator and Consultation Coordinator proposed to discuss the AOPFN's Alternative Means Assessment (AMA) for the NPD Closure Project at the September 21, 2022 working group meeting. CNL followed up on September 20, 2022.		√								
September 20, 2022 Incoming email	This email from the AOPFN Consultation Coordinator to a CNL Senior Communications Officer confirmed that the AOPFN would lead the working group meeting discussion on the AMA. CNL acknowledged.		√								
September 16, 2022 Outgoing email	Email invitation to the AOPFN working group tour for the tour of the NPD Facility.										√
September 21, 2022 Working group meeting	This meeting was between the AOPFN (Consultation Coordinator, Project Administrator, Project Coordinator and Consultants) and CNL representatives (including the Manager of Regulatory Approvals for the NPD Closure Project and the ERM Stakeholder Relations Manager and Communications Officers) and AECL (Including the Director of Decommissioning). The focus of this meeting was the presentation and discussion of the AOPFN's Alternative Means Assessment. AOPFN and CNL discussed how the AMA could be integrated into the EIS.		√								
September 21, 2022 Incoming email	This email from the AOPFN Project Administrator to a CNL Senior Communications Officer requested an alternative date for the working group tour of the NPD facility.										√
September 26, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Project Administrator and Consultation Coordinator provided the link to the register for the AOPFN fall inventory on October 4&5, 2022. AOPFN acknowledged.										√
September 27, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Project Administrator and Consultation Coordinator was to follow up from the September 21, 2022 AMA working group meeting. CNL appreciated the opportunity for conversation around the key findings of the AMA. For next steps, CNL proposed: CNL will share a written response to the Alternative Means recommendations by the end of October. AOPFN and CNL to collaborate on how to incorporate the results of the AMA into the Environmental Assessment (EA) / Environmental Impact Statement (EIS). Note that CNL suggests the AOPFN update their EIS subsection on Alternative Means and reference the AMA (by the end of November), which CNL will then include as a technical reference in the EIS submission package to the CNSC. AOPFN and CNL work together to bridge the gap on the opposing results for preferred option through development of related commitments. Related to the third proposed next step and in follow-up to the meeting, CNL attached the most recent version of the commitments.		√								√

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2022 September 27 Incoming email	This email from the AOPFN Project Administrator to a CNL Senior Communications Officer provided the list of participants for the October 5, 2022 NPD site inventory. AOPFN asked for additional logistical details.										√
2022 September 27 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Project Administrator provided the details requested related to the October 5, 2022 NPD site inventory. CNL requested that each participant for the inventory register online. AOPFN acknowledged.										√
2022 October 01 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN’s consultation attached CNL memo: Summary of AOPFN Field Inventory Taking 2022 August 16 and 17 for the AOPFN-CNL site assessment in support of NSDF commitment AOPFN-21 “Pre-Project inventory work at site” as well as the AOPFN-CNL site assessment for the NPD site.								√		√
2022 October 05 Site Inventory	AOPFN knowledge keeper and AOPFN’s consultant and CNL representatives (include environmental protection staff, NPD Project staff and ERM Stakeholder Relations) conducted the site inventory. The purpose of these field visits are to support AOPFN in the identification of their cultural and environmental values prior to possibly obtain authorization to proceed by the Canadian Nuclear Safety Commission (CNSC) with the NPD site closure. CNL staff assisted with environmental data collection, supported species identification, and answered questions regarding the NPD closure project and biodiversity monitoring as requested. The day started with a pre inventory meeting to discuss the plan for the day.								√	√	
2022 October 18 Incoming email	This email from the AOPFN Project Coordinator to a CNL Senior Communications Officer requested a proposed agenda for the October 20, 2022 working group meeting.										√
2022 October 20 Outgoing email	This email from Manager of Regulatory Affairs for the NPD Project at CNL to the AOPFN Project Coordinator proposed an agenda for the October 20, 2022 working group meeting. CNL proposed: Refresh on the commitments sought by AOPFN; Discussion of commitments that are specific to the NPD site and the Decommissioning Execution phase of the project.										√
2022 October 20 Incoming email	This email from the AOPFN Project Administrator to a CNL Senior Communications Officer attached documents related to the AOPFN Action Item from our July 27th AOPFN - CNL monthly working group meeting. That action was for AOPFN to send comments related to the three draft EAFMPs for the NPD Project. Documents attached: Letter: NPD – Draft EAMP Review; AOPFN comments on the NSDF draft EAFMP.								√		
2022 October 20 Working group meeting	This meeting was between the AOPFN (Consultation Coordinator, Project Administrator, Project Coordinator and Consultants) and CNL representatives (including the Manager of Regulatory Approvals for the NPD Closure Project and the ERM Stakeholder Relations Manager and Communications Officers). CNL and the AOPFN discussed the letter from the AOPFN on the next steps letter and reviewed the commitments list and made edits. CNL committed to issuing a revised letter to AOPFN, AOPFN will then formally respond. CNL also committed to sending AOPFN the updated commitment list. AOPFN and CNL agreed to plan a site visit.										√

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2022 October 31 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Project Administrator ask for clarification as to why the Diet and Harvest Report specific to NPD was marked as confidential the Diet and Harvest Report specific to the NSDF project was marked as non-confidential. CNL asked is the NPD report need to be confidential.					√					
2022 November 01 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN consultant attached CNL memo: Summary of AOPFN Field Inventory Taking 2022 October 5 for the Nuclear Power Demonstration (NPD) commitment CNL has made to support AOPFN in conducting a site-wide Algonquin Knowledge Inventory at the NPD site.										√
2022 November 08 Incoming email	This email from the AOPFN Project Administrator to a CNL Senior Communications Officer requested the next steps or action items noted during the October 20, 2022 working group meeting.										√
2022 November 08 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Project Administrator sent the next steps or action items noted during the October 20, 2022 working group meeting. CNL to send AOPFN updated NPD “next steps” or update letter; AOPFN to send response to NPD letter once receipt of; CNL to send updated contribution agreement amendment; AOPFN and CNL to coordinate NPD site visit: Suggested December or January. CNL to send updated commitments to AOPFN; AOPFN to review updated commitments (flagging which ones require future discussion for another commitments meeting). AOPFN acknowledged.									√	
2022 November 09 Outgoing letter	This revised letter addressed to the AOPFN Chief from CNL’s Director of Indigenous Relations provided an update on the NPD Closure Project and included an updated engagement status section to reflect next steps discussed at the October 20, 2022 working group meeting.									√	
2022 November 09 Outgoing letter	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator attached an updated CNL – AOPFN Contribution Agreement Amendment # 3 for AOPFN review and comment. CNL made edits based on the October 20, 2022 working group meeting discussion and requested AOPFN review the updates prior to sending to legal counsels. AOPFN acknowledged.										√
2022 November 16 Incoming email	This email from the AOPFN Consultation Coordinator to a CNL Senior Communications Officer proposed the agenda for the November 17, 2022 working group meeting. CNL had previously suggested the NSDF EAFMP as the topic for the meeting but changed to accommodate AOPFN’s request. AOPFN proposed: Finish reviewing commitment sought Discuss the letter sent by Patricia CA revision walk through (Can CNL walk AOP through the numbers?) Discussion on the NPR site tour										√

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2022 November 17 Working Group meeting	This meeting was between the AOPFN (Project Administrator and Consultants) and CNL representatives (including the Manager of Regulatory Approvals for the NPD Closure Project and the ERM Stakeholder Relations Manager and Communications Officers). CNL and AOPFN discussed updated to the Contribution Agreement, the Environmental Assessment letter sent by CNL and planned a NPD site tour for the afternoon of December 13th and the winter inventory for December 14, 2022. CNL committed to updating the commitments table. CNL and AOPFN discussed the topics for the December 15, 2022 working group meeting. Update on the commitments sought AMA recommendation/EIS subsection updates.										√
2022 November 22 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator attached CNL's responses to the AOPFN's Alternative Means Assessment Recommendations. CNL also committed to following up within the next week and a half with the updated contribution agreement and the updated commitment table for the NPD Closure Project.									√	√
2022 November 23 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator followed up on the October 31 email related to the Diet and Harvest Report specific to NPD being marked as confidential.					√					
2022 November 23 Incoming email	This email from the AOPFN Consultation Coordinator to a CNL Senior Communications Officer requested that CNL list the AOPFN study report as confidential and send AOPFN any draft text inside of the sections CNL would like to use it in and AOPFN will verify. CNL acknowledged.					√					
2022 November 23 Incoming email	This email from the AOPFN Project Coordinator to a CNL Senior Communications Officer provided the participant list for the December 13, 2022 NPD tour. CNL acknowledged.										√
2022 November 29 Incoming letter	This letter from the AOPFN Consultation Coordinator to CNL's Director of Indigenous Relations was in response to CNL's November 9, 2022 letter that identified an updated draft list of priorities for engagement with AOPFN for the NPD Project. AOPFN outlined tasked in the letter that AOPFN believed should be completed before CNL submits the revised draft EIS. AOPFN requested that CNL provide a timeline for the activated listed. AOPFN also requested that the CA be updated to reflect the activities in the letter.	√	√	√	√	√	√	√	√	√	
2022 November 30 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Project Coordinator requested a list of participants for the AOPFN winter inventory at the NPD site on December 14, 2022.										√
2022 November 30 Incoming email	This email from the AOPFN Project Coordinator to a CNL Senior Communications Officer canceled the NPD winter site inventory on December 14th and reschedule it for the end of January or early February 2023. CNL acknowledged.										√
2022 November 30 Outgoing email	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator attached the revised CNL – AOPFN Contribution Agreement Amendment # 3. CNL requested AOPFN review the CA and confirm and update the final budget before sending to the legal counsels.										√

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2022 November/ December Emails	CNL and AOPFN exchanged email to coordinate the December 13 NPD tour.										√
December 06, 2022 Incoming Email	This email from the AOPFN Project Coordinator to a CNL Senior Communications Officer attached feedback on CNL response to AOPFN's AMA recommendations for review. AOPFN focused their comments on where action could be taken by CNL and AECL. AOPFN expressed disappointment about the responses.		√								
December 08, 2022 Outgoing email	This email from CNL Senior Communications Officer to the AOPFN Project Coordinator proposed the agenda for the 2022 December 13 working group meeting. CNL acknowledged.										√
December 12, 2022 Incoming Email	Email correspondence from the AOPFN Consultation Coordinator to a CNL Senior Communications Officer attached the contribution agreement with AOP changes for review. CNL Acknowledged.										√
December 13, 2022 Site Tour	CNL welcomed the AOPFN working group members to tour the NPD facility. The afternoon included a discussion about backfilling the site as requested. The tour was an opportunity for deeper engagement between the working group members.										√
December 15, 2022 Incoming Email	Email correspondence from the AOPFN Consultation Coordinator to a CNL Senior Communications Officer requested to defer the 2022 December 15 agenda item on commitments sought as CNL did not send the list in advance										√
December 15, 2022 Outgoing	Email correspondence from the Manager of Regulatory Approvals for the NPD Project to the AOPFN Consultation Coordinator agreed to defer the 2022 December 15 agenda item on commitments sought. CNL attached the updated commitments sought list and noted the updates.										√
December 15, 2022 Virtual Meeting	This meeting was between the AOPFN (Project Administrator and Consultants) and CNL representatives (including the Manager of Regulatory Approvals for the NPD Closure Project and the ERM Stakeholder Relations Manager and Communications Officers). CNL and AOPFN discuss the activities that support EIS submission that AOPFN outlined in the November 29, 2022 letter to CNL. CNL also described how the AMA findings could be presented in the EIS subsection 4.2.4.6 and how the commitments list will be integrated into the EIS. CNL committed to summarizing the actions from the meeting and the path forward after the meeting.		√								√
December 16, 2022 Incoming Email	Email correspondence from the AOPFN Consultation Coordinator to a Communications Officer at CNL provided CNL comments on the path forward CNL sent 2023 December 15.										√
December 16, 2022 Outgoing Email	Email correspondence from the Manager of Regulatory Approvals for the NPD Project to the AOPFN Consultation acknowledged AOPFN 2022 December 16 email and asked AOPFN to confirm if they agreed with the plan (and dates) proposed for continued development of the commitments. AOPFN confirmed										√
December 20, 2022 Outgoing Email	Email correspondence from Communications Officer at CNL to the AOPFN Consultation Coordinator attached CNL's updated responses to the AOPFN comments on the revised draft Environmental Impact Statement (EIS).	√	√	√	√	√	√	√	√	√	
January 04, 2023 Email between CNL and AOPFN (2 emails)	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator informing them of CNL being unable to secure a spot on the panel at the 2023 Waste Management Conference. And inquiring if AOPFN might be available for a Canadian conference in late summer. AOPFN confirmed receipt.										√

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January 05, 2023 Emails	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator confirming CNLs review of the REVISED CNL - AOPFN Contribution Agreement Amendment # 3 - 2022 November and it being sent to CNL's legal team for signature and preparation. AOPFN confirmed receipt of the email update.										√
January 09, 2023 Emails	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator confirming the cancellation of the 2023 January Working Group meeting. AOPFN confirmed the cancellation of the 2023 January working group meeting. CNL cancelled the meeting update.										√
January 03, 2023 Emails	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator following up with 2022 December 21 email to confirm receipt. AOPFN confirmed receipt of the email; CNL thanked AOPFN for confirming.										√
January 03, 2023 Outgoing emails	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator concerning potential dates of AOPFNs NPD's winter inventory.										√
January 17, 2023 Emails	Email correspondence between a CNL Senior Communications Officer and the AOPFN Consultation Coordinator. AOPFN requested the use of a photo of NPD, and CNL confirmed the use of the photo in their upcoming series of citizen engagement sessions, with a small caption.										√
January 20, 2023 Outgoing Email	This email from a CNL Communications Officer to the AOPFN Consultation Coordinator to inform of the decision to postpone the submission of the NPD Closure Project's draft Environmental Impact Statement (EIS) until 2023 May to allow for additional Indigenous input. CNL proposed the next steps would be to continue working together to ensure the AOPFN's interests and concerns are reflected in the EIS by CNL and AOPFN coordinating a winter inventory date, CNL drafting integrate results of the AOPFN AMA into EIS Section 4.2.4.6, after which AOPFN will review and revise, and by CNL and AOPFN discussing the continued development of the commitments.		√	√							√
January 23, 2023 Incoming Email	This email from the AOPFN Consultation Coordinator to a CNL Senior Communications Officer confirming receipt of the revised NPD timeline and following up on the actions regarding the AKLUS.					√				√	√
January 23, 2023 Outgoing Email	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator responding to AOPFN's 2023 January 23 email with an update on the AKLUS.										√
January 24, 2023 Emails	This email from the AOPFN Consultation Coordinator to a CNL Senior Communications Officer following up on AOPFN's 2022 December 15 email regarding unanswered questions from the NPD site visit. CNL confirmed a response will be sent no later than 2023 January 30.										√
January 24, 2023 Emails	Emails between CNL and AOPFN to coordinate the NPD Winter Site visit for March 02, 2023, and to reschedule the February working group to February 14, 2023, at 12:30 pm.										√
January 25, 2023 Incoming Email	This email from CNL to AOPFN to confirm 2023 March 02 as the NPD Site Inventory date and NPD site requirements.										√
January 25, 2023 Incoming Email	This email from the AOPFN Consultation Coordinator to a CNL Senior Communications Officer requesting a Word version of the NPD Environmental Impact Statement (EIS) Comment responses to AOPFN; CNL provided AOPFN with the Word version of the document.										√
January 31, 2023 Outgoing Email	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator with responses to AOPFNs 2023 December 15 email with AMA questions. The questions were related to the NPD site visit on 2023 December 13.		√								

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February 07, 2023 Emails	This email from the AOPFN Consultation Coordinator to a CNL Senior Communications Officer to inquire about the topics for the February 2023 working group agenda; CNL responded with the agenda topics for the February 14, 2023, working group meeting.										√
February 07, 2023 Outgoing Email	This email from CNL to AOPFN with CNL's responses to the AOPFN's implications and recommendations from the AKLUS, Culture and Rights Study, and Diet and Harvest Study, which the AOPFN shared on 2022 August 13, CNL asked AOPFN to confirm that the priority activity for the NPD Closure Project remains to finalize the commitments and moving forward on actions. CNL proposed monitoring being the topic for Working Group Meetings in the future.					√			√		
February 07, 2023 Outgoing Email	This email from a CNL Communications Officer to the AOPFN Consultation Coordinator brining attention to the language of proposed commitment #13 (a) that has been slightly altered in CNLs response to the Implications letter, reflect learnings from the Near Surface Disposal Facility (NSDF) Project. Recognizing the ongoing work to resolve AOPFN comments on the NSDF Environmental Assessment Follow-up Monitoring Plan (EAFMP) and the types of monitoring activities that are being contemplated under the Guardian Program through the Long-Term Relationship Agreement (LTRA), CNL is proposing to update the language in Proposed Commitment # 13 (a) to better align with how we expect the two parties will work together to incorporate Algonquin knowledge into the NPD EAFMP.										√
February 14, 2023 Virtual Meeting	This meeting was between the AOPFN (Consultation Coordinator, Project Administrator and Consultant) and CNL representatives (including the Manager of Regulatory Approvals for the NPD Closure Project, ERM Stakeholder Relations Manager, Communications Officers and Director of NPD & WR-1 Reactor Decommissioning) and AECL. CNL began by reviewing the outstanding action items including the commitments list, Implications letter response, AMA results and inventory visits. CNL was prepared to review the AOPFN comments on the commitments list. Once the reviewed started it was agreed that AOPFN and CNL should meet in-person to review the commitments, proving AOPFN more time to review and comment. CNL suggested a conversation related to interim monitoring (pre Guardian Program). AOPFN did not provide CNL will comments related to interim monitoring.	√	√	√	√	√			√	√	
February 14, 2023 Emails	Emails between a CNL Senior Communications Officer and the AOPFN Consultation Coordinator to plan the March working group meeting in-person for March 21, at 1:00 PM in Pikwàkanagàn First Nation.										√
February 15, 2023 Outgoing Email	This email from a CNL Senior Communications Officer and the AOPFN Consultation Coordinator to confirm receipt of the 2023 January 25 email confirming 2023 March 02, as the date for NPD Site Inventory date.										√
February 16, 2023 Incoming Email	This email from the AOPFN Coordinator to a CNL Communications Officer to confirm the receipt of the 2023 January 25. This email from CNL with the date of the NPD Site Inventory date along with names of the AOPFN team members who will be attending. AOPFN requested PPE and Snowshoes.										√
February 16, 2023 Outgoing Email	This email from a CNL Senior Communications Officer and the AOPFN Coordinator to confirm the ability to provide PPE and snowshoes for the NPD Site Inventory tour.										√
February 16, 2023 Incoming Email	This email from the AOPFN Coordinator to a CNL Senior Communications Officer requesting a list of all proposed 2023 monitoring and ecological data collection activities and timelines for NPD.										√
February 16, 2023 Emails	This email from a CNL Senior Communications Officer and the AOPFN Coordinator with an invitation to the reception during the CNA Conference on 2023 February 23. AOPFN confirmed interest in 3 members attending (including the Chief).										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
February 16, 2023 Outgoing Email	This email from a CNL Senior Communications Officer to the AOPFN Coordinator responding to AOPFN's This email from 2023 February 16 requesting proposed 2023 monitoring and ecological data collection activities and timelines for NPD, noting that the information will be provided by the end of the month.								√	√	
February 16, 2023 Outgoing Email	This email from a CNL Senior Communications Officer to the AOPFN Consultation Coordinator with the NPD EIS report Section 4.2.4.6. CNL requested AOPFN's final edits by the end of 2023 April.										√
March 02, 2023 Site Inventory	AOPFN knowledge keeper and AOPFN's consultant and CNL representatives (include environmental protection staff, NPD Project staff and ERM Stakeholder Relations) conducted the site inventory. The purpose of these field visits are to support AOPFN in the identification of their cultural and environmental values prior to possibly obtain authorization to proceed by the Canadian Nuclear Safety Commission (CNSC) with the NPD site closure. CNL staff assisted with environmental data collection, supported species identification, and answered questions regarding the NPD closure project and biodiversity monitoring as requested. The day started with a pre inventory meeting to discuss the plan for the day.								√	√	
March 06, 2023 Emails	This email from a CNL Communications Officer to the AOPFN Coordinator with proposed 2023 monitoring and ecological data collection activities. CNL also requested AOPFN send the NPD commitments table to them so that CNL can review it prior to the in-person meeting on 2023 March 21. AOPFN confirmed CNL will receive their comments prior to the 2023 March 21 meeting. CNL confirmed receipt of the email.								√		
March 06, 2023 Emails	This email from the AOPFN Coordinator to a CNL Communications Officer to discuss attendance at the in-person monthly meeting being held on 2023 March 21 in Pikwàkanagàn First Nation.										√
March 08, 2023 Outgoing Email	This email from CNL Communications Officer to the AOPFN Coordinator thanking them for visiting site on 2023 March 02, and providing AOPFN with additional information for those who were not present at the site visit. CNL also invited AOPFN to a knowledge holder's discussion to give them the opportunity to ask questions and learn more about topics of interest to them. AOPFN confirmed receipt of the email.		√								√
March 09, 2023 Incoming Email	This email from the AOPFN Coordinator to CNL Senior Communications Officer asking to post-pond the NPD topic for the 2023 March Monthly meeting, previously arranged for March 21 in-person, be moved to 2023 April.										√
March 09, 2023 Outgoing Email	This email from CNL Senior Communications Officer to the AOPFN Coordinator in response to AOPFN's email on the 2023 March 09 to confirm if a meeting on 2023 March 21 in person with a different topic is still occurring, and to confirm that the 2023 April 20 meeting is to be scheduled as an in-person meeting.										√
March 09, 2023 Outgoing Email	This email from CNL Senior Communications Officer to the AOPFN Coordinator to confirm the status of the 2023 March 21 in-person meeting in Pikwàkanagàn First Nation.										√
March 14, 2023 Outgoing Email	This email from CNL Communications officer to the AOPFN Coordinator with a follow-up to the AOPFN email sent on 2023 February 16; CNL provided AOPFN with the list of proposed 2023 monitoring and ecological data collection activities for the NPD site.										√
March 14, 2023 Outgoing Email	This email from CNL Senior Communications Officer to the AOPFN Consultation Coordinator with CNL's Indigenous Relations Procurement Strategy.										√
March 15, 2023 Emails	This email from CNL Senior Communications Officer to the AOPFN Coordinator following up on an email sent on 2023 March 09 to confirm the 2023 March 21 Monthly meeting and location. AOPFN cancelled the March 21, 2023, in-person meeting- no virtual meeting will be held either.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
March 27, 2023 Emails	This email from CNL Senior Communications Officer to the AOPFN Coordinator to follow up on an email sent on 2023 March 15 to confirm the status of the 2023 April 20 working group meeting, and the topics to be discussed are NPD related. AOPFN confirmed the meeting for April, however, requested a date change to 2023 April 18. CNL Confirmed the date change of the April meeting to 2023 April 18. The topics to be discussed are NPD EIS comment responses and the AMA EIS insert.										√
April 06, 2023 Incoming Email	This email from the AOPFN Coordinator to CNL Senior Communications Officer with draft revisions to the NPD EIS section on AMA for CNL's review. AOPFN also confirmed that they should be able to provide EIS comments the week of 2023 April 10. CNL confirmed receipt of the email.		√								√
April 12, 2023 Emails	This email from the AOPFN Coordinator to CNL Senior Communications Officer with a request to have the 2023 Spring inventory be held on 2023 May 09 and 2023 on May 10. CNL confirmed the receipt of the request and noted they will confirm the dates as soon as possible. CNL Later confirmed the site visit for 2023 May 09 on 2023 April 14.										√
April 14, 2023 Outgoing Email	This email from CNL Senior Communications Officer to the AOPFN Coordinator with copies of declined meeting invites from AOPFN staff- AOPFN confirmed a glitch in the system and that they would be in attendance on 2023 May 09 and 10.										√
April 17, 2023 Incoming Email	This email from the AOPFN Coordinator to CNL Senior Communications Officer with a draft agenda for the 2023 April Monthly working group being held on 2023 April 18th. AOPFN also asked to confirm the status of the CNL/AOP contribution agreement to amendment #3.										√
April 17, 2023 Incoming email	Email correspondence from the AOPFN Coordinator to CNL Senior Communications Officer requesting to be removed from the monthly meeting invite list due to a role change.										√
April 18, 2023 Virtual Meeting	This meeting was between the AOPFN (including the Project Coordinator, Consultation Coordinator and Consultant), CNL representatives (including the Manager of Regulatory Approvals for the NPD Closure Project, ERM Stakeholder Relations Manager, Communications Officers and Director of NPD & WR-1 Reactor Decommissioning) and AECL. CNL and AOPFN discussed that funding would not be impacted due to the LTRA not being signed yet. CNL noted that it received the AOPFN's AMA edits and committed to accepting the edits and sending a clean version back to AOPFN. AOPFN and CNL created a path forward for the EIS Comment Response table. After CNL response to questions about the monitoring schedule AOPFN committed to indicating areas of interest.		√							√	√
April 19, 2023 Emails	Email correspondence from the AOPFN Project Coordinator to a CNL Communications Officer requesting action items from AOPFN/ CNL meeting. CNL sent AOPFN with action items coming out of the 2023 April 18 working group meeting. CNL also asked if it is appropriate to start planning 2023 inventory days. AOPFN confirmed the desire to start planning site inventory.										√
April 21, 2023 Emails	Email correspondence between CNL Communications Officer and the AOPFN Project Coordinator with a copy of the May Site Inventory participants; CNL confirmed the participants and requested they provide information for site access guest pass.										√
April 25, 2023 Outgoing email	Email correspondence from CNL Senior Communications Officer to the AOPFN Project Coordinator with an open invite for AOPFN consultation staff and AOPFN community members to the Chimney Swift Count Night.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
April 25, 2023 Emails	Email from the CNL Manager, Stakeholder Relations to AOPFN with a follow-up to the 2023 April 19 email concerning the 2023 April NPD working group to inform AOPFN of CNL’s commitment to funding associated with AOPFN’s continued engagement in the NPD Environmental Impact Statement (EIS). CNL also provided AOPFN with an update on all remaining actions from the AOPFN/CNL 2023 April Monthly working group meeting.										√
April 25, 2023 Incoming email	Email from AOPFN to a CNL Senior Communications Officer requesting a date change for the AOPFN spring NPD Inventory date. AOPFN requested the inventory day be switched to Tuesday, May 9th.										√
May 03, 2023 Emails	Email correspondence between a CNL Communications Officer and AOPFN with site visit instructions for the AOPFN NSDF/NPD spring inventory visit.										√
May 05, 2023 Emails	Email correspondence between CNL Senior Communications Officer and AOPFN with site visit list of attendees for both the NSDF and NPD site inventories.										√
May 10, 2023 Site Inventory	AOPFN knowledge keepers and AOPFN’s consultant and CNL representatives (include environmental protection staff, NPD Project staff and ERM Stakeholder Relations) conducted the site spring inventory. The purpose of these field visits are to support AOPFN in the identification of their cultural and environmental values prior to possibly obtain authorization to proceed by the Canadian Nuclear Safety Commission (CNSC) with the NPD site closure. CNL staff assisted with environmental data collection, supported species identification, and answered questions regarding the NPD closure project and biodiversity monitoring as requested. The day started with a pre inventory meeting to discuss the plan for the day.	√								√	
May 10, 2023 Outgoing email	This email from CNL Senior Communications Officer to AOPFN to provide a copy of the radiation dose chart; CNL also printed some and provided them to AOPFN during the NPD site tour. CNL also informed AOPFN that the CNSC website offers additional information if there is more interest in this topic, and attached a link to the CNSC website.										√
May 10, 2023 Outgoing email	This email from a CNL Communications Officer to AOPFN to provide links to the video and cutaway that were referenced during the NPD Site tour on 2023 May 10. CNL also provided AOPFN with Nuclear 101 created by the Grand Council of Treaty #3.										√
May 12, 2023 Outgoing email	This email from a CNL Senior Communications Officer to AOPFN is to confirm the ability to attend the 2023 May 26 in-person monthly meeting being held in Pikwàkanagàn First Nation, CNL also asked if they can confirm numbers later. CNL asked AOPFN to confirm the agenda topics for the meeting.										√
May 15, 2023 Incoming email	This email from the AOPFN Manager, Consultation to a CNL Senior Communications Officer is in follow-up to the 2023 May 01 email from CNL outlining action items from the 2023 April Monthly Working Group Meeting. AOPFN had no comments on the AOPFN AMA insert for the EIS. AOPFN provided feedback on the EIS commitment table.		√				√			√	
May 16, 2023 Outgoing email	This email from a CNL Communications Officer to AOPFN seeking confirmation that the version of the AMA report attached to AOPFN's email on 2022 April 28 is the version to be included as an appendix in the NPD Revised Draft EIS. CNL also asked AOPFN to confirm that there are no confidentiality issues with including the AMA report as is in the EIS as it will be publicly available.		√								
May 16, 2023 Outgoing email	This email from a CNL Communications Officer to AOPFN is to provide AOPFN with the registration link for the NPD Swift Night Count being held on 2023 May 24 and 2023 May 31.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
May 16, 2023 Outgoing email	This email from a CNL Communications Officer to AOPFN provided AOPFN with the updated Interests and Concerns Table. Specifically CNL’s response to the interest/concern and the status of the concern. These updates align with the progress on engagement we have made together and AOPFN’s recent feedback (April 2023). CNL noted they have marked new language with grey shading. CNL also noted that AOPFN will also see new rows (indicated in pale yellow) which were added to capture concerns that were missing or not stand alone in previous versions of the table. As part of the Environmental Assessment process CNL is seeking verification that AOPFN agrees with the updates and that CNL has accurately captured AOPFN’s concerns on the project.									√	
May 18, 2023 Outgoing email	This email from CNL Senior Communications Officer to AOPFN is to confirm the number of CNL Staff attending the in-person 2023 May 26 monthly working group meeting being held in community.										√
May 24, 2023 Outgoing email	This email from a CNL Senior Communications Officer to AOPFN is to provide AOPFN with the proposed agenda for the 2023 May 26 in-person working group meeting. AOPFN confirmed receipt of the meeting agenda.										√
May 26, 2023 Meeting	This meeting was between the AOPFN (Project Administrator, Manager of Consultation and Consultants) and CNL (including Manager, ERM Stakeholder Relations, Manager, NPD Regulatory Approvals, Manager ERM Licensing Support, Senior Communications Officer, and Indigenous Engagement Coordinator, held in-person at Golden Lake. This meeting was to discuss the NSDF and NPD commitments tale, the bears Den Memo and to provide updates.						√			√	
May 30, 2023 Outgoing email	This email from CNL Indigenous Engagement Coordinator to AOPFN is to provide AOPFN with an action list from the 2023 May 26 CNL/AOPFN working group meeting.						√			√	√
May 30, 2023 Signing of the LTRA	CNL, AECL, and AOPFN signed the Long Term Relationship Agreement (LTRA).										√
May 30, 2023 Outgoing email	This email from a CNL Communications Officer to AOPFN following up on the email sent on 2023-05-16 concerning the inclusion of the AMA report as it as an appendix in the NPD Revised Draft. AOPFN responded and noted they would respond once the Consultation Manager has returned. CNL confirmed receipt of the email.		√								
June 01, 2023 Incoming email	This email from AOPFN Project Coordinator to CNL Manager, NPD Regulatory Approvals provided CNL with AOPFN’s NPD Seasonal Surveys Implications Letter and the 4 associated seasonal survey reports. CNL confirmed receipt.	√								√	√
June 06, 2023 Emails	This email from CNL Communications Officer to AOPFN in response to the seasonal inventory Implications Letter and reports. CNL indicated that In CNL’s initial review of the NPD Seasonal Surveys Implications Letter CNL was seeking clarification on language indicating a new commitment sought by AOPFN. AOPFN confirmed once AOPFN receives the updated commitments sought document with additional columns from CNL they would be providing feedback on the table. This feedback will include a couple of additional commitments that we drafted, including #22.						√				√
June 07, 2023 Outgoing email	This email from a CNL Communications Officer to AOPFN is to provide them with a draft list of commitments for the NPD Closure Project. CNL requested that as AOPFN reviews, please provide AOPFN’s agreement/position re public facing or not and AOPFN confirmation of commitments that will be covered under the LTRA.						√				√
June 20, 2023 Incoming email	This email is from AOPFN to a CNL Communications Officer provided CNL with Issues and Concerns Table with AOPFN’s comments for review. AOPFN also attached a Question feedback document for further discussion as per the April 2023 EIS Comments Response Table. CNL confirmed receipt of the document									√	
June 27, 2023 Outgoing email	This email from a CNL Communications Officer to AOPFN requesting clarification on when CNL would receive AOPFN’s forthcoming “Commitments Sought” update. Referenced in the June 20 I&C Table feedback.						√				√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
June 27, 2023 Incoming email	This email from AOPFN to a CNL Communications Officer indicating the “Commitments Sought” update would be shared shortly.										√
June 29, 2023 Incoming email	This email from AOPFN to a CNL Communications Officer proving the Commitments Sought updated document for CNL’s review.						√				
June 29, 2023 Outgoing email	This email from a CNL Communications Officer to AOPFN confirming receipt of the Commitments Sought updated document. CNL requested AOPFN provide meeting times to discuss the edits. CNL also asked the AOPFN to confirm version of the AMA report attached in the April 28, 2022 email to CNL is the version to be included as an appendix in the NPD Revised Draft EIS.		√				√				√
June 29, 2023 Incoming email	This email from AOPFN to a CNL Communications Officer confirmed the version of the AMA report to be included as an appendix.		√								
July 04, 2023 Outgoing Email	This email is from CNL Senior Communications Officer to AOPFN communicated some questions related to the NPD Interest and Concerns Table.									√	
July 05, 2023 Telephone Call	Phone call from an AOPFN Project Coordinator to a CNL Communications Officer asking for a timeline for needing responses to the questions.									√	
July 24, 2023 Outgoing Email	This email is from CNL Communications Officer to AOPFN is to provide a status update on the I&C table.									√	
August 03, 2023 Outgoing Email	This email from CNL Director, Communications and Engagement to the AOPFN Chief is to invite him to the AECL, CNL and Canada’s nuclear supply chain leadership for the annual Organization of Canadian Nuclear Industry (OCNI) Suppliers Day Banquet Dinner.										√
August 03, 2023 Outgoing Email	This email from CNL Manager, Communications and Engagement to AOPFN is to offer AOPFN a complimentary registration to the upcoming Canadian Conference on Waste Management, Decommissioning and Environmental Restoration (NWMDER) to be held August 27 - 31, 2023 in Niagara Falls, ON.										√
August 15, 2023 Outgoing Email	This email from CNL Manager, Communications and Engagement to AOPFN is to follow-up on the email sent on 2023 August 03, offering AOPFN a complimentary registration to the upcoming Canadian Conference on Waste Management, Decommissioning and Environmental Restoration (NWMDER) to be held August 27 - 31, 2023 in Niagara Falls, ON.										√
August 29, 2023 Outgoing Email	This email from CNL Communications Officer to AOPFN is to inform AOPFN that CNL is interested in meeting with AOPFN to discuss the status of the NPD Closure Project and review the I&C and Commitment tables together. CNL asked that AOPFN provide some date options for next week that would work for AOPFN. Prior to the meeting, CNL noted that they will share the updated I&C Table and the simplified Commitments Table. CNL also noted that they will also provide AOPFN a bilateral response to the Commitments sought. AOPFN confirmed possible dates and CNL sent a meeting invite.						√			√	
August 30, 2023 Outgoing Email	This email from the Manager, NPD Closure Project, to AOPFN is to provide AOPFN the updated Table of Interests and Concerns and a Table of Commitments for the EIS. CNL noted the changes to the I&C Table made from feedback received from AOPFN on June 21. CNL requested a future meeting to include confirming that status is correct and next steps are appropriate. CNL also noted they had utilized the feedback on commitments provided by AOPFN on June 29, using the list in Appendix B as a guide, to develop of Table of Commitments (list) suitable for the EIS.						√			√	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
September 06, 2023 Meeting	This meeting between CNL (Including, Manager, NPD Closure Project, Decommissioning and Environmental Specialist, Communications Officer, Indigenous Engagement Coordinator) and AOPFN (including, Project Coordinators, Project Administrators, Communications Specialist and Consultant) is to discuss the AOPFN NPD Interest and Concerns table and Commitments list for the NPD Closure Project. CNL and AOPFN reviewed the language in the I&C Table and mitigation measures. CNL provided a status update on the Commitments list. Following the meeting AOPFN committed to sharing marked up versions of both tables to CNL.						√			√	
September 15, 2023 Incoming Email	This email from AOPFN Project Administrator to CNL Communications Officer is to provide CNL with AOPFNs I&C table with AOPFN’s latest comments and track changes. Also, as per the last discussion, AOPFN requested another NPD-focused meeting be scheduled, and provided possible dates for a meeting.						√			√	
September 20, 2023 Incoming Email	This email from the AOPFN Project Coordinator to CNL is to provide a copy of AOPFNs simplified version of the Table of Commitments (list) suitable for the EIS. CNL confirmed receipt.									√	
September 27, 2023 Incoming Email	This email from the AOPFN Project Coordinator to CNL Communications Officer is to request available dates to discuss NPD Interests and Concerns and Commitments list. CNL confirmed 2023 October 19th from 2:30 pm.									√	
September 29, 2023 Outgoing Email	This email from the CNL Communications Officer to AOPFN Project Coordinator is to propose a draft agenda for the 2023 October 19 AOPFN-CNL NPD-focused meeting. AOPFN confirmed the draft agenda on 2023 October 03.									√	√
October 13, 2023 Emails	These email between the CNL Communications Officer and AOPFN Project Coordinator is to inform AOPFN that CNL will be sending the updated I&C table and commitments the following day. CNL also looked to add some time next week to work together on the wording of the EIS commitment list. AOPFN confirmed the delay in the updated I&C and confirmed the draft agenda. AOPFN looked for an update on the table and CNL sent it over. AOPFN confirmed receipt on 2023 October 16.									√	
October 17, 2023 Incoming Email	This email from AOPFN to CNL Communications Officer is to inform CNL that upon receipt of NPD Issues and Concern documents on October 16, it has been determined that appropriate time is not available for a proper evaluation. AOPFN requested to postpone the upcoming meeting on October 19th to ensure adequate reviews from the AOPFN team. CNL proposed alternative dates.									√	√
October 19, 2023 Outgoing Email	This email from CNL Manager, Communications and Engagement to AOPFN is to propose converting the NSDF weekly meeting on 2023 November 2 to the NPD Closure Project discussion (I&C and Commitment Tables). CNL noted that CNL will be providing updated NPD Issues and Concern documents by 2023 October 20 for review. APOFN confirmed the meeting subject change.						√			√	
October 26, 2023 Outgoing Email	This email from CNL Communications Officer to AOPFN shared the updated Commitments table. CNL noted the updates made to align with the NSDF Project March 29, 2021 letter specifically Attachment B.						√				
November 02, 2023 Incoming Email	This email from AOPFN to a CNL Communications Officer provided the updated Interest and Concerns List.									√	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
November 02, 2023 Meeting	This meeting between CNL (including the CNL Director NPD Closure Project, Director, Communications and Engagement, Environmental and Decommissioning Specialist, and Indigenous Engagement Coordinator) and AOPFN (Including, Project Coordinators, Project Administrator, Communications Specialist, and Consultant) was to discuss the I&C and EIS Commitments tables. CNL and AOPFN reviewed the comments provided by AOPFN on November 02. During the discussion on the commitments AOPFN provided guidance to CNL on how to revise the public facing list for the EIS. CNL and AOPFN also discussed a project specific agreement and the purpose it would serve.						√			√	
November 07, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to AOPFN is to provide the actions captured at the 2023 November 02 AOPFN-CNL NPD Closure Project working group meeting (Interests and Concerns and Commitments List).										√
December 14, 2023 Outgoing Email	This email from CNL Communications Officer to AOPFN Project Administrator is to provide the updated Summary of AOPFN Key Interests and Concerns and the Commitments working table along with forward facing list for the EIS. Both documents have been updated with edits suggested by AOPFN in writing and at the November 2, 2023, meeting. The I&C table has track changes showing only the most recent edits. CNL noted that unless AOPFN has any significant concerns about the changes to the I&C table, these are now ready for the EIS submission. CNL would appreciate confirmation from AOPFN by 2024 January 26.						√			√	√
January 25, 2024 Incoming Email	This email from AOPFN Project Coordinator to CNL Communications Officer informed CNL that AOPFN is not going to provide further comments on the public facing I&C and Commitments Tables at this time. AOPFN noted sharing thoughts and recommended edits, and while there may be sections that we don't agree on, AOPFN won't be holding you up from filing the EIS but do want it noted that the submission should not be labelled as approved by or otherwise endorsed by AOPFN. AOPFN reserves the right to further comment during the FPIRT process.						√			√	
January 29, 2024 Outgoing Email	This email from CNL to AOPFN Project Coordinator confirmed that AOPFN is not providing further comments on the updated Key Interests and Concerns and the Commitments Tables and provided an update on the outstanding responses.						√			√	
February 08, 2024 Telephone Call	This telephone call between CNL Communications Officer and AOPFN Project Coordinator is to discuss the outstanding responses to the 2023 EIS questions which CNL did not provide on the agreed date. CNL noted planning to provide the responses by the end of the month, and as a reminder we have committed to providing the responses prior to submitting the revised draft EIS.										√
February 08, 2024 Outgoing Email	This email from a CNL Communications Officer to AOPFN Project Coordinator is to apologise for not provided the outstanding responses to the 2023 questions by the date indicted in a previous email. CNL noted the extra time is being used to ensure the responses are in alignment with all the work being done at the working group level and with AECL. CNL is planning to provide the responses by the end of the month, and as a reminder CNL have committed to providing the responses prior to submitting the revised draft EIS. AOPFN Project Coordinator confirmed receipt of the update from CNL.										√

K.2 Mapping of AOPFN Key Interests and Concerns

Table K.2 presents a mapping of how the key interests and concerns relate to detailed feedback and input from the AOPFN, up to March 2024.
Table K.2 has 3 columns:

- Column 1 identifies the topic, i.e., the subject area the key interest(s) or concern(s) falls under.
- Column 2 presents a key interest or concern, why it is important to the Indigenous Nation, community or organization, and connects it to a project aspect or an Aboriginal or treaty right wherever possible. This may be a summary of multiple related interests or concerns that have been expressed by the Indigenous Nation, community or organization.
- Column 3 presents details of the key interest or concern that the Indigenous Nation, community or organization has identified formally in writing and/or verbally to CNL.

Topic	Key Interests and Concerns	Specific feedback provided by the AOPFN on this interest/concern (Validated)
1. Accidents and Malfunctions	Concerns about potential effects of malfunctions and accidents (e.g., due to natural hazards) and concern about overall deterioration of the disposal facility over time. It is important to the AOPFN that there are no health or environmental impacts from the facility, in the long term because of the project’s proximity to the Kichi-Sibi, which has great importance to AOPFN culture, heritage and ways of life. As well, the AOPFN is concerned that contamination leads to further alienation and loss of access to traditional land use. This is a project-specific concern.	In July 2020, the AOPFN submitted formal comments on the 2020 EIS. AOPFN raised concerns about potential accidents and malfunctions. In addition, participants at the Algonquin Advisory Committee (AAC) meeting in 2021 July also expressed significant concerns about what-if scenarios related to both accidents and malfunctions caused by effects of the environment on the project and from other sources. In their letter dated August 13, 2021 that outlined the implications of the AOPFN studies for the NPD Closure Project, AOPFN highlighted member concerns over the potential for contaminants leaking into waterways. Further the Aug 13th letter indicated concerns about the integrity of the site in the event of natural disasters, such as earthquakes, and impacts of climate change, including changing precipitation patterns and alterations to the bank of the Kichi-Sibi that may expose the grouted monolith to increased erosion. Similarly, concerns were expressed over the cracking, breaking or general deterioration of the concrete barriers over time. In April 2023, AOPFN also identified that CNL should be required to provide substantive evidence that it has contingency plans in place in case the facility fails to contain the radioactive materials adequately, including a scenario where the materials need to be removed. Further, AOPFN is concerned because the placement of the grout and cap will make it more difficult to access the facility in the future, and therefore any such remedial action may be difficult to activate. AOPFN highlights that proximity is only one factor in assessing the potential risks to health. While workers will be geographically closer and have potentially longer exposure periods to both radiological and non-radiological contaminants, workers will also have access to protective equipment, emergency procedures, and early warning of accidents and malfunctions. AOPFN is seeking meaningful participation in compliance monitoring and emergency response planning as part of any AOPFN-specific risk communication program.
2. Alternatives	Technical suitability of the In-Situ Disposal concept AOPFN is seeking for the NPD site to be decommissioned in a manner that is safe, acceptable and preferable to Algonquin peoples, when considering environmental, rights, and other values. This is a project-specific concern.	AOPFN is concerned that ISD is not a preferred alternative means to decommission the NPD site, technically or from an Algonquin perspective. AOPFN is concerned about the reversibility of the ISD technique, consistency of ISD with international best practice and that the hazard will outlive the design life of the closure strategy and contamination will be dispersed. In July 2020, AOPFN submitted formal comments on the 2020 EIS. Several were related to the in-situ disposal concept, including: • The reversibility of the in-situ disposal technique and mitigation strategies; • Consistency of in-situ disposal with International best practice; • The design life of the disposal facility in relation to the hazard duration of the waste; The effectiveness of retrofitting the current NPD facility as opposed to constructing a purpose built facility. In April 2023, AOPFN reiterated its concern that the hazard will outlive the design life of the closure strategy and contamination will be dispersed. While the severity of any associated impacts may be low from a technical perspective, some form of contamination risk and the associated psycho-social impact will persist. AOPFN is also concerned that CNL considers material within the facility to be ‘existing wastes’ given that the decommissioning work has not yet occurred.
2. Alternatives	Process for Assessment of Alternatives It is important to the AOPFN that the process of the assessment of alternatives is accepted by and includes AOPFN. This is a project-specific concern.	AOPFN highlights that joint assessment of alternatives is considered best practice and are commonly implemented for projects that are of high concern to Indigenous peoples. AOPFN has indicated that the alternative means assessment (AMA) should be following the more rigorous IAA 2019 legislation. In July 2020, the AOPFN submitted formal comments on the 2020 EIS. Several were related to the alternatives assessment process and the in-situ disposal concept, including: • The principle of willing host and the precedent for future disposal facilities • The need for a detailed quantitative assessment of each alternative against the ALARA principle. • A lack of consultation on the design alternatives assessment methodology • No participation of AOPFN in the alternatives assessment • No opportunity for AOPFN to engage on the criteria and weightings used in the assessment and concerns about specific criteria weightings • The need for a robust environmental effects assessment for each alternative • A lack of evidence supporting significant incremental risks related to off-site disposal • An AOPFN request for a multi-party reconsideration of alternatives

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		In their letter dated August 13, 2021 that outlined the implications of the AOPFN studies for the NPD Closure Project, AOPFN reiterated their concern with the way in which CNL undertook the AMA for the project and highlighted that the Diet and Harvest Study found a clear majority of AOPFN respondents prefer the full removal option. In April 2023, AOPFN reiterated its concerns related to CNL’s process for assessment of alternatives including that the willing host principle has not been followed for this permanent radioactive waste disposal facility. AOPFN remains concerned that doses from ISD are not ALARA, that a quantitative comparison of dose risks from all technically and economically feasible alternatives has not been provided, that ISD would defer risks to future generations, that ISD would create an unnecessary permanent radioactive waste disposal facility in AOPFN territory, that ISD has heightened long-term impacts on AOPFN traditional land and resource use, culture, and health and well-being compared to other alternatives, that the risks of a contaminant plume impacting on the Ottawa River are not justified, that ISD is not amenable to easy contingency adaptive management in case the technology does not contain the radiological risk, that ISD is not considered a preferred means of decommissioning a reactor versus a geological repository, and that occupational risks have been weighted too heavily in CNL’s assessment. AOPFN has also indicated a continued desire for a multi-party forum for selection and evaluation of alternatives.
2. Alternatives	Integration of AOPFN AMA results into CNL’s overall assessment of alternatives It is important to AOPFN that CNL meaningfully consider the results of the AOPFN Alternative Means Assessment. Further, AOPFN expected CNL to reconsider its original alternatives assessment and directly integrate the AOPFN results. This is a project-specific concern.	It is important to AOPFN that CNL meaningfully consider the results of the AOPFN AMA. Further, AOPFN expected CNL to reconsider its original alternatives assessment and directly integrate the AOPFN results. In a meeting on September 27, 2021, AOPFN representatives reiterated concerns that AOPFN members feel like their perspectives on preferred alternative means had not been integrated into CNL’s EIS. AOPFN is appreciative that CNL funded AOPFN’s AMA however remain concerned that CNL has not meaningfully considered AOPFN’s AMA or conducted a reconsideration of CNL’s original AMA as a result of AOPFN’s AMA. AOPFN expressed disappointment that AOPFN material was only recognized and not integrated into CNL’s decision-making process.
2. Alternatives	Emphasis on financial costs in determining preferred alternative means. AOPFN is concerned that CNL may be incentivized to choose the single fastest and cheapest decommissioning option (ISD) versus the two “removal” options. This is both a CNL-wide and a project-specific concern.	AOPFN is concerned that CNL prefers the option that has the lowest potential risks of short-term (i.e., plan implementation) safety, security or environmental incidents, at the expense of that option transferring longer-term risks to the immediate receiving environment. In July 2020, AOPFN submitted formal comments on the 2020 EIS including questions related to the contractual relationships between CNEA, AECL and CNL. In December 2020, AOPFN expressed concern that CNL was financially incentivized to find the fastest and cheapest way to decommission NPD. In April 2023, AOPFN reiterated its concerns that the fastest, cheapest option has been selected.
3. Archaeology and Cultural Heritage	(a) Involvement in culture and heritage matters at the NPD site It is important for the AOPFN to be involved in any future archaeological activities at the site, to ensure that artefacts with cultural value and significance are identified and protected as archaeological sites and artifacts have deep cultural value and significance for the Algonquins. This is both a CNL-wide and project-specific concern.	The AOPFN AKLUS highlights the potential for deposited artefacts in the area of the NPD property related to pre-contact transportation corridors. As these archaeological sites and artefacts have deep cultural value and significance, AOPFN requires further involvement in culture and heritage matters at the NPD site. In addition, the AKLUS and the Culture and Rights Studies discuss the significant cultural and historical importance of the Kichi-Sibi, and the AOPFN’s concerns about impacts to current and future values and use of the Kichi-Sibi. Protection of the Kichi-Sibi is discussed in row #16 (a) below.
4. Baseline Characterization	(a) Characterization of aquatic and terrestrial biota baseline It is important to AOPFN that the baseline	AOPFN has identified concerns in particular with the absence of an Algonquin Knowledge baseline for the NPD site and its surroundings, due to an absence of prior engagement by CNL and AECL of AOPFN in Algonquin Knowledge studies in and around this 400 hectare site. In July 2020, AOPFN submitted formal comments on the 2020 EIS. Several were related to baseline characterization:

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	environmental conditions around the site of the NPD Closure Project including aquatic and terrestrial biota are well understood and are protected in order to adequately assess potential impacts to AOPFN rights and traditional land and resource uses. This is a project-specific concern.	- A lack of data for benthic invertebrates abundance/diversity and no studies of fish tissues; - A reliance on background information and not on targeted field studies when defining the baseline for the terrestrial environment. - Species presence, abundance and potential nesting areas for migratory birds.
4. Baseline Characterization	(b) Use of a current, damaged baseline as the starting point for the assessment AOPFN has raised consistent concerns about the temporal comparison chosen by CNL for the NPD decommissioning assessment, which is to compare the future against today, rather than against a pre-NPD site condition (i.e., the early 1960s). This is not a project-specific interest; however it has implications for the EA process and methods used in this project-specific assessment.	AOPFN has argued that any decommissioning project needs to be tied to the ability to reach an agreed upon desired future state, not against an already damaged current state. In July 2020, AOPFN submitted formal comments on the 2020 EIS. Several comments were related to EA methodology and process. In their letter dated August 13, 2021 that outlined the implications of the AOPFN studies for the NPD Closure Project, one of the concerns reiterated by AOPFN was the lack of consideration of effects against a pre-NPD baseline. AOPFN reiterated to CNL in its feedback from April 2023 that it disagrees with the use of the current – damaged, baseline in CNL’s assessment.
4. Baseline Characterization	(c) Technical suitability of the site. AOPFN is concerned that the site was not designed to be a permanent radioactive waste disposal facility. This is a project-specific concern.	AOPFN wants to ensure that AOPFN lands and the Kichi-Sibi are protected and to reduce the radiological burden placed on AOPFN by Canada in the future. In July 2020, AOPFN submitted formal comments on the 2020 EIS. AOPFN expressed concern that CNL had not completed a siting study that demonstrated the site is technically superior and publicly acceptable. In April 2023, AOPFN repeated their concern that CNL had not performed a comprehensive exercise to determine the suitability of the site.
5. Engagement	(a) Interest in establishing a Long-Term Relationship Agreement (LTRA) It is important that a mechanism be in place for AOPFN to express its community members’ needs and concerns with respect to CNL activities, including those beyond the NPD Closure Project, to CNL and AECL, and to be able to work with CNL and AECL towards understanding and resolution with respect to CNL activities and AECL-owned sites within the Algonquin Settlement Area where AOPFN members harvest food, medicines, and other natural materials. This is a CNL-wide interest.	In July 2020, AOPFN submitted formal comments on the 2020 EIS. In these comments, the AOPFN expressed interest in developing a LTRA with CNL. In April 2023, AOPFN clarified that there are only some mechanisms from the proposed LTRA which are applicable to NPD (i.e., the Guardian Program and Risk Communication Program). AOPFN has indicated that further collaborative assessment and negotiation of a Project-Specific Agreement will be required for NPD as part of a consent seeking process between the parties, at the end of which AOPFN may or may not provide its free, prior and informed consent to the proposed in-situ project at NPD.
5. Engagement	(b) Interest in more direct and collaborative engagement on the NPD Closure Project	AOPFN was not engaged collaboratively during the early stages of the Environmental Assessment (EA) e.g., the AMA and has identified their desire to be involved in all phases of the EA. Key areas for collaboration include: Integration of the Traditional Use Study into project planning, design, mitigation and accommodation both during and post-EIS.

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	It is important to the AOPFN that engagement involve two-way communication and active collaboration through all phases of the project as there are potential impact to current and future AOPFN members' rights and ability to practice traditional activities on the land / water. This is a project-specific interest.	- Development of mitigations that will be considered in assessments for valued components <u>today</u> – so AOPFN is involved in all phases of the EA and project life-cycle. - co-development and co-approval for development and implementation of the EA follow-up and monitoring program for the project, including adaptive management objectives, indicators, thresholds, and responses for terrestrial wildlife, fish and fish habitat, traditional land and resource use, and water quality at minimum. - co-development and co-management of end-state land use planning for the entire AECL site at NPD. In July 2020, AOPFN submitted formal comments on the 2020 EIS. In these comments AOPFN requested a work plan for direct EA engagement. AOPFN highlighted the need for more collaborative engagement and two-way dialogue.
6. EA Process and Methodology	(a) Concern about the methodology for conducting the effects assessment and determination of significance It is important to the AOPFN that events with the potential for an adverse effects on the environment and/or AOPFN rights are carried through the assessment process as far as is reasonable as the project may have impact to current and future AOPFN members' rights and ability to practice traditional activities on the land / water. This is a project-specific concern.	AOPFN is concerned that CNL's assessment does not integrate into its effects characterization any of the impact pathways identified by AOPFN that results in both direct and indirect effects on Traditional Land and Resource Use: quality and accessibility of the land, consideration against a pre-NPD baseline, Project-related activities would exacerbate the issue of alienation and further limitation of members' access to the area, perpetuating the difficulty of exercising their Aboriginal rights, long-term continuation of an avoidable location-specific effect in the form of fencing off and not allowing the NPD site to return to a natural condition, and the permanent cementing in place of radioactive materials very close to the Kichi-Sibi the radioactive materials that cause fear, stigma, alienation and concerns about the quality of country foods and medicines, and whether they are harvestable. In July 2020, AOPFN submitted formal comments on the 2020 EIS. Several were related to EA methodology and process. In their letter on August 13, 2021, that outlined the implications of the AOPFN studies for the NPD Closure Project, AOPFN reiterated their concerns related to EA methodology and process. The following items were highlighted related to EA methodology and process: - Concerns with the methodology to determine significance of adverse residual effects; - Concerns related to the determination of effects (impacts) and on the adequacy of evaluation of cumulative effects. - Concerns about how the quality and accessibility of land were considered in the effects assessment; this is discussed in row #17(b) below. - Consideration of effects against a pre-NPD baseline. The findings of the three AOPFN studies suggest there are residual adverse effects potential across a larger number of VCs, including Indigenous land and resource use, and the EIS has not been updated to properly reflect AOPFN's understandings of impacts on AOPFN members from the project. AOPFN reiterated to CNL in its feedback from April 2023 that it disagrees with the use of the current – damaged, baseline in CNL's assessment.
6. EA Process and Methodology	(b) Concern about the methodology of the cumulative effects assessment It is important to AOPFN that the project assessment is properly informed by cumulative effects assessment in order to protect AOPFN values and rights. This is both a project-specific and CNL-wide concern.	AOPFN is concerned that despite AOPFN finding adverse effects there has been inadequate consideration of trend-over-time impacts on VCs found at and around the NPD site (adoption of a damaged current baseline), no cumulative effects assessment on AOPFN culture, traditional land and resource use, or health and well-being. AOPFN has provided evidence through four studies of risks in the Project Case to longer-term continuation of alienation and loss of use effects on traditional land users as a result of converting the NPD site to a permanent radioactive waste disposal facility. In July 2020, AOPFN submitted formal comments on the 2020 EIS. Several were related the adequacy of evaluation of cumulative effects.
6. EA Process and Methodology	(c) Relevant legislation AOPFN expressed concern on continued use of <i>CEAA, 2012</i> rather than the more recent <i>Impact Assessment Act</i>. It is important to AOPFN that the NPD Closure Project Environmental Assessment is carried out using up-to-date legislation that includes best practice decision-	The impacts that AOPFN has identified are impacts within the federal jurisdiction under <i>IAA</i> (2019) and is disappointed that CNL, AECL and CNSC are continuing this assessment under the less rigorous expectations of <i>CEAA</i> 2012. In April 2023, AOPFN reiterated its disappointment that CNL, AECL, and CNSC, have chosen to continue the NPD Closure Project EA under the less rigorous expectations of <i>CEAA</i> 2012.

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	making through a collaborative process. This is not a project-specific interest; however it has implications for the EA process and methods used in this project-specific assessment.	
6. EA Process and Methodology	(d) AOPFN participation in the assessment AOPFN is seeking good impact assessment practice that include Indigenous groups as part of the assessment early and throughout the process. This is not a project-specific interest; however it has implications for the EA process and methods used in this project-specific assessment.	The traditional users themselves, through the four AOPFN studies, have concluded that the proposed project will have impact on traditional use. AOPFN is concerned that the inputs from Indigenous Land users themselves has not been integrated into the actual effects characterization and significance determination process. AOPFN – and AOPFN’s evidence in the traditional land use and occupancy study, the Diet and Harvest Study, and AOPFN’s AMA, and culture and rights study, all of which have been made available to CNL, do not support CNL’s conclusion that “the project will not interfere with traditional activities. AOPFN has and will continue to provide evidence that CNLs estimation of no adverse impacts on TLRU in the Project Case are incorrect, not supported by the traditional users themselves, In April 2023, AOPFN highlighted that their involvement in the assessment has been from the outside looking in and that AOPFN perspectives have had little to no influence on CNL’s assessment findings. Further AOPFN highlights that there is an important distinction between putting an Indigenous group’s perspective into a portion of the EIS and actually involving that Indigenous group in the assessment process.
7. End State, Site Restoration and Future Use of the Land	(a) Collaborative end land use planning It is important to AOPFN that it receives reassurance that the land around the facility will be renaturalized over time, so that AOPFN community members can reconnect with the site and be able to practice traditional land use activities. This is both a CNL-wide and project-specific concern.	AOPFN is a governance and stewardship entity with a right to be directly and deeply involved in collaborative end state planning. AOPFN is seeking an active, decision making, co-management role in the end state planning for NPD including early involvement in the development of the plan (not simply an opportunity to provide feedback on the plan after CNL has already drafted). AOPFN is also concerned that restoration of these ecosystems strive to bring back conditions similar to a pre-disturbance baseline (or intact reference baseline) and that more detailed restoration plans be included in the EIS. In July 2020, AOPFN submitted formal comments on the 2020 EIS. Several were related to end land use and restoration such as: • A request from AOPFN for commitment from CNL and AECL on collaborative end land use planning; • A lack of detail in the EIS to determine the cultural and ecological effectiveness of the lands following completion of the project; • A request for clarification on terminology (“renaturalization”). In their letter dated August 13, 2021 that outlined the implications of the AOPFN studies for the NPD Closure Project, AOPFN reiterated their request for collaboration on end-land use planning for the NPD site. In April 2023, AOPFN repeated its desire for collaborative end-land use planning for the full NPD site and indicated their preference to see the restoration activities further developed in the EIS before final submission. AOPFN’s requested commitments would require CNL and AECL to fund and collaborate with AOPFN to undertake end-land use planning for the larger AECL-controlled NPD site, including plans for compensation if end-land use goals that have been agreed to are not met. CNL and AECL have not yet adequately demonstrated that they are ready to meet this requirement.
7. End State, Site Restoration and Future Use of the Land	(b) Preparation of on-site landfills for the post-closure period Closure plans for the on-site landfills are important to AOPFN because it wants to ensure that the environment around the site of the NPD Closure Project is protected as these landfills were located on the NPD site within unceded Algonquin traditional territory where AOPFN members harvest food, medicines, and other natural materials. This is a project-specific interest.	In July 2020, AOPFN submitted formal comments on the 2020 EIS. AOPFN requested additional details on how the landfills onsite will be prepared for the post-closure period.

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7. End State, Site Restoration and Future Use of the Land	(c) Project timeframe AOPFN is concerned that the site will require an indefinite period (>100 years) of institutional care. This is both a CNL-wide and project-specific interest.	AOPFN is concerned that the site will require an indefinite period (>100 years) of institutional care to monitor and maintain the infrastructure necessary to prevent potential impacts including continuation of active controls. AOPFN is also concerned that long-term funding for these institutional controls is uncertain. AOPFN is concerned that the NPD site and surrounding lands are safe for traditional land and resource use activities in the future. In July 2020, AOPFN submitted formal comments on the 2020 EIS. One comment requested details on the length of Institutional Control period and the Crown's commitment of long-term funds
7. End State, Site Restoration and Future Use of the Land	(d) Long-term liability of the site beyond decommissioning. It is important to AOPFN that the end state of the NPD site is safe for future land users and that a guarantee and long-term funding is in place for Institutional Controls for as long as necessary. This is a project-specific concern.	AOPFN is concerned that the Institutional Control period will need to be significantly longer than 100 years. Further AOPFN is concerned that contingency plans in case the facility fails to contain the radioactive materials adequately, including a scenario where the materials need to be removed are not sufficiently developed. For both of these aspects AOPFN does not have confidence that government funding will continue or be in place. It is important to AOPFN that radioactive risks will not be passed on as a burden to future generations and it is important to AOPFN that radioactive materials are not abandoned and forgotten in Algonquin territory. It is important to AOPFN that they have safe and trusted access and use of the NPD site and its surroundings for present and future generations. AOPFN prefers an alternative that allows the land to heal the quickest from harms i.e., a removal option that does not perpetuate the current state of contamination. In a future with in-situ disposal, the underground conditions will be unnatural, and on the surface, portions of the site will be unnaturally fenced off, covered with a concrete cap and unable to return to a forested condition. AOPFN is concerned that project-related activities would exacerbate the issue of alienation and further limit members' access to the area. In April 2023, CNL heard that AOPFN remains concerned about a guarantee for funding of Institutional Controls and the lack of clarity on the length of the Institutional Control period.
8. Environmental Effects and Mitigation Measures	(a) Invasive species management AOPFN is unclear how invasive species will be managed at the NPD site if introduced by vectors other than heavy equipment (e.g., by smaller vehicles, hand-held equipment, or people). This is a project-specific concern.	It is unclear what measures will be implemented to manage invasive species, should they be accidentally introduced or already present at the site. In July 2020, AOPFN submitted formal comments on the 2020 EIS seeking additional information on how invasive species will be managed. In December 2020 and April 2023 AOPFN continued to seek clarity on what measures would be implemented to manage invasive species if they are accidentally introduced or already present at the NPD site.
9. Free Prior and Informed Consent (FPIC)	(a) Principle of consent It is important to AOPFN that the right to give consent to be a willing host be respected as the NPD site and facility is in unceded AOPFN traditional territory. This is both a CNL-wide and project-specific concern.	AOPFN is concerned that it did not consent to the original NPD construction and operation and that now, potentially without their consent, are expected to host the radioactivity in perpetuity. AOPFN has noted that the United Nations Declaration on the Rights of Indigenous peoples, section 29.2, is not being adhered to by CNL and AECL in relation to the NPD Project. AOPFN has identified in writing, including in a letter shared in 2022 March, that it expects CNL and AECL to respect AOPFN's right to be a Willing Host for any transition of this site from a nuclear reactor site to a permanent hazardous waste disposal facility, and to respect AOPFN's right to Free, Prior and Informed Consent (FPIC) to any such proposal, as per the United Nations Declaration on the Rights of Indigenous peoples. In April 2023, AOPFN highlighted that it did not consent to the NPD construction/operation and that now, without consent, AOPFN is expected to host the radioactive waste in perpetuity. AOPFN continued to highlight its position that FPIC is mandatory in relation to hazardous waste disposal facilities which this project has proposed the NPD facility become.
10. Impacts on Rights	(a) Concerns about completeness of assessment of impacts on rights It is important to the AOPFN that all potential effects of concern have been assessed, including the potential alienation of AOPFN members from land use due to distrust in the safety of the land and water as this may impact AOPFN members ability to practice traditional activities on the land. This is a project-specific concern.	AOPFN has raised concerns that the implications of the findings of AOPFN's Culture and Rights Study, along with the Algonquin Knowledge and Land Use Study, the Diet and Harvest Study, and the AMA, which point to measurable adverse effects from the proposed In-Situ Decommissioning on AOPFN rights and related valued components, have not been adequately integrated into the EIS' effects characterization and significance estimation process. In particular, AOPFN has stated on multiple occasions and through the AMA process, that In-Situ Decommissioning is the least preferable decommissioning option from a rights protection perspective, given the area would not see the radiological hazard fully removed and as such the area cannot return to a natural and trusted condition in a reasonable time frame. In July 2020, AOPFN submitted formal comments on the 2020 EIS. One comment raised concern about potential Impacts on Rights and a desire for adoption of the new requirements as per the IAA (2019). In their letter in August 2021 that outlined the implications of the AOPFN studies for the NPD Closure Project, AOPFN's position was that measurable impacts on long-term ability to harvest in the NPD area will result from the project as proposed. Additionally, the August 2021 letter repeated AOPFN's concern that CNL has underestimated the project's impacts on traditional land and resource use, as well as culture and heritage resources, and impacts on AOPFN rights. In April 2023, identified the need for recognition of truth. The legacy of the NPD facility and larger surrounding site, including ongoing effects, are a fact that must be considered during the assessment and consultation phase for this proposed Project. AOPFN's position remains that there are measurable impacts on the rights of AOPFN to practice traditional activities around

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		the NPD site. Psychosocial effects are discussed further in row 11 (b) below.
11. Indigenous Health	(a) Indigenous health assessment, receptors and diet AOPFN is concerned that health is primarily focused on biophysical health rather than full scope Indigenous determinants of health. This is a project-specific concern.	The assessment of Indigenous health should look beyond radiation dose thresholds and include consideration of the more difficult to measure, but equally important, perceptual and real impacts on AOPFN determinants of health including education status, economic status, and diet, among other factors. Diet is of critical importance given the likelihood that negative perceptions of the safety of the Project may diminish AOPFN member’s consumption of traditional foods. In July 2020, AOPFN submitted formal comments on the 2020 EIS. Several identified concerns with the health assessment and requested a dietary study involving AOPFN. The concerns are: • Changes in diet from perceived contamination and effects on overall health. • The definition of the Indigenous receptor and alignment of that profile with the harvest and diet practices of the local population. • A request to update the spatial boundaries for the Indigenous Health assessment. AOPFN has highlighted that the Diet and Harvest Study implications do not end at modelling of the human health risks and factors related to Indigenous determinants of health have not been demonstrably integrated into the EIS materials that assess Indigenous health.
11. Indigenous Health	(b) Psychosocial effects AOPFN is concerned that in relation to human health, CNL has adopted a relatively narrow perspective on human health that is focused on biophysical impacts to human health, with little or no emphasis on other factors that influence Indigenous population health. This is a both a CNL-wide and project-specific concern.	This is particularly concerning to AOPFN because of the fear, stigma, and alienation felt by AOPFN members associated with the nuclear industry in general. The impacts resulting from the perception of environmental effects must be recognized. These include but are not limited to continued – now potentially permanent - fear and stigma associated with the radiological legacy at the site, and communal health and wellness issues associated with the inability to connect to the site and protect and heal it which is characterized by AOPFN as both a right and a responsibility. Pooled together, these concerns are often labeled as psychosocial impacts, and they are major contributors to poor health and wellness outcomes among Indigenous peoples. AOPFN has raised consistent concerns that CNL is not considering psychosocial impacts as legitimate impacts. AOPFN disagrees with CNL’s assessment that there are no effects from the NPD Closure Project. AOPFN continues to have concerns about the safety of the NPD site and the potential impacts on the rights of AOPFN to practice traditional activities around the NPD site. AOPFN has highlighted in its feedback in April 2023 that CNL does not consider perceived risk, fear, stigma and their combined impacts on traditional use and rights practices as a legitimate impact pathway in this assessment. AOPFN is concerned that CNL is making this assessment/characterization instead of allowing AOPFN to decide whether it will be impacted. AOPFN is interested in better characterization of the factors that have led to alienation and loss of land use, and better understanding of the implications of psychosocial impacts on AOPFN socio-cultural health and well-being. AOPFN has indicated that this will be an important issue for focus on a move forward basis.
12. Long-term Safety	(a) Concern about overall deterioration of the disposal facility over time. The AOPFN identified the long-term site integrity as important because of the site’s location within unceded Algonquin traditional territory and the potential of the project / site to impact people living or fishing nearby (exercising rights to fish), as well as wildlife, vegetation, and all elements of the natural environment at and in the vicinity of the Project. This is a project-specific concern.	AOPFN has raised concerns about whether future safety will be properly monitored, given the life of some of the contaminants exceeds the predicted Institutional Control period for the facility in the Project Case. Within the AKLUS report, participants identified concern about long-term site integrity and monitoring. The Culture and Rights Study also identified concern about site integrity and the need for monitoring based on Algonquin principles. In their letter dated August 13, 2021 that outlined the implications of the AOPFN studies for the NPD Closure Project, AOPFN highlighted member concerns over the potential for contaminants leaking into waterways. Further the Aug 13th letter indicated concerns about the integrity of the site in the long-term resulting from cracking, breaking or general deterioration of the concrete barriers over time.
13. Monitoring	(a) AOPFN involvement in monitoring Involvement in monitoring is important to the AOPFN to ensure the Kichi-Sibi is taken care of as it has great importance to AOPFN culture, heritage and ways of life.	It is important to AOPFN that it has a co-development and co-approval role in the development and implementation of the EA follow-up and monitoring program for the project, including adaptive management objectives, indicators, thresholds, and responses for terrestrial wildlife, fish and fish habitat, traditional land and resource use, and water quality at minimum. AOPFN is concerned that follow-up monitoring lacks a health component that would evaluate aspects of TLRU, culture and Indigenous health/well-being. AOPFN is seeking meaningful participation in compliance monitoring and emergency response planning as part of any AOPFN-specific risk communication program.

Topic	Key Interests and Concerns	Specific feedback provided by the AOPFN on this interest/concern (Validated)
	This is both a CNL-wide and project-specific interest.	AOPFN’s position is that an independent Indigenous Guardian-style program is critical in relation to the NPD site and its surroundings. This will allow for Indigenous Knowledge to be integrated into project monitoring for the first time, restore AOPFN stewardship responsibilities in keeping with Canada’s commitment to reconciliation and UNDRIP, increase AOPFN capacity to understand and monitor changes to the environment our members rely upon, and is an important link into a required Indigenous-driven risk communication strategy for the Project. In July 2020, AOPFN submitted formal comments on the 2020 EIS. Several indicated AOPFNs desire for involvement in monitoring. In their letter dated August 2021 that outlined the implications of the AOPFN studies for the NPD Closure Project, AOPFN reiterated their expectation of a meaningful AOPFN role in site (and surroundings) monitoring for the life of the project, and support for the collection of both technical and Indigenous Knowledge monitoring data. To facilitate this meaningful role, AOPFN is seeking support for the Neya Wabun Guardian Program to be applied in relation to monitoring the NPD site. Specifically, the Culture and Rights Study requested long-term monitoring of the site, including a site inventory by AOPFN members to know what resources are within the fenced site location (the entirety of the AECL-owned property, not just the NPD reactor location within it), and the current conditions of those resources.
14. National Policy	(a) Canadian strategy for waste management is lacking AOPFN is concerned that the Government of Canada does not yet have a modern nuclear waste management policy in place and that a lack of coordinated planning in past to develop permanent facilities has resulted in a proposed facility in AOPFN territory that it has not consented to, and which is contrary to IAEA guidance and the principle of consolidation of waste into the smallest feasible number of permanent waste disposal facilities. This is not a project-specific concern; however it has implications on this project.	In April 2023, AOPFN highlighted that Canada lacked a coordinated strategy to develop permanent disposal facilities. As an outcome of this failing by Canada, not only did AOPFN not consent to the NPD construction/operation, they are now, without their consent, expected to host the radioactivity in perpetuity.
14. National Policy	(b) Canadian strategy for waste management is not timely AOPFN’s view is that Canada failed to act in a timely manner to implement an acceptable permanent waste management alternative. This is not a project-specific concern; however it has implications on this project.	AOPFN is concerned that it did not consent to the NPD construction/operation and that now, without consent, AOPFN is expected to host the radioactive waste in perpetuity. In April 2023, AOPFN highlighted that Canada failed to act in a timely manner to implement an acceptable permanent waste management alternative.
15. Protection of Flora and Fauna	(a) Habitat (including Species at Risk) and road mortality impacts As stewards of lands and waters, it is important to the AOPFN that the environment, wildlife, and plants, including Species at Risk and their habitat areas, are taken care of now and for future generations. This is a project-specific concern.	In July 2020, AOPFN submitted formal comments on the 2020 EIS. One comment sought additional information about potential road mortality impacts for important VCs such as Blanding’s turtles and milk snake. Within the AKLUS report, participants identified the following concerns related to species at risk: - Species at risk including lake sturgeon, eel, and bald eagles, including habitat concerns; - Concerns about loss of habitat.

Topic	Key Interests and Concerns	Specific feedback provided by the AOPFN on this interest/concern (Validated)
16. Protection of the Ottawa River	(a) The Ottawa River, and shoreline and riparian ecosystems AOPFN is concerned that the disturbed riparian habitat was excluded from CNL’s Ecological Land Classification on the basis that it was considered an anthropogenic site. This is both a CNL-wide and project-specific concern.	AOPFN is concerned that the Project will contribute impacts to riparian ecosystems as a result of decommissioning activities, batch plant operation, traffic on adjacent roadways, dust, and ongoing legacy effects as a result of liabilities remaining after decommissioning that are likely to influence groundwater and adjacent riparian areas. The restoration of these ecosystems should strive to bring back conditions similar to a pre-disturbance baseline (or intact reference baseline). In July 2020, AOPFN submitted formal comments on the 2020 EIS. One comment expressed concern about the impacts to the riparian ecosystem as a result of decommissioning activities and the liability remaining after decommissioning. Within the AKLUS report, participants identified concerns related to the Kichi-Síbi, fish, fish habitat and bioaccumulation. A letter from the AOPFN, received in August 2021 highlighted concern about the proximity of the proposed project to the Kichi-Sìbì, considering its importance to AOPFN culture, heritage and ways of life. In April 2023, AOPFN identified the need for restoration activities to re-establish a more natural riparian habitat in the NPD Project- affected area.
17. Socio-Economic	(a) The absence of primary socio-economic baseline data for AOPFN The AOPFN have indicated that having primary socio-economic baseline data is important to the AOPFN because Indigenous Nations, communities and organizations often conceptualize socio-economic wellbeing in ways that cannot be adequately captured with census data. And, potential effects to Indigenous socio-economic conditions cannot be adequately assessed without this baseline. This is a project-specific concern.	AOPFN is concerned that the Indigenous socio-economic assessment is extremely narrow, focusing primarily on nuisance effects from Project activities and traffic safety. This assessment does not contain an appropriate social component, which may include (but not be limited to) considerations such as social relations, family, intergenerational relations, food security, sharing relationships, and psychosocial factors, as well as standard socio-economic considerations such as (but not limited to) education and training, employment and income, job readiness, housing, and community services. In addition, AOPFN commercial activities (e.g. guiding and outfitting) should be assessed. The socio-economic effects assessment should consider direct, indirect, induced, and cumulative socio-economic impacts. In addition, appropriate mitigation and monitoring measures should be adopted. In July 2020, AOPFN submitted formal comments on the 2020 EIS. AOPFN raised concerns on the narrow spectrum of socio-economic issues discussed in the EIS.
18. Technical	(a) Emissions and Discharges It is important to AOPFN that emissions to the environment are properly assessed and are mitigated and monitored as appropriate to ensure that the rights and interests of AOPFN members are upheld in relation to the environment (i.e., hunting, trapping, gathering, fishing and cultural ceremonies). This is a project-specific concern.	In July 2020, AOPFN submitted formal comments on the 2020 EIS. Several were technical such as: - Plans for dust mitigation. - Effluent discharges to the aquatic environment.
19. Traditional Land and Resource Use and Cultural Impacts	(a) Algonquin traditional knowledge should be collected and incorporated into the EIS. It is important to AOPFN that community-specific knowledge be obtained and used to properly characterize current conditions and develop scenarios that accurately represent potential future uses of the site to enable future AOPFN members to practice traditional activities	In July 2020, AOPFN submitted formal comments on the 2020 EIS. Two of these comments focused on the incorporation of AKLUS information into the EIS. AOPFN also requested capacity for disaggregation of AOO AKLUS results.

Topic	Key Interests and Concerns	Specific feedback provided by the AOPFN on this interest/concern (Validated)
	in the region. This is a project-specific concern.	
19. Traditional Land and Resource Use and Cultural Impacts	(b) Impact on ability to practice traditional activities. AOPFN is concerned about continued ability to harvest and consume wildlife and natural materials from the area, including hunting, plant harvesting and fishing. This is a project-specific concern.	AOPFN is concerned that harvesting sites could become compromised in the future, leading to concerns over safety that would impact members’ abilities to pass on AOPFN knowledge on harvesting to children. This would in turn affect the ability of future generations to use the area; and that project-related activities would exacerbate the issue of alienation and further limit members’ access to the area, and perpetuate the difficulty of exercising their Aboriginal rights. AOPFN disagrees with CNL’s conclusion of no impacts on traditional land use. AOPFN’s four studies, supported by evidence from traditional land users themselves identify the following existing impact pathways: • Lack of access to the NPD site since 1962; • Diminished quality and quantity of game species in preferred hunting areas; • Lack of confidence in the health of animals, fish, medicines, and waters, and in their safety for human consumption. In July 2020, AOPFN submitted formal comments on the 2020 EIS. One comment included AOPFN perceptions of safety and quality of experience on the land. Through its recent engagement with AOPFN, CNL has also heard interest on the topics of Traditional Use (aesthetics and visual), perceived and sensory effects that may result in alienation from lands and impact on cultural landscapes. Within the AKLUS report, participants identified the following concerns with respect to traditional land and resource use and cultural impacts: • Concerns about impacts to harvesting; • Concerns about the Kichi-Síbí, fish and bioaccumulation; • Concerns about future generations’ ability to use the area; • Concerns about the protection of and access to sites of cultural and spiritual significance; • Concerns about loss of access. In their letter dated 2021 August that outlined the implications of the AOPFN studies for the NPD Closure Project, AOPFN’s position is that measurable impacts on long-term ability to harvest in the NPD area will result from the proposed project. This letter repeated AOPFN’s concern that CNL has underestimated the project’s impacts on traditional land and resource use, as well as culture and heritage resources, and impacts on AOPFN rights. The 2021 August letter highlighted: • concern over the potential for leaks from the facility affecting people and wildlife that rely on them; • Perception of contamination, leading to further alienation and loss of access to traditional land use; AOPFN is interested in better characterization of the factors that have led to alienation and loss of land use, and better understanding of the implications of psychosocial impacts on AOPFN socio-cultural health and well-being. In April 2023, AOPFN reiterated its position that CNL’s estimation of no adverse impacts on TLRU in the Project Case are incorrect and not supported by the traditional users themselves.
19. Traditional Land and Resource Use and Cultural Impacts	(c) Preservation of cultural resources, and mitigation of impacts to cultural resources It is important to the AOPFN that traditional land use and cultural resources are protected and potential effects are mitigated and monitored in a way that recognizes the interdependencies between ecological, socio-economic, community and cultural health. This is a project-specific concern.	AOPFN is concerned that the EIS has only considered the presence of ceremonies and access to physical archaeological resources, neglecting other cultural values of importance to AOPFN such as transmission of traditional knowledge, cultural landscapes as well as trails and travel-ways such as the Ottawa river. Further mitigations for impacts to traditional use are limited to construction timing, dust suppression, and communication/notification. AOPFN is seeking a collaborative process to identify culturally appropriate ways to mitigate potential impacts and concerns of AOPFN and AOPFN Knowledge Keepers. In 2020 July, AOPFN submitted formal comments on the 2020 EIS. Several were related to traditional land and resource use: • Preservation of cultural resources. • Culturally appropriate mitigations. In April 2023, AOPFN identified that commitments to collaborative development of mitigation measures and monitoring activities remain too vague. Further AOPFN is looking to a see health follow-up monitoring activities that integrate aspects of TLRU, culture and Indigenous health and well-being.

Topic	Key Interests and Concerns	Specific feedback provided by the AOPFN on this interest/concern (Validated)
19. Traditional Land and Resource Use and Cultural Impacts	(d) Concern about the size of the study areas for the assessment of effects on traditional land use. It is important to the AOPFN that all potential effects on traditional land use are considered by identifying study areas that encompass not just biophysical and physical effects, but also changes to the environment that would affect the values and sense of safety of AOPFN members. This is a project-specific concern.	AOPFN is concerned that CNL has not adopted the larger Local and Regional Study Areas used by AOPFN in their studies. This highlights the continued lack of understanding of just how large the impact zone on Traditional Land and Resource Use is around the NPD site. AOPFN has flagged that the study areas selected for traditional use VCs by CNL in the EIS differ from the study areas used by AOPFN in the AKLUS. AOPFN highlighted in its text within Section 9.9 of the EIS that CNL has chosen to ignore the larger Local Study Area and Regional Study Area used by AOPFN peoples in three studies, thus rejecting AOPFN Algonquin Knowledge. The result is Local Study Areas and Regional Study Areas that are 25 times smaller than those chosen by the AOPFN Algonquin knowledge holders themselves. This contributes to the continued lack of understanding of just how large the impact zone on Traditional Land and Resource Use is around the NPD site, which remains an open question in this EA.
19. Traditional Land and Resource Use and Cultural Impacts	(e) Participation of knowledge holders in the assessment of effects to TLRU. AOPFN is concerned about the lack of integration of AOPFN knowledge and AOPFN members into the assessment of effects on traditional land and resource use, culture, and Indigenous health and well being This is not a project-specific interest; however it has implications for the EA process and methods used in this project-specific assessment.	AOPFN holds that it is a principle of meaningful assessment of effects on Indigenous land use, culture, and health and well-being that not only must Indigenous inputs be provided into the process, but the Indigenous Knowledge holders, with their unique expertise as the actual land users and culture holders, must be involved in effects characterization and significance estimation. In their April 2023 comments to CNL, AOPFN highlighted that the traditional users themselves, through the four AOPFN studies, have concluded that the proposed project will have impact on traditional use. AOPFN is concerned that the inputs from Indigenous land users themselves has not been integrated into the actual effects characterization and significance determination process. AOPFN has and will continue to provide evidence that CNLs estimation of no adverse impacts on TLRU in the Project Case are incorrect, not supported by the traditional users themselves.
20. Valued Components	(a) Inclusion of VCs identified by AOPFN AOPFN is concerned that the specific species they have identified are sometimes assessed using a representative species. Further, AOPFN is concerned that the final decisions on what VCs to include was made by CNL, and was not verified as appropriate by AOPFN, which suggests that Algonquin Knowledge is still not treated as of equivalent value to western science in CNL’s environmental assessment. This is a project-specific concern.	The decision to use a receptor species and the appropriateness of that species was not informed by Algonquin Knowledge. For example AOPFN is concerned that the many fish species are evaluated using only two generic categories – pelagic and benthic and that vegetation is represented by a single VC – terrestrial vegetation. AOPFN also suggests additional work to understand the values, distribution, abundance, and risks to impacts of specific aquatic and terrestrial vegetation is required. In their letter dated August 2021 that outlined the implications of the AOPFN studies for the NPD Closure Project, AOPFN expressed their concern that several VCs identified by AOPFN Knowledge Keepers in the AKLUS were not covered in the draft EIS: • Culturally important plants (including cattails and muskrat root/sweet flag); • Furbearers of cultural importance (including Amik (Beaver), Pashkwajàsh (Coyote), Odjig (Fisher), Wàbisheshi (Marten), Nigig (Otter), Wàbòz (Rabbit), Esiban (Raccoon), Wàgosh (Fox), Adjidimò (Squirrel),and Shingosi (Weasel)); • Mónz and Mónz Habitat; • Wawáshkeshi Habitat; • Partridge; • AOPFN preferred harvesting sites; • AOPFN preferred fishing sites; • Kichi-Sìbì as a cultural landscape. • AOPFN member cultural continuity and way of life. Further, late in 2021 AOPFN provided text directly for the EIS that highlighted several concerns about the comprehensiveness and representativeness of some of the VCs chosen by CNL for this EA.

K.3 Summary of Interests and Concerns

Table K.3 below summarizes the key interests and concerns that the AOPFN have raised up to March 2024 on the NPD Closure Project, through comments submitted on the 2020 EIS to the CNSC and CNL, subsequent filings of material by AOPFN to CNL or through direct discussion and engagement between AOPFN and CNL.

Table CK.3 has five columns:

- Column 1 identifies the topic, i.e., the subject area the key interest(s) or concern(s) falls under.
- Column 2 presents a key interest or concern, and why it is important to the Indigenous Nation, community or organization. This may be a summary of multiple related interests or concerns that have been expressed by the Indigenous Nation, community or organization.
- Column 3 summarizes CNL’s response or conclusions as well as CNL’s efforts to address this key interest or concern.
- Column 4 identifies where in the EIS the key interest or concern is addressed, and whether any changes were made to the EIS in response to the interest/concern. If these changes resulted in a different outcome in the EIS, this is also discussed.

Column 5 summarizes the “Status” of the key interest or concern and the anticipated Next Steps towards achieving resolution of the key interest or concern. Not all concerns can be quickly or easily resolved, as some concerns go beyond the scope of the EA process, or there may divergent perspectives on certain interests or concerns. Note: this column does not, unless specifically confirmed by the Indigenous Nation, community and organization, mean that they have verified that the interest or concern has been dealt with to their satisfaction.

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
1. Accidents and Malfunctions	(a) Concerns about potential effects of malfunctions and accidents (e.g., due to natural hazards) It is important to the AOPFN that there are no health or environmental impacts from the facility, in the long term because of the project’s proximity to the Kichi-Sibi, which has great importance to AOPFN culture, heritage and ways of life. As well, the AOPFN is concerned that contamination leads to further alienation and loss of access to traditional land use. This is a project-specific concern.	CNL has responded in writing to AOPFN comments on accidents and malfunctions citing relevant sections of the EIS as part of the comment response. AOPFN provided feedback on these dispositions in December 2020, and two meetings to discuss responses were held in 2020. CNL updated its dispositions to AOPFN comments on the EIS and responded to AOPFN in December 2022. AOPFN provided additional feedback to CNL in April 2023. CNL delivered a presentation to the Algonquin Advisory Committee (AAC) in 2021 September on how the project considers what-if scenarios, including accidents, leaks, or malfunctions. <u>CNL Response:</u> CNL’s Emergency Procedure for the NPD site includes actions for specific staff roles in the event of a wide range of emergency conditions including fires, floods, hazardous spills, loss of power, earthquakes, and tornados. This procedure was developed and is updated in accordance with CNL’s company-wide Emergency Preparedness Program, which has been accepted by the CNSC and meets the requirements of REGDOC 2.10.1 Nuclear Emergency Preparedness and Response. It will remain in place and be updated as required throughout the Decommissioning Execution and Institutional Control phases of this project. Per the plan, as soon as it is safe to do so following an emergency event, CNL staff will evaluate site and facility conditions and arrange for any necessary repairs to be made. Further, CNL has assessed the probabilities and potential impacts of flooding, seismic activity, above-ground natural hazards and extreme temperature change through all project phases (Decommissioning, Institutional Control and Post-Institutional Control) and has concluded that these events will have no undue effects on people or the environment around the site. CNL models several scenarios in its PostSA TSD which take into account how accidents and natural hazards could affect the facility. These scenarios are called disruptive events. One such case models severe erosion (flood) while another models extreme degradation of the facility (the concrete structure and the grout). In both of these cases the	<u>Where is this topic discussed in the EIS?</u> Section 8.12 of the EIS discusses the natural disasters to which NPD may be exposed. Section 9.14 of the EIS discusses the potential effects on the project of climate change, forest fires, floods, earthquakes, severe weather such as tornados, lightning strikes, ice storms, and changes to the Ottawa River. Additional details and a range of scenarios that encompass the potential impacts from extreme weather and natural hazards are examined in the Decommissioning Safety Assessment TSD and the PostSA TSD. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this comment.	<u>Status:</u> Further alignment on this concern is unlikely. CNL's technical assessment shows that accidents and natural hazards which could affect the facility will not result in undue effects on people and the environment around the site. CNL understands that this concern is outstanding from AOPFN’s perspective based on AOPFN feedback in April 2023. A contributing factor to this outstanding concern is AOPFN’s concern that the proposed closure of the facility (grout, cap etc.) will make it very difficult to access the facility in the future to intervene with remedial action if the facility does not perform as expected. <u>Next steps:</u> CNL and AOPFN have agreed to the following commitments: AOPFN-3: CNL is committed to collaborative development of risk-informed communication materials for the NPD Closure Project for AOPFN community members and application of the AOPFN Risk Communication Program at the NPD Site. AOPFN-5: CNL is committed to develop with AOPFN a meaningful role for AOPFN in the monitoring for the NPD Closure Project in addition to AOPFN participation in current environmental/compliance monitoring.

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
		predicted doses to receptors are still well below the dose criterion of 0.25 mSv/yr; 0.009 mSv/yr and 0.0009 mSv/yr, respectively. To verify that the engineered barriers as a whole are performing as expected/designed, CNL will monitor groundwater. Groundwater wells will be located between the NPD facility and the Ottawa River in order to monitor groundwater quality after it interacts with the facility and before it reaches the Ottawa River.		
2. Alternatives	(a) Technical suitability of the In-Situ Disposal concept AOPFN is seeking for the NPD site to be decommissioned in a manner that is safe, acceptable and preferable to Algonquin peoples, when considering environmental, rights, and other values. AOPFN is concerned that ISD is not a preferred alternative means to decommission the NPD site, technically or from an Algonquin perspective. AOPFN is concerned about the reversibility of the ISD technique, consistency of ISD with international best practice and that the hazard will outlive the design life of the closure strategy and contamination will be dispersed. This is a project-specific concern.	CNL has responded in writing to AOPFN comments on the in-situ disposal concept citing relevant sections of the EIS as part of the comment response. AOPFN provided feedback on these dispositions in December 2020. CNL updated its dispositions to AOPFN comments on the EIS and responded to AOPFN in December 2022. AOPFN provided additional feedback to CNL in April 2023. At the November 2020 meeting with the AAC, CNL provided an overview of the in-situ disposal concept. CNL presented to the AAC on how it conducted the alternative means assessment (AMA) and why in-situ disposal is the preferred approach in October 2021. AOPFN recommended to CNL in 2021 September that further revisions be made to the EIS section on Alternative Means, including a meaningful effort to integrate AOPFN perspectives from the three studies and through the AAC on in-situ disposal compared to other alternative means. CNL funded an AOPFN AMA and a report was completed in April 2022. The report includes AOPFN community perspectives and concerns about the alternatives to decommission the site. The report also identifies full removal as AOPFN’s preferred decommissioning strategy. <u>CNL Response:</u> CNL agrees that protection of future land users is an important concern and has addressed this subject. CNL has assessed the suitability of in-situ disposal for the NPD site, and the EIS shows that such a disposal is safe for human health and the environment in the short term and long term. The NPD reactor has a low radionuclide inventory. Tritium is the major radionuclide and will decay to low levels during the Institutional Control period (~100 years). The proposed waste disposal facility barriers have a design life consistent with that timeframe. The longer-lived Intermediate Level Waste (ILW) consists of small quantities of low energy beta emitters. The beta emitters have low radiotoxicity. The main barrier to containing the radioactivity on long timescales is that 83% of the initial inventory (mostly activation products) is embedded within steels and zircaloy which corrode very slowly, particularly in an alkaline environment. The metals used in the reactor vault are corrosion-resistant alloys, with stainless steel taking approximately 30,000 years to fully corrode and zircaloy up to 300,000 years to fully corrode. The low corrosion rates allow the radioactivity to decay before it is released into the reactor vault. Once in the reactor vault the radioactive contaminants sorb onto the grout which further delays its diffusion out of the facility. Based on its consideration of national and international standards and guidelines, CNL continues to believe that the NPD facility has characteristics that support in-situ disposal.	<u>Where is this topic discussed in the EIS?</u> The in-situ disposal approach is described in Section 3.2 of the EIS. Alternative means are discussed in the Alternative Means Assessment TSD (64-509200-ASD-002 Revision 1) and Section 4.2 of the EIS. <u>What changes have been made (and where)?</u> CNL has included within the EIS a sub-section (Section 4.2 Alternative Means), written by the AOPFN, that provides a summary of the results of the AOPFN AMA. The AOPFN AMA has also been included as an appendix to the EIS (Appendix D). The 2020 EIS reviewed by AOPFN already included the following improvements: • CNL incorporated additional information from the AMA TSD in the EIS (Section 4.2) to provide greater clarity on how the alternative means was completed and what the results mean. • CNL enhanced the assessment of alternatives in the AMA TSD; for example, the projected radiological dose and industrial safety risk to workers for each alternative means was presented. Though all alternatives can be performed safely, there is an increased risk to workers from industrial hazards and radiological dose for the removal alternative means compared to in-situ disposal.	<u>Status:</u> Further alignment on this concern not possible CNL's technical assessment shows that the in-situ design is appropriate for the hazardous timeframe of the contaminants and is consistent with national and international standards. CNL understands that this concern is outstanding from the AOPFN’s perspective based on AOPFN feedback in April 2023. AOPFN’s position is that full removal is the preferred option. AOPFN is concerned that the hazard will outlive the design life of the strategy and that contamination will be dispersed over time, possibly after Institutional Controls have been removed, thus exposing future generations to this risk. AOPFN is also concerned that ISD would defer risks to future generations, that ISD would create an unnecessary permanent radioactive waste disposal facility in AOPFN territory, that ISD is not amenable to easy contingency adaptive management in case the technology does not contain the radiological risk and that ISD is not considered a preferred means of decommissioning a reactor versus a geological repository, AOPFN acknowledges that, from a technical perspective, the severity of the impacts may be low, some form of contamination risk and the associated psycho-social impact will persist. <u>Next steps:</u> AOPFN and CNL disagree on the preferred option to decommission the NPD site. Through continued engagement at the Working Group and with the AAC CNL hopes that the parties are able to find common ground on this topic. CNL and AOPFN have agreed to the following commitment: AOPFN-5: CNL is committed to develop with AOPFN a meaningful role for AOPFN in the monitoring for the NPD Closure Project in addition to AOPFN participation in current environmental/compliance monitoring. This commitment has the potential to build confidence and trust in the in-situ disposal concept.

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
2. Alternatives	(b) Process for Assessment of Alternatives It is important to the AOPFN that the process of the assessment of alternatives is accepted by and includes AOPFN. AOPFN highlights that joint assessment of alternatives is considered best practice and are commonly implemented for projects that are of high concern to Indigenous peoples. AOPFN has indicated that the alternative means assessment should be following the more rigorous IAA 2019 legislation. This is a project-specific concern.	CNL has responded in writing to AOPFN comments on alternatives citing relevant sections of the EIS as part of the comment response. AOPFN provided feedback on these dispositions in December 2020. CNL updated its dispositions to AOPFN comments on the EIS and responded to AOPFN in December 2022. AOPFN provided additional feedback to CNL in April 2023. As per direction from the CNSC and the transitional provisions of the <i>Impact Assessment Act</i>, CNL is continuing its Environmental Assessment (EA) for the NPD Closure Project under <i>CEAA</i> (2012). Letter to CNL - Changes to Federal Legislation. CNL recognizes that what AOPFN is requesting is consistent with the new provisions and commitments under the <i>Impact Assessment Act</i> (IAA) but is beyond the scope of <i>CEAA</i> (2012) and this EA, and therefore is not required to be considered. The final NPD EIS will meet the requirements of <i>CEAA</i> (2012) but will also incorporate good practices consistent with the IAA. CNL held a workshop with the AAC in October 2021 that explained how CNL conducted the AMA and why in-situ disposal is the preferred approach. This was also an opportunity for AAC members to ask questions about the alternatives assessment and voice concerns directly with the project team. To address AOPFN's concerns about participation in the study design and assessment, CNL funded an AOPFN AMA and a report was completed in April 2022. The report includes AOPFN community perspectives and concerns about the alternatives to decommission the site. The report also identifies full removal as AOPFN's preferred decommissioning strategy. <u>I aCNL Response:</u> When conducting the AMA, CNL followed the regulatory framework laid out in the Canadian Environmental Assessment Agency (CEAA) Operational Policy Statement: Addressing "Purpose of" and "Alternative Means" under the <i>Canadian Environmental Assessment Act</i>, 2012 (<i>CEAA</i> 2015) for the evaluation of alternatives. The level of analysis conducted for each alternative is consistent with these requirements. The waste at NPD has been there for over 55 years. CNL is reducing the waste liability by converting the waste into a form that provides safe, permanent waste disposal. However, in order to ensure that AOPFN's perspective on this subject has been recorded, CNL has added a sub-section to the EIS Alternative Means section (Section 4.2) written by the AOPFN. CNL has provided support for the AOPFN to conduct its own AMA and through this assessment, CNL has been able to better understand AOPFN's views on the proposed NPD disposal facility.	<u>Where is this topic discussed in the EIS?</u> The in-situ disposal approach is described in Section 3.2 of the EIS. Alternative means are discussed in the Alternative Means Assessment TSD (64-509200-ASD-002 Revision 1) and Section 4.2 of the EIS. <u>What changes have been made (and where)?</u> CNL has included within the EIS a sub-section to Section 4.2 (Alternative Means), written by AOPFN, that provides AOPFN perspectives on in-situ disposal compared to other alternative means developed thus far, based on study findings and community perspectives. The AOPFN AMA has also been included as an appendix to the EIS (Appendix D). The 2020 EIS reviewed by AOPFN already included the following improvements: • CNL incorporated additional information from the AMA TSD in the EIS (Section 4.2) to provide greater clarity on how the alternative means was completed and what the results mean. • CNL enhanced the assessment of alternatives in the AMA TSD; for example, the projected radiological dose and industrial safety risk to workers for each alternative means was presented. This assessment has shown that in-situ disposal is safer than the removal alternative means. The results and conclusions of the AOPFN AMA have been integrated into the EIS to demonstrate the inclusion of valuable input into the EA process. However, the results of the AOPFN AMA do not replace or supersede CNL's conclusions.	<u>Status:</u> Further alignment on this concern not possible CNL's technical assessment was conducted in accordance with the requirements of <i>CEAA</i> (2012) and concludes that ISD is the preferred means to execute the NPD Closure Project. CNL understands that this concern is outstanding from the AOPFN's perspective based on AOPFN feedback in April 2023. AOPFN has identified that the willing host principle has not been followed for this permanent radioactive waste disposal facility. Further AOPFN remains concerned that doses from ISD are not ALARA, that a quantitative comparison of dose risks from all technically and economically feasible alternatives has not been provided, that ISD would defer risks to future generations, that ISD has heightened long-term impacts on AOPFN traditional land and resource use, culture, and health and well-being compared to other alternatives, that the risks of a contaminant plume impacting on the Ottawa River are not justified and that occupational risks have been weighted too heavily is CNL's assessment. AOPFN has also indicated a desire for a multi-party forum for selection and evaluation of alternatives. <u>Next steps:</u> AOPFN and CNL disagree on the process for assessing alternatives and on the preferred option to decommission the NPD site. Through continued engagement at the Working Group and with the AAC CNL hopes that the parties are able to find common ground on this topic.
2. Alternatives	(c) Integration of AOPFN AMA results into CNL's overall assessment of alternatives It is important to AOPFN that CNL meaningfully consider the results of the AOPFN Alternative Means Assessment.	CNL has responded in writing to AOPFN comments on alternatives citing relevant sections of the EIS as part of the comment response. AOPFN provided feedback on these dispositions in December 2020. CNL updated its dispositions to AOPFN comments on the EIS and responded to AOPFN in December 2022. AOPFN provided additional feedback to CNL in April 2023.	<u>Where is this topic discussed in the EIS?</u> Alternative means are discussed in the Alternative Means Assessment TSD (64-509200-ASD-002 Revision 1) and Section 4.2 of the EIS. <u>What changes have been made (and where)?</u>	<u>Status:</u> Further alignment on this concern not possible. CNL's technical assessment was conducted in accordance with the requirements of <i>CEAA</i> (2012). CNL understands that this concern is outstanding

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	Further, AOPFN expected CNL to reconsider its original alternatives assessment and directly integrate the AOPFN results. This is a project-specific concern.	CNL held a workshop with the AAC in October 2021 that explained how CNL conducted the AMA and why in-situ disposal is the preferred approach. This was also an opportunity for AAC members to ask questions about the alternatives assessment and voice concerns directly with the project team. CNL funded an AOPFN AMA and a report was completed in April 2022. The report includes AOPFN community perspectives and concerns about the alternatives to decommission the site. The report also identifies full removal as AOPFN’s preferred decommissioning strategy. <u>CNL Response:</u> When conducting the AMA, CNL followed the regulatory framework laid out in the Canadian Environmental Assessment Agency (CEAA) Operational Policy Statement: Addressing “Purpose of” and “Alternative Means” under the <i>Canadian Environmental Assessment Act, 2012</i> (CEAA 2015) for the evaluation of alternatives. The level of analysis conducted for each alternative is consistent with these requirements.	CNL has included within the EIS a sub-section to Section 4.2 (Alternative Means), written by AOPFN, that provides AOPFN perspectives on in- situ compared to other alternative means developed thus far, based on study findings and community perspectives. The AOPFN AMA has also been included as an appendix to the EIS (Appendix D). The results and conclusions of the AOPFN AMA have been integrated into the EIS to demonstrate the inclusion of valuable input into the EA process. However, the results of the AOPFN AMA do not replace or supersede CNL’s conclusions.	from the AOPFN’s perspective based on AOPFN feedback in April 2023. AOPFN appreciated CNL’s support to complete the AMA however they remain disappointed that CNL has not meaningfully considered the results or reconsidered its own assessment. AOPFN has stated that CNL’s AMA fundamentally ignores AOPFN inputs, which include a finding that ISD is clearly the least preferred option when considering AOPFN values, criteria, and weighting. <u>Next steps:</u> AOPFN and CNL disagree on the preferred option to decommission the NPD site. Through continued engagement at the Working Group and with the AAC CNL hopes that the parties are able to find common ground on this topic. CNL and AOPFN have agreed to the following commitment: AOPFN-5: CNL is committed to develop with AOPFN a meaningful role for AOPFN in the monitoring for the NPD Closure Project in addition to AOPFN participation in current environmental/compliance monitoring. This commitment has the potential to build confidence and trust in the in-situ disposal concept.
2. Alternatives	(d) Emphasis on financial costs in determining preferred alternative means. AOPFN is concerned that CNL may be incentivized to choose the single fastest and cheapest decommissioning option. AOPFN is concerned that CNL prefers the option that has the lowest potential risks of short-term (i.e., plan implementation) safety, security or environmental incidents, at the expense of that option transferring longer-term risks to the immediate receiving environment. AOPFN is significantly concerned that this implies that Canada and its agents are not willing to pay the financial price necessary to comply with the best practices of willing host, DGR and not willing to pay the financial price to comply with their commitments (e.g., UNDRIP, FPIC, reconciliation), nor AOPFN's preferences, which should be a critical consideration in determining what is an "acceptable design".	CNL has responded in writing to AOPFN comments on alternatives. AOPFN provided feedback on these dispositions in December 2020. CNL updated its dispositions to AOPFN comments on the EIS and responded to AOPFN in December 2022. AOPFN provided additional feedback to CNL in April 2023. <u>CNL Response:</u> The NPD Closure Project is managed under a specific target-cost agreement. CNEA earns a fee based on its cost performance against a target cost over the entire project. The contract includes provisions for fee reductions where there are safety, security or environmental incidents. Overall, the contract is set up to incentivize effective performance without compromise to health and safety. AECL provides oversight with a view to obtaining value for Canada under the contract. Moreover, CNL has obligations as a licensee to maintain safe operations, and the CNSC, as the independent federal regulator, oversees safety of CNL’s operations and protection of the environment. The specific financial terms between Canada and the CNEA (incentives/penalties) cannot be disclosed as they are confidential. CNL will not be receiving greater compensation for implementing in-situ disposal versus other alternative means. Through its target cost contract, CNL (the contractor) was asked to ensure the strategy selected reduced nuclear liabilities at the NPD site in a timely manner rather than deferring the waste management decision for NPD. CNL’s role is to determine the most effective method to safely and securely manage the nuclear liabilities at the NPD site. In alignment with the CEAA Operational Policy	<u>Where is this topic discussed in the EIS?</u> The in-situ disposal approach is described in Section 3.2 of the EIS. Alternative means are discussed in the Alternative Means Assessment TSD (64-509200-ASD-002 Revision 1) and Section 4.2 of the EIS. <u>What changes have been made (and where)?</u> CNL has included within the EIS a sub-section to Section 4.2 (Alternative Means), written by the AOPFN, that provides the results of the AOPFN AMA. The AOPFN AMA has also been included as an appendix to the EIS (Appendix D).	<u>Status:</u> Further alignment on this concern is unlikely. CNL’s technical assessment was conducted in accordance with the requirements of <i>CEAA</i> (2012), and concludes that ISD is the preferred means to execute the NPD Closure Project based on a number of factors, one of which was are options within the financial guarantee committed by NRCan. CNL understands that this concern is outstanding from AOPFN’s perspective based on AOPFN feedback in April 2023. AOPFN remains concerned that ISD would defer risks to future generations, that ISD has heightened long-term impacts on AOPFN traditional land and resource use, culture, and health and well-being compared to other alternatives and that the risks of a contaminant plume impacting on the Ottawa River are not justified. <u>Next steps:</u> AOPFN and CNL disagree on the preferred option to decommission the NPD site. Through continued engagement at the Working Group and with the AAC CNL hopes that the parties are able to find common ground on this topic. CNL and AOPFN have agreed to the following commitment: AOPFN-5: CNL is committed to develop with AOPFN a

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	This is both a CNL-wide and a project-specific concern.	Statement: Addressing “Purpose of” and “Alternative Means” under the CEAA (2012), an AMA was completed. The purpose of the AMA is to provide a qualitative analysis of the environmental risks (including health) of alternative decommissioning techniques to allow for the selection of a preferred method for carrying out the project. The AMA informed the decision to proceed with in-situ disposal through the EA process. The use of a robust AMA process demonstrates that the NPD Closure Project is not solely motivated by cost savings or profit. In CNL’s AMA, all options proposed were shown to meet the financial guarantee from NRCan for the nuclear liability at NPD, after which point there was no further consideration/weighting of the cost in the assessment. While cost was one factor in CNL’s assessment of alternatives, it was not the decision-making factor in the AMA for NPD.		meaningful role for AOPFN in the monitoring for the NPD Closure Project in addition to AOPFN participation in current environmental/compliance monitoring. This commitment has the potential to build confidence and trust in the in-situ disposal concept..
3. Archaeology and Cultural Heritage	(a) Involvement in culture and heritage matters at the NPD site It is important for the AOPFN to be involved in any future archaeological activities at the site, to ensure that artefacts with cultural value and significance are identified and protected as archaeological sites and artefacts have deep cultural value and significance for the Algonquins. This is both a CNL-wide and project-specific concern.	CNL has responded in writing to the AOPFN’s specific comments on the EIS and recommendations from the AKLUS. CNL and the AOPFN have worked together to establish a project-specific Contribution Agreement that includes capacity, schedule, studies and engagement activities. In addition, CNL, AECL and the AOPFN finalized a Long-Term Relationship Agreement (LTRA) in June 2023 that includes, as matters of mutual interest, cultural protection, promotion, education, recognition and reconciliation and AOPFN’s role in archaeological programs. Note: The LTRA does not provide AOPFN’s consent for the proposed ISD decommissioning plan for NPD. <u>CNL Response:</u> CNL’s archaeology consultant determined that there was no archeological potential for the Site Study Area (where project activities will take place), because that area has already been completely disturbed during site construction. However, in response to concerns expressed by Indigenous Nations, communities and organizations, CNL did conduct a Stage 1 archaeological assessment of the remainder of the NPD site. CNL shared the results of this assessment with the AOPFN and provided a summary and overview presentation on the archaeological work conducted on the site. No further archaeological work is planned for NPD.	<u>Where is this topic discussed in the EIS?</u> Indigenous cultural resources and ceremonies, including the presence of Algonquin Cultural Sites and features, are discussed in in Section 8.9.3 of the EIS. The EIS references the AOPFN AKLUS report. Section 8.11.4 of the EIS summarizes the Archaeology TSD, including the findings of the Stage 1 archaeological assessment. The EIS does not predict any adverse residual effects from the project on the Indigenous socio-economic environment (Section 9.10.1.6) or on traditional land and resource use (Section 9.9.3.3), including access to cultural sites. No changes to these sections were required. Section 9.9.3.2 of the EIS includes the proposed mitigation measures that will be employed if undocumented archaeological resources are discovered during the project. <u>What changes have been made (and where)?</u> CNL updated several sections of the EIS, in response to AOPFN comments and to include information from the AOPFN AKLUS Report (Sections 6.2, 6.3, 8.9, 9.9). In particular, CNL expanded its description of cultural aspects in Section 8.9 of the EIS. CNL has added more information on the engagement activities to date between CNL and the AOPFN in Section 6.2.4.3 of the EIS.	<u>Status:</u> Resolution is in progress. CNL understands that this concern is partially resolved from AOPFN’s perspective. CNL believes that they have addressed this concern. Continued engagement may result in additional commitments which will enhance confidence and trust in CNL’s assessment. Involvement of the AOPFN in culture and heritage matters is not expected to affect the outcome of CNL’s assessment. <u>Next steps:</u> CNL and AOPFN have agreed to the following commitments: AOPFN-2: CNL will support a Cultural Protection and Commemoration Plan in relation to the NPD site and CNL commits to involve AOPFN in any future archaeological programs at or around the NPD site. AOPFN-15: CNL is committed to work jointly with AOPFN to develop a NPD site specific chance find procedure and TLRU discovery plan.
4. Baseline Characterization	(a) Characterization of aquatic and terrestrial biota baseline It is important to AOPFN that the baseline	In response to comments from Indigenous Nations, communities and organizations, CNL completed sediment and benthic invertebrate sampling and fish habitat surveys to establish the baseline for follow-up monitoring.	<u>Where is this topic discussed in the EIS?</u> Appendix B and Section 8.6 of the EIS indicate which species have been observed on the NPD site.	<u>Status:</u> Resolution in Progress CNL understands that this concern is partially resolved from AOPFN’s perspective as the parties completed four one-day field studies at the NPD site.

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	environmental conditions around the site of the NPD Closure Project including aquatic and terrestrial biota are well understood and are protected in order to adequately assess potential impacts to AOPFN rights and traditional land and resource uses. AOPFN has identified concerns in particular with the absence of an Algonquin Knowledge baseline for the NPD site and its surroundings, due to an absence of prior engagement by CNL and AECL of AOPFN in Algonquin Knowledge studies in and around this 400 hectare site. This is a project-specific concern.	CNL has responded in writing to AOPFN comments on baseline characterization citing relevant section of the EIS as part of the comment response. AOPFN provided feedback on these dispositions in 2020 December, and two meetings to discuss responses were held in 2020. CNL also shared the baseline survey data for migratory birds in November 2020. CNL is continuing its water bird species identification and nest survey that began in 2021 and will share the results with AOPFN. Through the contribution agreement, AOPFN and CNL have worked together to conduct site-wide Algonquin Knowledge Inventories at the NPD site in 2022 and 2023. CNL has committed to include Algonquin Knowledge, collected independently by Indigenous guardians, in all future ecological data collection programs at the NPD site. <u>CNL Response:</u> To supplement baseline data, a study of sediment, benthic invertebrates and fish habitat features was undertaken upstream, adjacent to and downstream of the NPD site in 2020, and the report was provided to the AOPFN. The study determined that the Ottawa River benthic invertebrate community near the NPD site is healthy and typical of what is observed in many large, soft-bottomed, relatively deep river systems. This study can be repeated when decommissioning is complete, to verify if the project has had an impact. CNL is planning to regularly monitor the Ottawa River water quality before the project begins. CNL is willing to discuss fish tissue sampling with the AOPFN and review past studies of fish tissue in the NPD area. CNL has undertaken several site-specific surveys for the terrestrial environment, such as surveys of songbirds, bats and chimney swifts. Species detected as part of baseline biodiversity surveys within a 200m area beyond the perimeter of the project footprint have been included as Valued Components for the NPD Closure Project, and mitigation measures, including buffers, have been developed for protection.	<u>What changes have been made (and where)?</u> The benthos and fish habitat survey is important baseline data for the follow-up monitoring program. The results of this study which are now summarized in Section 8.4 do not alter the aquatic environment baseline for the project.	AOPFN is seeking a site-wide and more comprehensive Algonquin knowledge inventory. <u>Next Steps:</u> CNL and the AOPFN are continuing engagement through the framework of the contribution agreement. Using the findings and recommendations from AOPFN’s initial four days of investigations and a more comprehensive and site-wide inventory, as committed below, CNL looks forward to working with AOPFN to ensure that mitigations are in place to protect terrestrial and aquatic biota that are important to AOPFN. CNL and AOPFN have agreed to the following commitments: AOPFN-5: CNL is committed to support the AOPFN with NPD Closure Project and NPD site specific Guardian monitoring activities, incorporating traditional knowledge and AOPFN valued components. Until the Guardian Program is stood up, CNL can support AOPFN participation/observation in our current environmental monitoring activities. CNL welcomes recommendations for other monitoring/mitigation activities that should be integrated into our existing program to ensure that environmental and cultural components of value to AOPFN are protected. AOPFN-6: CNL is committed to supporting AOPFN-led site inventory work to develop an Algonquin Knowledge baseline for the entire NPD site. Where AOPFN identifies important resources that could be impacted by the project, CNL is committed to evaluate and implement additional mitigation measures if necessary. AOPFN-13: CNL is committed to engaging with the AOPFN in the NPD Closure Project Environmental Assessment Follow-up Monitoring Program (EAFMP) development. CNL recognizes that our plans would benefit from incorporation of Indigenous knowledge and welcomes AOPFN comments on the plans. AOPFN-15: CNL is committed to work jointly with AOPFN to develop a NPD site specific chance find procedure, TLRU discovery plan, Eagle Feather Protocol and cultural protection plan. AOPFN-18: CNL is committed to co-developing with the AOPFN additional mitigation measures to include within the NPD Closure Project Environmental Protection Plan to ensure that items of value to AOPFN are protected.

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4. Baseline Characterization	(b) Use of a current, damaged baseline as the starting point for the assessment. AOPFN has raised consistent concerns about the temporal comparison chosen by CNL for the NPD decommissioning assessment, which is to compare the future against today, rather than against a pre-NPD site condition (i.e., the early 1960s). AOPFN has argued that any decommissioning project needs to be tied to the ability to reach an agreed upon desired future state, not against an already damaged current state. This is not a project-specific interest; however it has implications for the EA process and methods used in this project-specific assessment.	<u>CNL Response:</u> CNL acknowledges that AOPFN disagrees with the use of the current baseline in its assessment of impacts on Traditional Land and Resource Use. In its assessment, CNL has determined that there are no adverse impacts on Traditional Land and Resource Use resulting from the NPD Closure Project. Indigenous Nations, communities and organizations often prefer a different approach, consider different factors, and evaluate against a different baseline than CNL and, subsequently, the findings of the Indigenous Nations, communities and organizations, and CNL, differ. The methodology for assessing the significance of residual effects used in the EIS for the NPD Closure Project is an established methodology which used the criteria in CNSC REGDOC 2.9.1 (2020), Environmental Protection: Environmental Principles, Assessments and Protection Measures. The baseline used in the EIS reflects current-day conditions, in accordance with CEAA (2012) requirements. CNL maintains the view that past disturbances, i.e., those that occurred during the pre-construction of the NPD facility, are not in scope. CNL notes that the proposed NPD Closure Project will improve the long-term environmental conditions and safety of the NPD site and surroundings, which will be confirmed by Indigenous-led monitoring programs.	<u>Where is this topic discussed in the EIS?</u> The EIS does not predict any adverse residual effects on traditional land and resource use (as described in Sections 8.9 and 9.9). CNL invited the AOPFN to share their perspective within the EIS (Sections 9.9.6 and Section 11.1). <u>What changes have been made (and where)?</u> EIS changes as a result of this comment: - Table 6.3-1(b) AOPFN Concerns recorded alongside CNL's conclusions (third column of this table) - Text throughout Section 6.2.4.3.3 was updated based on specific mark-ups provided by AOPFN - A dedicated section added (Section 9.9.6 – AOPFN Perspective on Effects to Traditional Land and Resource Use) this includes AOPFN concerns with CNL's assessment approach and details AOPFN findings in relation to traditional land and resource use - A dedicated section added (Section 11.1.1 – AOPFN Perspective on Assessment Findings) highlighting the AOPFN's desire for the assessment to use pre-NPD construction as the baseline for comparison and for fear, stigma and alienation to be recognized as valid impact pathways.	<u>Status:</u> Further alignment on this concern is unlikely. CNL's technical assessment was conducted in accordance with the requirements of CEAA (2012). CNL has performed baseline characterization to ensure that the site conditions support the proposed facility. CNL understands that this concern is outstanding from AOPFN's perspective based on feedback in April 2023, that AOPFN disagree with the use of a damaged current baseline in the assessment. <u>Next steps:</u> AOPFN and CNL disagree on the baseline for the effects assessment. Through continued engagement at the Working Group CNL hopes that the parties are able to find common ground on this topic. CNL and AOPFN have agreed to the following commitment: AOPFN-5: CNL is committed to support the AOPFN with NPD Closure Project and NPD site specific Guardian monitoring activities, incorporating traditional knowledge and AOPFN valued components. Until the Guardian Program is stood up, CNL can support AOPFN participation/observation in our current environmental monitoring activities. CNL welcomes recommendations for other monitoring/mitigation activities that should be integrated into our existing program to ensure that environmental and cultural components of value to AOPFN are protected. AOPFN-6: CNL is committed to supporting AOPFN-led site inventory work to develop an Algonquin Knowledge baseline for the entire NPD site. Where AOPFN identifies important resources that could be impacted by the project, CNL is committed to evaluate and implement additional mitigation measures if necessary.
4. Baseline Characterization	(c) Technical suitability of the site AOPFN is concerned that the site was not designed to be a permanent radioactive waste disposal facility. AOPFN wants to ensure that AOPFN lands and the Kichi-Sibi (Ottawa River) are protected and to reduce the radiological burden placed on AOPFN by Canada in the future.	CNL has responded in writing to AOPFN concerns that the NPD facility was not originally designed to be a permanent waste disposal facility. AOPFN provided feedback on these dispositions in December 2020. CNL updated its dispositions to AOPFN comments on the EIS and responded to AOPFN in December 2022. AOPFN provided additional feedback to CNL in April 2023. <u>CNL Response:</u> CNL does not intend to conduct a siting study for the waste that is currently at the NPD site. Such siting studies are done for new waste disposal facilities. The waste at NPD has been there for over 55 years. CNL has however completed geoscientific characterization work to understand the local geology and hydrogeology. The Geoscientific	<u>Where is this topic discussed in the EIS?</u> Section 8.5 of the EIS presents information on geological and hydrogeological conditions around the NPD site and study areas. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this comment.	<u>Status:</u> Further alignment on this concern is unlikely. CNL has performed characterization to ensure that the site conditions support the proposed facility. CNL's assessment has shown that the proposed facility will safely contain and isolate wastes using multiple barriers, one of which is the bedrock surrounding the facility. CNL understands that this concern is outstanding from the AOPFN's perspective based on AOPFN feedback in April 2023. AOPFN remains concerned that CNL has not performed a comprehensive exercise to determine the suitability of the site and that without their consent, AOPFN is expected to host

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	This is a project-specific concern.	Characterization Report was used to revise the Geosynthesis for the site, Local and Regional Study Areas. The site investigation work found that the general site conditions are 5-10 m of overburden comprised of fluvial sands and gravels and silt to cobble till underlain by a granitic gneiss bedrock. Through CNL’s site investigation work the properties of the overburden and bedrock are well understood such that CNL can evaluate the possible movement of contaminants in the geosphere. The site information is used in various models (i.e., Groundwater Modelling, Resaturation Modelling). The results of the models feed into CNL’s PostSA TSD, enabling CNL to assess potential effects to valued components (VC). The geosphere is one of multiple barriers identified in CNL’s Safety Case that helps to contain and isolate the waste within the NPD facility.		the radioactivity in perpetuity. <u>Next steps:</u> Through continued engagement at the Working Group CNL hopes that the parties are able to find common ground on this topic. CNL is also committed to begin discussions with AOPFN on a project-specific agreement for NPD. AOPFN and CNL have agreed to the following commitments: AOPFN-1: CNL is committed to providing the funding to continue the Working Group and AOPFN Advisory Committee (AAC) for 10 years.
5. Engagement	(a) Interest in establishing a Long-Term Relationship Agreement (LTRA) It is important that a mechanism be in place for AOPFN to express its community members’ needs and concerns with respect to CNL activities, including those beyond the NPD Closure Project, to CNL and AECL, and to be able to work with CNL and AECL towards understanding and resolution with respect to CNL activities and AECL-owned sites within unceded AOPFN traditional territory where AOPFN members harvest food, medicines, and other natural materials. This is a CNL-wide interest.	CNL has responded in writing to AOPFN comments on requesting the establishment of an LTRA. Since 2020, CNL has undertaken extensive engagement with AOPFN, implemented a Memorandum of Understanding (MOU) and carried out engagement activities and LTRA discussions with the AOPFN in the form that AOPFN has requested. In 2021, AECL, CNL, and AOPFN signed a tripartite MOU. The parties have agreed to work together on items of mutual interest related to CNL operations and projects. LTRA topics of consideration include: • communication and engagement, • environmental baseline data collection, • risk communication, • a role in site level and project planning activities for major projects, • cultural protection, promotion, education, recognition and reconciliation, • economic development opportunities, • cumulative effects assessment, and • environmental stewardship and monitoring. CNL, AECL and the AOPFN finalized an LTRA in June 2023 that includes, as matters of mutual interest, (1) Engagement and communications on items of note related to ongoing operations and activities, as well as changes in scope to existing major projects, at CRL and NPD and (2) an AOPFN role in site level and project planning activities for major projects, including as part of their life-cycle (where practicable). (3) logistical support for the development of an AOPFN guardian program to enable stewardship and monitoring at and in the vicinity of the CNL operated sites; (4) risk communication re: the health of country foods, medicines and waters at, and in the vicinity of, the CNL operated sites in the territory that AOPFN asserts is its unceded traditional territory and (5) opportunities for meaningful engagement to recognize, characterize and as necessary	<u>Where is this topic discussed in the EIS?</u> Section 6.2.4.3 of the EIS summarizes CNL engagement with the AOPFN to date and presents information on the collaborative work by CNL and to develop a project-specific contribution agreement and an LTRA. <u>What changes have been made (and where)?</u> CNL has updated Section 6.2.4.3 of the EIS to include the recent engagement-related activities and to describe progress in the relationship between the AOPFN and CNL, including development of the LTRA.	<u>Status:</u> Resolved <u>Next steps:</u> Make progress on agreed commitments. Begin discussions on a project-specific agreement for NPD.

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		accommodate for potential historic harms The LTRA does not provide AOPFN’s consent for the proposed ISD decommissioning plan for NPD. AOPFN has identified that there are only some mechanisms from the proposed LTRA which are applicable to NPD (i.e., the Guardian Program and Risk Communication Program, characterization of historic harms). AOPFN has indicated that further collaborative assessment and negotiation of a project-specific agreement will be required for NPD as part of a consent seeking process between the parties, at the end of which AOPFN may or may not provide its free, prior and informed consent to the proposed in-situ project at NPD. <u>CNL Response:</u> CNL heard AOPFN’s request to establish an LTRA and signed a MOU in 2020 to support the development, in addition to the project-specific Contribution Agreement. CNL, AECL and the AOPFN finalized an LTRA in June 2023 to facilitate a response to this concern.		
5. Engagement	(b) Interest in more direct and collaborative engagement on the NPD Closure Project It is important to the AOPFN that engagement involve two-way communication and active collaboration through all phases of the project as there are potential impacts to current and future AOPFN members’ rights and ability to practice traditional activities on the land / water. AOPFN was not engaged collaboratively during the early stages of the Environmental Assessment (EA) e.g., the Alternative Means Assessment and has identified their desire to be involved in all phases of the EA. Key areas for collaboration include: • Integration of the Traditional Use Study into project planning, design, mitigation and accommodation both during and post-EIS. • Development of mitigations that will be considered in assessments for valued components <u>today</u> – so AOPFN is involved in all phases of the EA and project lifecycle. • co-development and co-approval for development and implementation of the EA follow-up and monitoring	CNL has responded in writing to AOPFN comments on direct and collaborative engagement on the NPD Closure Project. A project contribution agreement was established in 2020 and has been updated to accommodate the evolving relationship and engagement activities between CNL and AOPFN and the addition of new scope. Working Group meetings are held on a monthly basis to understand each other’s concerns and move forward to address them together. CNL has committed to continued funding for the Working Group and AOPFN Algonquin Advisory Committee (AAC) until closure is achieved for the NPD Closure Project. Through the contribution agreement, AOPFN and CNL have worked together to conduct site-wide Algonquin Knowledge Seasonal Inventories at the NPD site in 2022 and 2023. AOPFN members generously shared their time and interest in biodiversity, and in turn CNL was able to share information on the nuclear industry and environmental monitoring. The time spent together in the field has proven to be very valuable to improve the relationship <u>CNL Response:</u> CNL is committed to collaborative, two-way engagement with the AOPFN on the NPD Closure Project. CNL has much to learn and hopes to build trust and seek guidance from AOPFN. CNL heard AOPFN’s request for direct and collaborative engagement. In response to this request, CNL and the AOPFN have worked together to establish a Contribution Agreement that includes capacity, schedule, studies and engagement activities for the NPD Closure Project. Through this Contribution Agreement, CNL has funded four technical studies related to the project. A number of other meaningful engagement activities, as requested by AOPFN, are also identified, funded and planned for the next two years.	<u>Where is this topic discussed in the EIS?</u> Section 6.2.4.3 of the EIS summarizes CNL engagement with the AOPFN to date and presents information on CNL and AOPFN’s work towards developing a project-specific Contribution Agreement and a LTRA. <u>What changes have been made (and where)?</u> CNL has updated Section 6.2.4.3.1 of the EIS to include the recent engagement-related activities and relationship progress between the AOPFN and CNL.	<u>Status:</u> Resolution is in progress. CNL understands that this concern is well on its way to resolution from AOPFN’s perspective. CNL has taken meaningful interim measures to improve its engagement with AOPFN. CNL understands that the AOPFN is seeking for this funding to extend well into the Institutional Control period and given that the NPD is not consented to through the LTRA, that a project specific agreement must be sought for the NPD that would fuel future engagement, should the decommissioning project proceed. <u>Next steps:</u> CNL and AOPFN have agreed to the following commitments: AOPFN-1: CNL is committed to providing the funding to continue the Working Group and AOPFN Advisory Committee (AAC) for 10 years. AOPFN-5: CNL is committed to develop with AOPFN a meaningful role for AOPFN in the monitoring for the NPD Closure Project in addition to AOPFN participation in current environmental/compliance monitoring. AOPFN-6: CNL is committed to supporting AOPFN-led site inventory work to develop an Algonquin Knowledge baseline for the entire NPD site. Where AOPFN identifies important resources that could be impacted by the project, CNL is committed to evaluate and implement additional mitigation measures if necessary. AOPFN-13: CNL is committed to engaging with the AOPFN in the NPD Closure Project Environmental

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	program for the project, including adaptive management objectives, indicators, thresholds, and responses for terrestrial wildlife, fish and fish habitat, traditional land and resource use, and water quality at minimum. co-development and co-management of end-state land use planning for the entire AECL site at NPD, This is a project-specific interest.			Assessment Follow-up Monitoring Program (EAFMP) development. CNL recognizes that our plans would benefit from incorporation of Indigenous knowledge and welcomes AOPFN comments on the plans. AOPFN-18: CNL is committed to co-developing with the AOPFN additional mitigation measures to include within the NPD Closure Project Environmental Protection Plan to ensure that items of value to AOPFN are protected.
6. EA Process and Methodology	(a) Concern about the methodology for conducting the effects assessment and determination of significance It is important to the AOPFN that events with the potential for an adverse effect on the environment and/or AOPFN rights are carried through the assessment process as far as is reasonable as the project may have impact to current and future AOPFN members’ rights and ability to practice traditional activities on the land / water. AOPFN is concerned that CNL’s assessment does not integrate into its effects characterization any of the impact pathways identified by AOPFN that results in both direct and indirect effects on Traditional Land and Resource Use: quality and accessibility of the land, consideration against a pre-NPD baseline, Project-related activities would exacerbation of alienation and further limitation of members’ access to the area, perpetuating the difficulty of exercising their Aboriginal rights, long-term continuation of an avoidable location-specific effect in the form of fencing off and not allowing the NPD site to return to a natural condition, and the permanent cementing in place of radioactive materials very close to the Kichi-Sibi the radioactive materials that cause fear, stigma, alienation and concerns about the quality of country	CNL has responded in writing to AOPFN comments on EA methodology and significance of adverse residual effects citing relevant sections of the EIS as part of the comment response. AOPFN provided feedback on these dispositions in December 2020, and two meetings to discuss responses were held in 2020. CNL has offered to present all environmental effects of the project to AOPFN and to explain the process and thresholds for determining the significance of adverse residual effects. CNL is continuing its efforts to address these concerns by: (iii) Involving the Indigenous Nations, communities and organizations, including AOPFN, in monitoring activities that will confirm the conclusions of the EIS. An Indigenous-driven monitoring program can help to reduce fear or anxiety associated with traditional uses occurring adjacent to and near the CNL operated properties and build confidence that the decommissioning strategy and mitigation measures are effective (iv) Developing an Indigenous-driven risk-informed communications program for the NPD Closure Project to promote understanding of the EIS results and to help alleviate the concerns related to negative perceptions and feelings of discomfort and concern (Section 9.9.5 of the EIS). <u>CNL Response:</u> CNL has acknowledged that AOPFN and CNL have differing perspectives on impacts to traditional land and resource use Valued Components (VC). The methodology used in the EIS for assessing the significance of residual effects for the NPD Closure Project is an established methodology that was used in the EA for the Darlington New Nuclear Project, which currently has an approved License to Prepare Site. The criteria for the evaluation of significance are from the CNSC REGDOC 2.9.1(2020),	<u>Where is this topic discussed in the EIS?</u> Section 9.1.2 of the EIS explains the methodology used for determining the significance of residual effects. It also presents the criteria used to evaluate significance, which are from CNSC REGDOC 2.9.1 (2020), Environmental Protection: Environmental Principles, Assessments and Protection Measures. Section 11 of the EIS, Conclusion on Significance, discusses the assessment findings. <u>What changes have been made (and where)?</u> CNL has provided AOPFN an opportunity to directly integrate the following into the EIS: a summary of its differing perspective on impacts on traditional land and resource use (Section 9.9) and on overall assessment findings (Section 11.1).	<u>Status:</u> Further alignment on this concern is unlikely. CNL’s technical assessment was conducted in accordance with the requirements of CEAA (2012). CNL understands that this concern is outstanding from the AOPFN’s perspective based on AOPFN feedback in April 2023. AOPFN remains concerned that the project is evaluated against the current baseline site conditions and does not consider the damage caused by the historic siting and operation of the site. In addition, AOPFN has raised concerns about the fact that CNL has chosen to ignore AOPFN’s studies’ findings of adverse effects from the proposed decommissioning project on traditional land and resource use, culture, and well-being. <u>Next Steps:</u> AOPFN and CNL disagree on the baseline for the effects assessment. Through continued engagement at the Working Group, CNL hopes that the parties are able to find common ground on this topic. CNL wishes to continue discussions with AOPFN to better understand the community’s perspective and values and any fears, or concerns associated with the NPD site and traditional use near the site. CNL and AOPFN have agreed to the following commitment: AOPFN-3: CNL is committed to collaborative development of risk-informed communication materials for the NPD Closure Project for AOPFN community members and application of the AOPFN Algonquin Food Program at the NPD Site. AOPFN-5: CNL is committed to develop with AOPFN a meaningful role for AOPFN in the monitoring for the NPD Closure Project in addition to AOPFN participation in current environmental/compliance monitoring.

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	foods and medicines, and whether they are harvestable. This is a project-specific concern.	Environmental Protection: Environmental Principles, Assessments and Protection Measures. The baseline used in the EIS reflects current-day conditions, in accordance with <i>CEAA</i> (2012) requirements. CNL notes that the proposed NPD Closure Project will improve the long-term environmental conditions and safety of the NPD site and surroundings, which will be confirmed by Indigenous-led monitoring programs. The participation of AOPFN in monitoring work for the NPD Closure Project ensures consideration of Indigenous knowledge, collaboration, mutual respect, ongoing participation and relationship building for the future. CNL is willing to conduct a workshop with AOPFN to review all environmental effects of the project and present the methodology for determining significance of adverse residual effects.		AOPFN-6: CNL is committed to supporting AOPFN-led site inventory work to develop an Algonquin Knowledge baseline for the entire NPD site. Where AOPFN identifies important resources that could be impacted by the project, CNL is committed to evaluate and implement additional mitigation measures if necessary. AOPFN-18: CNL is committed to co-developing with the AOPFN additional mitigation measures to include within the NPD Closure Project Environmental Protection Plan to ensure that items of value to AOPFN are protected. These commitments have the potential to build confidence and trust in the in-situ disposal concept and may help to alleviate fear, stigma, alienation and concerns about the quality of country foods and medicines.
6. EA Process and Methodology	(b) Concern about the methodology of the cumulative effects assessment It is important to AOPFN that the project assessment is properly informed by cumulative effects assessment in order to protect AOPFN values and rights. AOPFN is concerned that despite AOPFN finding adverse effects there has been inadequate consideration of trend-over-time impacts on VCs found at and around the NPD site (adoption of a damaged current baseline), no cumulative effects assessment on AOPFN culture, traditional land and resource use, or health and well-being. This is both a project-specific and CNL-wide concern.	CNL responded to this concern by summarizing the cumulative effects assessment methodology applied in the EIS, which is consistent with <i>CEAA</i> (2012). CNL also provided additional background information in its responses. CNL, AECL and the AOPFN have established an LTRA that can support the parties work together to alleviate this concern. <u>CNL Response:</u> CNL is in agreement with AOPFN’s comment that a cumulative effects assessment is required only where adverse residual effects have been identified, a position consistent with <i>CEAA</i> (2012). For all VCs in all environmental components, it was determined that no adverse residual effects are expected to occur from the NPD Closure Project: the proposed mitigation measures are expected to eliminate, reduce or control possible effects, resulting in no or negligible effects. According to <i>CEAA</i> (2012), cumulative effects assessment is not required for negligible potential effects. Therefore, conducting a cumulative effects assessment would be beyond the scope of <i>CEAA</i> (2012) and this EA.	<u>Where is this topic discussed in the EIS?</u> Section 9.13 of the EIS provides the process for evaluating cumulative effects and the assessment of cumulative effects for the NPD Closure Project. <u>What changes have been made (and where)?</u> CNL has provided AOPFN an opportunity to directly integrate a summary of its differing perspective on impacts on traditional land and resource use (Section 9.9.6) and overall assessment findings (Section 11.1), into the EIS.	<u>Status:</u> Efforts at resolution in progress; further alignment is possible but uncertain. CNL’s technical assessment was conducted in accordance with the requirements of <i>CEAA</i> (2012). CNL understands that this concern is outstanding from AOPFN’s perspective based on AOPFN feedback in April 2023. AOPFN remains concerned that their involvement in the assessment has been from the outside looking in, that AOPFN and Algonquin Knowledge holders had no role in the effects characterization or significance estimation process, and that AOPFN perspectives have had little to no influence on CNL’s assessment findings. AOPFN has indicated that changes to the effects characterization to include cumulative effects assessments for additional VCs is required. <u>Next Steps:</u> AOPFN and CNL disagree on the assessment methodology for cumulative effects and on the assessment of impacts to TLRU. Through continued engagement at the Working Group, CNL hopes that the parties are able to find common ground on this topic. CNL and AOPFN have agreed to the following commitment: AOPFN-3: CNL is committed to collaborative development of risk-informed communication materials for the NPD Closure Project for AOPFN community members and application of the AOPFN

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				Algonquin Food Program at the NPD Site. AOPFN-5: CNL is committed to develop with AOPFN a meaningful role for AOPFN in the monitoring for the NPD Closure Project in addition to AOPFN participation in current environmental/compliance monitoring. AOPFN-6: CNL is committed to supporting AOPFN-led site inventory work to develop an Algonquin Knowledge baseline for the entire NPD site. Where AOPFN identifies important resources that could be impacted by the project, CNL is committed to evaluate and implement additional mitigation measures if necessary. AOPFN-18: CNL is committed to co-developing with the AOPFN additional mitigation measures to include within the NPD Closure Project Environmental Protection Plan to ensure that items of value to AOPFN are protected.
6. EA Process and Methodology	(c) Relevant legislation AOPFN expressed concern on continued use of <i>CEAA, 2012</i> rather than the more recent <i>Impact Assessment Act</i>. It is important to AOPFN that the NPD Closure Project Environmental Assessment is carried out using up-to-date legislation that includes best practice decision-making through a collaborative process. The impacts that AOPFN has identified are impacts within the federal jurisdiction under IAA 2019 and is disappointed the CNL, AECL and CNSC are continuing this assessment under the less rigorous expectations of CEAA 2012. This is not a project-specific interest; however it has implications for the EA process and methods used in this project-specific assessment.	<u>CNL Response</u> This interest is generally beyond the scope of the project. As per direction from the CNSC and the transitional provisions of the <i>Impact Assessment Act</i>, CNL is continuing its EA for the NPD Closure Project under <i>CEAA</i> (2012). Letter to CNL - Changes to Federal Legislation. CNL recognizes that what AOPFN is requesting is consistent with the new provisions and commitments under the <i>Impact Assessment Act (IAA)</i> but is beyond the scope of <i>CEAA</i> (2012) and this EA, and therefore is not required to be considered. The final NPD EIS will meet the requirements of <i>CEAA</i> (2012) but will also incorporate good practices consistent with the <i>IAA</i>.	<u>Where is this topic discussed in the EIS?</u> Section 3.5 of the EIS discusses the regulatory framework of the project. <u>What changes have been made (and where)?</u> CNL added text to Section 3.5 of the EIS, providing clarification on this issue. A reference was added to a letter received from the CNSC, which indicates that the NPD Closure Project will continue under <i>CEAA</i> (2012).	<u>Status:</u> Further alignment on this concern not possible CNL will continue the NPD Closure Project EA under <i>CEAA</i> (2012). CNL will endeavour to work towards meeting the more rigorous expectations of <i>IAA</i> where possible. CNL understands that this concern is outstanding from the AOPFN’s perspective based on AOPFN feedback in April 2023. AOPFN remains concerned that CNL has chosen to disregard the new <i>IAA</i> (2019) legislation, instead opting for the less rigorous expectations of <i>CEAA</i> (2012). <u>Next steps:</u> Through continued engagement at the Working Group, CNL hopes that the parties are able to find common ground on this topic. AOPFN and CNL have agreed to the following commitments: AOPFN-1: CNL is committed to providing the funding to continue the Working Group and AOPFN Advisory Committee (AAC) for 10 years. AOPFN-18: CNL is committed to co-developing with the AOPFN additional mitigation measures to include within the NPD Closure Project Environmental Protection Plan to ensure that items of value to AOPFN are protected.
6. EA Process and Methodology	(d) AOPFN participation in the assessment	<u>CNL Response:</u> See responses above regarding impact assessment practices. CNL has included a summary of AOPFN traditional knowledge and land	<u>Where is this topic discussed in the EIS?</u> AOPFN input appears in Section 4.2, Section 6.3, Section 8.9, Section 9.9, and	<u>Status:</u> Further alignment on this concern unlikely CNL’s technical assessment was conducted in

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	AOPFN is seeking good impact assessment practice that include Indigenous groups as part of the assessment early and throughout the process. The traditional users themselves, through the four AOPFN studies, have concluded that the proposed project will have impact on traditional use. AOPFN is concerned that the inputs from Indigenous Land users themselves has not been integrated into the actual effects characterization and significance determination process. This is not a project-specific interest; however it has implications for the EA process and methods used in this project-specific assessment.	use, incorporated the valued species identified by AOPFN, and recorded main concerns about the project in the EIS.	Section 11.1 of the EIS. <u>What changes have been made (and where)?</u> CNL has provided AOPFN an opportunity to directly integrate a summary of its differing perspectives in Section 4.2, Section 6.3, Section 8.9, Section 9.9, and Section 11.1.	accordance with the requirements of <i>CEAA</i> (2012). CNL understands that this concern is outstanding from the AOPFN’s perspective based on AOPFN feedback in April 2023. AOPFN remains concerned that their involvement in the assessment has been from the outside looking in, that AOPFN and Algonquin Knowledge holders had no role in the effects characterization or significance estimation process, and that AOPFN perspectives have had little to no influence on CNL’s assessment findings. AOPFN has indicated that this approach seriously undermines the quality and likely accuracy of the CNL impact assessment. <u>Next steps:</u> AOPFN and CNL disagree on the assessment methodology and on the assessment of impacts to TLRU. Through continued engagement at the Working Group, CNL hopes that the parties are able to find common ground on this topic. CNL and AOPFN have agreed to the following commitment: AOPFN-3: CNL is committed to collaborative development of risk-informed communication materials for the NPD Closure Project for AOPFN community members and application of the AOPFN Algonquin Food Program at the NPD Site. AOPFN-5: CNL is committed to develop with AOPFN a meaningful role for AOPFN in the monitoring for the NPD Closure Project in addition to AOPFN participation in current environmental/compliance monitoring. AOPFN-6: CNL is committed to supporting AOPFN-led site inventory work to develop an Algonquin Knowledge baseline for the entire NPD site. Where AOPFN identifies important resources that could be impacted by the project, CNL is committed to evaluate and implement additional mitigation measures if necessary. AOPFN-18: CNL is committed to co-developing with the AOPFN additional mitigation measures to include within the NPD Closure Project Environmental Protection Plan to ensure that items of value to AOPFN are protected.
7. End State, Site Restoration and	(a) Collaborative end land use planning It is important to AOPFN that it receives	CNL has responded in writing to AOPFN comments on collaborative end land use planning citing relevant sections of the EIS as part of the comment response. AOPFN provided feedback on these dispositions in	<u>Where is this topic discussed in the EIS?</u> General plans for restoration and end state are described in Section 4.3.1.9 of the EIS.	<u>Status:</u> Resolution is in progress. CNL understands that this concern is outstanding from AOPFN’s perspective, pending the establishment

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Future Use of the Land	reassurance that the land around the facility will be renaturalized over time, so that AOPFN community members can reconnect with the site and be able to practice traditional land use activities. AOPFN is a governance and stewardship entity with a right to be directly and deeply involved in collaborative end state planning. AOPFN is seeking an active, decision making, co-management role in the end state planning for NPD including early involvement in the development of the plan (not simply an opportunity to provide feedback on the plan after CNL has already drafted). AOPFN is also concerned that restoration of these ecosystems strive to bring back conditions similar to a pre-disturbance baseline (or intact reference baseline) and that more detailed restoration plans be included in the EIS. This is both a CNL-wide and project-specific concern.	December 2020, and two meetings to discuss responses were held in 2020. CNL has committed to sharing the draft restoration plan with AOPFN once it is developed. <u>CNL Response</u> CNL acknowledges the AOPFN's request for collaboration on end-use planning and has a similar vision for the future use of the land. CNL has used the terms renaturalize/renaturalization to mean: return to natural. As the majority of the site is forested, disturbed areas outside the final licensed area will be left to return to natural via natural succession. Renaturalization will have a positive impact on terrestrial biodiversity because vegetation will provide habitat for nests and dens, cover for animals as they roam, and will promote movement of animals by increasing connectivity (reducing habitat fragmentation). Future land use is a discussion topic that requires the participation of AECL as the owner of the NPD site, in consultation with Indigenous Nations, communities, and organizations, the public, as well as industry and government. As the licensee, CNL is committed to engagement and consultation with AOPFN on future end state and land use. The potential land options will not be fully determined until the NPD Closure Project EA and license amendment process proceeds further. In the meantime, CNL is preparing a plan for site restoration after decommissioning is complete, which CNL is committed to sharing with the AOPFN.	<u>What changes have been made (and where)?</u> CNL has provided AOPFN an opportunity to directly integrate a summary of its differing perspective on renaturalization into the EIS (Section 9.9.6.1).	of end-state planning commitments that reflect AOPFN's expectation for collaborative governance and stewardship for the whole NPD site. <u>Next Steps:</u> CNL recognizes that AOPFN remains concerned that CNL is developing a draft restoration plan before engaging AOPFN on this topic. CNL will engage with AOPFN through targeted discussions to seek input prior to and during restoration plan development. The restoration and end state plan draft will be shared with AOPFN to verify that input has been adequately recorded, and/or justification given for why information could not be included. AOPFN and CNL have agreed to the following commitment: AOPFN-21: CNL is committed to seeking input from the AOPFN on the proposed ISD project end state, including AOPFN input on lands restoration of the disturbed areas. Tri-party discussion including AECL/CNL/AOPFN will be required for site-wide end state planning.
7. End State, Site Restoration and Future Use of the Land	(b) Preparation of on-site landfills for the post-closure period Closure plans for the on-site landfills are important to AOPFN because it wants to ensure that the environment around the site of the NPD Closure Project is protected as these landfills were located on the NPD site within unceded AOPFN traditional territory where AOPFN members harvest food, medicines, and other natural materials. This is a project-specific interest.	<u>CNL Response</u> CNL has responded in writing to AOPFN comments related to the on-site landfills citing relevant sections of the EIS as part of the comment response. AOPFN provided feedback on these dispositions in December 2020, and indicated that CNL's response was adequate.	<u>Where is this topic discussed in the EIS?</u> The former landfills are introduced in Section 3.3.1 of the EIS (Structures at the NPD Site). General plans for restoration and end state are described in Section 4.3.1.9 of the EIS. Section 8.5 describes the geology and baseline characterization near the former landfills. Landfill monitoring activities are discussed in Section 12 of the EIS. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this comment.	<u>Status:</u> Resolved.
7. End State, Site Restoration and Future Use of the Land	(c) Project timeframe AOPFN is concerned that the site will require an indefinite period (>100 years) of institutional care to monitor and maintain the infrastructure necessary to prevent potential impacts including continuation of active controls. AOPFN is also concerned that long-term funding for these Institutional Controls is uncertain. AOPFN is concerned that the NPD site and	CNL has responded in writing to AOPFN comments on the project timeframe. AOPFN provided feedback on these dispositions in December 2020, and two meetings to discuss responses were held in 2020. <u>CNL Response</u> CNL acknowledges AOPFN's concerns about the long-term safety of the NPD site and the potential impacts on the rights of the AOPFN and other Indigenous Nations, communities and organizations to practice traditional activities around the NPD site. Ongoing monitoring and maintenance of the site will occur during the	<u>Where is this topic discussed in the EIS?</u> General plans for restoration and end state are described in Section 4.3.1.9 of the EIS. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this comment.	<u>Status:</u> Efforts at resolution in progress; further alignment is possible but uncertain. CNL understands that this concern is outstanding from AOPFN's perspective due to a lack of confidence in long-term funding commitments. <u>Next Steps:</u> Through continued engagement at the Working Group, CNL hopes that the parties are able to find common ground on this topic.

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	surrounding lands are safe for traditional land and resource use activities in the future. This is both a CNL-wide and project-specific interest.	Institutional Controls period, which will last a minimum of 100 years and will be extended as long as is necessary to ensure protection of people and the environment. The PostSA TSD demonstrates that the impact beyond the Institutional Controls period on the public, Indigenous peoples and the environment is negligible under all scenarios. CNL notes that the final end state is the only time when changes to access will occur; the final end state of the NPD site will be an improvement from current conditions. To instill confidence in the EIS findings and the effectiveness of the follow-up monitoring, CNL will involve the AOPFN and other Indigenous Nations, communities and organizations in the monitoring program, which aims to confirm the predictions of the EIS.		AOPFN and CNL have agreed to the following commitment: AOPFN-1: CNL is committed to providing the funding to continue the Working Group and AOPFN Advisory Committee (AAC) for 10 years.
7. End State, Site Restoration and Future Use of the Land	(d) Long-term liability of the site beyond decommissioning. It is important to AOPFN that the end state of the NPD site is safe for future land users and that a guarantee and long-term funding is in place for Institutional Controls for as long as necessary. AOPFN is concerned that the Institutional Control period will need to be significantly longer than 100 years. Further AOPFN is concerned that contingency plans in case the facility fails to contain the radioactive materials adequately, including a scenario where the materials need to be removed are not sufficiently developed. For both of these aspects AOPFN does not have confidence that government funding will continue or be in place. It is important to AOPFN that radioactive risks will not be passed on as a burden to future generations and it is important to AOPFN that radioactive materials are not abandoned and forgotten in Algonquin territory. It is important to AOPFN that they have safe and trusted access and use of the NPD site and its surroundings for present and future generations. AOPFN prefers an alternative that allows the land to heal the quickest from harms i.e., a removal option that does not perpetuate the current state of contamination. In a future with in-situ disposal, the underground conditions will be unnatural, and on the surface, portions of the site will be unnaturally fenced off, covered with a concrete cap and unable to return to a forested condition. AOPFN is	CNL heard AOPFN’s concern about long-term liability of the site and addressed it in its responses to AOPFN comments. CNL has developed monitoring programs that extend into the Institutional Controls period, to ensure that the public, Indigenous and the environment are protected. <u>CNL Response:</u> CNL acknowledges that as the licensee, it is responsible for ongoing monitoring and maintenance of the site during the Institutional Controls period. The financial guarantee for Atomic Energy of Canada Limited’s (AECL’s) sites, including Nuclear Power Demonstration (NPD), has been provided by the Government of Canada. AECL has committed to enforcing land-use restrictions (Institutional Controls) on the NPD site – into the future, for as long as possible during the post-closure phase of the NPD. At the appropriate time CNL or its successor will apply to the CNSC for a Licence to Abandon – cease active institutional controls - following the requirements of applicable law in effect at such time. The PostSA TSD demonstrates that the impact on the public, Indigenous and the environment is negligible, under all scenarios, beyond the Institutional Controls period.	<u>Where is this topic discussed in the EIS?</u> This topic will be discussed as part of the LTRA with the participation of AECL as the owner of the NPD site. However, the long-term liability of the site extends beyond the scope of CEAA (2012) and the EA for the NPD Closure Project. Therefore, it is not discussed in the EIS. <u>What changes have been made (and where)?</u> No changes were made in the EIS related to long-term liability.	<u>Status:</u> Efforts at resolution in progress; further alignment is possible but uncertain. It is noted that this topic extends beyond the scope of CEAA (2012) and the EA for the NPD Closure Project. CNL understands that this concern remains unresolved from AOPFN’s perspective based on feedback in April 2023. AOPFN is concerned about the lack of clarity on the likely length of the Institutional Control period and the commitment for long-term funding. <u>Next Steps:</u> Through continued engagement at the Working Group, CNL hopes that the parties are able to find common ground on this topic. CNL wishes to continue discussions with AOPFN to better understand the community’s perspective and values and any fears, or concerns associated with the NPD site and traditional use near the site. CNL and AOPFN have agreed to the following commitment: AOPFN-3: CNL is committed to collaborative development of risk-informed communication materials for the NPD Closure Project for AOPFN community members and application of the AOPFN Algonquin Food Program at the NPD Site. AOPFN-5: CNL is committed to develop with AOPFN a meaningful role for AOPFN in the monitoring for the NPD Closure Project in addition to AOPFN participation in current environmental/compliance monitoring. AOPFN-6: CNL is committed to supporting AOPFN-led

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	concerned that project-related activities would exacerbate the issue of alienation and further limit members’ access to the area. This is a project--specific concern.			site inventory work to develop an Algonquin Knowledge baseline for the entire NPD site. Where AOPFN identifies important resources that could be impacted by the project, CNL is committed to evaluate and implement additional mitigation measures if necessary. AOPFN-18: CNL is committed to co-developing with the AOPFN additional mitigation measures to include within the NPD Closure Project Environmental Protection Plan to ensure that items of value to AOPFN are protected. These commitments have the potential to build confidence and trust in the in-situ disposal concept and the long-term safety of the NPD site.
8. Environmental Effects and Mitigation Measures	(a) Invasive species management AOPFN is unclear how invasive species will be managed at the NPD site if introduced by vectors other than heavy equipment (e.g., by smaller vehicles, hand-held equipment, or people). It is also unclear what measures will be implemented to manage invasive species, should they be accidentally introduced or already present at the site. This is a project-specific concern.	<u>CNL’s Response:</u> In response to the AOPFN’s follow-up question on how invasive species (non-native plants, animals, aquatic life and micro-organisms that, when introduced outside of their natural environment, out-compete native species) will be managed at the NPD site, the CNL standard Management of Land, Habitat and Wildlife (900-509200-STD-006) will be followed. CNL recognizes that when invasive species become established in a new habitat, they can disrupt the existing balance of the ecosystem. In some cases, the new species takes over, causing radical and irreversible changes to its new environment. Aquatic invasive species are managed through prohibitions on import, transport, possession and/or release of aquatic invasive species as per the Aquatic Invasive Species Regulations. Activities conducted on different water bodies shall take into consideration the potential to spread aquatic invasive species. In order to prevent the spread of invasive species or noxious weeds on-to the NPD Closure Project site, heavy equipment entering the site will be inspected to ensure they are free of dirt clogs coming from outside of the site. This will prevent the spread via seeds. Other methods used by CNL to manage and prevent the spread of invasive species include: • Washing and disinfecting equipment used to conduct work in a waterbody before leaving or returning to a CNL site (e.g., sampling equipment, boats, motors, and trailers) • Washing equipment used on land before leaving or returning to a CNL site Other methods used by CNL to minimize and manage the risks of invasive species spread and protect our Canadian ecosystems can be found through the Canadian Food Inspection Agency (CFIA) as per the <i>Plant Protection Act</i>. CNL is open to working collaboratively with the AOPFN to develop proposed mitigation measures to eliminate, reduce or control possible effects from invasive species. CNL looks forward to seeking input and feedback from Indigenous peoples, such as the AOPFN, on specific restoration activities for the NPD	<u>Where is this topic discussed in the EIS?</u> General plans for restoration and end state are described in Section 4.3.1.9 of the EIS. Section 9.6.3.2 and Table 10.3-1 within the EIS describes the proposed mitigation measures for invasive species. <u>What changes have been made (and where)?</u> No changes to these sections of the EIS have been made since the AOPFN review.	<u>Status:</u> Resolution is in progress. CNL will engage with AOPFN to seek input prior to and during restoration plan development. CNL understands that this concern is outstanding from AOPFN’s perspective, pending the establishment of end state planning commitments for the NPD site. AOPFN has requested to be involved at a decision-making level in both immediate-term restoration planning and end-state planning for the entire NPD site. AOPFN’s general position is that restoration plans should be included in the EIS after discussions with AOPFN. <u>Next Steps:</u> CNL will engage with AOPFN through targeted discussions to seek input prior to and during restoration plan development. The restoration and end state plan draft will be shared with AOPFN to verify that input has been adequately recorded, and/or justification given for why information could not be included. AOPFN and CNL have agreed to the following commitments: AOPFN-18: CNL is committed to co-developing with the AOPFN additional mitigation measures to include within the NPD Closure Project Environmental Protection Plan to ensure that items of value to AOPFN are protected. AOPFN-21: CNL is committed to seeking input from the AOPFN on the proposed ISD project end state, including AOPFN input on lands restoration of the disturbed areas.

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		site.		
9. Free Prior and Informed Consent (FPIC)	(a) Principle of consent It is important to AOPFN that the right to give consent to be a willing host be respected as the NPD site and facility is in unceded AOPFN traditional territory. AOPFN is concerned that it did not consent to the original NPD construction and operation and that now, potentially without their consent, are expected to host the radioactivity in perpetuity. AOPFN has noted that the United Nations Declaration on the Rights of Indigenous peoples, section 29.2, is not being adhered to by CNL and AECL in relation to the NPD Project. This is both a CNL-wide and project-specific concern.	CNL, AECL and the AOPFN finalized a LTRA in June 2023 that includes, as matters of mutual interest, (1) Engagement and communications on items of note related to ongoing operations and activities, as well as changes in scope to existing major projects, at CRL and NPD, (2) an AOPFN role in site level and project planning activities for major projects, including as part of their life-cycle (where practicable) and (3) opportunities for meaningful engagement to recognize, characterize and as necessary accommodate for potential historic harms. The LTRA does not provide AOPFN’s consent for the proposed ISD decommissioning plan for NPD. AOPFN has identified that there are only some mechanisms from the proposed LTRA which are applicable to NPD (i.e., the Guardian Program and Risk Communication Program). AOPFN has indicated that further collaborative assessment and negotiation of a project-specific agreement will be required for NPD as part of a consent seeking process between the parties, at the end of which AOPFN may or may not provide its free, prior and informed consent to the proposed in-situ project at NPD. CNL and AECL have met with the AOPFN council and shared correspondence related to this issue. In correspondence CNL and AECL have stated: “AECL and CNL are fully aligned with the Government of Canada on the principle of FPIC and committed to advancing Canada’s policy and objectives in this regard.” CNL responded to each of the AOPFN Principles and Requirements related to Nuclear Sector Projects as outlined in Appendix 3 of the August 2021 Implications Letter to indicate how the proposed NPD Closure Project can satisfy or meet the intent of these principles/requirements, including through project commitments as appropriate. <u>CNL Response:</u> It is understood by AOPFN that an Indigenous Nation, community or organizations’ consent is required for the creation of a permanent hazardous waste disposal facility in its traditional territory, per Section 29.2 of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). CNL is committed to work towards consensus and consent, with an understanding that UNDRIP does not necessitate a veto in decision-making. CNL is committed to ensuring meaningful participation of Indigenous peoples in decisions that affect their nations, communities and territories. This is a key topic for future discussions between AOPFN, AECL and CNL.	<u>Where is this topic discussed in the EIS?</u> Section 4.2.4.7.3 of the EIS. <u>What changes have been made (and where)?</u> CNL has included a summary, prepared by AOPFN, describing the importance of Indigenous consent for the NPD disposal facility per UNDRIP within Section 4.2.4.7.3 of the EIS.	<u>Status:</u> Further alignment on this concern is unlikely. CNL remains committed to on-going discussions on this topic. CNL understands that this concern is outstanding from AOPFN’s perspective as consent has not been given for this permanent hazardous waste disposal facility. As of 2023 April, CNL has not committed to respect AOPFN’s consent decision in relation to the NPD Project decommissioning. <u>Next Steps:</u> CNL and the AOPFN continue engagement through the framework of the contribution agreement working to satisfy or meet the intent of AOPFN nuclear sector principles/requirements, including through project commitments as appropriate. Begin discussions on a project-specific agreement for NPD.
10. Impacts on Rights	(a) Concerns about completeness of assessment of impacts on rights It is important to the AOPFN that all potential effects of concern have been assessed, including the potential alienation	CNL shared that perception of an effect could not be considered a primary pathway under the <i>CEAA</i> (2012) because it is not tied to a biophysical effect to the environment. CNL has responded in writing to AOPFN comments related to assessment of impacts on rights citing relevant sections of the EIS as part of the comment response. AOPFN provided feedback on these dispositions in	<u>Where is this topic discussed in the EIS?</u> The EIS notes in Table 6.2-2 that the NPD site is located within the vicinity of known traditional territory. The EIS does not predict any adverse residual effects to traditional land and resource use	<u>Status:</u> Further alignment on this concern unlikely. CNL’s technical assessment was conducted in accordance with the requirements of <i>CEAA</i> (2012). CNL stands by its conclusion that the project will not interfere with traditional activities or have a negative

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	of AOPFN members from land use due to distrust in the safety of the land and water as this may impact AOPFN members ability to practice traditional activities on the land. AOPFN has raised concerns that the implications of the findings of AOPFN’s Culture and Rights Study, along with the Algonquin Knowledge and Land Use Study, the Diet and Harvest Study, and the Alternative Means Assessment, which point to measurable adverse effects from the proposed In-Situ Decommissioning on AOPFN rights and related valued components, have not been adequately integrated into the EIS’ effects characterization and significance estimation process. In particular, AOPFN has stated on multiple occasions and through the Alternative Means Assessment process, that in-situ decommissioning is the least preferable decommissioning option from a rights protection perspective, given the area would not see the radiological hazard fully removed and as such the area cannot return to a natural and trusted condition in a reasonable time frame. This is a project-specific concern.	December 2020, and two meetings to discuss responses were held in 2020. CNL has also contributed funds for AOPFN to undertake a Culture and Rights Study, which were completed in August 2021. CNL seeks to develop a mutual understanding of the perceived effects of NPD Closure Project activities on the environment and any potential negative impacts on Aboriginal and/or treaty rights. This includes, but is not limited to, rights to trap, hunt, fish, gather, or harvest as well as the continuation and uninterrupted access to cultural and spiritual activities on the lands and waters. CNL is continuing its efforts to address this concern by committing to: (i) Involving the Indigenous Nations, communities and organizations, including AOPFN, in monitoring activities that will confirm the conclusions of the EIS. An Indigenous-driven monitoring program can help to reduce fear or anxiety associated with traditional uses occurring adjacent to and near the CNL managed properties and build confidence that the decommissioning strategy and mitigation measures are effective (ii) Developing an Indigenous-driven risk-informed communications program for the NPD Closure Project to promote understanding of the EIS results and to help alleviate the concerns related to negative perceptions and feelings of discomfort and concern (Section 9.9.5 of the EIS). CNL, AECL and the AOPFN finalized an LTRA in June 2023 that includes, as matters of mutual interest, (1) logistical support for the development of an AOPFN guardian program to enable stewardship and monitoring at and in the vicinity of the CNL operated sites and (2) risk communication re: the health of country foods, medicines and waters at, and in the vicinity of, the CNL operated sites in the territory that AOPFN asserts unceded traditional territory and (3) opportunities for meaningful engagement to recognize, characterize and as necessary accommodate for potential historic harms. Note: the LTRA does not provide AOPFN’s consent for the proposed ISD decommissioning plan for NPD. <u>CNL Response:</u> CNL acknowledges AOPFN’s concerns about assessment of impacts to rights and traditional land and resource use, driven by concerns about contamination of and distrust in the safety of the land and water. CNL is open to increased engagement, education and participatory involvement in monitoring activities at its sites to address these concerns. Through the contribution agreement with AOPFN, CNL provided funding for a Culture and Rights Study. CNL has provided evidence in the EIS to support the conduct of a rights impact assessment between the CNL and AOPFN. The proposed NPD Closure Project has the potential to help reduce concerns of alienation and/or fears. The proposed project involves a long-	(Section 9.9.3.5). <u>What changes have been made (and where)?</u> CNL has provided AOPFN an opportunity to directly integrate a summary of its differing perspective on impacts on traditional land and resource use (Section 9.9.6.1) and overall assessment findings (Section 11.1), into the EIS.	impact on the biological resources on which they are dependent. CNL acknowledges that the findings of the ongoing AOPFN-CNLC rights impact assessment may require additional engagement and a mutually agreed upon resolution of any found impacts on rights. CNL understands that this concern is outstanding from AOPFN’s perspective as the EIS findings in relation to traditional land and resource use (which are closely related to impacts on rights) do not correlate to those from AOPFN’s studies, and the related concerns that: a. AOPFN was not directly involved in the effects characterization or significance estimation process, and b. CNL has not provided evidence that its consultants working on effects characterization or significance estimation for traditional land and resource use, Indigenous culture, and Indigenous health and well-being, have expertise on these topics. <u>Next steps:</u> AOPFN and CNL disagree on the assessment methodology, the assessment of impacts to TLRU and on the preferred decommissioning alternative. Through continued engagement at the Working Group, CNL hopes that the parties are able to find common ground on this topic. CNL and AOPFN have agreed to the following commitments: AOPFN-3: CNL is committed to collaborative development of risk-informed communication materials for the NPD Closure Project for AOPFN community members and application of the AOPFN Algonquin Food Program and Risk Communication Program at the NPD Site. AOPFN-5: CNL is committed to support the AOPFN with NPD Closure Project and NPD site specific Guardian monitoring activities, incorporating traditional knowledge and AOPFN valued components. Until the Guardian Program is stood up, CNL can support AOPFN participation/observation in our current environmental monitoring activities. CNL welcomes recommendations for other monitoring/mitigation activities that should be integrated into our existing program to ensure that environmental and cultural components of value to AOPFN are protected. AOPFN-18: CNL is committed to co-developing with the AOPFN additional mitigation measures to include within the NPD Closure Project Environmental

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		term solution to ensure the waste that currently resides at the NPD site is effectively contained and isolated from the environment, ensuring public safety. This solution has the potential to result in additional lands being freed up for traditional harvest or other uses by Indigenous peoples or the public. CNL stands by its conclusion that the project will not interfere with traditional activities or have a negative impact on the biological resources on which they are dependent. Ultimately, the decision of impacts to rights rests with the CNSC. If the CNSC finds any potential impacts to AOPFN’s Indigenous and/or treaty rights, CNL remains committed to understanding these rights and working collaboratively to ensure that they are appropriately mitigated to the greatest extent possible.		Protection Plan to ensure that items of value to AOPFN are protected.
11. Indigenous Health	(a) Indigenous health assessment, receptors and diet AOPFN is concerned that health is primarily focused on biophysical health rather than full scope Indigenous determinants of health. The assessment of Indigenous health should look beyond radiation dose thresholds and include consideration of the more difficult to measure, but equally important, perceptual and real impacts on AOPFN determinants of health including education status, economic status, and diet, among other factors. Diet is of critical importance given the likelihood that negative perceptions of the safety of the Project may diminish AOPFN member’s consumption of traditional foods. This is a project-specific concern.	CNL shared that perception of an effect could not be considered a primary pathway under the <i>CEAA</i> (2012) because it is not tied to a biophysical effect to the environment. CNL has responded in writing to AOPFN comments related to Indigenous health, receptors and diet citing relevant sections of the EIS as part of the comment response. AOPFN provided feedback on these dispositions in December 2020, and two meetings to discuss responses were held in 2020. CNL is continuing its efforts to address these concerns by committing to: (i) Involving the Indigenous Nations, communities and organizations, including AOPFN, in monitoring activities that will confirm the conclusions of the EIS. An Indigenous-driven monitoring program can help to reduce fear or anxiety associated with traditional uses occurring adjacent to and near the CNL managed properties and build confidence that the decommissioning strategy and mitigation measures are effective. (ii) Developing an Indigenous-driven risk-informed communications program for the NPD Closure Project to promote understanding of the EIS results and to help alleviate the concerns related to negative perceptions and feelings of discomfort and concern (Section 9.9.5 of the EIS). CNL, AECL and the AOPFN finalized an LTRA in June 2023 that includes, as matters of mutual interest, (1) logistical support for the development of an AOPFN guardian program to enable stewardship and monitoring at and in the vicinity of the CNL operated sites (2) risk communication re: the health of country foods, medicines and waters at, and in the vicinity of, AECL sites in the territory that AOPFN asserts is its unceded traditional territory(3) logistical support for the development of an AOPFN guardian program to enable stewardship and monitoring at and in the vicinity of the CNL operated sites; (4) risk communication re: the health of country	<u>Where is this topic discussed in the EIS?</u> The EIS presents the PostSA results for the Indigenous receptor group in Section 9.10.2. <u>What changes have been made (and where)?</u> CNL’s has updated its PostSA). This update includes an Indigenous receptor whose characteristics have been based on the results of the AOPFN Harvest and Diet Study. Two additional medicinal pathways have been added in addition to ingestion (inhalation and skin application). The human health assessment in the PostSA also includes an even more conservative scenario where an Indigenous receptor where characteristics match a pre-European contact lifestyle. The results of the PostSA have been integrated into the EIS. CNL has also provided AOPFN an opportunity to directly integrate a summary of its differing perspective on overall assessment findings into the EIS (Section 11.1).	<u>Status:</u> Efforts at resolution in progress; further alignment is possible but uncertain. CNL's technical assessment shows that there are no predicted impacts to Indigenous biophysical health resulting from the NPD Closure Project. CNL understands that this concern is outstanding from AOPFN’s perspective because to date, CNL has not revised its assessment of Indigenous health in relation to the NPD Closure Project to adopt a more holistic evaluation of health. <u>Next Steps:</u> CNL is committed to working with AOPFN to incorporate Harvest and Diet Study results as they relate to Indigenous health and overall community wellness in a subsequent revision of the IER. Through continued engagement at the Working Group, CNL hopes that the parties are able to find common ground on this topic. CNL wishes to continue discussions with AOPFN to better understand the community’s perspective and values and any fears, or concerns associated with the NPD site and traditional use near the site. CNL and AOPFN have agreed to the following commitments: AOPFN-3: CNL is committed to collaborative development of risk-informed communication materials for the NPD Closure Project for AOPFN community members and application of the AOPFN Algonquin Food and Risk Communication Programs at the NPD Site. AOPFN-5: CNL is committed to develop with AOPFN a meaningful role for AOPFN in the monitoring for the NPD Closure Project in addition to AOPFN participation in current environmental/compliance

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		foods, medicines and waters at, and in the vicinity of, AECL sites in the territory that AOPFN asserts is its unceded traditional territory and (5) opportunities for meaningful engagement to recognize, characterize and as necessary accommodate for potential historic harms. The LTRA does not provide AOPFN’s consent for the proposed ISD decommissioning plan for NPD. AOPFN has identified that there are only some mechanisms from the proposed LTRA which are applicable to NPD (i.e., the Guardian Program and Risk Communication Program, characterization of historic harms). AOPFN has indicated that further collaborative assessment and negotiation of a Project-Specific Agreement will be required for NPD as part of a consent seeking process between the parties. <u>CNL Response:</u> CNL acknowledges AOPFN’s concerns about perceived contamination and health effects from the NPD site. CNL has added an Indigenous receptor group to the PostSA TSD. In the third iteration of the PostSA TSD issued in March 2020, CNL included a Potential Exposure Group consisting of a family of self-sufficient Indigenous receptors in the NPD area. The exposure profile in the postclosure period was developed based on a traditional Indigenous lifestyle pre-European contact (SENES 2014). This lifestyle results in a more cautious dose estimate than that based on current-day lifestyle, where some food is store-bought. The predicted peak dose to an Indigenous receptor (from the 3rd iteration PostSA) is 0.0004 mSv/yr, which is 500 times less than the dose criterion. The analysis demonstrates that the impact on the public, Indigenous peoples and the environment is negligible under all scenarios. To instill confidence in the EIS findings and the effectiveness of the follow-up monitoring, CNL will involve the AOPFN and other Indigenous Nations, communities and organizations in the monitoring program, which aims to confirm the predictions of the EIS. CNL acknowledges that each Indigenous Nation, community and organization and, each individual study may establish different study area boundaries. CNL respects that AOPFN’s evaluation identifies potential effects. CNL maintains that human health has been conservatively assessed for Indigenous Nations, communities and organizations within the EIS. CNL acknowledges that AOPFN disagrees on the basis that there are other determinants of health important to AOPFN including the avoidance of consuming traditional foods.		monitoring.
11. Indigenous Health	(b) Psychosocial effects AOPFN is concerned that in relation to human health, CNL has adopted a relatively narrow perspective on human health that is focused on biophysical impacts to human health, with little or no emphasis on other factors that influence Indigenous population health. This is particularly concerning to AOPFN because of the fear, stigma, and	CNL shared that perception of an effect could not be considered a primary pathway under the CEAA (2012) because it is not tied to a biophysical effect to the environment. CNL recognizes AOPFN’s interest in better characterization of the factors that have led to alienation and loss of land use, and better understanding of the implications of psychosocial impacts on AOPFN socio-cultural health and well-being. CNL seeks to develop a mutual understanding of the perceived effects of the NPD Closure Project activities on the environment and any potential negative impacts on Aboriginal and/or treaty rights. CNL remains	<u>Where is this topic discussed in the EIS?</u> The EIS discusses concerns about potential loss of connection to land and water (e.g., feeling of discomfort or concern), and loss of land and water use in Section 9.9.5. <u>What changes have been made (and where)?</u> CNL added discussion of loss of connection to and use of lands and water to Section 6.3 (interests and concerns related to VCs) and in new Sections 9.3.1.1, 9.6.1.1, and 9.9.1.1	<u>Status:</u> Further alignment on this concern unlikely. It is CNL’s position that this topic extends beyond the scope of CEAA (2012) and this EA. CNL recognizes that AOPFN’s position is that the EIS does not adequately consider Indigenous health and wellness impacts beyond biophysical parameters, and that AOPFN’s studies find adverse effects on other

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	alienation felt by AOPFN members associated with the nuclear industry in general, The impacts resulting from the perception of environmental effects must be recognized. These include but are not limited to continued – now potentially permanent - fear and stigma associated with the radiological legacy at the site, and communal health and wellness issues associated with the inability to connect to the site and protect and heal it which is characterized by AOPFN as both a right and a responsibility. Pooled together, these concerns are often labeled as psychosocial impacts, and they are major contributors to poor health and wellness outcomes among Indigenous peoples. AOPFN has raised consistent concerns that CNL is not considering psychosocial impacts as legitimate impacts. This is a both a CNL-wide and project-specific concern.	committed to finding alternative ways to address AOPFN’s concern. CNL is attempting to address these concerns by committing to: (i) Involving the Indigenous Nations, communities and organizations, including AOPFN, in monitoring activities that will confirm the conclusions of the EIS. An Indigenous-driven monitoring program can help to reduce fear or anxiety associated with traditional uses occurring adjacent to and near the CNL managed properties and build confidence that the decommissioning strategy and mitigation measures are effective (ii) Developing an Indigenous-driven risk-informed communications program for the NPD Closure Project to promote understanding of the EIS results and to help alleviate the concerns related to negative perceptions and feelings of discomfort and concern (Section 9.9.5 of the EIS). <u>CNL Response:</u> CNL acknowledges AOPFN’s concerns about the safety of the NPD site and the potential impacts on the rights of the AOPFN and other Indigenous Nations, communities and organizations to practice traditional activities around the NPD site. CNL has assessed potential effects related to dust and noise nuisance, loss of connection, safety of harvesting and consuming local foods, and changes to access and identified no significant adverse effects. To instill confidence in the EIS findings and the effectiveness of the follow-up monitoring, CNL will involve the AOPFN and other Indigenous Nations, communities and organizations in the monitoring program, which aims to confirm the predictions of the EIS.	within the EIS. CNL has provided AOPFN an opportunity to directly integrate a summary of its differing perspective on impacts on traditional land and resource use (Section 9.9.6.1) and overall assessment findings (Section 11.1), into the EIS.	key Indigenous determinants of health in the Project Case. <u>Next Steps:</u> Through continued engagement at the Working Group, CNL hopes that the parties are able to find common ground on this topic. CNL wishes to continue discussions with AOPFN to better understand the community’s perspective and values and any fears, or concerns associated with the NPD site and traditional use near the site. CNL and AOPFN have agreed to the following commitment: AOPFN-3: CNL is committed to collaborative development of risk-informed communication materials for the NPD Closure Project for AOPFN community members and application of the AOPFN Algonquin Food Program at the NPD Site. AOPFN-5: CNL is committed to develop with AOPFN a meaningful role for AOPFN in the monitoring for the NPD Closure Project in addition to AOPFN participation in current environmental/compliance monitoring. AOPFN-18: CNL is committed to co-developing with the AOPFN additional mitigation measures to include within the NPD Closure Project Environmental Protection Plan to ensure that items of value to AOPFN are protected.
12. Long-term Safety	(a) Concern about overall deterioration of the disposal facility over time. The AOPFN identified the long-term site integrity as important because of the site’s location within unceded Algonquin traditional territory and the potential of the project / site to impact people living or fishing nearby (exercising rights to fish), as well as wildlife, vegetation, and all elements of the natural environment at and in the vicinity of the Project. AOPFN has also raised concerns about whether future safety will be properly monitored, given the life of some of the contaminants exceeds the predicted Institutional Control period for the facility in the Project Case. This is a project-specific concern.	CNL is attempting to address these concerns by committing to: (iii) Involving the Indigenous Nations, communities and organizations, including AOPFN, in monitoring activities that will confirm the conclusions of the EIS. An Indigenous-driven monitoring program can help to reduce fear or anxiety associated with traditional uses occurring adjacent to and near the CNL managed properties and build confidence that the decommissioning strategy and mitigation measures are effective. (iv) Developing an Indigenous-driven risk-informed communications program for the NPD Closure Project to promote understanding of the EIS results and to help alleviate the concerns related to negative perceptions and feelings of discomfort and concern (Section 9.9.5 of the EIS). CNL, AECL and the AOPFN finalized an LTRA in June 2023 that includes, as matters of mutual interest, (1) logistical support for the development of an AOPFN guardian program to enable stewardship and monitoring at and	<u>Where is this topic discussed in the EIS?</u> Section 8.12 of the EIS discusses the relevant natural disasters to which NPD may be exposed. Section 9.14 of the EIS discusses the potential effects on the project of climate change, forest fires, floods, earthquakes, severe weather such as tornados, lightning strikes, ice storms, and changes to the Ottawa River. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this comment.	<u>Status:</u> Efforts at resolution in progress; further alignment is possible but uncertain. CNL's technical assessment predicts no long-term environmental effects resulting from the NPD Closure Project. CNL understands that this concern is outstanding from AOPFN’s perspective as the duration of the hazard exceeds the length of the Institutional Control period. <u>Next Steps:</u> CNL will plan workshops to gather feedback on the draft follow-up monitoring plans. CNL and AOPFN have agreed to the following commitments: AOPFN-3: CNL is committed to collaborative development of risk-informed communication materials for the NPD Closure Project for AOPFN community members and application of the AOPFN Algonquin Food Program and Risk Communication

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		in the vicinity of the CNL operated sites and (2) risk communication re: the health of country foods, medicines and waters at, and in the vicinity of, the CNL operated sites in the territory that AOPFN asserts is its unceded traditional territory. Note: the LTRA does not provide AOPFN’s consent for the proposed ISD decommissioning plan for NPD. <u>CNL Response:</u> CNL has assessed the probabilities and potential impacts of flooding, seismic activity, above-ground natural hazards and extreme temperature change on the integrity of the grouted facility and concluded that these events will have no undue short-term or long-term effects on people or the environment around the site. CNL will conduct monitoring for as long as necessary to verify the results of the assessment in the EIS.		Program at the NPD Site. AOPFN-5: CNL is committed to support the AOPFN with NPD Closure Project and NPD site specific Guardian monitoring activities, incorporating traditional knowledge and AOPFN valued components. Until the Guardian Program is stood up, CNL can support AOPFN participation/observation in our current environmental monitoring activities. CNL welcomes recommendations for other monitoring/mitigation activities that should be integrated into our existing program to ensure that environmental and cultural components of value to AOPFN are protected.
13. Monitoring	(a) AOPFN involvement in monitoring Involvement in monitoring is important to the AOPFN to ensure the Kichi-Sìbì is taken care of as it has great importance to AOPFN culture, heritage and ways of life. It is important to AOPFN that it has a co-development and co-approval role in the development and implementation of the EA follow-up and monitoring program for the project, including adaptive management objectives, indicators, thresholds, and responses for terrestrial wildlife, fish and fish habitat, traditional land and resource use, and water quality at minimum. AOPFN is concerned that follow-up monitoring lacks a health component that would evaluate aspects of TLRU, culture and Indigenous health/well-being. AOPFN is seeking meaningful participation in compliance monitoring and emergency response planning as part of any AOPFN-specific risk communication program. This is both a CNL-wide and project-specific interest.	CNL has responded in writing to AOPFN comments requesting involvement in monitoring citing relevant sections of the EIS as part of the comment response. AOPFN provided feedback on these dispositions in December 2020, and two meetings to discuss responses were held in 2020. CNL committed to share the draft follow-up monitoring plans with AOPFN for comment and did so in November 2020. CNL is continuing its efforts to address these concerns by involving the Indigenous Nations, communities and organizations, including AOPFN, in monitoring activities that will confirm the conclusions of the EIS. An Indigenous-driven monitoring program can help build confidence that the decommissioning strategy and mitigation measures are effective. CNL, AECL and the AOPFN finalized an LTRA in June 2023 that includes, as a matter of mutual interest logistical support for the development of an AOPFN guardian program to enable stewardship and monitoring at and in the vicinity of the CNL operated sites. Note: the LTRA does not provide AOPFN’s consent for the proposed ISD decommissioning plan for NPD. <u>CNL Response:</u> CNL is committed to involving the AOPFN in its monitoring programs. The participation of AOPFN in monitoring work for the NPD Closure Project ensures consideration of Indigenous knowledge, collaboration, mutual respect, ongoing participation and relationship building for the future.	<u>Where is this topic discussed in the EIS?</u> CNL has indicated that it is willing to involve the AOPFN in its monitoring programs (Section 6.2.4.2.3). The follow-up monitoring program is described at a high level in Section 12 of the EIS, details of which derive from the development of the effluent, environment and groundwater draft follow-up monitoring plans. <u>What changes have been made (and where)?</u> No change to the EIS has been made since the AOPFN review.	<u>Status:</u> Resolution is in progress CNL understands that this concern is outstanding from AOPFN’s perspective until such time as there is a dedicated long-term. Indigenous-led, Indigenous Knowledge driven component integrated into the site monitoring at NPD. AOPFN’s position remains that an independent Indigenous Guardian-style program is critical in relation to the NPD site and its surroundings. This will allow for Indigenous Knowledge to be integrated into project monitoring for the first time, restore AOPFN stewardship responsibilities in keeping with Canada’s commitment to reconciliation and UNDRIP, increase AOPFN capacity to understand and monitor changes to the environment our members rely upon, and is an important link into a required Indigenous-driven risk communication strategy for the project. <u>Next Steps:</u> CNL will plan workshops to gather feedback on the draft follow-up monitoring plans and here feedback from the AOPFN site-wide inventory to ensure that monitoring and mitigations are in place for AOPFN values of importance. CNL and AOPFN have agreed to the following commitments: AOPFN-5: CNL is committed to support the AOPFN with NPD Closure Project and NPD site specific Guardian monitoring activities, incorporating traditional knowledge and AOPFN valued components. Until the Guardian Program is stood up, CNL can support AOPFN participation/observation in our current environmental monitoring activities. CNL welcomes recommendations for other monitoring/mitigation activities that should be integrated into our existing program to ensure that environmental and cultural components of value to

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				AOPFN are protected. AOPFN-13: CNL is committed to engaging with the AOPFN in the NPD Closure Project Environmental Assessment Follow-up Monitoring Program (EAFMP) development. CNL recognizes that our plans would benefit from incorporation of Indigenous knowledge and welcomes AOPFN comments on the plans.
14. National Policy	(a) Canadian strategy for waste management is lacking AOPFN is concerned that the Government of Canada does not yet have a modern nuclear waste management policy in place and that a lack of coordinated planning in past to develop permanent facilities has resulted in a proposed facility in AOPFN territory that it has not consented to, and which is contrary to IAEA guidance and the principle of consolidation of waste into the smallest feasible number of permanent waste disposal facilities. This is not a project-specific concern; however it has implications on this project.	<u>CNL Response:</u> This interest is generally beyond the scope of the project. The proposal to create a disposal facility on the NPD reactor site through in-situ decommissioning has been chosen as a safe and immediate decommissioning option for the NPD reactor with respect to the environment, workers and the public. It is important to highlight that this closure will reduce historic nuclear liabilities for Canada and, at the same time, reduce the footprint of the NPD site.	<u>Where is this topic discussed in the EIS?</u> Section 3.5 of the EIS summarizes the regulatory framework for the NPD Closure Project. <u>What changes have been made (and where)?</u> This concern is recorded in Section 6.2.4.3.	<u>Status:</u> From CNL’s perspective, this concern is out of scope of the NPD Closure Project. CNL understands that AOPFN is concerned about why in the Project Case this waste is not proposed to be consolidated with other sources of waste, and why the intermediate-level waste is not being removed and stored for the purpose of ultimate deep geological disposal, as per AOPFN’s understanding of nuclear waste management and disposal principles. <u>Next Steps:</u> Through continued engagement at the Working Group, CNL hopes that the parties are able to find common ground on this topic, even though it is out of scope for the project. AOPFN and CNL have agreed to the following commitments: AOPFN-1: CNL is committed to providing the funding to continue the Working Group and AOPFN Advisory Committee (AAC) for 10 years.
14. National Policy	(b) Canadian strategy for waste management is not timely AOPFN’s view is that Canada failed to act in a timely manner to implement an acceptable permanent waste management alternative. AOPFN is concerned that it did not consent to the NPD construction/operation and that now, without consent, AOPFN is expected to host the radioactive waste in perpetuity. This is not a project-specific concern; however it has implications on this project.	<u>CNL’s Response:</u> Approaches for the management of radioactive waste have evolved over time, and strategies must be adjusted based on best available solutions and international best practices. It should be noted that the availability of a disposal facility for intermediate-level waste (ILW) is not the only factor that is taken into account when considering options for the decommissioning of the NPD reactor. The AMA considers the alternatives for technical feasibility (proven technology and compliance with regulatory requirements), financial feasibility and effects on the people and the environment. The current version of the Alternative Means report (prepared for March 2020) does include that a disposal facility will be available for ILW within the 100 year Institutional Control Period. There are activities underway to identify options for the disposal of intermediate-level radioactive waste, including characterization work that has already led to a better understanding of the exact volumes. AECL also asked CNL to evaluate the various options based on an analysis not only of the technical possibilities, but also of their costs in order to lead to a decision that is in the best interest of Canada. CNL, as the licensee, is committed to protecting the environment and reducing risk. Completing the decommissioning of the NPD site is part of that commitment. The proposal to create a disposal facility on the NPD	<u>Where is this topic discussed in the EIS?</u> AOPFN’s view is that Canada failed to act in a timely manner to implement an acceptable permanent waste management alternative extends beyond the scope of CEAA (2012) and the NPD Closure Project. Therefore, it is not discussed in the EIS. <u>What changes have been made (and where)?</u> This concern is recorded in Section 6.2.4.3.	<u>Status:</u> This concern extends beyond the scope of CEAA (2012) and the EA for the NPD Closure Project. CNL understands that this concern remains unresolved from AOPFN’s perspective based on feedback in 2023 April. <u>Next Steps:</u> Through continued engagement at the Working Group, CNL hopes that the parties are able to find common ground on this topic.

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		reactor site, using a method called in-situ decommissioning has been chosen as a safe and immediate decommissioning option for the NPD reactor with respect to the environment, workers and the public. It is important to highlight that this closure will reduce historic nuclear liabilities for Canada and, at the same time, reduce the footprint of the site. The fundamental objective of the in-situ decommissioning strategy is to contain and isolate contaminants in the NPD facility for a sufficiently long time to ensure that post closure doses and concentrations are safe for people and the environment. A long-term safety analysis completed by CNL shows that the proposed decommissioned facility can achieve this result. In-situ decommissioning is a proven technology. It has been in successful use for over six decades in the United States. CNL has completed a Review of In-Situ Disposal and has summarized in a report (Aikens, 2019). At the present time, there are no suitable repositories in Canada for the disposal of radioactive waste generated during the decommissioning of nuclear reactors. Therefore, the only alternatives are to continue with SWS or to remove the Facility and store it within an existing waste storage facility, or build a new waste storage facility. Of these two options, only SWS is currently practical as there is not a waste storage facility of sufficient capacity to accept this volume of waste. To transfer this waste to an existing waste storage facility would require capital construction of a new facility with a resultant increase of national liability and waste facility surveillance costs. The relatively small size of the NPD Facility means that it can be effectively grouted in place at a significantly lower cost than the construction of a new disposal facility. In the case of NPD, the characteristics of the Facility and its location mean that in-situ disposal can be considered as a viable option for decommissioning and that in-situ disposal reduces Canada’s nuclear liability.		
15. Protection of Flora and Fauna	(a) Habitat (including Species at Risk) and road mortality impacts As stewards of lands and waters, it is important to the AOPFN that the environment, wildlife, and plants, including Species at Risk and their habitat areas, are taken care of now and for future generations. This is a project-specific concern.	CNL has responded in writing to AOPFN comments about habitat and species at risk citing relevant sections of the EIS as part of the comment response. AOPFN provided feedback on these dispositions in December 2020, and two meetings to discuss responses were held in 2020. CNL committed to share the draft follow-up monitoring plans with AOPFN for comment, and did so in November 2020. CNL is continuing its efforts to address these concerns by involving the Indigenous Nations, communities and organizations, including AOPFN, in monitoring activities that will confirm the conclusions of the EIS. An Indigenous-driven monitoring program can help build confidence that the decommissioning strategy and mitigation measures are effective. CNL, AECL and the AOPFN finalized a LTRA in June 2023 that includes, as a matter of mutual interest logistical support for the development of an AOPFN guardian program to enable stewardship and monitoring at and in the vicinity of the CNL managed sites. Note: the LTRA does not provide AOPFN’s consent for the proposed ISD decommissioning plan for NPD. <u>CNL Response:</u>	<u>Where is this topic discussed in the EIS?</u> Mitigation measures related to migratory birds, avian and herpetofauna species at risk and road mortality are discussed in Section 9.6.3.2 of the EIS. Impacts to the surface water environment (including the Ottawa River) are discussed in Section 9.3.3 of the EIS, and impacts to aquatic species at risk are discussed in Section 9.4.3 of the EIS. <u>What changes have been made (and where)?</u> CNL has included additional mitigation measures related to migratory birds and avian and herpetofauna species at risk.	<u>Status:</u> Resolution is in progress CNL understands that this concern is outstanding from AOPFN’s perspective until such time as there is a dedicated Indigenous-led, Indigenous Knowledge driven component integrated into the site monitoring at NPD. The participation of AOPFN in monitoring work for the NPD Closure Project ensures consideration of Indigenous knowledge, collaboration, mutual respect, ongoing participation and relationship building for the future. <u>Next Steps:</u> CNL and AOPFN have agreed to the following commitments: AOPFN-5: CNL is committed to support the AOPFN with NPD Closure Project and NPD site specific Guardian monitoring activities, incorporating traditional knowledge and AOPFN valued components. Until the Guardian Program is stood up,

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		As the bald eagle’s nest is located approximately 875 m away from the facility where work will be occurring, and the EIS notes that project activities are limited to the vicinity of the facility (Morin and Carr 2015), no impacts are expected to the bald eagle’s nest. _ As shown in the EIS, there are no predicted adverse impacts from the project on the Ottawa River shoreline or on any fish, wildlife or plants (see row 4(a) for more details) The speed limit on roads at the NPD site will be reduced to no more than 20 km/h, and frequent inspection for wildlife presence will be conducted by the environmental personnel in the field. Following Ontario Ministry of Natural Resources and Forestry, Best Management Practices for Mitigating the Effects of Road on Amphibians and Reptiles (https://arc-solutions.org/wp-content/uploads/2017/02/mnrf_herp_road-mitigation_bmp_2016.pdf), CNL will be implementing mitigation measures to influence driver behaviour at the NPD site. If approved, the NPD Closure Project reduces the overall disturbed habitat compared to the present-day conditions, and thus will increase available habitat for vegetation and wildlife.		CNL can support AOPFN participation/observation in our current environmental monitoring activities. CNL welcomes recommendations for other monitoring/mitigation activities that should be integrated into our existing program to ensure that environmental and cultural components of value to AOPFN are protected. AOPFN-6: CNL is committed to supporting AOPFN-led site inventory work to develop an Algonquin Knowledge baseline for the entire NPD site. Where AOPFN identifies important resources that could be impacted by the project, CNL is committed to evaluate and implement additional mitigation measures if necessary. AOPFN-15: CNL is committed to work jointly with AOPFN to develop a NPD site specific chance find procedure, TLRU discovery plan, Eagle Feather Protocol and cultural protection plan.
16. Protection of the Ottawa River	(a) The Ottawa River, and shoreline and riparian ecosystems AOPFN is concerned that the disturbed riparian habitat was excluded from CNL’s Ecological Land Classification on the basis that it was considered an anthropogenic site. AOPFN is concerned that the Project will contribute impacts to riparian ecosystems as a result of decommissioning activities, batch plant operation, traffic on adjacent roadways, dust, and ongoing legacy effects as a result of liabilities remaining after decommissioning that are likely to influence groundwater and adjacent riparian areas. The restoration of these ecosystems should strive to bring back conditions similar to a pre-disturbance baseline (or intact reference baseline). This is both a CNL-wide and project-specific concern.	CNL has responded in writing to AOPFN comments about the Ottawa River shoreline and riparian ecosystem citing relevant sections of the EIS as part of the comment response. AOPFN provided feedback on these dispositions in December 2020, and two meetings to discuss responses were held in 2020. CNL committed to share the draft follow-up monitoring plans with AOPFN for comment and did so in November 2020. CNL is continuing its efforts to address these concerns by involving the Indigenous Nations, communities and organizations, including AOPFN, in monitoring activities that will confirm the conclusions of the EIS. An Indigenous-driven monitoring program can help build confidence that the decommissioning strategy and mitigation measures are effective. CNL, AECL and the AOPFN finalized a LTRA in June 2023 that includes, as a matter of mutual interest, logistical support for the development of an AOPFN Guardian Program to enable stewardship and monitoring at and in the vicinity of the CNL managed sites. Note: the LTRA does not provide AOPFN’s consent for the proposed ISD decommissioning plan for NPD. <u>CNL Response:</u> The EIS estimates no adverse impacts from the project on the Ottawa River shoreline or on any fish, wildlife or plants within the riparian and aquatic ecosystems (see row 4(a) for more details). A small area of the shoreline at the NPD Site is maintained in a cleared state, with riprap on the shoreline, to enable access to the dry hydrant near the shoreline (which was installed to draw water from the Ottawa River if needed for fire suppression). The NPD Closure Project decommissioning activities will not impact the currently disturbed riparian area. For this reason, no impact assessment has been conducted for this habitat. Past disturbances, i.e., those that occurred during the construction of the NPD facility, are not in scope.	<u>Where is this topic discussed in the EIS?</u> The EIS does not predict any adverse residual effects on the surface water environment, which encompasses the Ottawa River (Section 9.3.3.5). <u>What changes have been made (and where)?</u> Section 9.3.3.2 of the EIS expands on the mitigation measures for the protection of surface water, including the Kichi-Sibi.	<u>Status:</u> Resolution is in progress. CNL understands that this concern is outstanding from AOPFN’s perspective until such time as there is a dedicated Indigenous-led, Indigenous Knowledge driven component integrated into the site monitoring at NPD. AOPFN would also like to see re-establishment of a more natural riparian habitat along the shore near the facility as part of site restoration activities. AOPFN has requested to be involved at a decision-making level in both immediate-term restoration planning and end-state planning for the entire NPD site. <u>Next Steps:</u> CNL and AOPFN have agreed to the following commitments: AOPFN-6: CNL is committed to supporting AOPFN-led site inventory work to develop an Algonquin Knowledge baseline for the entire NPD site. Where AOPFN identifies important resources that could be impacted by the project, CNL is committed to evaluate and implement additional mitigation measures if necessary. AOPFN-21: CNL is committed to seeking input from the AOPFN on the proposed ISD project end state, including AOPFN input on lands restoration of the disturbed areas. Tri-party discussion including AECL/CNL/AOPFN will be required for site-wide end state planning.

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		To supplement baseline data, a study of sediment, benthic invertebrates and fish habitat features was undertaken upstream, adjacent to and downstream of the NPD site in 2020, and the report was provided to the AOPFN. The study determined that the Ottawa River benthic invertebrate community near NPD is healthy and typical of what is observed in many large, soft-bottomed, relatively deep river systems. This study can be repeated when decommissioning is complete, to verify if the project has had an impact. CNL is planning to regularly monitor the Ottawa River water quality before the project begins. CNL is willing to discuss fish tissue sampling with the AOPFN and review past studies of fish tissue in the NPD area. Follow-up monitoring for the NPD Closure Project will include monitoring of the Ottawa River to verify that there are no effects.		
17. Socio-Economic	(a) The absence of primary socio-economic baseline data for AOPFN The AOPFN have indicated that having primary socio-economic baseline data is important to the AOPFN because Indigenous Nations, communities and organizations often conceptualize socio-economic wellbeing in ways that cannot be adequately captured with census data. Potential effects to Indigenous socio-economic conditions cannot be adequately assessed without this baseline. AOPFN is concerned that the Indigenous socio-economic assessment is extremely narrow, focusing primarily on nuisance effects from Project activities and traffic safety. This assessment does not contain an appropriate social component, which may include (but not be limited to) considerations such as social relations, family, intergenerational relations, food security, sharing relationships, and psychosocial factors, as well as standard socio-economic considerations such as (but not limited to) education and training, employment and income, job readiness, housing, and community services. In addition, AOPFN commercial activities (e.g. guiding and outfitting) should be assessed. The socio-economic effects assessment	CNL has responded in writing to AOPFN comments on socio-economic baseline data citing relevant sections of the EIS as part of the comment response. AOPFN provided feedback on these dispositions in December 2020, and two meetings to discuss responses were held in 2020. <u>CNL Response:</u> CNL’s socio-economic analysis does focus on secondary census data for AOPFN; however, the AOPFN AAC, formed as part of the contribution agreement, provides an opportunity for primary collection of socio-economic data. CNL would be pleased to participate in a focused discussion with AOPFN on this topic and would welcome any “gray literature” that might be available. Further, CNL acknowledges that Indigenous Nations, communities and organizations may conceptualize socio-economic wellbeing in ways that cannot be adequately captured with census data.	<u>Where is this topic discussed in the EIS?</u> Section 9.10.1.2 of the EIS describes the interactions of the Indigenous Socio-Economic environment and the project as well as proposed mitigations. The EIS does not predict any adverse residual effects on the Indigenous socioeconomic and health (Sections 9.10.1.4 and 9.10.2.4). <u>What changes have been made (and where)?</u> No changes to these sections of the EIS have been made since the AOPFN review.	<u>Status</u> Outstanding CNL understands that this concern is outstanding from AOPFN’s perspective as no further engagement on this topic has occurred since AOPFN reviewed the 2020 draft EIS. <u>Next Steps:</u> CNL is committed to working with AOPFN to incorporate material related to Indigenous Socio-economics in a subsequent revision to the IER. AOPFN and CNL have agreed to the following commitment: AOPFN-1: CNL is committed to providing the funding to continue the Working Group and AOPFN Advisory Committee (AAC) for 10 years.

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	should consider direct, indirect, induced, and cumulative socio-economic impacts. In addition, appropriate mitigation and monitoring measures should be adopted. This is a project-specific concern.			
18. Technical	(a) Emissions and Discharges It is important to AOPFN that emissions to the environment are properly assessed and are mitigated and monitored as appropriate to ensure that the rights and interests of AOPFN members are upheld in relation to the environment (i.e., hunting, trapping, gathering, fishing and cultural ceremonies). This is a project-specific concern.	CNL has responded in writing to AOPFN comments on effluent and effluent mitigation measures citing relevant sections of the EIS as part of the comment response. AOPFN provided feedback on these dispositions in December 2020, and two meetings to discuss responses were held in 2020. <u>CNL Response:</u> The EcoRA evaluates potential impacts to biota, including those in the Kichi-Sibi, from chemical and radiological releases during all phases of the project. The EcoRA found that no potential exposure-related effects to aquatic biota are expected during the Decommissioning Execution phase. The EcoRA also determined that no adverse residual effects to aquatic biota are anticipated during the Institutional Controls or Post-Institutional Controls phases. The EIS describes noise and dust mitigation measures, and monitoring is planned as part of the EA follow-up monitoring.	<u>Where is this topic discussed in the EIS?</u> Section 9.2.3 of the EIS provides the mitigation measures and monitoring for dust. Section 9.4.3 of the EIS summarizes the EcoRA findings related to potential impacts to biota, including those in the Kichi-Sibi, from chemical and radiological releases during all phases of the project. <u>What changes have been made (and where)?</u> No changes to the EIS have been made in response to this concern.	<u>Status:</u> Resolved <u>Next Steps:</u> AOPFN's review of the draft responses to comments on the EIS indicated that CNL's response on dust was adequate, and that they would need to review the PostSA to assess the adequacy of the response related to effluent discharges to the aquatic environment. CNL and the AOPFN are continuing engagement through the framework of the contribution agreement.
19. Traditional Land and Resource Use and Cultural Impacts	Algonquin traditional knowledge should be collected and incorporated into the EIS. It is important to AOPFN that community-specific knowledge be obtained and used to properly characterize current conditions and develop scenarios that accurately represent potential future uses of the site to enable future AOPFN members to practice traditional activities in the region. This is a project-specific concern.	CNL sent two letters asking specific questions of AOPFN to align with the requirements of CEAA (2012) Section 5(1)(c). These questions included: - Do you have any members that currently practice traditional activities such as, trapping, hunting, fishing and/or gathering, near the two projects? - Does [AOPFN], or any members, have sites of ceremonial significance in close proximity [of NPD], or more generally, any cultural activities near [the NPD site]? The CNSC and CNL have contributed funds for AOPFN to disaggregate the AOO AKLUS results, which was completed in November 2020. CNL has also contributed funds for AOPFN to undertake a Harvest and Diet Study and Culture and Rights Study, which were completed in August 2021. CNL has responded in writing to AOPFN comments on incorporation of AKLUS information in the EIS citing relevant sections of the EIS as part of the comment response. AOPFN provided feedback on these dispositions in December 2020, and two meetings to discuss responses were held in 2020. Also, in November 2020, CNL sent by letter to AOPFN the content from the AKLUS that it intended to include in the December 2020 EIS. Revised content was shared again with AOPFN in May 2021. In August 2021, AOPFN shared the Harvest and Diet Study and Culture and Rights Study along with a presentation and letter summarizing the findings and implications of these two studies and the AKLUS. Leading up to the December 2021 EIS submission CNL shared revised	<u>Where is this topic discussed in the EIS?</u> Section 8.9 of the EIS presents information about traditional land and resource use, including specific information about the AOPFN (Section 8.9.2.2.3). Section 9.9 of the EIS assesses risk to traditional land and resource use VCs, including new VCs (Sections 6.3 and 9.9 of the EIS). Section 9.1.1.1 of the EIS presents the future exposure scenarios and groups that are considered in the PostSA TSD. The EIS and supporting studies have assumed that traditional uses do occur adjacent to the NPD site, whether on the Ottawa River or outside the restricted/fenced area. CNL has also assumed that there will be future interest in re-establishing traditional use activities on the NPD site. <u>What changes have been made (and where)?</u> CNL expanded the description of traditional uses and added and evaluated new traditional land and resource use VCs (Sections 6.3 and 9.9) of the EIS. Content from the AKLUS, Harvest and Diet Study and Culture and Rights Study has been added to the EIS (Section 8.9). The EIS update includes additional detail on the VC-related engagement process (Section 6.3) and how	<u>Status:</u> Efforts at resolution in progress; resolution possible but uncertain at this time. CNL understands that this concern is outstanding from AOPFN's perspective as the findings of CNL in the EIS do not correlate with the findings from the three AOPFN-related studies, in relation to impacts on traditional land and resource use, culture, and Indigenous health and well-being. <u>Next steps:</u> CNL and AOPFN have agreed to the following commitments: AOPFN-3: CNL is committed to collaborative development of risk-informed communication materials for the NPD Closure Project for AOPFN community members and application of the AOPFN Algonquin Food Program and Risk Communication Program at the NPD Site. AOPFN-6: CNL is committed to supporting AOPFN-led site inventory work to develop an Algonquin Knowledge baseline for the entire NPD site. Where AOPFN identifies important resources that could be impacted by the project, CNL is committed to evaluate and implement additional mitigation measures if necessary. AOPFN-18: CNL is committed to co-developing with the AOPFN additional mitigation measures to include within the NPD Closure Project Environmental Protection Plan to ensure that items of value to

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		Sections of the EIS (Section 8.9 and 9.9) and sought and incorporated AOPFN feedback. <u>CNL Response:</u> CNL agrees that traditional knowledge from the AOPFN and other Indigenous Nations, communities and organizations should be integrated into the EIS. CNL has contributed funding to the preparation of an AOPFN AKLUS, Harvest and Diet Study and Culture and Rights Study and has integrated findings and concerns into the EIS. CNL includes an Indigenous receptor group in its PostSA. CNL has completed an initial comparison of the AOPFN study results with the characteristics of the Indigenous receptor used in the PostSA and found that its assumptions in almost all cases are conservative for the Indigenous receptor profile. The predicted peak dose to an Indigenous receptor is 0.0004 mSv/yr which is 500 times less than the dose criterion. The analysis demonstrates that the impact on Indigenous Peoples and the environment is negligible.	Indigenous interests have been incorporated into the VCs selected for the NPD Closure Project. CNL has provided AOPFN an opportunity to directly integrate a summary of its differing perspective on impacts on traditional land and resource use (Section 9.9.6.1) and overall assessment findings (Section 11.1), into the EIS.	AOPFN are protected.
19. Traditional Land and Resource Use and Cultural Impacts	Impact on ability to practice traditional activities. AOPFN is concerned about continued ability to harvest and consume wildlife and natural materials from the area, including hunting, plant harvesting and fishing. AOPFN is concerned that harvesting sites could become compromised in the future, leading to concerns over safety that would impact members’ abilities to pass on AOPFN knowledge on harvesting to children. This would in turn affect the ability of future generations to use the area; and that project-related activities would exacerbate the issue of alienation and further limit members’ access to the area, and perpetuate the difficulty of exercising their Aboriginal rights. AOPFN disagrees with CNL’s conclusion of no impacts on traditional land use. AOPFN’s four studies, supported by evidence from traditional land users themselves identify the following existing impact pathways: • Lack of access to the NPD site since 1962; • Diminished quality and quantity of game species in preferred hunting areas; • Lack of confidence in the health of animals, fish, medicines, and waters,	CNL has sent two targeted letters asking specific questions of AOPFN to align with the requirements of CEAA (2012) Section 5(1)(c). CNL has responded in writing to AOPFN comments on safety and quality of experience on the land citing relevant sections of the EIS as part of the comment response. AOPFN provided feedback on these dispositions in 2020 December, and two meetings to discuss responses were held in 2020. CNL is continuing its efforts to address these concerns by committing to: (i) Involving the Indigenous Nations, communities and organizations, including AOPFN, in monitoring activities that will confirm the conclusions of the EIS. An Indigenous-driven monitoring program can help to reduce fear or anxiety associated with traditional uses occurring adjacent to and near the CNL managed properties and build confidence that the decommissioning strategy and mitigation measures are effective (ii) Developing an Indigenous-driven risk-informed communications program for the NPD Closure Project to promote understanding of the EIS results and to help alleviate the concerns related to negative perceptions and feelings of discomfort and concern (Section 9.9.5 of the EIS). CNL, AECL and the AOPFN finalized a LTRA in June 2023 that includes, as matters of mutual interest, (1) logistical support for the development of an AOPFN guardian program to enable stewardship and monitoring at and in the vicinity of the CNL operated sites and (2) risk communication re: the health of country foods, medicines and waters at, and in the vicinity of, CNL operated sites in the territory that AOPFN asserts is its unceded traditional territory. Note: the LTRA does not provide AOPFN’s consent for the proposed ISD decommissioning plan for NPD.	<u>Where is this topic discussed in the EIS?</u> The EIS discusses concerns about potential loss of connection to land and water (e.g., feeling of discomfort or concern), and loss of land and water use in Section 9.9.5. General plans for restoration and end state, including access considerations, are described in Section 4.3.1.9 of the EIS. <u>What changes have been made (and where)?</u> CNL added discussion of loss of connection to and use of lands and water to Section 6.3 in the EIS (interests and concerns related to VCs) and in new Sections 9.3.1.1, 9.6.1.1, and 9.9.1.1 in the EIS. CNL has provided AOPFN an opportunity to directly integrate a summary of its differing perspective on impacts on traditional land and resource use (Section 9.9.6.1) and overall assessment findings (Section 11.1), into the EIS.	<u>Status:</u> Further alignment on this concern not possible CNL’s technical assessment was conducted in accordance with the requirements of CEAA (2012). CNL’s conclusion is that the project will not interfere with traditional activities or have a negative impact on the biological resources on which they are dependent. CNL understands that this concern is outstanding from AOPFN’s perspective based on AOPFN feedback in April 2023. The findings of CNL are not supported by the traditional users themselves and CNL has chosen not to update the results of its effects assessment with this information. <u>Next steps:</u> CNL and the AOPFN are continuing engagement through the framework of the contribution agreement. CNL wishes to continue discussions with AOPFN to better understand the community’s perspective and values and any fears, or concerns associated with the NPD site and traditional use near the site. CNL has proposed a workshop with AOPFN focused on effects to traditional land and resource use, and on commitments to mitigate this concern. CNL and AOPFN have agreed to the following commitment: AOPFN-2: CNL will support a Cultural Protection and Commemoration Plan in relation to the NPD site. AOPFN-3: CNL is committed to collaborative

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	and in their safety for human consumption. This is a project-specific concern.	CNL seeks to develop a mutual understanding of the perceived effects of the NPD Closure Project activities on the environment and any potential negative impacts on Aboriginal and/or treaty rights. This includes, but is not limited to, rights to trap, hunt, fish, gather, or harvest as well as the continuation and uninterrupted access to cultural and spiritual activities on the lands and waters. <u>CNL Response:</u> CNL acknowledges AOPFN’s concerns about the safety of the NPD site and the potential impacts on the rights of the AOPFN and other Indigenous Nations, communities and organizations to practice traditional activities around the NPD site. CNL has assessed potential effects related to dust and noise nuisance, loss of connection, safety of harvesting and consuming local foods, and changes to access and identified no significant adverse effects. To instill confidence in the EIS findings and the effectiveness of the follow-up monitoring, CNL will involve the AOPFN and other Indigenous Nations, communities and organizations in the monitoring program, which aims to confirm the predictions of the EIS. CNL notes that the final end state is the only time when changes to access will occur; the final end state of the NPD site will be an improvement from current conditions. The PostSA TSD addresses the potential for concerns about loss of connection to land and water, and about food safety. The PostSA and EIS (and other supporting studies) have demonstrated that, there are no concerns about the accessibility or safety of the NPD site in the long term based on several different future use scenarios, including self-sufficient Indigenous receptors. The proposed activities will result in an enhancement of current conditions at the NPD site and will improve the ability to practice traditional activities in the area surrounding the NPD site. These findings, which will be confirmed by monitoring, may reduce concerns about loss of connection to land and water, and about food safety.		development of risk-informed communication materials for the NPD Closure Project for AOPFN community members and application of the AOPFN Algonquin Food Program and Risk Communication Program at the NPD Site. AOPFN-5: CNL is committed to support the AOPFN with NPD Closure Project and NPD site specific Guardian monitoring activities, incorporating traditional knowledge and AOPFN valued components. Until the Guardian Program is stood up, CNL can support AOPFN participation/observation in our current environmental monitoring activities. CNL welcomes recommendations for other monitoring/mitigation activities that should be integrated into our existing program to ensure that environmental and cultural components of value to AOPFN are protected. AOPFN-6: CNL is committed to supporting AOPFN-led site inventory work to develop an Algonquin Knowledge baseline for the entire NPD site. Where AOPFN identifies important resources that could be impacted by the project, CNL is committed to evaluate and implement additional mitigation measures if necessary. AOPFN-15: CNL is committed to work jointly with AOPFN to develop a NPD site specific TLRU discovery plan. AOPFN-18: CNL is committed to co-developing with the AOPFN additional mitigation measures to include within the NPD Closure Project Environmental Protection Plan to ensure that items of value to AOPFN are protected.
19. Traditional Land and Resource Use and Cultural Impacts	Preservation of cultural resources, and mitigation of impacts to cultural resources It is important to the AOPFN that traditional land use and cultural resources are protected and potential effects are mitigated and monitored in a way that recognizes the interdependencies between ecological, socio-economic, community and cultural health. AOPFN is concerned that the EIS has only considered the presence of ceremonies and access to physical archaeological resources, neglecting other cultural values of importance to AOPFN such as transmission	CNL has responded in writing to AOPFN comments on preservation of cultural resources citing relevant sections of the EIS as part of the comment response. AOPFN provided feedback on these dispositions in December 2020, and two meetings to discuss responses were held in 2020. Also, in November 2020, CNL sent by letter to AOPFN the content from the AKLUS that it intended to include in the December 2020 EIS. Revised content was shared again with AOPFN in 2021 May. In 2021 August, AOPFN shared the Harvest and Diet Study and Culture and Rights Study along with a presentation and letter summarizing the findings and implications of these two studies and the AKLUS. Leading up to the December 2021 EIS submission CNL shared revised Sections of the EIS (Section 8.9 and 9.9) and sought and incorporated AOPFN feedback. CNL is attempting to further address concerns on this topic through	<u>Where is this topic discussed in the EIS?</u> • CNL added content from the AKLUS report to the EIS. The EIS update includes additional detail on the VC-related engagement process and how Indigenous interests have been incorporated into the VCs selected for the NPD Closure Project. • Content from the AKLUS, Harvest and Diet Study and Culture and Rights Study has been added to Sections 8.9 and 9.9 of the EIS.	<u>Status:</u> Efforts at resolution in progress; resolution possible but uncertain at this time. CNL understands that this concern is outstanding from AOPFN’s perspective as the findings of CNL do not correlate with the findings from the three AOPFN studies, in relation to impacts on traditional land and resource use and culture. AOPFN is also concerned that commitments related to collaborative development of mitigations and monitoring activities remain too vague. <u>Next steps:</u> CNL and the AOPFN are continuing engagement through the framework of the contribution agreement. CNL wishes to continue discussions with AOPFN to better understand the community’s

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	of traditional knowledge, cultural landscapes as well as trails and travel-ways such as the Ottawa river. Further mitigations for impacts to traditional use are limited to construction timing, dust suppression, and communication/notification. AOPFN is seeking a collaborative process to identify culturally appropriate ways to mitigate potential impacts and concerns of AOPFN and AOPFN Knowledge Keepers. This is a project-specific concern.	project commitments related to involvement in the monitoring and key protocols and procedures that will be co-developed for the NPD site (see Next Steps). CNL, AECL and the AOPFN finalized a LTRA in June 2023 that includes, as a matter of mutual interest, cultural protection, promotion, education, recognition and reconciliation. The LTRA does not provide AOPFN’s consent for the proposed ISD decommissioning plan for NPD. AOPFN has identified that there are only some mechanisms from the proposed LTRA which are applicable to NPD (i.e., the Guardian Program and Risk Communication Program, characterization of historic harms). AOPFN has indicated that project specific commitments in this area are required. <u>CNL Response:</u> CNL has included a summary of AOPFN traditional knowledge and land use, incorporated the valued species identified by AOPFN, and recorded main concerns about the project in the EIS, which also includes new VCs as well as updated mitigation measures related to the assessment of traditional land and resource use. CNL would be willing and pleased to work with AOPFN on identifying culturally appropriate mitigation measures to deal with effects associated with the proposed project. CNL invites AOPFN to identify timing and methodology to perform this work.	Mitigation measures for Indigenous Land and Resource Use are presented in Section 9.9.3.2 and for Indigenous Socio-Economic and Health in Section 9.10.1.3.2. <u>What changes have been made (and where)?</u> Mitigation measures have been updated in the EIS, and the Cultural Resource Management Procedure has been referenced as a mitigation.	perspective and values, as well as any fears or concerns associated with the NPD site and traditional use near the site. CNL proposes a workshop with AOPFN focused on effects to traditional land and resource use and on future commitments to mitigate this concern. CNL and AOPFN have agreed to the following commitment: AOPFN-2: CNL will support a Cultural Protection and Commemoration Plan in relation to the NPD site and CNL commits to involve AOPFN in any future archaeological programs at or around the NPD site. AOPFN-3: CNL is committed to collaborative development of risk-informed communication materials for the NPD Closure Project for AOPFN community members and application of the AOPFN Algonquin Risk Communication Program at the NPD Site. AOPFN-5: CNL is committed to support the AOPFN with NPD Closure Project and NPD site specific Guardian monitoring activities, incorporating traditional knowledge and AOPFN valued components. Until the Guardian Program is stood up, CNL can support AOPFN participation/observation in our current environmental monitoring activities. CNL welcomes recommendations for other monitoring/mitigation activities that should be integrated into our existing program to ensure that environmental and cultural components of value to AOPFN are protected. AOPFN-6: CNL is committed to supporting AOPFN-led site inventory work to develop an Algonquin Knowledge baseline for the entire NPD site. Where AOPFN identifies important resources that could be impacted by the project, CNL is committed to evaluate and implement additional mitigation measures if necessary. AOPFN-15: CNL is committed to work jointly with AOPFN to develop a NPD site specific chance find procedure, TLRU discovery plan, Eagle Feather Protocol and cultural protection plan. AOPFN-18: CNL is committed to co-developing with the AOPFN additional mitigation measures to include within the NPD Closure Project Environmental Protection Plan to ensure that items of value to AOPFN are protected.

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19. Traditional Land and Resource Use and Cultural Impacts	Concern about the size of the study areas for the assessment of effects on traditional land use. It is important to the AOPFN that all potential effects on traditional land use are considered by identifying study areas that encompass not just biophysical and physical effects, but also changes to the environment that would affect the values and sense of safety of AOPFN members. AOPFN is concerned that CNL has not adopted the larger Local and Regional Study Areas used by AOPFN in their studies. This highlights the continued lack of understanding of just how large the impact zone on Traditional Land and Resource Use is around the NPD site. This is a project-specific concern.	CNL is attempting to address these concerns by committing to: (i) Involving the Indigenous Nations, communities and organizations, including AOPFN, in monitoring activities that will confirm the conclusions of the EIS. An Indigenous-driven monitoring program can help to reduce fear or anxiety associated with traditional uses occurring adjacent to and near the CNL managed properties and build confidence that the decommissioning strategy and mitigation measures are effective. (ii) Developing an Indigenous-driven risk-informed communications program for the NPD Closure Project to promote understanding of the EIS results and to help alleviate the concerns related to negative perceptions and feelings of discomfort and concern (Section 9.9.5 of the EIS). CNL, AECL and the AOPFN finalized a LTRA in June 2023 that includes, as matters of mutual interest, (1) logistical support for the development of an AOPFN guardian program to enable stewardship and monitoring at and in the vicinity of the CNL operated sites and (2) risk communication re: the health of country foods, medicines and waters at, and in the vicinity of, the CNL operated sites in the territory that AOPFN asserts is its unceded traditional territory The LTRA does not provide AOPFN’s consent for the proposed ISD decommissioning plan for NPD. AOPFN has identified that there are only some mechanisms from the proposed LTRA which are applicable to NPD (i.e., the Guardian Program and Risk Communication Program, characterization of historic harms). AOPFN has indicated that project specific commitments in this area are required. AOPFN has drafted Section 9.9.6 of the EIS, identifying remaining concerns AOPFN has with CNL’s assessment approach. <u>CNL Response:</u> CNL acknowledges that each Indigenous Nation, community or organization may establish different study area boundaries, and may identify different potential effects of concern. CNL is working with Indigenous Nations, communities and organizations, including AOPFN, to improve risk communications, promote understanding of the EIS results, and involve Indigenous groups in monitoring to build confidence that the land is safe for use (see further discussion below). For the assessment of effects on traditional land and resource use, CNL selected a Local Study Area that extends beyond NPD property boundaries, including Crown land in Ontario and Quebec, and the Ottawa River. If any effects were to be experienced, they would occur in the selected Local Study Area. If required, based on the results of the assessment, the boundaries of the Local Study Area could be extended. In Section 9 of the EIS, the assessment confirmed that there are no measurable effects for any environmental component beyond the Local Study Area. Enlarging the Local Study Area would not change these findings. Similarly, the Regional Study Area boundaries were chosen to	<u>Where is this topic discussed in the EIS?</u> Section 8.9.1 of the EIS presents the spatial boundaries selected by CNL to assess potential effects on the Indigenous traditional land and resource use environment. Section 9.9 of the EIS presents the assessment of effects to traditional land and resource use VCs, including further discussion of the assessment boundaries used (Section 9.9.2 of the EIS). Note that in its review of these sections, the AOPFN indicated that they continue to disagree with CNL’s conclusion that there are no measurable effects to traditional land and resource use. <u>What changes have been made (and where)?</u> No change has been made to the study areas used in the assessment. CNL has provided AOPFN an opportunity to directly integrate a summary of its differing perspective on impacts on traditional land and resource use (Section 9.9.6.1) and overall assessment findings (Section 11.1), into the EIS.	<u>Status:</u> Further alignment on this concern unlikely. CNL’s technical assessment was conducted in accordance with the requirements of CEAA (2012). CNL understands that this concern is outstanding from AOPFN’s perspective because CNL has chosen not to adopt the study area boundaries from the AOPFN studies. <u>Next steps:</u> AOPFN and CNL disagree on the assessment area boundaries and on the assessment of impacts to TLRU. Through continued engagement at the Working Group, CNL hopes that the parties are able to find common ground on this topic. CNL and AOPFN have agreed to the following commitment: AOPFN-3: CNL is committed to collaborative development of risk-informed communication materials for the NPD Closure Project for AOPFN community members and application of the AOPFN Algonquin Risk Communication Program at the NPD Site. AOPFN-5: CNL is committed to support the AOPFN with NPD Closure Project and NPD site specific Guardian monitoring activities, incorporating traditional knowledge and AOPFN valued components. Until the Guardian Program is stood up, CNL can support AOPFN participation/observation in our current environmental monitoring activities. CNL welcomes recommendations for other monitoring/mitigation activities that should be integrated into our existing program to ensure that environmental and cultural components of value to AOPFN are protected. AOPFN-6: CNL is committed to supporting AOPFN-led site inventory work to develop an Algonquin Knowledge baseline for the entire NPD site. Where AOPFN identifies important resources that could be impacted by the project, CNL is committed to evaluate and implement additional mitigation measures if necessary. AOPFN-18: CNL is committed to co-developing with the AOPFN additional mitigation measures to include within the NPD Closure Project Environmental Protection Plan to ensure that items of value to AOPFN are protected.

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		include the expected area of possible effects. The assessment, which was conducted per <i>CEAA</i> (2012) requirements, found that no measurable effects on traditional land use VCs in the Regional Study Area are expected from the project.		
19. Traditional Land and Resource Use and Cultural Impacts	Participation of knowledge holders in the assessment of effects to TLRU AOPFN is concerned about the lack of integration of AOPFN knowledge and AOPFN members into the assessment of effects on traditional land and resource use, culture, and Indigenous health and well-being. AOPFN holds that it is a principle of meaningful assessment of effects on Indigenous land use, culture, and health and well-being that not only must Indigenous inputs be provided into the process, but the Indigenous Knowledge holders, with their unique expertise as the actual land users and culture holders, must be involved in effects characterization and significance estimation. This is not a project-specific interest; however it has implications for the EA process and methods used in this project-specific assessment.	In July 2020, AOPFN submitted formal comments on the 2020 EIS. Several comments were related to effects on traditional land and resource use, culture, Indigenous health and well-being. In their letter dated August 13, 2021, that outlined the implications of the AOPFN studies for the NPD Closure Project, AOPFN highlighted that best practice considers all potential impact pathways and that for impacts on the human environment they should be considered by the people who would be impacted themselves. AOPFN reiterated to CNL in its feedback from April 2023 that Knowledge holders should participate in the effects characterization for traditional land, resource use and culture. <u>CNL Response:</u> CNL acknowledges that AOPFN is concerned that Knowledge holders did not participate in the effects assessment. The EIS and supporting studies have assumed that traditional uses do occur adjacent to the NPD site, whether on the Ottawa River or outside the restricted/fenced area. CNL has also assumed that there will be future interest in re-establishing traditional use activities on the NPD site. CNL has determined that there are no adverse impacts on Traditional Land and Resource Use resulting from the NPD Closure Project. Indigenous Nations, communities and organizations often prefer a different approach, consider different factors, and evaluate against a different baseline than CNL and, subsequently, the findings of the Indigenous Nations, communities and organizations, and CNL, differ. CNL has provided AOPFN an opportunity to directly integrate its assessment findings for impacts on traditional land and resource use within the EIS. Through the contribution agreement with AOPFN, CNL provided funding for a Culture and Rights Study. CNL has provided evidence in the EIS to support the conduct of a rights impact assessment between the CNSC and AOPFN. The proposed NPD Closure Project has the potential to help reduce concerns of alienation and/or fears. The proposed project involves a long-term solution to ensure the waste that currently resides at the NPD site is effectively contained and isolated from the environment, ensuring public safety. This solution has the potential to result in additional lands being freed up for traditional harvest or other uses by Indigenous peoples or the public. CNL stands by its conclusion that the project will not interfere with traditional activities or have a negative impact on the biological resources on which they are dependent. Ultimately, the decision of impacts to rights rests with the CNSC. If the CNSC finds any potential impacts to AOPFN’s Indigenous and/or treaty rights, CNL remains committed to understanding these rights and working collaboratively to ensure that they are appropriately mitigated to the greatest extent possible.	<u>Where is this topic discussed in the EIS?</u> Section 8.9 of the EIS presents information about traditional land and resource use, including specific information about the AOPFN (Section 8.9.2.2.3). Section 9.9 of the EIS assesses risk to traditional land and resource use VCs, including new VCs (Sections 6.3 and 9.9). Section 9.1.1.1 of the EIS presents the future exposure scenarios and groups that are considered in the PostSA TSD. <u>What changes have been made (and where)?</u> CNL expanded the description of traditional uses and added and evaluated new traditional land and resource use VCs (Sections 6.3 and 9.9 of the EIS). Content from the AKLUS, Harvest and Diet Study and Culture and Rights Study has been added to the EIS (Section 8.9). The EIS update includes additional detail on the VC-related engagement process (Section 6.3) and how Indigenous interests have been incorporated into the VCs selected for the NPD Closure Project. CNL has provided AOPFN an opportunity to directly integrate a summary of its differing perspective on impacts on traditional land and resource use (Section 9.9.6.1) and overall assessment findings (Section 11.1), into the EIS.	<u>Status:</u> Further alignment on this concern unlikely CNL’s technical assessment was conducted in accordance with the requirements of <i>CEAA</i> (2012). CNL understands that this concern is outstanding from the AOPFN’s perspective based on AOPFN feedback in April 2023. AOPFN remains concerned that CNL has not shown expertise in assessing effects on these valued components, has not included Algonquin Knowledge holders in the assessment of effects on these valued components and that AOPFN perspectives have had little to no influence on CNL’s assessment findings. <u>Next steps:</u> AOPFN and CNL disagree on the assessment methodology and on the assessment of impacts to TLRU. Through continued engagement at the Working Group, CNL hopes that the parties are able to find common ground on this topic. CNL and AOPFN have agreed to the following commitment: AOPFN-3: CNL is committed to collaborative development of risk-informed communication materials for the NPD Closure Project for AOPFN community members and application of the AOPFN Algonquin Food Program and Risk Communication Program at the NPD Site. AOPFN-5: CNL is committed to develop with AOPFN a meaningful role for AOPFN in the monitoring for the NPD Closure Project in addition to AOPFN participation in current environmental/compliance monitoring. AOPFN-6: CNL is committed to supporting AOPFN-led site inventory work to develop an Algonquin Knowledge baseline for the entire NPD site. Where AOPFN identifies important resources that could be impacted by the project, CNL is committed to evaluate and implement additional mitigation measures if necessary. AOPFN-18: CNL is committed to co-developing with the AOPFN additional mitigation measures to include within the NPD Closure Project Environmental Protection Plan to ensure that items of value to AOPFN are protected.

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
20. Valued Components	(a) Inclusion of VCs identified by AOPFN AOPFN is concerned that the specific species they have identified are sometimes assessed using a representative species. The decision to use a receptor species and the appropriateness of that species was not informed by Algonquin Knowledge. For example AOPFN is concerned that the many fish species are evaluated using only two generic categories – pelagic and benthic and that vegetation is represented by a single VC – terrestrial vegetation. AOPFN also suggests additional work to understand the values, distribution, abundance, and risks to impacts of specific aquatic and terrestrial vegetation is required. Further, AOPFN is concerned that the final decisions on what VCs to include was made by CNL, and was not verified as appropriate by AOPFN, which suggests that Algonquin Knowledge is still not treated as of equivalent value to western science in CNL’s environmental assessment. This is a project-specific concern.	CNL has updated the draft EIS to include a mapping of Indigenous VCs to the effects assessment. CNL shared the new content in Section 6.3 with AOPFN for review and comment. AOPFN has drafted Section 6.3.2.1 of the EIS, identifying remaining issues AOPFN has with the VCs and how they are used in the CNL assessment. Through the contribution agreement, AOPFN and CNL have worked together to conduct site-wide Algonquin Knowledge Seasonal Inventories at the NPD site in 2022 and 2023. <u>CNL Response:</u> CNL initially created a Master List of Candidate Valued Components by reviewing relevant reference documents and applying EA process and site knowledge. These candidate VCs include biota such as fish or birds, as well as abiotic qualities such as cultural and heritage sites, or socio-economic entities such as fishing. CNL provides rationale for including or not including species as a VC. The VCs selected for the NPD Closure Project reflect a wide range of Indigenous interests. Many of the interests and concerns raised by Indigenous Nations, communities and organizations, correspond directly or indirectly to the VCs selected for the project. Based on Indigenous feedback received during engagement activities, CNL has added several human and non-human VCs that were identified as being of importance to Indigenous Nations, communities and organizations. Berries, mushrooms, mink, river otter, weasel, red fox, moose and monarch butterflies were added as VCs, as well as soil quality, groundwater quality, groundwater flow and several Indigenous socio-economic and Indigenous health VCs. In some cases no new VCs were added, because direct, representative or related VCs that encompass the value or interest of the Indigenous Nation, community or organization were already included in the assessment.	<u>Where is this topic discussed in the EIS?</u> A complete listing of VCs assessed by the project can be found in Table 5.2-3 of the EIS while Appendix B provides a Master List of Candidate Valued Components, providing a rationale for including or not including the species as a VC. Section 6.3 of the EIS captures VCs identified by Indigenous Nations, communities and organizations. <u>What changes have been made (and where)?</u> CNL has developed a detailed table (Table 6.3-1 (b)) for Section 6.3 of the EIS that captures VCs of Indigenous Nations, communities and organizations and demonstrates how they are either directly or indirectly assessed in the EIS. CNL shared and incorporated AOPFN feedback into this table in November 2021. CNL has also provided AOPFN an opportunity to directly integrate a summary of its differing perspective on the use of representative species and other VC-related issues (Section 6.3.2.1) into the EIS.	<u>Status:</u> Resolution is in Progress CNL’s EIS considers a wide range of VCs and where individual species have not been selected CNL provides rationale for the use of representative species. CNL and AOPFN have completed four one-day seasonal field inventories at portions of the NPD site and AOPFN has requested funding and time for a site-wide Algonquin knowledge inventory, which has yet to occur. CNL looks forward to discussing the inventory results and recommendations. CNL understands that this concern is outstanding from AOPFN’s perspective, with specific issues raised in the AOPFN-developed Section 6.3.2.1 of the EIS. <u>Next Steps:</u> CNL and the AOPFN are continuing engagement through the framework of the contribution agreement. Using the findings and recommendations from AOPFN’s partial site inventory to date, CNL commits to work with AOPFN to develop specific project and corporate commitments that consider AOPFN valued species and components and mitigations to ensure AOPFN valued species are protected. AOPFN and CNL have agreed to the following commitment: AOPFN-6: CNL is committed to supporting AOPFN-led site inventory work to develop an Algonquin Knowledge baseline for the entire NPD site. Where AOPFN identifies important resources that could be impacted by the project, CNL is committed to evaluate and implement additional mitigation measures if necessary.

Appendix L Métis Nation of Ontario (MNO) Record of Engagement and Interests and Concerns

This appendix provides a complete record of all engagement between CNL and MNO from June 2016 to March 2024 (Table L.1). Table L.1 includes the date and method of the communication / engagement, the topics discussed and participants. The table also highlights engagements where key EA topics were discussed. The key EA topics align with “Generic Guidelines for Preparation of an Environmental Impact Statement Pursuant to the Canadian Environmental Assessment Act, 2012” as well as the requirements of REGDOC 3.2.2 “Indigenous Engagement” and guidance specific to NPD provided by the CNSC in January 2021 (e-doc # 6467843).

Following the record of engagement is a mapping of how the summary of interests and concerns were compiled (Table L.2, as well as a summary of interests and concerns raised by MNO (Table L.3).

Section 4.4.3.1 of the IER summarizes the engagement activities that have taken place to date between CNL and the MNO.

L.1 Record of Engagement - Métis Nation of Ontario (MNO) – 2016 June to 2024 March

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
June 02, 2016 Meeting	This teleconference between CNL staff (including the Director of Corporate Communications) and MNO representatives (including the MNO’s Manager of Natural Resources and Consultations) was an introductory overview discussion on the NPD Closure Project to build awareness on the project and on Métis interests.			√						√	
July 15, 2016 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the President of the MNO introduced the project and requested community input on any potential adverse impacts from project activities. To demonstrate requirements of CEAA, 2012 Section 5(1)(c), the letter requested meaningful feedback on the following: Whether the project may have environmental effect on any lands and/or resources currently used by Aboriginal peoples for traditional purposes; Whether the project may have any perceived impacts on Aboriginal and Treaty Rights; Whether local and traditional knowledge can assist in describing the existing environment; and, The view of Aboriginal communities on proposed valued ecosystems components (environmental attributes) that have been identified for the assessment.				√	√				√	
July 20, 2016 Meeting	This meeting between MNO (including members of the MNO Mattawa/Lake Nipissing Métis Traditional Territory Consultation Committee and the MNO’s Manager of Natural Resources and Consultations) and CNL representatives was an introductory meeting hosted by the MNO in North Bay to share information on the project and learn about the MNO and in particular the MNO Mattawa/Lake Nipissing Métis Traditional Territory Consultation Committee. Six staff members from CNL, from the NPD Closure Project, Corporate Communications and Environmental Protection attended, as well as four members of the MNO Mattawa/Lake Nipissing Métis Traditional Territory Consultation Committee and two MNO staff members. CNL staff shared a presentation on the proposed project, which focussed on: the existing site and its history, alternative means, the project timeline and planned phases for decommissioning, environmental assessments (including its purpose of determining mitigation measures) and Environmental Impact Statement contents, VCs, effluent monitoring and shared North American examples of technique. The MNO identified a number of interests at this meeting. A member of the consultation committee stated that CNL did a good job of identifying the “potential” VCs to their communities and asked if CNL could look into whether berry patches would be affected, sharing that the people in his community did a lot of berry picking along the side of the roads and highways. The same member also inquired on could find out if any historic or current cemeteries that could be affected. Employment opportunities for Métis business owners also came up as a topic of discussion as well as the whether the project would remain on Crown property. Interest in medicinal plants in the region was also identified, as well as an interest in facility tours. This is the first instance where the MNO raised interest in VCs and archaeology and cultural sites.	√	√	√	√					√	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
November 01, 2016 Outgoing telephone call	This telephone call from a CNL communications officer to a member of the Mattawa Métis Council was in follow-up to earlier interest in the Chimney Swifts. CNL had understood there was interest in the Chimney Swifts and left a voicemail offering more information and an opportunity to chat with a subject matter expert.			√						√	
December 22, 2016 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the Presidents representing the Mattawa Métis Council, the North Bay Métis Council and the Sudbury Métis Council inquired about asserted rights and traditional activities in the region around CRL. To demonstrate requirements of CEAA 2012 Section 5(1)(c), the letter requested a better understanding of MNO’s historic and/or modern day use of lands in and/or near both of the projects and asked the following questions: Do members have traditional territory near the NSDF and/or NPD Closure Project? What is the history of the Métis using the areas around the two projects? Do you have any members that currently live in close or reasonable proximity to either of the projects? Do you have any members that currently practice traditional activities such as, trapping, hunting, fishing and/or gathering, near the two projects? Do the Métis have sites of cultural significance in close proximity to either of the two sites, or more generally, any cultural activities near either of the two sites? CNL also indicated interested in learning more about the MNO and any asserted rights, interests or activities members might undertake in the local or regional areas in proximity to the project.				√	√				√	
July 19, 2017 Incoming letter	This letter from the MNO Provisional Council to CNL’s Director of Corporate Communications shared information to CNL on Métis rights, the need for consultation per the Crown’s duty to consult, and confirmation that the MNO Mattawa/Lake Nipissing Traditional Territory Consultation Committee will be the Métis community that CNL should engage with in regards to the proposed project. This is the first instance of the MNO raising the interest of Métis rights and interests and traditional use with respect to the project.					√				√	
July 20, 2017 Outgoing email	This email from CNL’s Director of Corporate Communications to the MNO’s Manager of Natural Resources and Consultation confirmed receipt of the earlier letter and indicated that CNL would respond and look forward to engagement with the MNO.									√	
August 25, 2017 Outgoing letter	This letter to the MNO Provisional Council from CNL’s Director of Communications thanked the MNO for the July letter and shared information on the CNL as the Crown with respect to the duty to consult. This letter also discussed working on an MOU or Consultation Plan between the MNO and CNL.					√				√	
August 30, 2017 Incoming email	This email from the MNO’s Manager of Natural Resources and Consultation to CNL’s Director of Corporate Communications indicated that an agreement between the MNO and CNL should be designed to: Identify Métis-specific values; Identify Métis land use and traditional knowledge; Engage the community; Identify impacts to Métis rights, interests and way of life; Undertake a thorough technical review of the EIS, its baseline data, assumptions and conclusions; Mitigate any potential impacts; and Accommodate those potential impacts that cannot be mitigated.					√				√	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
September 26, 2017 Meeting	This meeting between nine MNO representatives (including members of MNO Mattawa/Lake Nipissing Métis Traditional Territory Consultation Committee and the Manager of Natural Resources and Consultation) and six CNL representatives (including the Director of the NPD Closure Project and the Director of Corporate Communications) in North Bay, Ontario was to discuss developing a work plan agreement/ MOU and to discuss the project. Information shared included: Environmental monitoring; Environmental assessment; Traditional use and traditional use effects assessment; NPD Closure Project timelines; End state; and Species at risk.	√		√	√	√				√	
October 2017 Outgoing letter	This letter from CNL’s Corporate Communications staff to the MNO representative on the ESC was sent enclosing the agenda from the October 26, 2017 ESC meeting and the notes from the June 22, 2016 ESC meeting. The notes gave the following information about the ESC meeting related to the NPD Closure Project: Meggan Vickerd – Manager, NPD Operations at CNL presented to the council an update on the NPD Closure Project comprising of an overview on environmental performance which included current and future site monitoring and reporting. QUESTIONS: Where is the source of tritium at NPD and what percentage is background? Do you monitor at the top of the stack and do you monitor liquid emissions into the Ottawa River? Does the 2020 completion date reflect all closure activities? ESC Action 170622:05 – NPD project to provide ESC members with the airborne tritium levels at NPD? Kurt Kehler is responsible for this action.										√
November 15, 2017 Outgoing email	This email from CNL’s Corporate Communications staff to MNO representatives enclosed links to the full draft EIS, an interactive “public-friendly” executive summary of the draft EIS, the CNSC’s public notice, a short overview of the project and the environmental assessment, as well as detailed information on the timing of the EA process and how to participate in the public comment period.	√	√	√	√	√	√	√	√	√	√
November 17, 2017 Outgoing email	This email from CNL’s Corporate Communications staff to MNO representatives enclosed the draft Aboriginal Engagement Report for the NPD Closure Project and stated, per CEAA, 2012 requirements: “CNL would be pleased to update information in this current draft with input from your community.”	√	√	√	√	√	√	√	√	√	√
December 18, 2017 Incoming email	This email from the MNO’s Manager of Lands, Resources and Consultation to the CNL’s Director of Corporate Communications requested supporting information to assist in the MNO’s review of the NPD Closure Project’s draft EIS.										√
December 18, 2017 Outgoing email	This email from CNL’s Corporate Communications staff to the MNO’s Manager of Lands, Resources and Consultation was to share the complete set of technical support documents to support the MNO’s review of the draft EIS. The email also offered a meeting with the MNO to discuss.	√	√	√	√		√	√	√	√	
March 09, 2018 Meeting	This meeting between representatives of the MNO (including the Manager of Natural Resources and Consultation) and CNL (including the Director of Corporate Communications and NPD Closure Project staff) focussed on the development of an MOU. CNL also shared information on past cultural resources management at CNL and the Stage 1 Archaeological Assessment for the NPD Closure Project with the MNO at this meeting.									√	√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
June 13, 2018 Outgoing email	This email from a CNL communications officer to the MNO’s Director of Lands, Resources and Consultation enclosed 13 documents requested by the MNO related to topics of interest with respect to the NPD Closure Project, which included information on the following: Annual compliance monitoring and reporting; Derived release limits for the NPD site; Past groundwater and hydrogeological reports; Draft follow-up monitoring plans.	√								√	
December 17, 2018	The MOU between the MNO and CNL related to the NPD Closure Project and NSDF Project was signed.	√	√	√	√	√	√	√	√	√	√
January 23, 2019 Incoming email	This email from the MNO’s Manager, Nuclear Energy Lands Resources & Consultations to CNL’s Director of Corporate Communications attached the MNO’s draft hydrogeological and archaeological technical reviews for the NPD Closure Project.	√			√	√	√			√	
February 28, 2019 Incoming email	This email from MNO staff to CNL staff enclosed the MNO’s Traditional Knowledge and Land Use Study (TKLUS).				√	√				√	
April 02, 2019 Outgoing email	This email from CNL’s Director of Corporate Communications to the MNO’s Manager, Nuclear Energy Lands Resources & Consultations and the MNO’s Manager of Lands, Resources and Consultations enclosed a partial set of draft responses to the MNO’s comments on the NPD Closure Project’s draft EIS.		√		√		√	√	√	√	
April 23, 2019 Meeting	This meeting between representatives of the MNO (including members of the Mattawa/Lake Nipissing Traditional Territory Consultation Committee and the Manager of Lands, Resources and Consultation) and CNL (including the Director of Environmental Protection, the Director of Corporate Communications and the Director of the NPD Closure Project) involved an NPD Closure Project update, an overview of environmental monitoring and a presentation on proposed VC for the NPD Closure Project. The update on the NPD Closure Project included an overview of the EIS, which covered the following topics: Alternative means; Valued Components (VC); Baseline environment; Aboriginal land and resource use; Groundwater and the Ottawa River; Effects on the environment; Project timeline; EIS conclusion. The VCs presentation included definition and identification, types of VCs, approach and selection of VCs and the MNO VCs addressed in the environmental assessment. This meeting also included a review and discussion of the draft dispositions to the formal EIS comments and draft dispositions to MNO VCs workshop comments. All questions were addressed verbally at the meeting.	√	√	√	√	√	√	√		√	
October 15, 2019 Incoming email	This email from MNO staff to CNL’s Communications Officer attached the MNO comments on the draft follow-up monitoring plans for the NPD Closure Project.					√	√		√	√	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
October 23, 2019 Meeting	This meeting between CNL representatives (including the Director of the NPD Closure Project, the Director of Corporate Communication and the Environmental Specialist for the NPD Closure Project) and the MNO (including members of the Mattawa/Lake Nipissing Traditional Territory Consultation Committee and the Manager of Lands, Resources and Consultation) involved a discussion of the NPD Closure Project and a review of their comments and CNL responses. Specific topics presented included: Alternative means; Geological site characterization; Archaeological assessment; VCs; Follow-up monitoring; Site restoration.		√	√	√		√		√	√	
October 23, 2019 Community Information Session	This community information involving CNL representatives (including the Director of the NPD Closure Project, the Director of Corporate Communication and the Environmental Specialist for the NPD Closure Project) and MNO representatives (including members of the Mattawa/Lake Nipissing Traditional Territory Consultation Committee and the Manager of Lands, Resources and Consultation) was held in North Bay for MNO citizens. MNO citizens were able to discuss and share feedback on the NPD Closure Project with CNL representatives. Specific topics presented included: Project overview; Environmental assessment; VCs; Groundwater flow and the Ottawa River; Project interactions with the environment; Follow-up monitoring.			√	√				√	√	
November 12, 2019 Incoming letter	This letter from MNO staff to CNL’s Communications Officer outlined the MNO responses to CNL’s disposition of MNO comments on the draft EIS.		√		√		√	√	√	√	
In March 2020, the COVID-19 pandemic impacted in-person engagement activities. CNL adapted to the restrictions providing online platforms for virtual meetings, workshops, webinars, Project updates and open houses.											
April 02, 2020 Virtual meeting	This virtual meeting between CNL (including the Director of Corporate Communications), AECL (including the Director of Communications and Government Reporting), and the MNO (including the Manager, Lands Resources & Consultations) involved preliminary discussions on developing a LTRA.									√	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
May 06, 2020 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the MNO’s Manager, Lands Resources & Consultations enclosed a preliminary version of the 2020 EIS and updated IER and indicated an interest in meeting with the MNO. The letter also asked for feedback through the following three questions: - Any additional information you have regarding traditional use (fishing, hunting, trapping, gathering, practicing cultural ceremonies). - Any additional information on important resources, uses, activities, values and interests to your community near the NPD site. - Let us know of any potential concerns you have with respect to effects and any potential impacts on rights. CNL would be pleased to describe its proposed design and mitigation measures and is open to hearing about other mitigation and monitoring measures from your community.	√	√	√	√	√	√	√	√	√	
June 05, 2020 Outgoing email	This email from CNL’s Communications Officer to the MNO’s Manager of Lands Resources and Consultation was to follow-up on the 2020 May 06 letter sent from CNL.										√
June 06, 2020 Virtual meeting	This virtual meeting between CNL representatives (including the Director of Corporate Communications) and the MNO (including the Manager of Lands, Resources and Consultation) involved further preliminary discussion on a LTRA.										√
September 09, 2020 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the MNO’s Manager, Nuclear Energy Lands Resources and Consultations enclosed a full set of CNL’s responses to the MNO’s comments on the 2017 draft EIS.		√		√		√	√	√	√	
October 01, 2020 Outgoing email	This email CNL’s Communications Officer to the MNO’s Manager, Nuclear Energy Lands Resources and Consultations was to follow up on the September letter enclosing the full set of CNL’s responses to the MNO’s comments on the 2017 draft EIS.										√
October 19, 2020 Incoming email	This email from the MNO’s Manager, Nuclear Energy Lands Resources and Consultations to a CNL Communications Officer was to clarify that a response to CNL’s September letter, which enclosed a full set of dispositions on the MNO comments on the 2017 draft EIS for the NPD Closure Project was in draft and that the consultation committee would need to approve.									√	√
October 30, 2020 Meeting	This meeting was between CNL’s Communications Officer and the MNO’s Manager of Natural Resources and Consultation was to plan for the wider meeting on NPD Closure Project monitoring scheduled for November 09, 2020.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
November 09, 2020 Meeting	This meeting between nine representatives of the MNO (including the Manager, Lands, Resources and Consultation, the Nuclear Policy Analyst and members of the consultation committee) and five CNL staff (including the Manager of Stakeholder Relations, Communications Officers, Director of the NPD Closure Project, Manager of NPD Regulatory Approvals and an Environmental Specialist with the NPD Closure Project) focused on monitoring for the NPD Closure Project. The focus was follow-up monitoring and the potential involvement of MNO citizens in monitoring. Some questions were answered verbally and CNL shared further information on the remaining questions following the meeting. Questions and interests that arose included the following: • Is it dry? • If there is a release what is the contingency plan? • How long until we could harvest on the land? • It would be good to have a reference point for background monitoring; example? • Why not sample the dust in all four corners of the footprint? How do we ensure the dust is properly monitoring across the site? • Do you have an idea on how long it takes for groundwater to flow across the site? • Has the Province of Quebec been consulted? • Do you monitor the noise on the Quebec side? • How is water treated at CRL? • Is there an erosion plan? • Will fumes from grout effect Chimney Swifts? • Interest in citizen monitoring?	√		√					√	√	
November 17, 2020 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the MNO’s Manager, Nuclear Energy Lands Resources and Consultations enclosed follow-up on a number of questions that arose in the earlier meeting on monitoring for the NPD Closure Project. The information provided covered the following: • Background radiation in the region; • Noise monitoring (the MNO had indicated interest in expanded noise monitoring); • Groundwater flow; • Further information on specific phases of decommissioning; • Examples what MNO involvement in monitoring could look like.	√							√	√	
November 30, 2020 Outgoing email	This email from the Director of Corporate Communications for CNL to the MNO’s Manager, Nuclear Energy Lands Resources and Consultations to attend CNL’s virtual industry for the opportunity to learn more about CNL’s operations and projects, including the NPD Closure Project.									√	√
January 11, 2021 Outgoing email	This email from CNL’s Communications Officer to MNO’s Manager, Nuclear Energy Lands Resources and Consultations and Nuclear Policy Analyst enclosed CNL’s dispositions of the MNO’s comments on the three draft follow-up monitoring plans.					√	√		√	√	
February 03, 2021 Virtual meeting	This meeting between CNL (including the Director of Environmental Protection, the Director of the NPD Closure Project, the Manager of Stakeholder Relations and Communications Officer) and the MNO (including the MNO’s Manager, Nuclear Energy Lands Resources and Consultations and Nuclear Policy Analyst) was to discuss CNL’s current monitoring program and where the MNO could be involved in the future with respect to the NPD Closure Project.								√	√	
April 15, 2021 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the MNO’s Manager, Nuclear Energy Lands Resources and Consultations enclosed a preliminary list of commitments and indicated interest in meeting to discuss.									√	√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
May 05, 2021 Outgoing letter	This letter from a CNL communications officer to the MNO’s Manager, Nuclear Energy Lands Resources and Consultations enclosed the 2020 EIS and directed to the sections where the MNO TKLUS had been incorporated (8.9 and 9.9) for verification.									√	√
June 08, 2021 Virtual meeting	This virtual meeting between CNL (including the Manager of Stakeholder Relations and the Director of Corporate Communications), AECL (including the Director of Communications and Government Reporting), and the MNO (including the Manager, Lands Resources & Consultations) involved discussions on developing an LTRA.										√
June 15, 2021 Outgoing email	This email from a communications officer with CNL to the MNO’s Manager, Nuclear Energy Lands Resources and Consultations was to follow-up on the April letter.										√
June 21, 2021 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the MNO’s Manager, Nuclear Energy Lands Resources and Consultations enclosed a draft summary of the MNO’s interests and concerns for the NPD Closure Project for the MNO’s review and verification.									√	√
June 22, 2021 Outgoing email	This email from a communications officer with CNL to the MNO’s Manager, Nuclear Energy Lands Resources and Consultations was to share a CNL proposal on MNO involvement in Environmental Monitoring activities.								√		
July 12, 2021 Incoming letter	This email from the MNO’s Manager, Nuclear Energy Lands Resources and Consultations to a CNL Communications Officer was to provide MNO’s comments on the June 21, 2021 draft summary of the MNO’s interests and concerns for the NPD Closure Project letter.									√	
July 15, 2021 Virtual meeting	This meeting between the MNO’s Manager, Nuclear Energy Lands Resources and Consultations and CNL (including the Manager of Regulatory Approvals for the NPD Closure Project, the Manager for ERM Stakeholder Relations and communications specialists) discussed the MNO’s feedback on CNL’s Table of Interests and Concerns and confirmed that the general topics were accurate, that commitments were in development, and that the long-term relationship agreement between CNL and the MNO would enact the commitments specific to the NPD Closure Project. It was also confirmed that no further formal response on the 2017 draft EIS comments was necessary.									√	√
August 10, 2021 Incoming email	This email from the MNO’s Manager, Nuclear Energy Lands Resources and Consultations to a CNL communications officer was to provide MNO’s comments on the June 22 CNL proposal on MNO involvement in environmental monitoring activities.								√		
August 12, 2021 Outgoing email	This email from a Communications Officer with CNL to the MNO’s Manager, Nuclear Energy Lands Resources and Consultations was to share the draft summary table of interests and concerns (attached) that was revised to reflect our conversation at the July 15, 2021 meeting. CNL added commitments to address the remaining interests and concerns of the MNO.									√	
August 19, 2021 Outgoing email	This email from a Communications Officer with CNL to the MNO’s Manager, Nuclear Energy Lands Resources and Consultations was to confirm that the information from the MNO Traditional Knowledge and Land Use Study has been adequately incorporated into the draft Environmental Impact Statement and confirm that CNL has captured the Valued Components (VC), which the MNO have shared with CNL on the NPD Closure Project, to date. CNL included working revisions of Sections 8.9 and 9.9 of the EIS and Valued Components Identified by Métis Nation of Ontario through the TKLUS.	√			√					√	
August 31, 2021 Outgoing email	This email from a Communications Officer with CNL to the MNO’s Manager, Nuclear Energy Lands Resources and Consultations requested MNO confirmation that CNL has captured accurately the MNO summary of interests and concerns. CNL shared the updated Summary Table of Interest and Concerns, which had been updated following the July 15, 2021 meeting.									√	
September 7, 2021 Outgoing telephone call	This telephone call from a Communications Officer with CNL to the MNO’s Manager, Nuclear Energy Lands Resources and Consultations discussed the MNO’s review of the Table of Interests and Concerns and how CNL planned on submitting the revised draft EIS in October, and would need feedback on the Table before then. A meeting date to discuss updating the MOU between CNL and the MNO was also discussed.										√
September 7, 2021 Outgoing email	This email from a Communications Officer with CNL to the MNO’s Manager, Nuclear Energy Lands Resources and Consultations confirmed the details of the phone call and coordinated the next meeting.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
October 6, 2021 Virtual meeting	This meeting between the MNO’s Manager, Nuclear Energy Lands Resources and Consultations and CNL (including the Manager for ERM Stakeholder Relations and a Senior Communications Officer) discussed a proposed schedule of activities to amend the MOU to cover continued engagement with MNO on the NPD Closure Project and the NSDF Project.										√
October 20, 2021 Outgoing Email	This email from a Senior Communications Officer at CNL to the MNO’s Manager of Lands, Resources, and Consultations (LRC) was to follow up on previous correspondence regarding the Table of Interests and Concerns stating: “the MNO provided verbal agreement to the interests and concerns shared and discussed (attached) at the 2021 July 15 meeting and CNL has been seeking a formal agreement in writing that these are an accurate portrayal of the MNO’s interests and concerns since then.” This email also shared an update on CNL’s plans to submit the revised draft EIS and requested verification by November 15, 2021.									√	√
November 3, 2021 Outgoing Email	This email from a Senior Communications Officer at CNL was to follow up on an email that was sent on October 20, 2021 that included a summary of the next steps on the NSDF Project as well as the NPD Closure Project. This email was to follow up and ensure that the MNO had received this email.									√	√
December 3, 2021 Virtual Meeting	This virtual meeting between a Senior Communications Officer at CNL and the MNO’s Manager of Lands, Resources, and Consultations (LRC) discussed the NSDF Project and the NPD Closure Project. The MNO confirmed knowledge that CNL was submitting the revised draft EIS for the NPD Closure Project in December 2021.										√
December 23, 2021 Letter from CNL to MNO	CNL’ Director of Corporate Communications sent a letter to the MNO’s Manager of Lands, Resources, and Consultations (LRC) providing MNO the opportunity to participate in future diet and harvest studies. The purpose of the letter was to advise the MNO of the opportunity to participate in a study to support the update of derived release limits for airborne and liquid emissions at the Chalk River Laboratories Site. CNL provided information on derived release limits. CNL proposed engaging MNO community members in a survey during the summer of 2022.										√
February 03, 2022 Outgoing Email	This email from a CNL Senior Communications Officer to MNO was to connect to discuss any of the information that CNL shared about Douglas Point. CNL also informed MNO that they hired a new Director of Indigenous Relations. CNL offered to coordinate a brief introductory meeting to discuss the most recent engagements with the MNO Region 7 prior to (the new member of MNO’s) arrival.										√
February 03, 2022 Incoming Email	This email from MNO’s Manager of Nuclear Lands, Resources, and Consultations agreed to coordinate a future discussion in the next while. MNO informed CNL of a new staff person who will be the Consultation Advisor responsible for connecting with CNL hopefully starting on February 14 and MNO requested to meet at that time.										√
March 03, 2022 Outgoing Email	This email from a CNL Senior Communications Officer to MNO’s (Jesse) was to inform MNO that the NPD Closure Project was working on completing all outstanding comments and the response to the MNO’s Water and Archaeology Technical review was complete. CNL attached both the original letter from the MNO, dated January 23, 2019, enclosing the review, as well as the CNL’s responses to the MNO’s review in a word document.										√
March 03, 2022 Incoming Email	This email from MNO’s Manager of Nuclear Lands, Resources, and Consultations to a CNL Senior Communications Officer was to thank CNL for the presentation and discussion about the Douglas Point Decommissioning Project on February 9, 2022. MNO noted that they had spoken with the Georgian Bay Traditional Territory Consultation Committee about initiating a long-term contribution agreement with CNL and the Committee had expressed interest and had asked MNO to reach out to CNL to begin discussions.										√
March 08, 2022 Outgoing Email	This email from a CNL Senior Communications Officer to MNO (Jesse) was to inform MNO of the inclusion of a revised column to link each of MNO’s interests and concerns to a specific aspect of the project, and/or an Aboriginal and treaty right, where possible. CNL informed MNO that the interest and concerns that MNO previously verified would remain unchanged as part of the Environmental Impact Statement (EIS) and Indigenous Engagement Report that is submitted alongside the EIS. CNL asked for MNO to confirm whether they would like to verify that the revised table still reflects your interests and concerns.									√	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
March 16, 2022 Incoming Email	MNO (Jesse) confirmed that MNO would like to review the Summary of Interests and Concerns Table before CNL’s submission to the CNSC.									√	
March 16, 2022 Outgoing Email	This email from a CNL Senior Communications Officer to MNO (Jesse) was to confirm sharing a restructured copy of the table within the next 2 weeks.									√	
March 30, 2022 Incoming email	This email from MNO FN to a CNL Senior Communications Officer was to inquire about the radiation protection training.									√	
April 11, 2022 Outgoing email	This email from a CNL Senior Communications Officer to MNO was to inform MNO that members of the MNO are welcome to come on site and observe monitoring with CNL personnel. Observing monitoring (e.g. collecting biota, surface or groundwater samples) would provide the MNO with a very good idea of monitoring activities at the CRL site.									√	
April 19, 2022 Outgoing email	This email from a CNL Senior Communications Officer to MNO attached the goals document for the GRA with a few minor comments from the ERM team at CNL. CNL offered MNO to give a call or set up a chat if there is clarification needed.									√	
April 23, 2022 Outgoing email	This email from a CNL Senior Communications Officer to MNO FN attached the repackaged summary table of interests and concerns. This repackaging is based on feedback from the Canadian Nuclear Safety Commission (CNSC) on CNL’s December 2021 draft EIS submission package. CNL requested that MNO review the new table and provide feedback with a potential 4 week turnaround.									√	
April 25, 2022 Incoming email	This email from MNO FN to a CNL Communications Officer was to confirm the fact that there are there are multiple opportunities for MNO observers to visit the site should they not have time to complete the radiation protection training.										√
April 27, 2022 Outgoing email	This email from a CNL Communications Officer to MNO FN to CNL’s Industry Day on June 2, 2022.										√
May 06, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the MNO’s Manager of Lands, Resources, and Consultations (LRC) was an invitation to the CNL Industry Day at the Chalk River Laboratories on Thursday, June, 2, 2022 to promote the broader engagement between CNL’s nuclear industry partners and our local supply chain.										√
May 07, 2022 Incoming email	This email from the MNO’s Manager of Lands, Resources, and Consultations (LRC) to a CNL Senior Communications Officer asked if the June 2, 2022 Industry Day was related to all CNL sites, or just CRL? CNL confirmed that the day included all CNL sites.										√
May 09, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the MNO’s Manager of Lands, Resources, and Consultations (LRC) was to follow-up on the April 23, 2022 email requesting feedback on the repackaged summary table of interests and concerns. CNL attached the table.									√	
June 07, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the MNO’s Manager of Lands, Resources, and Consultations (LRC) was to follow-up on the April 23, 2022 and May 9, 2022 emails requesting feedback on the repackaged summary table of interests and concerns.									√	
June 10, 2022 Incoming email	This email from the MNO’s Manager of Lands, Resources, and Consultations (LRC) to a CNL Senior Communications Officer confirmed receipt of the repackaged summary table of interests and concerns and had no comments.									√	
August 19, 2022 Outgoing email	This email from CNL’s Environmental Assessment Section Head to the MNO’s Manager of Lands, Resources, and Consultations (LRC) shared the draft MNO Diet and Harvest Survey for review.										√
August 30, 2022 Outgoing email	This email from CNL’s Environmental Assessment Section Head to the MNO’s Manager of Lands, Resources, and Consultations (LRC) confirmed that the MNO Diet and Harvest Survey could be completed online. CNL proposed meeting in September 2022 to conduct the survey.										√
September 02, 2022 Incoming email	This email from the MNO’s Manager of Lands, Resources, and Consultations (LRC) to CNL’s Environmental Assessment Section Head provided MNO’s comments on the Diet and Harvest Survey.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
September 08, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the MNO’s Manager of Lands, Resources, and Consultations (LRC) offered a fall tour of NSDF and NPD. MNO confirmed interest and provide CNL the contact of the Consultation Advisor to coordinate with.										√
September 08, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the MNO’s Consultation Advisor extended an invitation to the MNO staff and RCC to visit the Chalk River Laboratories (CRL) site and the NPD) site.										√
September 09, 2022 Incoming email	This email from the MNO’s Manager of Lands, Resources, and Consultations (LRC) to CNL’s Environmental Assessment Section Head confirmed that the MNO would like to offer the Diet and Harvest Study survey virtually.										√
September 09, 2022 Outgoing email	This email from CNL’s Environmental Assessment Section Head to the MNO’s Manager of Lands, Resources, and Consultations (LRC) confirmed that CNL would assist in the virtual Diet and Harvest Study survey. CNL requested the MNO identify participants in advance and provide them paper copies. MNO confirmed.										√
September 12, 2022 Incoming email	This email from the MNO’s Manager of Lands, Resources, and Consultations (LRC) to CNL’s Environmental Assessment Section Head asked if there is a deadline to complete the Diet and Harvest Study survey. CNL replied that there is no deadline for completion but CNL was hoping to conduct by the end of November 2022. To meet the deadline CNL offered to conduct the survey virtually.										√
September 22, 2022 Incoming email	This email from the MNO’s Manager of Lands, Resources, and Consultations (LRC) to a CNL Senior Communications Officer replied to CNL’s September 7, 2022 email regarding Radiation Protection Training. MNO asked about the length of training requested.								√		
September 28, 2022 Outgoing email	This email from CNL’s Environmental Assessment Section Head to the MNO’s Manager of Lands, Resources, and Consultations (LRC) asked about dates and locations for the Diet and Harvest Study survey.										√
September 22, 2022 Incoming email	This email from the MNO’s Manager of Lands, Resources, and Consultations (LRC) to CNL’s Environmental Assessment Section Head sharing the mail out that was shared with community members regarding the Diet and Harvest Study survey. MNO requested that CNL provide a short presentation of the NPD and NSDF Projects during the meeting. CNL confirmed.										√
October 01, 2022 Outgoing email	This email from a CNL Senior Communications Officer the MNO’s Manager of Lands, Resources, and Consultations (LRC) provided information about Radiation Protection Training, stating that the training could be covered as a one hour pre-job. MNO confirmed.								√		
October 01, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the MNO’s Consultation Advisor extended an invitation to the MNO staff and RCC to visit the Chalk River Laboratories (CRL) site and the NPD) site.										√
October 03, 2022 Outgoing Letter	This letter addressed to the MNO’s Manager of Lands, Resources, and Consultations (LRC) from CNL’s Director of Indigenous Relations provided a project update and the engagement status with the MNO, CNL noted that the next step to address comments for the MNO to review the final EIS. CNL believes that the next steps are to establish commitments between the MNO and CNL to ensure that all interests and concerns are addressed and tracked to resolution. CNL enclosed an updated draft set of commitments for the MNO’s review. CNL offered additional capacity. CNL also proposed a meeting to establish commitments prior to December 2022. CNL requested that the MNO respond confirming their agreement to proceed with these engagement activities, or modified engagement activities.				√	√				√	
October 05, 2022 Outgoing email	This email from CNL’s Environmental Assessment Section Head to the MNO’s Manager of Lands, Resources, and Consultations (LRC) sent the MNO the updated Diet and Harvest Study survey. CNL asked that the survey be circulated to those participating by Zoom.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
October 11, 2022 Incoming email	This email from MNO’s Consultation Advisor to CNL’s Environmental Assessment Section Head provided the agenda for the October 21, 2022 CNL Diet and Harvest Survey Community Information Session. 15 minutes were allotted for a NPD presentation.										√
October 18, 2022 Outgoing email	This email from a CNL Senior Communications Officer to MNO’s Consultation Advisor confirmed receipt of the October 11, 2020 agenda. CNL asked for an idea of the number of participants. CNL also asked if a community member would be willing to speak to their harvesting and /or cultural narratives prior to the survey.										√
October 19, 2022 Incoming email	This email from MNO’s Consultation Advisor to a CNL Senior Communications Officer shared that they had received 29 RSVPs for the CNL Diet and Harvest Survey Community Information Session. MNO committed to reaching out to the RSVPs to find out if any would be interested in speaking. MNO asked CNL to provide the names of the presenters.										√
October 19, 2022 Incoming email	This email from MNO’s Manager of Lands, Resources, and Consultations (LRC) to a CNL Senior Communications Officer noted that CNL’s request for speakers at the Diet and Harvest Survey Community Information Session may not be possible. This is due to potential time it may take for those interested to share their experiences. CNL confirmed.										√
October 21, 2022 Outgoing email	This email from a CNL Senior Communications Officer to MNO’s Consultation Advisor attached CNL’s presentation for the Diet and Harvest Survey Community Information Session. CNL sent a PowerPoint version via FTP link.										√
October 21, 2022 Community Information Session	CNL staff attended the MNO community information session for citizens who harvest in Region 5 to participate in a Diet and Harvest Study survey. For those who cannot join in person, CNL was also available via ZOOM to guide participants through the survey. The meeting included a presentation on the NPD Closure Project.										√
October 24, 2022 Outgoing email	This email from CNL’s Environmental Assessment Section Head to the MNO’s Consultation Advisor and Manager of Lands, Resources, and Consultations (LRC) thanked the MNO for their participation in the October 21, 2022 Diet and Harvest Survey Community Information Session. CNL requested the surveys completed by the Zoom participants. CNL followed-up on a comment made that the digital survey could be circulated to other Metis Nation of Ontario Members in region 5. CNL requested any additional survey results by November 7, 2022.										√
October 24, 2022 Outgoing email	This email from CNL Senior Communications Officer to the MNO’s Consultation Advisor and Manager of Lands, Resources, and Consultations (LRC) followed-up on the letter sent October 3, 2022.				√	√				√	
October 26, 2022 Incoming email	This email from a MNO community member to a CNL Senior Communications Officer requested a tour of CNL sites.										√
November 01, 2022 Outgoing email	This email from a CNL Senior Communications Officer to a MNO community member offered to support a tour of CNL sites.										√
November 02, 2022 Incoming email	The email from a MNO community member to a CNL Senior Communications Officer confirmed preferred days of the week for a tour and suggested November 11, 2022.										√
November 04, 2022 Outgoing email	This email from a CNL Senior Communications Officer to a MNO community member suggested November 14, 2022 for the requested tour. CNL asked questions about the tour, including if the community member would like to tour the NPD facility.										√
November 05, 2022 Incoming email	The email from a MNO community member to a CNL Senior Communications Officer confirmed that they would like to tour NPD and would provide CNL a date that worked better. CNL follow-up on November 11, 2022 regarding dates.										√
November 14, 2022 Incoming email	This email from the MNO’s Consultation Advisor to CNL’s Environmental Assessment Section Head informed CNL that they had not received any more Diet and Harvest Study surveys. CNL acknowledged and noted that they were processing the results.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
November 15, 2022 Outgoing email	Email invitation from a CNL Senior Communications Officer to the MNO’s Consultation Advisor and Manager of Lands, Resources, and Consultations (LRC) to discuss the NPD Project commitments.										√
November 23, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the MNO’s Consultation Advisor and Manager of Lands, Resources, and Consultations (LRC) proposed the agenda for the October 30, 2022 meeting on NPD commitments. Proposed agenda: LTRA status update; Confirming NPD commitments for the MNO; Ensure commitments are covered within LTRA.										√
November 28, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the MNO’s Consultation Advisor and Manager of Lands, Resources, and Consultations (LRC) advised of the upcoming CNL supply chain event in Pembroke, Ontario. Canadian Nuclear Laboratories in partnership with the AOPFN, County of Renfrew, and Pontiac Regional County Municipality (MRC), will be hosting the “Meet and Greet: CNL Major/Strategic Supply Chain Partners. MNO confirmed receipt.										√
November 28, 2022 Incoming email	The email from a MNO community member to a CNL Senior Communications Officer requested to postpone the tour until the spring of 2023. CNL confirmed receipt.										√
November 30, 2022 Meeting	This meeting between to the MNO’s Consultation Advisor and Manager of Lands, Resources, and Consultations (LRC) and CNL (including the Director of Indigenous Relations and NPD Closure Project staff) focussed on reviewing the NPD commitments and the status of the LTRA.										√
December 01, 2022 Outgoing email	This email from a CNL Communications Officer to the MNO’s Consultation Advisor and Manager of Lands, Resources, and Consultations (LRC) confirmed the next steps from the 2022 November 30 meeting.										√
January 20, 2023 Outgoing Email	This email from a CNL Communications Officer to the MNO Manager, Nuclear Energy Lands Resources and Consultations to inform of the decision to postpone the submission of the NPD Closure Project’s draft Environmental Impact Statement (EIS) until 2023 May to allow for additional Indigenous input. CNL proposed the next steps would be to discuss the MNO’s interest and desired involvement in the NPD project.										√
January 26, 2023 Incoming Email	This email from MNO to a CNL Communications Officer with an invitation to the Métis Business Tradeshow (March 18th/19th 2023) in Midland Ontario. CNL acknowledged receipt of the invitation.										√
March 14, 2023 Outgoing Email	This email from a CNL Senior Communications Officer to the MNO Manager, Nuclear Energy Lands Resources and Consultations with CNL's Indigenous Relations Procurement Strategy.										√
April 14, 2023 This email from CNL to MNO	This email from CNL Senior Communications Officer to a MNO member following up from a previous conversation from 2023 November to inquire if the MNO is still interested in attending a site visit in late spring 2023.										√
July 04, 2023 Emails	This email from CNL Communications Officer to MNO is to discuss MNO's interest in touring the NPD Site Facility. On 2023-07-06 MNO confirmed their interest in an NPD site tour.										√
July 10, 2023 Emails	This email from CNL Communications Officer to MNO is to discuss MNO's availability for an NPD site tour, and availability to first discuss the NPD Commitments. MNO confirmed some upcoming dates for an NPD commitment meeting in 2023 July.										√
July 13, 2023 Outgoing Email	This email from CNL Communications Officer to MNO is to confirm receipt of available times for the MNO and to inform them that CNL will confirm dates and send a draft agenda.										√
August 22, 2023 Emails	Email from CNL Communications Officer to MNO is to provide the draft agenda and potential tour dates for the MNO NPD and CRL site tours. CNL requested dates for the tour, and MNO noted they will send potential dates. CNL confirmed receipt of email. (5 emails).										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
September 19, 2023 Incoming Email	This email from the MNO to CNL Communications Officer is to inform CNL that there has been a lack of interest shown for a CNL site tour. MNO has asked that CNL reach out again in the spring-summer of 2024. CNL confirmed receipt.										v

L.2 Mapping of MNO Interests and Concerns

Table L.2 presents a mapping of how the key interests and concerns relate to detailed feedback and input from the MNO, up to March 2024.
Table L.2 has 3 columns:

- Column 1 identifies the topic, i.e., the subject area the key interest(s) or concern(s) falls under.
- Column 2 presents a key interest or concern, why it is important to the Indigenous Nation, community or organization, and connects it to a project aspect or an Aboriginal or treaty right wherever possible. This may be a summary of multiple related interests or concerns that have been expressed by the Indigenous Nation, community or organization.
- Column 3 presents details of the key interest or concern that the Indigenous Nation, community or organization has identified formally in writing and/or verbally to CNL.

Topic	MNO Key Interests and Concerns	Specific feedback provided by the MNO on this interest/concern
1. Accidents & Malfunctions	(a) Effects of accidents and malfunctions including as applicable to offsite transportation activities It is important to the MNO that impacts from accidents and malfunctions be assessed, and that procedures are in place to notify and provide information to MNO citizens in the event of an accident or malfunction. This is both a site-wide and project-specific concern.	In its comments on the 2017 draft EIS, the MNO expressed concern about the potential accidents and malfunctions related to the proposed project. The MNO also expressed concern about offsite transportation activities in relation to this topic area.
2. Alternatives	(a) Concern about the suitability of In-situ disposal (ISD). It is important to the MNO that future land users of the NPD site are protected. This is a project-specific concern.	In its comments on the 2017 draft EIS, the MNO expressed concern about the suitability of in-situ disposal as an alternative specifically with respect to the ILW inventory.
2. Alternatives	(b) Input into the Alternative Means Assessment It is important that the MNO’s perspectives be taken into account in the assessment of alternatives, because the approach selected has implications for Métis people’s future use of the site. This is a project-specific concern.	In its comments on the 2017 draft EIS, the MNO expressed concern that they were not provided an opportunity to provide input into the four proposed alternatives or the preferred approach selected.
3. Archaeology and Cultural Heritage	(a) Métis-specific Archaeology and Cultural Sites The MNO is concerned that without participation of MNO citizens, the project could potentially lack information about Métis-specific heritage resources. This is both a site-wide and project-specific concern.	In its comments on the 2017 draft EIS, the MNO expressed concern about the lack of involvement and lack of Métis history in the archaeology study. The MNO also requested that a Métis history section be included in the background section of future reports, when relevant to the project area.

Topic	MNO Key Interests and Concerns	Specific feedback provided by the MNO on this interest/concern
3. Archaeology and Cultural Heritage	(b) Archaeological buffer zone and rating It is important that areas with high archaeological value are identified appropriately and protected from project-related impacts.	The MNO consultant provided supplemental review comments in January 2019, including the following comments on archaeology: - Apply a 100 m high potential buffer to the entire length of the Ottawa River shoreline within NPD property area on the historical potential map. - Change the historical potential rating outside of the project area and high potential lands within the NPD property to 'moderate'.
4. Atmospheric Environment	(a) Atmospheric study area boundaries and data It is important to the MNO that study areas are large enough to encompass intangible effects and that baseline conditions in the study areas are correctly represented. This is a project-specific concern.	In its comments on the 2017 draft EIS, the MNO expressed concern about the baseline data used to develop study area boundaries for the atmospheric environment. Further, the MNO expressed concern that the study area boundaries are limited and may not extend to far enough to encompass the area where intangible aspects of Métis way-of-life may be affected and where there is Métis citizens perceive there may be impacts from the project.
4. Atmospheric Environment	(b) C-14 releases from the stack It is important to the MNO that they understand historic releases from the NPD site and implications of potential releases related to the project so they have confidence that the rights and interests of MNO citizens are upheld in relation to the environment. This is a project-specific concern.	In its comments on the 2017 draft EIS, the MNO expressed concern about increases in C-14 releases from the stack in recent years. The MNO also wish to understand any implications of the planned modifications to the stack.
5. Baseline Characterization	(a) Inclusion of Métis-specific socio-economic baseline data and effects This is important to the MNO because the socio-economic characterization and effects assessment should include consideration of Indigenous receptors (including citizens of the Métis Nation), and this can't be done without collecting information from Indigenous Nations, communities and organizations. This is a project-specific concern.	In its comments on the 2017 draft EIS, the MNO expressed concern that Metis-specific socio-economic baseline data was not included and request both collection and presentation of Métis-specific data.
5. Baseline Characterization	(b) Baseline soil contamination (near historic landfill) This is a concern for the MNO because it is important that the final state of the NPD site is safe to use, regardless of whether the contamination comes from the NPD Closure Project or earlier activities. This is a project-specific concern.	In their comments on the 2017 draft EIS, the MNO expressed concern about elevated soil concentrations in historic landfills.
5. Baseline Characterization	(c) Baseline for the Surface Water and Aquatic Environments This is important to the MNO because an understanding of current contamination in the Ottawa River is necessary in order to assess impacts on aquatic biota. It is also important to confirm that there are currently no discharges to the Ottawa River from NPD activities. This is a project-specific concern.	In their comments on the 2017 draft EIS the MNO identified a number of concerns related to the baseline conditions in both the surface water and aquatic environments including: - applicability of the current effluent monitoring plan, to Métis rights and interests; - discharges to the Ottawa River; - baseline and future chemical levels in surface water; - baseline sediment quality data.
5. Baseline Characterization	(d) MNO involvement in baseline data collection activities. This is important to the MNO because engagement should involve two-way communication, information-sharing, and participation in project-related activities This is a project-specific interest.	In its comments on the 2017 draft EIS, the MNO expressed interest in being involved in collection of baseline data for areas of interest.
5. Baseline Characterization	(e) Geological and Hydrogeological site characterization It is important to the MNO that baseline hydrogeological conditions are accurate and well understood, so that the long-term impacts of the NPD Closure Project can be accurately assessed, and management plans can be made. This is a project-specific interest.	The MNO expressed a particular interest in hydrogeology including: - the groundwater flow characteristics being different from CRL site's decommissioning project; - long term impact of groundwater on infrastructure; - groundwater management plan.

Topic	MNO Key Interests and Concerns	Specific feedback provided by the MNO on this interest/concern
6. Engagement	(a) Meaningful engagement using best practices. It is important for the MNO to be meaningfully engaged on the project, using protocols and a workplan that are appropriate for Indigenous engagement and have been developed in consultation with the MNO. This is a project-specific concern.	Early in the engagement process, MNO expressed concern with the level of engagement and the lack of funding to support their involvement. In its comments on the 2017 draft EIS, the MNO expressed the need for Indigenous specific engagement activities and capacity to support meaningful engagement on the NPD Closure Project. The MNO have requested funding to better enable participation, including for the completion of a TKLUS.
6. Engagement	(b) Terminology: Use of “Métis Nation” instead of “Métis community” This is important to the MNO because the language “Métis community” minimizes the political structure and organization that the MNO has and operates under. This is both a site-wide and project-specific concern.	In its comments on the 2017 draft EIS, the MNO requested that CNL use the terminology Metis Nation instead of Metis community.
7. EA Process and Methodology	(a) Effects assessment methodology It is important that impacts of concern to the MNO be considered in the assessment of effects of the project on MNO citizens. This is a project-specific concern.	In its comments on the 2017 draft EIS, the MNO expressed concern in regards to assessment of residual effects, the criteria used to define significance of effects, likelihood analysis; consideration of MNO values, sustainability and uncertainty and CNL’s conclusion on significance of effects.
7. EA Process and Methodology	(b) Cumulative effects This is important to the MNO because it is interested in the overall protection of the Ottawa River and the NPD site, not just the impacts of a single project. This is a project-specific concern.	In its comments on the 2017 draft EIS, the MNO expressed concern about the potential that the NPD Closure Project may interact with existing and reasonably foreseeable projects and activities in the vicinity specifically those occurring at the CRL site.
8. Environmental Effects and Mitigation Measures	(a) Perceived effects of the project It is important to the MNO that the assessment of effects include the potential impacts of negative perceptions from Métis citizens. This is a project-specific concern.	In its comments on the 2017 draft EIS, the MNO expressed concern that the assessment did not include the potential perceptive effects of the project on the rights-bearing Métis Nation.
8. Environmental Effects and Mitigation Measures	(b) Impacts of increased dust and other emissions, noise, traffic volumes, and changes to access including those associated with transportation activities It is important to the MNO that they have input into mitigation and monitoring of dust, noise and emissions and other impacts to Métis harvesters who may be exercising their rights in the vicinity, to confirm that effects are low as predicted and do not extend beyond the project footprint.. MNO would like input in the selection of valued components for the assessment of potential effects. This is a project-specific concern	In its comments on the 2017 draft EIS, the MNO expressed concern and interest related to impacts on the Atmospheric Environment including: • Concern with the assumption that road dust, noise and emissions effects are negligible • An interest in providing input to the monitoring and mitigation for dust, noise and emissions • An interest in the VCs selected for evaluation of effects on the atmospheric environment • Concern about effects resulting from transportation activities
8. Environmental Effects and Mitigation Measures	(c) Involvement of MNO in developing mitigation measures This is important because the MNO feels that consultation and their input should have been sought to ensure reduction and elimination of potential effects. This is a project-specific interest.	In its comments on the 2017 draft EIS, the MNO expressed interest in collaborating to identify mitigation measures, where applicable and in providing input into alternate mitigation measures.

Topic	MNO Key Interests and Concerns	Specific feedback provided by the MNO on this interest/concern
8. Environmental Effects and Mitigation Measures	(d) Need for additional mitigation measures in the surface water, aquatic and terrestrial environments This is important to the MNO because the Ottawa River is of great importance to Métis harvesters, and because effects on vegetation and wildlife may have potential impacts on Métis rights and interests. This a project-specific concern.	In its comments on the 2017 draft EIS, the MNO expressed the following concerns related to mitigation measures: • Need for additional mitigation measures specific to the aquatic environment: Ottawa River, benthic invertebrates, aquatic vegetation, Emerald shiner, White sucker and Lake sturgeon. • The mitigation measures proposed for traditional land use activities are the same as those for the aquatic and terrestrial environments. • Need for additional mitigation measures (beyond standard construction practices) specific to wildlife and vegetation.
8. Environmental Effects and Mitigation Measures	(e) Effectiveness of Mitigation measures It is important to the MNO that the mitigation measures address the potential impacts on Métis citizens, and that the selected measures are likely to be successful. This is a project-specific concern.	In its comments on the 2017 draft EIS, the MNO expressed that mitigation measures and follow-up programs must address the potential impacts of the project on the rights-bearing Métis Nation. They expressed concern about the likelihood of mitigation being successful.
9. Indigenous Health	(a) Post closure Safety Assessment and Indigenous Health It is important to MNO that the human health assessment reflects the lifestyle of MNO citizens. This is a project-specific concern.	The MNO has raised concerns that their traditional food consumption levels are not reflected in the human health assessment. The MNO requested separate consideration of Indigenous Health within the EIS. The MNO would like involvement in the scoping/execution of future lifestyle surveys to ensure the best response rates of Métis harvesters.
10. Métis Rights and Interests	(a) Participation and engagement related to Métis rights and interests. The MNO believes that engagement is required to ensure that CNL understands, presents and assesses any Métis Rights and Interests that may be impacted in the general and surrounding areas resulting from the project. This is both a site-wide and a project-specific interest.	Early in the engagement process, the MNO identified a lack of documentation of Métis rights and interests. The MNO have requested to be more deeply engaged in the NPD Closure Project to ensure that Métis rights are incorporated. The MNO wishes to ensure that MNO rights in the vicinity of the project are accurately presented within the EIS. The MNO would like an opportunity to provide input into the Environmental Protection Program to ensure Métis rights are reflected in the document and for the ongoing reduction of potential effects on Métis rights and interests. The MNO specifically indicated that rights and interests go beyond hunting and trapping.
10. Métis Rights and Interests	(b) Impacts on Métis rights and interests. It is important to MNO that the rights and interests of the Métis Nation be understood and upheld. This is a project-specific concern.	In its comments on the 2017 draft EIS, the MNO expressed concern about the assessment of impacts on Métis rights and interests including: • Impacts on Métis harvesting rights. • Significant information gaps, including Métis-specific VCs and potential perceptive effects of the project on the regional rights-bearing Métis Nation. • MNO's perception and intangible aspects of Métis way-of-life – see Row 14c.
11. Monitoring	(a) Review and input to, monitoring plans This is important to the MNO because they want an opportunity to provide input into monitoring details (e.g., frequency, location, parameters) This is a project-specific interest.	In its comments on the 2017 draft EIS, the MNO requested that they be engaged to provide input into the final scope and framework of the follow-up monitoring program. The MNO have also indicated their desire to be involved in development and design of the draft follow-up monitoring plans. The MNO expressed specific interest in the monitoring plan design related to monitoring the preferential pathway and slope between the facility and the river and environmental monitoring of sediment.
11. Monitoring	(b) Participation in monitoring This is important to MNO because they want to ensure transparency and confidence in monitoring activities. This is a project-specific interest.	The MNO have indicated that they wish to participate in implementation of the draft follow-up monitoring plans. MNO submitted supplemental comments on CNL's draft Follow-up monitoring plans (October 2019). Within the supplemental comments, the MNO requested that their input be sought during reviews and audits of the follow-up monitoring program. There was renewed interest from the MNO in the Fall of 2020 and early in 2021 in the draft follow-up monitoring plans and opportunities for involvement in monitoring activities.
11. Monitoring	(c) Overall process and incorporating MNO comments It is important to the MNO that their comments are considered and incorporated into EA documents, including the draft follow-up monitoring	The MNO wants to ensure that when their comments on the EIS are addressed that relevant changes are also incorporated in the draft follow-up monitoring plans. Similarly, the MNO provided comments on groundwater characterization that should be incorporated through changes to the groundwater monitoring plan as necessary.

Topic	MNO Key Interests and Concerns	Specific feedback provided by the MNO on this interest/concern
	plans. This is a project-specific concern.	Finally, the MNO wants to ensure that MNO traditional uses and harvesting rights are included in the EIS and incorporated into the draft follow-up monitoring plans.
11. Monitoring	(d) Specific technical comments on Follow-up monitoring Plans It is important to the MNO that the monitoring plans reflect their input on monitoring details (e.g., frequency, location, parameters) This is a project-specific concern.	MNO submitted supplemental comments on CNL's draft Follow-up monitoring plans (October 2019). Specific technical comments include: - Groundwater benchmarks used in the Groundwater Monitoring Plan; - Evaluation and Acceptance Criteria; - Tritium as an indicator contaminant of concern; - Baseline interactions between sediment, groundwater, and surface water; - Landfill groundwater monitoring; - More detail required on sample locations and number of samples.
12. Socio-Economics	(a) Consideration of Métis use and enjoyment of the land This is important to the MNO because use and enjoyment of the land are values that may be affected by the project, and should be considered in the assessment. This is a project-specific concern.	In its comments on the 2017 draft EIS, the MNO expressed concern that assessment of impacts to the socio-economic component needed to consider Métis use and enjoyment of the land.
12. Socio-Economics	(b) Socio-economic mitigation measures and follow-up monitoring This is a concern for the MNO because it is not clear how effects related to the socio-economic environment can be mitigated and/or verified through activities in other environmental compartments. This is a project-specific concern.	In its comments on the 2017 draft EIS, the MNO expressed concern that the proposed mitigation measures are those typically used for construction activities and may be inadequate to address indirect socio-economic effects. Further, the MNO identified a lack of follow-up monitoring for the socio-economic environment.
13. Technical	(a) Local Study Area does not vary between environmental components This is important to the MNO because they want to ensure that potential effects on the different types of VCs have been thoroughly considered and assessed. This is a project-specific concern.	In their comments on the 2017 draft EIS the MNO expressed concern that the Local Study Area does not vary between environmental components.
13. Technical	(b) Concern about whether the Institutional Control Period is long enough This is important to the MNO because they would like assurance that the end state of the NPD site will be acceptable for safely engaging in unrestricted land use. This is a project-specific concern.	In their comments on the 2017 draft EIS, the MNO expressed concern about the length of the Institutional Control Period.
13. Technical	(c) Benefits to Indigenous peoples The MNO is interested in reviewing changes to the project, which is also a requirement under the CNSC's Generic EIS Guidelines. This is a project-specific interest.	In their comments on the 2017 draft EIS the MNO expressed interest in seeing the changes that have been made to the project, including benefits of these changes.
13. Traditional Land and Resource Use and Cultural Impacts	(a) Métis traditional knowledge and Métis specific information should be collected and incorporated into the EIS. It is important to the MNO that community-specific knowledge be obtained and used, to properly characterize current conditions and develop scenarios that accurately represent potential future uses of the site. This is a project specific concern.	In its comments on the 2017 draft EIS, the MNO identified a number of areas related to traditional use where the assessment could be strengthened by integration of Metis specific information including: - collection of Métis specific information related to areas of interest, via a Métis -specific traditional land use study; - integration of Métis-specific information into the EIS and IER; - consideration of activities such as fishing in the Ottawa River and Métis harvesting regions; - description of the Indigenous rights practiced in the vicinity of the project; - inclusion of geographical setting from Indigenous perspective;

Topic	MNO Key Interests and Concerns	Specific feedback provided by the MNO on this interest/concern
		description of plants and other species of traditional importance to the MNO.
14. Traditional Land and Resource Use and Cultural Impacts	(b) Spatial boundaries for Indigenous land and resource use It is important to the MNO that the determination of study areas takes into account the actual use of the land by Metis citizens for traditional purposes. This is a project-specific interest.	In its comments on the 2017 draft EIS, the MNO expressed interest in how the spatial boundaries for traditional land and resource use were determined.
14. Traditional Land and Resource Use and Cultural Impacts	(c) Impacts on Indigenous traditional activities: biophysical effects on species of importance as well as perceptive and intangible effects on Métis way of life The MNO would like to ensure that all potential effects of concern have been considered and addressed. This is a project-specific concern.	In its comments on the 2017 draft EIS, the MNO expressed concerns about impacts to Indigenous traditional activities and CNL’s assessment of those impacts including: - the need to consider all potential effects outlined in <i>CEAA</i> (2012); - consideration of impacts to the Metis way-of-life; - concern that the project-interactions matrix does not capture Métis rights and interests, including qualitative aspects; - ensuring the assessment includes aquatic and terrestrial species of importance to MNO citizens; - effects on harvester perceptions and access to species such as deer and walleye; - identification of intangible effects to Métis rights and interests, including perceptive effects; - assessment of impacts on Indigenous Health (this is discussed in Row 9 (a) above).
14. Traditional Land and Resource Use and Cultural Impacts	(d) Separate assessment of the effects to Métis rights and interests. It is important to the MNO that the EIS consider the potential effects of the project on Métis rights and interests, as they differ from those of other Indigenous Nations, communities and organizations . This is a project-specific concern.	In its comments on the 2017 draft EIS, the MNO expressed concern that a separate assessment of the effects to Metis rights and interests was needed and that TLRU information from other Indigenous Nations, communities and organizations cannot be used as a proxy for the MNO (CNL PI-203).
15. Valued Components	(a) Inclusion of VCs identified by MNO This is of interest to the MNO because these species and features are of particular importance to the MNO. The VCs selected need to consider Metis rights and interests in the assessment and the potential for interaction with the project activities. This is a project-specific concern.	The MNO expressed concern that VCs were selected without seeking feedback or input from the MNO. The MNO expressed verbally, in negotiations on scope of MOU and formally submitted comments that VCs must be representative of Metis interests (CNL PI-197, CNL PI-252. Beyond species VCs, the MNO TKLUS report participants identified a number of features within proximity to the NPD Closure Project including: - Habitat for wildlife (e.g., moose, partridge, grouse, rabbit, deer, duck, goose); - Habitat for plants (e.g., oak, ground hemlock and berries); - Small and large game harvesting areas; - Métis cultural practice site; - Trapping; - Fish harvesting areas; - Plant and Natural materials harvesting areas. In their review of the 2017 draft EIS, the MNO also noted that the selected VCs contain significant information gaps, including Métis-specific VCs and potential perceptive effects of the project on the regional rights-bearing Métis Nation (CNL PI-15, CNL PI-125, CNL PI-135, CNL PI-187).

L.3 MNO Summary of Interests and Concerns

Table L.3 below summarizes the key interests and concerns that the MNO have raised on the NPD Closure Project, up to March 2024, through comments submitted on the 2017 draft EIS to the CNSC or through direct discussion and engagement between MNO and CNL.

The full submission of MNO comments on the 2017 draft EIS can also be found online: [Comments on the 2017 draft EIS for NPD from Métis Nation of Ontario](#). These comments were summarized by CNSC and included as part of the CNL Table: Consolidated Public and Indigenous Groups’ Comments on the Nuclear Power Demonstration Closure Project Draft EIS: [IAA - NPD - Consolidated Public and Indigenous Comments](#) (April 2018).

Table L.3 has five columns:

- Column 1 identifies the topic, i.e., the subject area the key interest(s) or concern(s) falls under.
- Column 2 presents a key interest or concern, why it is important to the Indigenous Nation, community or organization, and connects it to a project aspect or an Aboriginal or treaty right wherever possible. This may be a summary of multiple related interests or concerns that have been expressed by the Indigenous Nation, community or organization.
- Column 3 summarizes CNL’s response or conclusions as well as CNL’s efforts to address this key interest or concern
- Column 4 identifies where in the EIS the key interest or concern is addressed, and whether any changes were made to the EIS in response to the interest/concern. If these changes resulted in a different outcome in the EIS, this is also discussed;
- Column 5 summarizes the “Status” of the key interest or concern and the anticipated Next Steps towards achieving resolution of the key interest or concern. Not all concerns can be quickly or easily resolved, as some concerns go beyond the scope of the EA process, or there may divergent perspectives on certain interests or concerns. Note: this column does not, unless specifically confirmed by the Indigenous Nation, community or organization, mean that they have verified that the interest or concern has been dealt with to their satisfaction.

Topic	MNO Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
1. Accidents & Malfunctions	(a) Effects of accidents and malfunctions including as applicable to offsite transportation activities It is important to the MNO that impacts from accidents and malfunctions be assessed, and that procedures are in place to notify and provide information to MNO citizens in the event of an accident or malfunction. This is both a site-wide and project-specific concern.	CNL has responded in writing to the MNO’s comments on this topic, citing relevant sections of the EIS as part of the comment responses. CNL’s response has been accepted by the MNO. <u>CNL Response:</u> CNL has heard MNO’s concerns about potential accidents and malfunctions resulting from the NPD Closure Project. CNL has assessed the various accidents or malfunctions that could occur during the three phases of the project: all effects from postulated accidents or malfunctions during all three phases were found to be below regulatory limits. With respect to off-site transportation, CNL would like to clarify that there will be no off-site transportation of radioactive waste because all waste is proposed to remain on-site and grouted in the facility. There will be shipments of raw construction material to site, but these transportation activities would be consistent with other construction projects. Building a batch plant on-site significantly reduces the amount transportation of material to the site. The NPD site has an Emergency Procedure that will remain in place and be updated as required throughout the Decommissioning Execution and Institutional Controls phases of this project. This procedure focuses on the prevention, mitigation of, preparedness for, response to, and recovery from a wide range of abnormal and emergency conditions including fires, floods, hazardous spills, loss of power, earthquakes, and tornados. The Emergency Procedure also defines the actions of specific staff/roles in such events. The NPD Emergency Plan is developed and maintained in accordance with CNL’s company-wide Emergency Preparedness Program that has been accepted to meet the CNSC’s requirements (under REGDOC-2.10.1). In the event of an accident or malfunction, CNL’s Corporate Communications may activate its own local Emergency Information Centre to disseminate information to the public. In the event a site emergency occurs and escalates leading to potential off-site consequences, a Municipal Emergency Information Centre (MEIC) will be established by the municipality to provide emergency communications for the media and the public. This process will be followed for the NPD Project. CNL is willing to discuss this process with the MNO if requested.	<u>Where is this topic discussed in the EIS?</u> Section 9.12 of the EIS discusses the various accidents or malfunctions (radiological and non-radiological) that could occur during the three phases of the project. Section 10.2 discusses CNL’s Emergency Preparedness Program, which includes process for public notification in the event of an accident or malfunction that could have an impact on the public or the environment The EIS directs readers to Section 7.4 of the Decommissioning Safety Assessment TSD, which lists many examples of safeguards that will be applied to the project. Section 9.10.3.3 of the EIS discusses the potential impacts of increased traffic volume on traditional land and resource use, noting that the increased traffic volume is expected to be temporary and minor, and that the Ministry of Transportation (MTO) has reviewed the project and concluded that it has no traffic or transportation-related concerns with respect to the project. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this comment.	<u>Status:</u> Resolved CNL considers this concern to be resolved. MNO has acknowledged and accepted CNL’s response on this topic.

Topic	MNO Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
2. Alternatives	(a) Concern about the suitability of In-situ disposal (ISD). It is important to the MNO that future land users of the NPD site are protected. This is a project-specific concern.	CNL has responded in writing to the MNO's comments on this topic, citing relevant sections of the EIS as part of the comment responses. CNL's response has been accepted by the MNO. <u>CNL Response:</u> In discussions with the MNO, CNL agreed that protection of future land users is an important concern and has addressed it. CNL has assessed the suitability of ISD for NPD, and the EIS shows that such disposal is safe for human health and the environment in the short term and long term. CNL has considered national and international standards and guidelines and continues to believe that the NPD facility has characteristics that support ISD.	<u>Where is this topic discussed in the EIS?</u> Alternative means are discussed in the Alternative Means Assessment TSD (64-509200-ASD-002 Revision 1) and Section 4.2 of the EIS. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this comment. However, CNL has revised Section 4.2 of the EIS since the MNO's review – details are provided in the next row.	<u>Status:</u> Resolved CNL considers this concern to be resolved. MNO has acknowledged and accepted CNL's responses on this topic.
2. Alternatives	(b) Input into the Alternative Means Assessment It is important that the MNO's perspectives be taken into account in the assessment of alternatives, because the approach selected has implications for Métis people's future use of the site. This is a project-specific concern.	CNL has responded in writing to the MNO's comments on this topic, citing relevant sections of the EIS as part of the comment responses. CNL has revised the EIS to include additional information on the alternative means assessment (AMA) and findings. As requested by MNO, the Alternative Means TSD was shared with MNO in December 2017. In August 2021, the MNO indicated that they had no further comments on this topic. <u>CNL Response:</u> CNL is committed to meeting with the MNO to continue to discuss the four alternatives and describe how the approach selected interfaces with MNO's vision on potential future use of the site. In particular, CNL is interested in going over the changes incorporated in the revised version of the AMA TSD with the MNO to discuss the additional quantitative analyses conducted for each of the alternatives that were considered.	<u>Where is this topic discussed in the EIS?</u> Alternative means are discussed in the Alternative Means Assessment TSD (64-509200-ASD-002 Revision 1) and Section 4.2 of the EIS. <u>What changes have been made (and where)?</u> Since the MNO's review, CNL has revised the EIS (Section 4.2) to include additional information from the AMA TSD, to provide greater clarity on how the AMA was completed and what the results mean. In addition, both the Alternative Means TSD and Section 4.2 of the EIS were updated to assess the projected radiological dose and industrial safety risk to workers for each option.	<u>Status:</u> Resolved The MNO indicated in a meeting in August 2021 that they had no further comments on this topic.
3. Archaeology and Cultural Heritage	(a) Métis-specific Archaeology and Cultural Sites The MNO is concerned that without participation of MNO citizens, the project could potentially lack information about Métis-specific heritage resources. This is both a site-wide and project-specific concern.	As part of the Memorandum of Understanding (MOU) established between CNL and MNO, CNL has provided funding and the MNO has provided feedback on the Stage 1 Archaeological Assessment. CNL has responded in writing to the MNO's comments on this topic, citing relevant sections of the EIS as part of the comment responses and agrees with the MNO request that Métis history be included in future CNL reports when it is relevant to the project. CNL concurs with the MNO that a Traditional Knowledge and Land Use Study (TKLUS) is a beneficial input to the project. CNL and the CNSC jointly funded the MNO TKLUS. CNL reviewed and incorporated relevant information from the MNO TKLUS into the EIS. CNL shared the revised sections of the EIS with the MNO for feedback on the incorporation of TKLUS results. CNL also conducted an MNO TKLUS follow-up meeting/presentation in North Bay in October 2019. In August 2021, the MNO indicated that they had no further comments on this topic. <u>CNL Response:</u> CNL is committed to working with the MNO to identify potential information regarding Métis specific heritage resources. CNL has conducted a Stage 1 Archaeological Assessment, and shared the results with the MNO. No further archaeological work is planned for NPD. If any archaeological reports	<u>Where is this topic discussed in the EIS?</u> Indigenous cultural resources and ceremonies, including the presence of Métis-specific cultural sites and features, are discussed in in Section 8.9.3 of the EIS. Section 8.11.4 of the EIS summarizes the Archaeology TSD , including the findings of the Stage 1 Archaeological Assessment. <u>What changes have been made (and where)?</u> CNL added information from the MNO TKLUS to Section 8.9.3 of the EIS, specifically the spiritual and cultural connection that Métis citizens have with the Ottawa River corridor.	<u>Status:</u> Resolved The MNO indicated in a meeting in August 2021 that they had no further comments on this topic.

Topic	MNO Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
		are prepared in the future, CNL will add a section on Métis history to the Background section. CNL has incorporated information on Métis-specific archaeology and cultural sites into the EIS, based on the results available from the MNO TKLUS.		
3. Archaeology and Cultural Heritage	(b) Archaeological buffer zone and rating It is important that areas with high archaeological value are identified appropriately and protected from project-related impacts.	CNL has responded in writing to the MNO's comments on this topic, citing relevant sections of the EIS as part of the comment responses. In August 2021, the MNO indicated that they had no further comments on this topic. <u>CNL Response:</u> CNL acknowledges that the NPD property, including the shoreline of the Ottawa River, carries a high level of archaeological potential and warrants protection. However, as indicated in the Stage 1 Archaeological Assessment, because there is no disturbance planned for the shoreline outside of the project footprint, there is no trigger at this time for further archaeological assessment and subsequent application of such a buffer. This does not leave the area unprotected; rather, the entire NPD property will be managed, as all CNL operated sites currently are, under CNL's Environmental Protection Program and subsequent Cultural Resource Management practices. The Stage 1 Archaeological Assessment did not identify the need for a "moderate" potential rating, based on historical information and planned project activities. However, it does recommend the following: "should any construction be planned in the future, a further Stage 1&2 assessment would be in order".	<u>Where is this topic discussed in the EIS?</u> Section 8.11.4 of the EIS summarizes the Archaeology TSD , including the findings of the Stage 1 archaeological assessment. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this comment.	<u>Status:</u> Resolved The MNO indicated in a meeting in August 2021 that they had no further comments on this topic.
4. Atmospheric Environment	(a) Atmospheric study area boundaries and data It is important to the MNO that study areas are large enough to encompass intangible effects and that baseline conditions in the study areas are correctly represented. This is a project-specific concern.	CNL has responded in writing to the MNO's comments on this topic, citing relevant sections of the EIS as part of the comment responses. CNL, AECL and the MNO are working together on an LTRA that includes collaboration in the area of environmental monitoring at CNL sites including facilitating the involvement of MNO Monitors in environmental monitoring activities at the sites. <u>CNL Response</u> CNL acknowledges that there is some uncertainty involved with using data from "far away" locations to represent baseline conditions, in the absence of site-specific data for NPD. However, the uncertainty is deemed to be very minor. For example, the CRL site (used to represent Regional Study Area) and NPD share similar topography, latitude and distance from the Ottawa River. In addition, conservative assumptions were made, such as using air quality from urban areas that are likely to have worse air quality than the NPD site. The EIS found that when the impact to air quality from the project is added to the baseline air quality from the more urban areas, the resulting impact is still so low that it's not considered measurable. Follow-up monitoring will take place during the project execution to verify that the impact to the environment is low, as predicted in the EIS. With respect to the effects on Métis perception or intangible aspects of Métis way-of-life, CNL is eager to learn more and discuss how these effects may be minimized, for example through participation in air monitoring activities. In addition, to address avoidance, CNL is committed to providing on-going educational and awareness opportunities, to alleviate concerns related to safety and risk.	<u>Where is this topic discussed in the EIS?</u> The atmospheric environment is defined in Section 8.2 of the EIS, including Study Areas in Section 8.2.1 . Effects to the atmospheric environment are assessed in Section 9.2 of the EIS. The EIS does not predict any adverse residual effects on the atmospheric environment (Section 9.2.4). MNO involvement in follow-up monitoring programs is discussed in Section 6.2.4.4.3 of the EIS. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this comment.	<u>Status:</u> Resolved CNL considers that this concern will be fully addressed through an appropriate commitment to provide capacity for monitoring to be established as part of the LTRA. Continued engagement between CNL and the MNO may result in additional mitigation measures or commitments that support MNO involvement in monitoring activities that will enhance confidence and trust in CNL's assessment.
4. Atmospheric Environment	(b) C-14 releases from the stack It is important to the MNO that they understand historic releases from the	CNL has responded in writing to the MNO's comments on this topic, citing relevant sections of the EIS as part of the comment responses. CNL, AECL and the MNO are working together on an LTRA that includes collaboration in	<u>Where is this topic discussed in the EIS?</u> The planned stack modifications are discussed in Section 4 (Project Description). Mitigation measures related to the	<u>Status:</u> Resolved CNL considers that this concern will be fully addressed

Topic	MNO Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
	NPD site and implications of potential releases related to the project so they have confidence that the rights and interests of MNO citizens are upheld in relation to the environment. This is a project-specific concern.	the area of environmental monitoring at CNL sites including facilitating the involvement of MNO Monitors in environmental monitoring activities at the sites. CNL looks forward to ongoing discussions with the MNO, regarding MNO input in and participation in mitigation measures and environmental monitoring activities. <u>CNL Response:</u> The main reason for an increase/decrease in C-14 over the years and specifically the increase between 2012 and 2015 is the frequency of operation of the ventilation. In recent years CNL has been operating the ventilation fans more frequently than earlier years because more work has been undertaken in the nuclear area, such as asbestos abatement and characterization activities. CNL only operates the ventilation units when work is being undertaken in the nuclear area. With respect to stack modifications: The potential releases from stack modification activities have been assessed and were determined to be negligible. However, CNL is open to meeting with MNO further, to discuss its concerns about avoidance behaviours and opportunities for education, awareness and involvement.	stack are discussed in Section 9.6.3.2 . MNO involvement in follow-up monitoring programs is discussed in Section 6.2.4.4.3 of the EIS. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this comment.	through an appropriate commitment to provide capacity for monitoring to be established as part of the LTRA. Continued engagement between CNL and the MNO may result in additional mitigation measures or commitments that support MNO involvement in monitoring activities that will enhance confidence and trust in CNL's assessment. -
5. Baseline Characterization	(a) Inclusion of Métis-specific socio-economic baseline data and effects This is important to the MNO because the socio-economic characterization and effects assessment should include consideration of Indigenous receptors (including citizens of the Métis Nation), and this can't be done without collecting information from Indigenous Nations, communities and organizations. This is a project-specific concern.	CNL has responded in writing to MNO comments on this topic citing relevant sections of the EIS in the response. MNO has engaged CNL and AECL in a preliminary tripartite discussion on a CNL Corporate LTRA. The LTRA discussion is expected to include socio-economic supports such as an Indigenous procurement policy. <u>CNL Response</u> CNL acknowledges the importance of collecting and incorporating information from the MNO, including socio-economic baseline information. CNL has jointly funded the MNO TKLUS and has reviewed and incorporated information from the MNO TKLUS into the EIS. CNL is also open to receiving more socio-economic information from the MNO; this information will be documented in the Indigenous Engagement Report that supports the EIS. CNL has added a new Indigenous socio-economic component and VCs to the EIS, in order to assess socio-economic impacts of the project on these VCs. The EIS does not predict any adverse residual effects on the Indigenous socioeconomic VCs.	<u>Where is this topic discussed in the EIS?</u> Indigenous socio-economic baseline is presented in Section 8.10.1 of the EIS. The assessment of effects to Indigenous socio-economic VCs is discussed in Section 9.10.1 of the EIS. <u>What changes have been made (and where)?</u> CNL added information from the MNO TKLUS into Section 6.2.4.4 of the EIS and Section 8.10 of the EIS, containing Indigenous Socioeconomic Baseline data. In response to this and other comments, CNL introduced a new Indigenous Socio-Economic component and VCs in Section 5.2.4 of the EIS. This is discussed further in Section 6.3 of the EIS. Section 9.10 of the EIS presents assessment of effects on the new Indigenous socio-economic VCs.	<u>Status:</u> Resolved. CNL considers that this concern will be addressed through an appropriate commitment to develop an Indigenous procurement policy as part of the LTRA.
5. Baseline Characterization	(b) Baseline soil contamination (near historic landfill) This is a concern for the MNO because it is important that the final state of the NPD site is safe to use, regardless of whether the contamination comes from the NPD Closure Project or earlier activities. This is a project-specific concern.	CNL has responded in writing to MNO comments on this topic citing relevant sections of the EIS in the response. CNL has revised the EIS to state that there are no chemical contaminants of potential concern in soil. In August 2021, the MNO indicated that they had no further comments on this topic. <u>CNL Response</u> CNL investigated the original references and determined that the text in the EIS was incorrect. CNL has corrected the text.	<u>Where is this topic discussed in the EIS?</u> The text in question is from Section 5.2.2 of the EIS. <u>What changes have been made (and where)?</u> CNL has revised Table 5.2-2 in Section 5.2.2 of the EIS.	<u>Status:</u> Resolved. The MNO indicated in a meeting in August 2021 that they had no further comments on this topic.
5. Baseline Characterization	(c) Baseline for the Surface Water and Aquatic Environments This is important to the MNO because an understanding of current contamination in the Ottawa River is necessary in order to assess impacts on	CNL has responded in writing to MNO comments on this topic citing relevant sections of the EIS in the responses. CNL undertook baseline studies of benthic macroinvertebrate, sediment quality and water quality in the Ottawa River in the summer of 2020. Samples were taken upstream, downstream and adjacent to the NPD facility. CNL has clarified in its responses to MNO that discharges to the Ottawa River have been	<u>Where is this topic discussed in the EIS?</u> Section 8 of the EIS presents the baseline data available so far. Section 8.3 presents baseline surface water and sediment data. Section 8.4 presents the aquatic environment. Section 12 of the EIS presents CNL's plans for monitoring of	<u>Status:</u> Resolved. CNL considers that this concern will be fully addressed through an appropriate commitment to provide capacity for monitoring to be

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	aquatic biota. It is also important to confirm that there are currently no discharges to the Ottawa River from NPD activities. This is a project-specific concern.	discontinued since 2017. <u>CNL Response</u> CNL conducts a very rigorous effluent monitoring program and is committed to ensuring that the environment around the NPD site, including the Ottawa River, is protected. The use of CSA Standards is not intended to replace ensuring Métis rights and interest are considered, but it is important to include as a well-established standard when discussing monitoring plans. CNL is happy to further discuss the monitoring plans with the MNO, including possible opportunities for MNO participation in monitoring activities. There may also be opportunities for MNO participation in collection of baseline data before commencement of the project. Capacity for MNO's involvement may be covered under the LTRA, which is currently being discussed by AECL, CNL and the MNO. To supplement baseline data, a study of sediment, benthic invertebrates and fish habitat features was undertaken upstream, adjacent to and downstream of the NPD site in 2020. The study determined that the Ottawa River benthic invertebrate community near NPD is healthy and typical of what is observed in many large, soft-bottomed, relatively deep river systems. CNL is planning to regularly monitor the Ottawa River water quality.	the NPD site during all phases of the project. <u>What changes have been made (and where)?</u> New sediment and surface water data has been added to Section 8.3 . Section 8.4 now includes a description of the fish habitat near NPD. The benthic macroinvertebrate community as found in the 2020 study has been is now described. Section 12 of the EIS addresses the interests and concerns expressed by the MNO, and notes that additional baseline data may be required to be collected before the project commences.	established as part of the LTRA. Continued engagement between CNL and the MNO may result in additional mitigation measures or commitments that support MNO involvement in monitoring activities that will enhance confidence and trust in CNL's assessment. -
5. Baseline Characterization	(d) MNO involvement in baseline data collection activities. This is important to the MNO because engagement should involve two-way communication, information-sharing, and participation in project-related activities This is a project-specific interest.	CNL has responded in writing to all MNO's comments on this topic, citing relevant sections of the EIS as part of the comment responses. CNL looks forward to ongoing discussions with the MNO regarding MNO input in and participation in baseline data collection activities and other monitoring activities. These activities will be captured under the LTRA that is being established between CNL, AECL and the MNO. <u>CNL Response:</u> CNL is committed to providing opportunities for MNO citizens to participate in activities related to baseline data collection. CNL is planning to undertake additional monitoring of the current environment in order to establish a baseline before the NPD Closure Project begins and would welcome MNO feedback on this aspect of monitoring.	<u>Where is this topic discussed in the EIS?</u> Section 6.2.4.4 of the EIS discusses CNL and MNO's interest in participation of MNO citizens in monitoring programs. It also discusses the MOU and work towards establishing a LTRA. Section 12 of the EIS discusses Indigenous group feedback on and participation in monitoring programs. <u>What changes have been made (and where)?</u> CNL has expanded its discussion of MNO interests and involvement, in Section 6.2.4.4 of the EIS.	<u>Status:</u> Resolved. CNL considers that this concern will be fully addressed through an appropriate commitment to provide capacity for monitoring and engagement to be established as part of the LTRA. Continued engagement between CNL and the MNO may result in additional mitigation measures or commitments that support MNO involvement in monitoring activities that will enhance confidence and trust in CNL's assessment.
5. Baseline Characterization	(e) Geological and Hydrogeological site characterization It is important to the MNO that baseline hydrogeological conditions are accurate and well understood, so that the long-term impacts of the NPD Closure Project can be accurately assessed, and management plans can be made. This is a project-specific interest.	CNL has responded in writing to MNO comments related to hydrogeology citing relevant sections of the EIS in the responses. In October 2019, CNL met with MNO Councillors and staff for an NPD Closure Project update and to review CNL comment responses. A key topic in the discussion was geological site characterization. <u>CNL Response:</u> CNL acknowledges that the 2017 draft EIS indicated a discrepancy in flow characteristics between the NPD and NSDF EIS, due to factors like sampling density (number of samples taken), and study methodology. Since that time, CNL has completed additional	<u>Where is this topic discussed in the EIS?</u> Section 8.5.5 of the EIS presents the hydrogeological baseline data. Section 9.1.1.1 discusses the expected and gradual degradation of parts of the facility through contact with groundwater, and that this degradation is considered in the assessment of long-term safety of the facility. Section 9.5 of the EIS presents the expected changes to the hydrogeological environment, including groundwater concentrations calculated in the PostSA TSD, and concludes	<u>Status:</u> Resolved. CNL considers that this concern will be fully addressed through an appropriate commitment to provide capacity for monitoring to be established as part of the LTRA. Continued engagement between CNL and the MNO

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		geoscientific characterization work to better understand the local geology and hydrogeology. These additional findings, which are consistent with observations at the NSDF Project site, are presented in CNL’s 2019 Geoscientific Characterization Report. CNL has also developed a detailed, calibrated groundwater flow model used to define hydrogeological conditions into the future to support Postclosure Safety Analysis. CNL has updated the EIS to incorporate the new hydrogeological data. With respect to long-term impacts of groundwater on the grouted NPDWF: this has been assessed. The PostSA TSD evaluates cases where groundwater comes in to contact with the grouted NPD facility and discharges to sediments at the base of the Ottawa River and where this groundwater discharges along the slope between the NPD facility and the Ottawa River. The predicted concentrations of contaminants in this groundwater and its discharge points are considered for the Indigenous receptor who is living a traditional self-sufficient lifestyle and are carried to the Ecological Risk Assessment (EcoRA), where risk to valued species (including those identified by the MNO in the MNO TKLUS) is evaluated. Both the EcoRA and PostSA conclude that humans and the environment remain protected. Follow up monitoring of groundwater will be used to confirm the predictions in the EcoRA and PostSA. Groundwater monitoring will commence before project approval (in order to obtain baseline data) and continue throughout the Decommissioning Execution and Institutional Controls phases of the project.	that no adverse residual effects on will occur as a result of the NPD Closure Project. The predicted concentrations of contaminants in groundwater and its discharge points are considered in Section 9.10.2 for the Indigenous receptor who is living a traditional self-sufficient lifestyle and in Sections 9.4 and 9.6 for non-human biota. These assessments also conclude that humans and the environment remain protected. Section 9.9 of the EIS evaluates the effects of the project on Indigenous Land and Resource use and concludes that no adverse residual effects on Indigenous land and resource use will occur as a result of the NPD Closure Project. <u>What changes have been made (and where)?</u> CNL updated Section 8.5.5 of the EIS to include information that is more recent and more consistent with the NPD site, CNL updated Section 9.5 of the EIS to incorporate the new geoscientific characterization information.	may result in additional mitigation measures or commitments that support MNO involvement in monitoring activities that will enhance confidence and trust in CNL’s assessment.
6. Engagement	(a) Meaningful engagement using best practices. It is important for the MNO to be meaningfully engaged on the project, using protocols and a workplan that are appropriate for Indigenous engagement and have been developed in consultation with the MNO. This is a project-specific concern.	CNL heard the MNO’s request for on-going meaningful engagement, and since 2016 has carried out extensive engagement with the MNO, implemented a Memorandum of Understanding (MOU), funded information-gathering studies such as the MNO TKLUS, and carried out engagement activities with the MNO. For CNL, meaningful engagement involves listening to the citizens’ concerns and making real changes to the EIS and/or to the project as appropriate, for example: • Changes to monitoring plan based on MNO feedback (see row later in this table). • Incorporation of information from the MNO TKLUS into the EIS. • Addition of VCs based on inputs from the MNO and other Indigenous Nations, communities and organizations (e.g., the Indigenous Health receptor). • Commitments to participation of Indigenous Nations, communities and organizations in future monitoring activities (see row later in this table). CNL has responded to MNO specific comments on the EIS, in writing. Some of the engagement activities that CNL has conducted specifically for the MNO include: Community information session for MNO citizens in North Bay (2019 October) Focused meetings on monitoring, including monitoring involvement, with the Consultation Committee (2020 November and 2021 February) Funding for a TKLUS, including a specific VC workshop CNL, AECL and the MNO are working together on an LTRA that includes collaboration in the area of engagement and communication in order to enable MNO participation and community capacity, including providing funding for the MNO to maintain open dialogue with its citizens about Projects.	<u>Where is this topic discussed in the EIS?</u> Section 6.2.4.4 of the EIS summarizes CNL engagement with MNO to date and presents information on CNL and MNO’s MOU for the NSDF and NPD projects. <u>What changes have been made (and where)?</u> CNL has updated Section 6.2.4.4 of the EIS (and Section 4.4 of the IER) to reflect recent and planned engagement activities to support the MNO’s meaningful participation in the EA process. Section 6.2.4.4.1 of the EIS directs the reader to the IER for a detailed listing of MNO-specific engagement activities. CNL added information from the MNO TKLUS to Section 8.9.3 of the EIS. CNL revised the VCs to incorporate input from MNO, adding new human and ecological receptors (Section 6.3 of the EIS).	<u>Status:</u> Resolved. CNL considers that this concern will be fully addressed through an appropriate commitment to provide capacity for ongoing engagement and participation objectives as part of the LTRA. CNL will continue to engage with the MNO, e.g., through the MOU, on the topic of meaningful engagement, including specific engagement activities.

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		<u>CNL Response:</u> CNL is committed to open, transparent and continuing engagement with the MNO. Since submission of the EIS, CNL has expanded its engagement with the MNO through dedicated meetings and communications. CNL and the MNO have agreed to a mutually beneficial, ongoing working relationship and to provide a process by which CNL can engage with the MNO at the local and regional levels in order to better understand any Métis Rights and Interests that may be impacted in the general and surrounding areas resulting from the project.		
6. Engagement	(b) Terminology: Use of “Métis Nation” instead of “Métis community” This is important to the MNO because the language “Métis community” minimizes the political structure and organization that the MNO has and operates under. This is both a site-wide and project-specific concern.	<u>CNL’s Actions to Address the Concern:</u> CNL has revised the EIS and the IER to use Métis Nation of Ontario (MNO) when referring to the governing body. A few instances of “Métis communities” or “Métis community” occur in the EIS and IER TSD when used in a similar context as is in the MNO Traditional Knowledge and Land Use Study (TKLUS) or in a historical context. For example, Section 8.9.2.4 of the EIS (which discusses Gathering activities) states: The MNO TKLUS (KnowHistory 2019) documented that the collection of plants, berries, wood and other natural materials is a practice associated with both historical and modern day Métis communities. In August 2021, the MNO indicated that they had no further comments on this topic. <u>CNL Response</u> CNL acknowledges the difference and is committed to using the correct terminology in the EIS and supporting documents.	<u>Where is this topic discussed in the EIS?</u> The MNO is discussed throughout the EIS, appearing most frequently in Sections 6.2.4.4, 6.3, 8.9 and 9.9. <u>What changes have been made (and where)?</u> CNL has revised the language throughout the EIS. It appears mostly in Sections 6.2.4.4, 6.3, 8.9 and 9.9.	<u>Status:</u> Resolved. The MNO indicated in a meeting in August 2021 that they had no further comments on this topic.
7. EA Process and Methodology	(a) Effects assessment methodology It is important that impacts of concern to the MNO be considered in the assessment of effects of the project on MNO citizens. This is a project-specific concern.	CNL has responded in writing to the MNO’s comments on this topic, citing relevant sections of the EIS as part of the comment responses. CNL is willing to participate in discussions with MNO focused on these concerns. <u>CNL response</u> CNL acknowledges the MNO’s concerns about the EA process and methodology, in particular: the process for determination of significance; consideration of likelihood of residual effects; success of mitigation measures; consideration of societal values and sustainability; measures to address uncertainty; and conclusions on significance. The criteria used for the evaluation of significance are from the CNSC (2020) Regulatory Document 2.9.1, Environmental Protection: Environmental Principles, Assessments and Protection Measures. CNL is willing to present to the MNO its process and findings on the environmental effects of the project and explain and discuss the process and thresholds for determination of significance of adverse residual effects.	<u>Where is this topic discussed in the EIS?</u> Section 9.1.2 of the EIS explains the methodology used for the determination of significance of residual effects. It also presents the criteria used for the evaluation of significance, which are from the CNSC (2020) Regulatory Document 2.9.1, Environmental Protection: Environmental Principles, Assessments and Protection Measures. Section 11 of the EIS, Conclusion on Significance, discusses the assessment findings. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this comment.	<u>Status:</u> Resolved. CNL considers that this concern will be fully addressed through an appropriate commitment to provide capacity for monitoring to be established as part of the LTRA. Continued engagement between CNL and the MNO may result in additional mitigation measures or commitments that support MNO involvement in monitoring activities that will enhance confidence and trust in CNL’s assessment.
7. EA Process and Methodology	(b) Cumulative effects This is important to the MNO because it is interested in the overall protection of the Ottawa River and the NPD site, not just the impacts of a single project. This is a project-specific concern.	CNL has responded in writing to the MNO’s comments on this topic, citing relevant sections of the EIS as part of the comment responses. <u>CNL Response:</u> CNL acknowledges the MNO’s concern about the effects on the Ottawa River and NPD site from various activities in the past, present and future. As discussed in the EIS and outlined in the <i>CEAA</i> technical guidance Assessing Cumulative Environmental Effects under the <i>Canadian Environmental Assessment Act</i>, 2012 (2018), a	<u>Where is this topic discussed in the EIS?</u> Section 9.13 of the EIS describes the process for evaluating cumulative effects and presents CNL’s assessment of cumulative effects for the NPD Closure Project. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this	<u>Status:</u> Resolved. CNL considers that this concern will be fully addressed through an appropriate commitment to provide capacity for monitoring to be

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		cumulative effects assessment is only required to be undertaken for residual effects of the project. For all environmental components, since it was determined that no adverse residual effects are expected to occur from the NPD project, there is no potential for the occurrence of cumulative effects, including no potential for synergistic and/or additive effects. CNL will undertake follow-up monitoring of the environment including the Ottawa River to verify the predictions of the EIS. CNL looks forward to ongoing discussions with the MNO regarding MNO participation in environmental monitoring activities.	comment.	established as part of the LTRA. Continued engagement between CNL and the MNO may result in additional mitigation measures or commitments that support MNO involvement in monitoring activities that will enhance confidence and trust in CNL's assessment.
8. Environmental Effects and Mitigation Measures	(a) Perceived effects of the project It is important to the MNO that the assessment of effects include the potential impacts of negative perceptions from Métis citizens. This is a project-specific concern.	CNL has responded in writing to the MNO's comments on this topic, citing relevant sections of the EIS as part of the comment responses. CNL is attempting to address these concerns by: (i) Incorporating information from MNO's TKLUS and MNO's VC workshop into the EIS. (ii) involving the Indigenous Nations, communities and organizations , including MNO, in monitoring activities that will confirm the conclusions of the EIS. An Indigenous-driven monitoring program can help to reduce fear or anxiety associated with traditional uses occurring adjacent to and near CNL operated sites and build confidence that the decommissioning strategy and mitigation measures are effective; and (iii) developing an Indigenous-driven risk-informed communications program for the NPD Closure Project, to promote understanding of the EIS results, and to help alleviate the concerns related to negative perceptions and feelings of discomfort and concern. <u>CNL Response:</u> CNL acknowledges MNO's concerns about perceived effects from the NPD site. The proposed NPD Closure Project has the potential to help reduce concerns of alienation and/or fears. The proposed project involves a long-term solution to ensure the waste that currently resides at the NPD site is effectively contained and isolated from the environment, ensuring public safety. This will potentially result in additional lands being freed-up for traditional harvest. CNL stands by its conclusion that the project will not interfere with traditional activities nor impact biological resources upon which they are dependent. However, CNL is open to increased engagement, education and participatory involvement in monitoring activities at CNL operated sites to help alleviate any concerns.	<u>Where is this topic discussed in the EIS?</u> Section 8.9 of the EIS discusses presents specific information about the MNO obtained from the MNO TKLUS report. Section 9.9.5 of the EIS discusses CNL's understanding and approach towards negative perceptions associated with the NPD Closure Project. <u>What changes have been made (and where)?</u> CNL added content from the MNO TKLUS report to the EIS (Sections 6.3 and 8.9). The EIS update includes additional detail on the VC-related engagement process and how Indigenous interests (including MNO input) have been incorporated into the VCs selected for the NPD Closure Project.	<u>Status:</u> Resolved. CNL considers that this concern will be fully addressed through an appropriate commitment to provide capacity for monitoring to be established as part of the LTRA. Continued engagement between CNL and the MNO may result in additional mitigation measures or commitments that support MNO involvement in monitoring activities that will enhance confidence and trust in CNL's assessment.
8. Environmental Effects and Mitigation Measures	(b) Impacts of increased dust and other emissions, noise, traffic volumes, and changes to access including those associated with transportation activities It is important to the MNO that they have input into mitigation and	CNL has responded in writing to the MNO's comments on this topic, citing relevant sections of the EIS as part of the comment responses. CNL, AECL and the MNO are working together on an LTRA that includes collaboration in the area of environmental monitoring at CNL sites including facilitating the involvement of MNO Monitors in environmental monitoring activities at the Sites CNL looks forward to ongoing discussions with the MNO, regarding MNO input in and participation in mitigation measures and environmental monitoring activities.	<u>Where is this topic discussed in the EIS?</u> The atmospheric environment is defined in Section 8.2 of the EIS and effects on the atmospheric environment are discussed in Section 9.2. Mitigations for the atmospheric environment and additional context on hazardous substances have been included in Section 9.2.3 and are summarized in Section 10. The EIS does not predict any adverse residual effects on the atmospheric environment	<u>Status:</u> Resolved. CNL considers that this concern will be fully addressed through an appropriate commitment to provide capacity for monitoring to be established as part of the LTRA.

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	monitoring of dust, noise and emissions and other impacts to Métis harvesters who may be exercising their rights in the vicinity, to confirm that effects are low as predicted and do not extend beyond the project footprint. MNO would like input in the selection of valued components for the assessment of potential effects. This is a project-specific concern	<u>CNL Response:</u> CNL understands the MNO’s concerns about project impacts from noise, dust and emissions, and from transportation-related impacts such as noise, traffic, changes to routes and access, and other inconveniences. The EIS assesses potential effects related to dust and noise nuisance, loss of connection, safety of harvesting and consuming local foods, and changes to access and identified no significant adverse effects. The EIS assesses the traffic and transportation effects on traditional land and resource use. The EIS notes that the increased traffic volume on the highway is expected to be temporary and minor, and noise related to this transportation is expected to be very minor and temporary. No residual adverse effects are predicted. CNL has developed mitigation measures for the protection of the atmospheric environment. For example, CNL has planned comprehensive dust suppression techniques and is willing to work with the MNO to explore further ways to minimize effects on nearby land users such as harvesters. The construction area for the project is surrounded by a larger restricted area where traditional harvesting does not occur. No large plumes of dust are anticipated to be released from the project. In addition, follow-up monitoring of the environment will be undertaken to verify the EIS predictions of no significant adverse effect and to confirm that mitigation measures are effective. With respect to noise, a baseline noise survey took place in 2020. Eleven locations around the NPD site were monitored, as well as one location offsite, in Swisha which is the nearest community to the NPD site, located approximately 1 km northwest of the NPD site. Baseline noise on the NPD site was similar to a quiet rural area (≤ 45 dBA), with slightly higher noise measured near Highway 17 (the entrance to the NPD site) and in Swisha. Noise will be monitored during the Decommissioning Execution phase of the project and CNL would welcome MNO input and involvement in noise monitoring activities. CNL is eager to learn more about the exercise of Métis rights and how ambient noise can affect perceived and actual use of the project area (e.g., impact on MNO harvesting timing windows).	(Section 9.2.4). Section 9.9.3.3 of the EIS discusses the effect of increased traffic volume from the project on traditional land and resource use. There are no adverse residual effects predicted. Section 12 of the EIS summarizes the draft Follow-up Monitoring Plans. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this comment.	Continued engagement between CNL and the MNO may result in additional mitigation measures or commitments that support MNO involvement in monitoring activities that will enhance confidence and trust in CNL's assessment. -
8. Environmental Effects and Mitigation Measures	(c) Involvement of MNO in developing mitigation measures This is important because the MNO feels that consultation and their input should have been sought to ensure reduction and elimination of potential effects. This is a project-specific interest.	CNL has responded in writing to the MNO’s comments on this topic, citing relevant sections of the EIS as part of the comment responses. CNL has revised the EIS to include mitigation measures specifically for Indigenous Socio-economic and Health and Traditional Land and Resource Use. CNL is willing to host workshops to gather MNO feedback on effects and mitigation measures. <u>CNL Response:</u> CNL agrees that MNO input into mitigation measures will be valuable. Since these comments were submitted, the MNO and CNL have signed a Memorandum of Understanding (MOU). Within this framework, CNL will seek to work together with the MNO regarding their input on alternate mitigation measures. CNL is committed to providing opportunities for MNO citizens to identify mitigation measures. The project is also eager to collaboratively discuss the list of mitigation measures proposed for the NPD Closure Project.	<u>Where is this topic discussed in the EIS?</u> Section 6.2.4.4 of the EIS discusses CNL and MNO’s interest in participation of MNO citizens in development of mitigation measures. It also discusses the MOU and work towards establishing a LTRA. A full list of mitigation measures is presented in Table 10.3-1 of the EIS. Some examples of mitigation measures are misting to control dust, and site sweeps of work areas to determine if Species at Risk are present (e.g., milksnakes, bats, monarchs). <u>What changes have been made (and where)?</u> CNL has added mitigation measures for Indigenous Land and Resource Use to Section 9.9.3.2 of the EIS, and for Indigenous Socio-Economic and Health in	<u>Status:</u> Resolved. CNL considers that this concern will be fully addressed through an appropriate commitment to seek and incorporate MNO input on mitigation measures, as part of the MOU. Continued engagement between CNL and the MNO may result in additional mitigation measures or commitments that support MNO involvement in monitoring activities that will

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			Section 9.10.1.3.2 of the EIS. CNL has expanded its discussion of MNO interests and involvement, in Section 6.2.4.4 of the EIS.	enhance confidence and trust in CNL's assessment.
8. Environmental Effects and Mitigation Measures	(d) Need for additional mitigation measures in the surface water, aquatic and terrestrial environments This is important to the MNO because the Ottawa River is of great importance to Métis harvesters, and because effects on vegetation and wildlife may have potential impacts on Métis rights and interests. This a project-specific concern.	CNL has responded in writing to the MNO's comments on this topic, citing relevant sections of the EIS as part of the comment responses. The MNO has reviewed the Environmental Monitoring Plan reports and submitted technical comments. CNL and MNO have discussed them once, and plan to conduct a more thorough discussion of all the MNO comments on follow-up monitoring at a subsequent meeting. CNL looks forward to future meetings with the MNO to resolve all comments on the draft follow-up monitoring plans. <u>CNL Response:</u> CNL appreciates that the aquatic environment and terrestrial environments are very important to the Métis citizens. CNL has developed mitigation for the protection of both the Ottawa River (as part of the Surface Water Environment), aquatic species (as part of the Aquatic Environment) and wildlife and vegetation (as part of the Terrestrial Environment). CNL is open to considering additional mitigation measures. In addition, follow-up monitoring of the environment will be undertaken to verify the EIS predictions of no significant adverse effect and to confirm that mitigation measures are effective. In response to concerns that CNL has proposed the same mitigation measures for the terrestrial and aquatic environments, as for minimizing potential effects on trapping, hunting, fishing and gathering of Indigenous Nations, communities and organizations: This is because those mitigation measures are needed in order to prevent effects on plants, wildlife and fish upon which resource harvest is based. They are not the only mitigation measures employed. CNL prepared three draft Follow-up Monitoring Plans, which provide more detail on the proposed monitoring for the NPD Closure Project. One of the plans, the Environmental Follow-Up Monitoring Plan, describes the planned monitoring of Ottawa River water, sediment, fish and benthic macroinvertebrates. To supplement baseline data, a study of sediment, benthic invertebrates and fish habitat features was undertaken upstream, adjacent to and downstream of the NPD site in 2020. The study determined that the Ottawa River benthic invertebrate community near NPD is healthy and typical of what is observed in many large, soft-bottomed, relatively deep river systems. This study can be repeated when decommissioning is complete, to verify if the project has had an impact. CNL is planning to regularly monitor the Ottawa River water quality before the project begins.	<u>Where is this topic discussed in the EIS?</u> Mitigation measures for the protection of the surface water, aquatic and terrestrial environments are discussed in Sections 9.3.3.2, 9.4.3.2 and 9.6.3.2 of the EIS. They are also summarized in Section 10 of the EIS. Section 12 of the EIS summarizes the draft Follow-up Monitoring Plans. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this comment.	<u>Status:</u> Resolved. CNL considers that this concern will be fully addressed through an appropriate commitment to provide capacity for monitoring to be established as part of the LTRA. Continued engagement between CNL and the MNO may result in additional mitigation measures or commitments that support MNO involvement in monitoring activities that will enhance confidence and trust in CNL's assessment. -
8. Environmental Effects and Mitigation Measures	(e) Effectiveness of mitigation measures It is important to the MNO that the mitigation measures address the potential impacts on Métis citizens, and that the selected measures are likely to be successful. This is a project-specific concern.	CNL has responded in writing to the MNO's comments on this topic, citing relevant sections of the EIS as part of the comment responses. The MNO has also reviewed the Environmental Monitoring Plan reports and submitted technical comments. CNL and MNO have discussed these comments once, and plan to conduct a more thorough discussion of all the MNO comments on follow-up monitoring at a subsequent meeting. CNL looks forward to future meetings with the MNO to resolve all comments on the draft follow-up monitoring plans. <u>CNL Response:</u> CNL agrees with MNO that it is important to develop mitigation measures that are likely	<u>Where is this topic discussed in the EIS?</u> Mitigation measures for the protection of the surface water, aquatic and terrestrial environments are discussed in Sections 9.3.3.2, 9.4.3.2 and 9.6.3.2 of the EIS. They are also summarized in Section 10 of the EIS. Section 12 of the EIS summarizes the draft Follow-up Monitoring Plans. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this	<u>Status:</u> Resolved. CNL considers that this concern will be fully addressed through an appropriate commitment to provide capacity for monitoring to be established as part of the LTRA. Continued engagement between CNL and the MNO

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		to be successful at reducing potential impacts. CNL has used information from the MNO TKLUS to develop and/or confirm mitigation measures that will reduce impacts on Métis citizens. With respect to the likelihood of mitigation being successful, most of the mitigation measures identified in the EIS are for activities in the Decommissioning Execution phase. These consist of standard mitigation measures for those activities (e.g., demolition, construction, transportation, storage of chemicals) and reflect industry best management practices. As such, these mitigation measures are assumed to be effective. The remaining mitigation measures consist of in-design mitigation measures. These are features included in the project design for the purpose of pre-empting possible environmental effects, such as the grout used to fill the structure restricts contaminant release from the NPD disposal facility. In order to reduce the uncertainty of the characteristics of these design features, the assessment includes sensitivity analysis to understand how much the impact to the environment would change if scenarios are changed. In addition, follow-up monitoring of the environment will be undertaken to verify the EIS predictions of no significant adverse effect and to confirm that mitigation measures are effective.	comment.	may result in additional mitigation measures or commitments that support MNO involvement in monitoring activities that will enhance confidence and trust in CNL's assessment. -
9. Indigenous Health	(a) PostSA TSD and Indigenous Health It is important to MNO that the human health assessment reflects the lifestyle of MNO citizens. This is a project-specific concern.	CNL has provided funding to MNO through a Memorandum of Understanding (MOU) to ensure that the MNO can be meaningfully engaged in the NPD regulatory review process. Under the MOU was the provision of capacity to undertake a TKLUS. The MNO's TKLUS was submitted to CNL in February 2019. CNL reviewed and discussed the MNO TKLUS report with the MNO at engagements starting in February 2019. CNL has incorporated findings from the MNO TKLUS into the EIS, including addition of an Indigenous receptor for the assessment of health effects. CNL has responded in writing to the MNO's comments on this topic, citing relevant sections of the EIS as part of the comment responses. <u>CNL Response:</u> CNL has added an Indigenous receptor group to the PostSA TSD. CNL also added a separate section on Indigenous Health. In the 3rd iteration of the PostSA TSD issued in March 2020, CNL included a Potential Exposure Group consisting of a family of self-sufficient Indigenous receptors in the NPD Area. The exposure profile in the postclosure period was developed based on a traditional Indigenous lifestyle pre-European contact (SENES 2014). This lifestyle results in a more cautious dose estimate than that based on current day lifestyle, where some food is store-bought and likely not from the contaminated area. The EIS does not predict any adverse residual effects to human health or Indigenous health.	<u>Where is this topic discussed in the EIS?</u> With respect to Indigenous Health, Indigenous consumption of country foods is considered under Human Health (Section 8.8 and 9.8 of the EIS) and CNL has added a stand-alone section on Indigenous Health (Section 8.10.2 and 9.10.2 of the EIS). <u>What changes have been made (and where)?</u> An Indigenous receptor was added to the human health assessment in the PostSA and EIS.	<u>Status:</u> Resolved. CNL considers that this concern will be fully addressed through an appropriate commitment to provide capacity for monitoring to be established as part of the LTRA. Continued engagement between CNL and the MNO may result in additional mitigation measures or commitments that support MNO involvement in monitoring activities that will enhance confidence and trust in CNL's assessment.
10. Métis Rights and Interests	(a) Participation and engagement related to Métis rights and interests. The MNO believes that engagement is required to ensure that CNL understands, presents and assesses any Métis Rights and Interests that may be impacted in the general and surrounding areas resulting from the	CNL has responded in writing to the MNO's comments on this topic, citing relevant sections of the EIS as part of the comment responses. CNL has changed the terminology in the EIS to reference Indigenous rights. The MNO and CNL have signed a Memorandum of Understanding (MOU). Together the two organizations have agreed to a mutually beneficial, ongoing working relationship and to provide a process to which CNL can engage with the MNO at the local and regional levels in order to better understand any Métis Rights and Interests that may be impacted in the general and surrounding areas around the projects. Canadian Nuclear Laboratories and the MNO are jointly working to establish additional engagement	<u>Where is this topic discussed in the EIS?</u> Section 6.2.4 of the EIS discusses CNL's willingness to involve Indigenous Nations, communities and organizations, including the MNO, in its monitoring programs. The follow up monitoring program is described at a high level in Section 12 of the EIS, with significant details developed compared to the 2017 draft EIS. <u>What changes have been made (and where)?</u> Section 6 of the EIS includes reference to MNO's stated	<u>Status:</u> Resolved. CNL considers that this concern will be fully addressed through an appropriate commitment to provide capacity for monitoring to be established as part of the LTRA.

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	project. This is both a site-wide and a project-specific interest.	opportunities under this MOU. The MNO has also reviewed the Environmental Monitoring Plan reports and submitted technical comments. CNL and MNO have discussed these comments once, and plan to conduct a more thorough discussion of all the MNO comments on follow-up monitoring at a subsequent meeting. CNL looks forward to future meetings with the MNO to establish commitments for MNO involvement in monitoring. <u>CNL Response:</u> The EIS recognizes the MNO’s assertion of rights in the vicinity of the NPD site. MNO, MNO North Bay, MNO Mattawa Métis, and MNO Sudbury (included via the Mattawa/Lake Nipissing Traditional Territory Consultation Committee) are identified in Table 6.2-1. In order to enable ongoing meaningful engagement with the MNO, CNL supported participation through a MOU with the MNO. Through the MOU, the MNO completed a TKLUS; the MNO shared the report with CNL in April 2019 and which contained information that CNL incorporated into the EIS. Trapping and hunting remain as VCs, along with fishing, gathering, and cultural resources & ceremonies under the Traditional Land and Resource Use component. CNL welcomes MNO’s feedback on the planned monitoring program. CNL and the MNO have agreed to conduct a more thorough discussion of all the MNO comments on follow-up monitoring at a future meeting.	rights in the vicinity of the project. CNL has changed the terminology in the EIS to reference Indigenous rights.	Continued engagement between CNL and the MNO may result in additional mitigation measures or commitments that support MNO involvement in monitoring activities that will enhance confidence and trust in CNL's assessment.
10. Métis Rights and Interests	(b) Impacts on Métis rights and interests. It is important to MNO that the rights and interests of the Métis Nation be understood and upheld. This is a project-specific concern.	CNL has responded in writing to MNO comments related to assessment of impacts on rights citing relevant section of the EIS as part of the comment response. CNL is continuing its efforts to address this concern by: (i) Involving the Indigenous Nations, communities and organizations, in monitoring activities that will confirm the conclusions of the EIS. An Indigenous-driven monitoring program can help to reduce fear or anxiety associated with traditional uses occurring adjacent to and near CNL operated sites and build confidence that the decommissioning strategy and mitigation measures are effective. (ii) Developing an Indigenous-driven risk-informed communications program for the NPD Closure Project to promote understanding of the EIS results and to help alleviate the concerns related to negative perceptions and feelings of discomfort and concern (Section 9.9.5 of the EIS). CNL, AECL and the MNO are working towards establishing a Long-Term Relationship Agreement (LTRA) that includes support for MNO involvement and participation in environmental monitoring. The MNO indicated in a meeting in August 2021 that they had no further comments on this topic. <u>CNL Response:</u> CNL acknowledges MNO’s concerns about assessment of impacts to rights and traditional land and resource use, driven by distrust in the safety of the land and water. CNL is open to increased engagement, education and participatory involvement in monitoring activities at its sites to address these concerns.	<u>Where is this topic discussed in the EIS?</u> Sections 6 and 8 of the EIS present information about Indigenous rights. The EIS does not predict any adverse residual effects to traditional land and resource use (Section 9.9.3.5). <u>What changes have been made (and where)?</u> Sections 5, 6, 8 and 9 of the EIS now reference Indigenous and/or treaty rights to be inclusive of Métis rights and interests.	Status: Resolved. The MNO indicated in a meeting in August 2021 that they had no further comments on this topic.

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		The proposed NPD Closure Project has the potential to help reduce concerns of alienation and/or fears. The proposed project involves a long-term solution to ensure the waste that currently resides at the NPD site is effectively contained and isolated from the environment, ensuring public safety. This solution has the potential to result in additional lands being freed up for traditional harvest or other uses by Indigenous peoples or the public. CNL stands by its conclusion that the project will not interfere with traditional activities or have a negative impact on the biological resources on which they are dependent. Ultimately, the decision of impacts to rights rests with the CNSC. It is CNL's understanding that the CNSC will engage directly with MNO on a rights assessment related to the NPD Closure Project. As the proponent of the project holding the responsibility to inform and engage the MNO, CNL will support that process where needed.		
11. Monitoring	(a) Review and input to, monitoring plans This is important to the MNO because they want an opportunity to provide input into monitoring details (e.g., frequency, location, parameters) This is a project-specific interest.	Follow-up monitoring for the NPD Closure Project will include monitoring of environmental components critical to the MNO. CNL has committed to involving Indigenous Nations, communities and organizations in its environmental monitoring programs and to hosting workshops in spring 2022 to gather more feedback on the draft follow-up monitoring plans. CNL has responded in writing to MNO comments related to review and input to monitoring plans and met with the MNO in February 2021 to further discuss MNO's involvement in long-term monitoring. <u>CNL Response:</u> Potential contaminant migration through the preferential groundwater flow pathway (i.e., pipe trench) is assessed in the PostSA, as well as the EcoRA. Both the EcoRA and PostSA conclude that humans and the environment remain protected. Additionally, the draft follow-up monitoring plan proposes several wells along the preferential pathway for groundwater flow. Sediment monitoring locations are proposed in the draft Environment Monitoring Plan. Only the "primary" monitoring locations are shown (i.e., the triggered monitoring locations were not shown). The draft Environmental Monitoring Plan explains that sediment sampling locations would be co-located with surface water monitoring locations, if triggered.	<u>Where is this topic discussed in the EIS?</u> CNL has indicated that it is willing to involve the MNO in its monitoring programs (Section 6.2.4.4.3). Sediment monitoring locations are discussed in the draft Environmental Monitoring Plan, and in Section 9.3.5.2 and Section 12 of the EIS. The follow-up monitoring program is described at a high level in Section 12 of the EIS, details of which derive from the development of the effluent, environment and groundwater draft follow-up monitoring plans. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this interest.	<u>Status:</u> Resolved. CNL considers that this concern will be fully addressed through an appropriate commitment to provide capacity for monitoring and engagement to be established as part of the LTRA. Continued engagement between CNL and the MNO may result in additional mitigation measures or commitments that support MNO involvement in monitoring activities that will enhance confidence and trust in CNL's assessment.
11. Monitoring	(b) Participation in monitoring This is important to MNO because they want to ensure transparency and confidence in monitoring activities. This is a project-specific interest.	CNL has indicated to the MNO willingness to collaborate and engage with interested Indigenous Nations, communities and organizations on environmental monitoring activities specific to the NPD Closure Project and the NPD site. CNL, AECL and the MNO are working together on an LTRA that includes collaboration in the area of environmental monitoring at CNL sites including facilitating the involvement of MNO Monitors in environmental monitoring activities at the Sites. CNL is open to discussing with the MNO the preferred ways of MNO involvement in monitoring plan design, implementation and communication of changes. CNL has responded in writing to MNO comments on this topic and met with the MNO in	<u>Where is this topic discussed in the EIS?</u> CNL has indicated that it is willing to involve the MNO in its monitoring programs (Section 6.2.4.4.3). The follow up monitoring program is described at a high level in Section 12 of the EIS with significant details developed compared to the 2017 draft EIS. These details come through the development of the three draft follow-up monitoring plans for effluent, environment and groundwater.	<u>Status:</u> Resolved. CNL considers that this concern will be fully addressed through an appropriate commitment to provide capacity for monitoring and engagement to be established as part of the LTRA. Continued engagement between CNL and the MNO

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		February 2021 to further discuss MNO's involvement in long-term monitoring. <u>CNL Response:</u> CNL is committed to involving the Indigenous Nations, communities and organizations, including MNO, in monitoring activities that will confirm the conclusions of the EIS. An Indigenous-driven monitoring program can help build confidence that the decommissioning strategy and mitigation measures are effective.	<u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this concern.	may result in additional mitigation measures or commitments that support MNO involvement in monitoring activities that will enhance confidence and trust in CNL's assessment.
11. Monitoring	(c) Overall process and incorporating MNO comments It is important to the MNO that their comments are considered and incorporated into EA documents, including the draft follow-up monitoring plans. This is a project-specific concern.	Follow-up monitoring for the NPD Closure Project will include monitoring of environmental components critical to the MNO. CNL has committed to involving Indigenous Nations, communities and organizations in its environmental monitoring programs and to hosting workshops in spring 2022 to gather more feedback on the draft follow-up monitoring plans. CNL met with the MNO in November 2020 to provide an overview presentation on the draft follow-up monitoring plans for the NPD Closure project with focus on monitoring aspects that were raised through MNO's comments on the draft EIS. CNL has responded in writing to MNO comments on this topic and met with the MNO in February 2021 to further discuss MNO's involvement in long-term monitoring. <u>CNL Response:</u> CNL has been working with the MNO to share more detailed information on follow-up monitoring through the provision of three draft follow-up monitoring plans. The MNO has provided feedback on the three drafts and CNL is looking at how to best incorporate this feedback. The monitoring plans were prepared as drafts to reflect the fact that CNL is seeking input on the plans, including through engagement with the MNO. There is an opportunity to update these plans with additional feedback from the MNO and others. Additional groundwater characterization and site data have been undertaken and added to the EIS.	<u>Where is this topic discussed in the EIS?</u> CNL has indicated that it is willing to involve the MNO in its monitoring programs (Section 6.2.4.4.3). The follow up monitoring program is described at a high level in Section 12 of the EIS with significant details developed compared to the 2017 draft EIS. These details come through the development of the 3 draft follow-up monitoring plans for effluent, environment and groundwater. <u>What changes have been made (and where)?</u> The EIS was updated to include an expanded description of traditional uses, and harvesting rights related to Traditional Land Use.	<u>Status:</u> Resolved. CNL considers that this concern will be fully addressed through an appropriate commitment to provide capacity for monitoring and engagement to be established as part of the LTRA. Continued engagement between CNL and the MNO may result in additional mitigation measures or commitments that support MNO involvement in monitoring activities that will enhance confidence and trust in CNL's assessment.
11. Monitoring	(d) Specific technical comments on Follow-up monitoring Plans It is important to the MNO that the monitoring plans reflect their input on monitoring details (e.g., frequency, location, parameters) This is a project-specific concern.	CNL met with the MNO in November 2020 to provide an overview presentation on the draft follow-up monitoring plans for the NPD Closure project with focus on monitoring aspects that were raised through MNO's comments on the draft EIS. CNL has responded in writing to MNO comments on this topic and met with the MNO in February 2021 to further discuss MNO's involvement in long-term monitoring. <u>CNL Response:</u> CNL has been working with the MNO to share more detailed information on follow-up monitoring through the provision of three draft follow-up monitoring plans. The MNO has provided feedback on the three drafts and CNL is looking at how to best incorporate this feedback. In the absence of CCME standards for groundwater, the groundwater monitoring plan uses Health Canada and MECP standards. Tritium is used as an indicator contaminant of concern due to its mobility in groundwater, which means that tritium would be the first contaminant seen flowing out of the facility. However, other parameters, gross beta and gross alpha, will also be measured. Groundwater near the landfills has been assessed through comprehensive campaigns in	<u>Where is this topic discussed in the EIS?</u> The follow up monitoring program is described at a high level in Section 12 of the EIS. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this concern.	<u>Status:</u> Resolved. CNL considers that this concern will be fully addressed through an appropriate commitment to provide capacity for monitoring and engagement to be established as part of the LTRA. Continued engagement between CNL and the MNO may result in additional mitigation measures or commitments that support MNO involvement in monitoring activities that will enhance confidence and trust in CNL's assessment.

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		2014 and 2017 and no groundwater impacts were noted related to the landfills. CNL has also conducted additional baseline surveys of sediment quality and benthic macroinvertebrates.		
12. Socio-Economics	(a) Consideration of Métis use and enjoyment of the land This is important to the MNO because use and enjoyment of the land are values that may be affected by the project and should be considered in the assessment. This is a project-specific concern.	CNL has responded in writing to MNO comments on this topic citing relevant sections of the EIS in the response. CNL has added a new Indigenous socio-economic environmental component and VCs, in order to address these concerns. <u>CNL Response</u> CNL agrees that use and enjoyment of the land is an important consideration. Therefore, CNL has added a new Indigenous socio-economic component to the EIS. Use and enjoyment of the land is one of the VCs for this component, alongside several other socio-economic VCs specific to Indigenous Nations, communities and organizations including the MNO. The EIS does not predict any adverse residual effects on the Indigenous socioeconomic VCs.	<u>Where is this topic discussed in the EIS?</u> Indigenous socio-economic VCs are presented in Section 5.2.4 of the EIS, and baseline is presented in Section 8.10.1 of the EIS. The assessment of effects to Indigenous socio-economic VCs is discussed in Section 9.10.1 of the EIS. <u>What changes have been made (and where)?</u> In response to this and other comments, CNL introduced a new Indigenous Socio-Economic component and VCs in Section 5.2.4 of the EIS. This is discussed further in Section 6.3 of the EIS.	<u>Status:</u> Resolved. CNL believes that these concerns are addressed through additional VCs and revisions to the EIS.
12. Socio-Economics	(b) Socio-economic mitigation measures and follow-up monitoring This is a concern for the MNO because it is not clear how effects related to the socio-economic environment can be mitigated and/or verified through activities in other environmental compartments. This is a project-specific concern.	CNL has responded in writing to MNO comments on this topic citing relevant sections of the EIS in the response. The MNO and CNL have signed a Memorandum of Understanding (MOU) and are working towards establishing a LTRA. Within this framework, CNL will seek to work together with the MNO regarding their feedback on alternate mitigation measures, and MNO participation in monitoring activities. <u>CNL Response</u> The reason why the EIS identifies no mitigation measures for land use is because a decision hasn't yet been made on the future land use designation of the unaffected areas of the NPD site. The NPD property belongs to AECL, a federal Crown corporation. Once CNL completes the decommissioning of the NPDWF, AECL will look at the future of the lands and consider input from Indigenous peoples (as described in Section 4.3.1.9 of the EIS). In the meantime, CNL is willing to discuss this topic with the MNO to better understand the indirect socio-economic effects from land use. As discussed at the 2019 October 23 meeting with the MNO Consultation Committee, CNL is also preparing a document which elaborates on CNL's plan for site restoration after decommissioning is complete. When the document is complete, CNL will share it with the MNO in order to seek feedback on site restoration plans. With respect to follow-up monitoring for effects to the socio-economic environment: CNL's approach involves verifying effects in the socio-economic environment through other environmental components: The negative impacts are primarily nuisance effects (dust, noise) on use and enjoyment of private property, occurring during the Decommissioning Execution phase. Ensuring that the environmental impact from dust and noise is minimized through air quality monitoring is a way to minimize these negative impacts. Potentially positive economic and employment benefits to MNO citizens have also been identified. Some discussions have occurred on the types of economic opportunities associated with the NPD Closure Project (e.g., MNO participation in environmental	<u>Where is this topic discussed in the EIS?</u> Section 9.10.1.3.2 of the EIS describes the proposed mitigation measures for the Indigenous Socio-Economic environment. The EIS does not predict any adverse residual effects on the Indigenous socioeconomic environment. Section 9.10.1.5 of the EIS discusses follow-up and monitoring for this component. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this comment.	<u>Status:</u> Resolved. CNL considers that this concern will be addressed through an appropriate commitment to develop an Indigenous procurement policy and support MNO involvement in environmental monitoring to be established as part of the LTRA.

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		monitoring). CNL is committed to further discussions on this topic with the MNO, including how to verify potential positive effects, perhaps through tracking of participation of MNO citizens in environmental monitoring.		
13. Technical	(a) Local Study Area does not vary between environmental components This is important to the MNO because they want to ensure that potential effects on the different types of VCs have been thoroughly considered and assessed. This is a project-specific concern.	CNL has responded in writing to MNO comments on this topic citing relevant sections of the EIS in the response. <u>CNL Response:</u> Early in the assessment process, the Local Study Area was chosen to be the NPD property as a convenient estimate of this area, with the intention of increasing the boundary if required, based on the results of the assessment. In Section 9 of the EIS, the assessment confirmed that there are no measurable effects for any environmental component beyond the Local Study Area.	<u>Where is this topic discussed in the EIS?</u> Section 5.2.1 of the EIS explains the general selection of study areas. The study areas selected for each environmental compartment are presented in Section 8 of the EIS (e.g., 8.2.1 for Atmospheric Environment, 8.3.1 for Surface Water Environment, etc.). Study areas for Traditional Land and Resource Use are presented in Section 8.9 of the EIS. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this comment.	<u>Status:</u> Resolved. CNL considers that this concern will be fully addressed through an appropriate commitment to provide capacity for monitoring to be established as part of the LTRA. Continued engagement between CNL and the MNO may result in additional mitigation measures or commitments that support MNO involvement in monitoring activities that will enhance confidence and trust in CNL's assessment.
13. Technical	(b) Concern about whether the Institutional Control Period is long enough This is important to the MNO because they would like assurance that the end state of the NPD site will be acceptable for safely engaging in unrestricted land use. This is a project-specific concern.	CNL has responded in writing to MNO comments on this topic citing relevant sections of the EIS in the response. <u>CNL Response:</u> CNL understands MNO's concern about the length of the Institutional Control period being insufficient. CNL is proposing a minimum of a 100-year Institutional Control period; however, this time period could be extended much longer and will be based on regulatory approval and public and Indigenous engagement at that time. The PostSA TSD demonstrates that beyond the Institutional Controls period, under all scenarios, the impact on the public, Indigenous and the environment is negligible.	<u>Where is this topic discussed in the EIS?</u> The phases of the project are introduced in Section 3.2 of the EIS. Temporal Boundaries are discussed in Section 5.2.1.2. CNL's plans for the Institutional Controls phase are also discussed throughout the EIS, e.g., in Section 4.1 (Project Description), Section 9 (Effects Assessment) and Section 12 (Follow-up Program). <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this comment.	<u>Status:</u> Resolved. CNL considers that this concern will be fully addressed through an appropriate commitment to provide capacity for monitoring to be established as part of the LTRA. Continued engagement between CNL and the MNO may result in additional mitigation measures or commitments that support MNO involvement in monitoring activities that will enhance confidence and trust in CNL's assessment.
13. Technical	(c) Benefits to Indigenous peoples The MNO is interested in reviewing changes to the project, which is also a requirement under the CNSC's Generic EIS Guidelines. This is a project-specific interest.	The MNO and CNL have signed a Memorandum of Understanding (MOU). Together the two organizations have agreed to a mutually beneficial, ongoing working relationship and to provide a process to which CNL can engage with the MNO at the local and regional levels in order to better understand any Métis Rights and Interests that may be impacted in the general and surrounding areas around the projects. <u>CNL Response</u> CNL has revised the EIS to incorporate MNO feedback shared through the context of the MOU and includes a summary of how public and Indigenous feedback has impacted decisions made on the project.	<u>Where is this topic discussed in the EIS?</u> Section 6.3.1 of the EIS summarizes changes that have been made to the project based on feedback from the public and Indigenous peoples. <u>What changes have been made (and where)?</u> CNL added discussion to Section 6.3.1 of the EIS, summarizing changes that have been made to the project based on feedback from Indigenous peoples. CNL added and evaluated new Indigenous health and traditional land	<u>Status:</u> Resolved. CNL considers that this concern will be addressed through an appropriate commitment to develop an Indigenous procurement policy as part of the LTRA.

Topic	MNO Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
			and resource use VCs (Sections 6.3 and 9.9 of the EIS).	
14. Traditional Land and Resource Use and Cultural Impacts	(a) Métis traditional knowledge and Métis specific information should be collected and incorporated into the EIS. It is important to the MNO that community-specific knowledge be obtained and used, to properly characterize current conditions and develop scenarios that accurately represent potential future uses of the site. This is a project specific concern.	CNL sent two letters asking specific questions of MNO to align with the requirements of <i>CEAA</i> (2012) Section 5(1)(c). These questions included: - Do you have any members that currently practice traditional activities such as trapping, hunting, fishing and/or gathering, near the two projects? - Does [the MNO], or any members, have sites of ceremonial significance in close proximity [of NPD], or more generally, any cultural activities near [the NPD site]? CNL contributed funds for the MNO to undertake a TKLUS, which was completed in February 2019. CNL has incorporated findings from the MNO TKLUS into the EIS and shared the revised sections of the EIS with the MNO for feedback on the incorporation of TKLUS results. CNL has responded in writing to MNO comments on this topic, citing relevant sections of the EIS as part of the comment responses. CNL is looking forward to continuing to work with the MNO to ensure that information on the Métis way-of-life is incorporated into the project. <u>CNL Response:</u> CNL agrees that Métis-specific information and traditional knowledge from the MNO and other Indigenous Nations, communities and organizations should be integrated into the EIS. Since receiving this feedback, CNL has contributed funding to the preparation of a TKLUS from the MNO and has integrated the findings and concerns into the EIS. The EIS and supporting studies have assumed that traditional uses do occur adjacent to the NPD site, whether on the Ottawa River or outside the restricted/fenced area. CNL has also assumed that in the future there is an interest to re-establish traditional use activities on the NPD site. CNL has incorporated important Métis-specific information into the EIS, from sources such as the MNO Traditional Knowledge and Land Use (TKLUS) study as well as findings from the Valued Components (VC) workshop. Examples are as follows: - Species of important traditional value to the Métis have informed the Valued Components selected for the project. Based on MNO feedback, moose and berries were added as VCs in the EIS. - Fish species identified in the MNO TKLUS (walleye, bass, trout) were assessed in the EcoRA TSD, which concludes that there is a negligible impact to fish from the NPD Closure Project. Fishing in the Ottawa River is assessed in the EIS as a traditional land and resource use VC. - With respect to plant species of importance: CNL reviewed the MNO TKLUS and noted the following plant species of value: wintergreen, blueberries, raspberries, chaga, choke cherries, fiddleheads, and trees suitable for the traditional Métis craft of canoe building (cedar, oak, ash and yellow birch).Of these species, blueberries, raspberries, maple trees, eastern white cedar, white ash and (white) birch are noted as observed on the NPD property in Appendix B of the Ecological Land Classification (ELC) TSD. The EIS has been updated to include these species of interest of the MNO. CNL is always open to providing a tour of the site to MNO citizens if there is interest in plant species in the forested areas of the NPD site.	Where is this topic discussed in the EIS? Section 8.9 of the EIS presents information about traditional land and resource use, including specific information about the MNO (Section 8.9.2.2.4). The assessment of effects to traditional land and resource use VCs is discussed in Section 9.9 of the EIS. <u>What changes have been made (and where)?</u> CNL added information from the MNO TKLUS to Section 8.9.3 of the EIS, including Métis harvesting regions. The potential impacts of the project on traditional land and resource use (including perceptive and other intangible effects) are discussed in Section 9.9 of the EIS. CNL added content from the MNO TKLUS report to the EIS (Sections 6.3 and 8.9). The EIS update includes additional detail on the VC-related engagement process and how Indigenous interests have been incorporated into the VCs selected for the NPD Closure Project.	<u>Status:</u> Resolved. CNL considers that this concern will be fully addressed through an appropriate commitment to provide capacity for monitoring and engagement to be established as part of the LTRA. Continued engagement between CNL and the MNO may result in additional mitigation measures or commitments that support MNO involvement in monitoring activities that will enhance confidence and trust in CNL's assessment. -

Topic	MNO Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
14. Traditional Land and Resource Use and Cultural Impacts	(b) Spatial boundaries for Indigenous land and resource use It is important to the MNO that the determination of study areas takes into account the actual use of the land by Metis citizens for traditional purposes. This is a project-specific interest.	CNL has responded in writing to the MNO’s comments on this topic, citing relevant sections of the EIS as part of the comment responses. <u>CNL Response</u> For the assessment of effects on traditional land and resource use, CNL selected a Local Study Area that extends beyond NPD property boundaries, including Crown land in Ontario and Quebec, and the Ottawa River. If any effects were to be experienced, they would occur in the selected Local Study Area. If required, based on the results of the assessment, the boundaries of the Local Study Area could be extended. In Section 9 of the EIS, the assessment confirmed that there are no measurable effects for any environmental component beyond the Local Study Area. Enlarging the Local Study Area would not change these findings. Similarly, the Regional Study Area boundaries were chosen to include the expected area of possible effects. The assessment, which was conducted per <i>CEAA</i> (2012) requirements, found that no measurable effects on traditional land use VCs in the Regional Study Area are expected from the project. The Local Study Area covers possible Métis harvest area on the Ottawa River and the Regional Study Area includes some crown land in which some Métis harvesters might practice traditional activities.	<u>Where is this topic discussed in the EIS?</u> Section 5.2.1 of the EIS explains the general selection of study areas. The study areas selected for each environmental compartment are presented in Section 8 of the EIS (e.g., 8.2.1 for Atmospheric Environment, 8.3.1 for Surface Water Environment, etc.). Study areas for Traditional Land and Resource Use are presented in Section 8.9 of the EIS. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this comment.	<u>Status:</u> Resolved. CNL considers that this concern will be fully addressed through an appropriate commitment to provide capacity for monitoring and engagement to be established as part of the LTRA. Continued engagement between CNL and the MNO may result in additional mitigation measures or commitments that support MNO involvement in monitoring activities that will enhance confidence and trust in CNL's assessment.
14. Traditional Land and Resource Use and Cultural Impacts	(c) Impacts on Indigenous traditional activities: biophysical effects on species of importance as well as perceptive and intangible effects on Métis way of life The MNO would like to ensure that all potential effects of concern have been considered and addressed. This is a project-specific concern.	CNL has sent two targeted letters asking specific questions of MNO to align with the requirements of <i>CEAA</i> (2012) Section 5(1)(c). CNL has responded in writing to MNO comments on impacts on Indigenous traditional activities citing relevant section of the EIS as part of the comment response. CNL is continuing its efforts to address these concerns by involving the Indigenous Nations, communities and organizations, including MNO, in monitoring activities that will confirm the conclusions of the EIS. An Indigenous-driven monitoring program can help to reduce fear or anxiety associated with traditional uses occurring adjacent to and near CNL operated sites and build confidence that the decommissioning strategy and mitigation measures are effective CNL incorporated information from the MNO TKLUS study into the EIS and has revised the EIS to include new Indigenous Socioeconomic & Health components, each with distinct VCs of interest to the MNO. CNL is willing to review the project-interactions matrix with the MNO to ensure all interactions are correctly identified and that the matrix properly captures qualitative aspects such as Métis perceptions and way-of-life. For example, CNL is willing to learn more about Métis harvesters’ rights, perceptions and concerns about access to hunting species such as white-tailed deer. The EIS and supporting studies have assumed that traditional uses do occur adjacent to the NPD site, whether on the Ottawa River or outside the restricted/fenced area. CNL has also assumed that in the future there is an interest to re-establish traditional use activities on the NPD site CNL has assessed the potential effects of the project on several VCs, including those of importance to the MNO. With respect to potential impacts on species of importance and perceptions of Métis way-of-life, CNL is eager to learn more and discuss how these effects may be minimized. The Ecological Risk Assessment Technical Support Document (EcoRA TSD) also assessed species of value identified by the MNO. For example, fish species identified in the MNO	<u>Where is this topic discussed in the EIS?</u> The EIS discusses Métis rights and interests and negative perceptions of the project as key concerns from the MNO, in Section 6.2.4.4 and in Section 9.9 within the EIS. The EIS discusses concerns about potential loss of connection to land and water (e.g., feeling of discomfort or concern), and loss of land and water use in Section 9.9.5 within the EIS. Section 8.9 of the EIS presents information about traditional land and resource use, including specific information about the MNO (Section 8.9.2.2.4). Section 9.9 of the EIS assesses risk to traditional land and resource use VCs. Section 9.1.1.1 of the EIS presents the future exposure scenarios and groups that are considered in the PostSA TSD. <u>What changes have been made (and where)?</u> Findings from the MNO TKLUS study and more recent engagement activities have been incorporated into Sections 5, 6, 8 and 9 of the EIS as follows: In Section 5 of the EIS, CNL added new Indigenous Health and Socio-economic components and VCs and assessed project interactions. Table 6.3-3 was added to the EIS, summarizing VCs identified as important in the MNO TKLUS, and how they have been represented in the EIS. CNL expanded the description of traditional uses in Section 8.9 of the EIS based on information from the MNO	<u>Status:</u> Resolved. CNL considers that this concern will be fully addressed through an appropriate commitment to provide capacity for monitoring and engagement to be established as part of the LTRA. Continued engagement between CNL and the MNO may result in additional mitigation measures or commitments that support MNO involvement in monitoring activities that will enhance confidence and trust in CNL's assessment. -

Topic	MNO Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
		TKLUS (walleye, bass, trout) were assessed in the EcoRA TSD, which concludes that there is a negligible impact to fish from the NPD Closure Project. Similarly, the EcoRA TSD was updated to include terrestrial species of value identified by the MNO (e.g., moose, goose, partridge, turkey, berries). The MNO and CNL have signed a Memorandum of Understanding (MOU). Together the two organizations have agreed to a mutually beneficial, ongoing working relationship and to provide a process to which CNL can engage with the MNO at the local and regional levels in order to better understand any Métis Rights and Interests that may be impacted in the general and surrounding areas around the projects. CNL is looking forward to continuing to work with the MNO to ensure any effects on the Métis way-of-life are incorporated into the applicable project phase. CNL is also committed to ongoing communications and involving the MNO in environmental monitoring which may help improve perceptions of the NPD site and NPD Closure Project. <u>CNL Response:</u> CNL acknowledges MNO’s concerns about potential impacts on the rights of the MNO and other Indigenous Nations, communities and organizations to practice traditional activities around the NPD site. CNL has assessed potential effects related to dust and noise nuisance, loss of connection, safety of harvesting and consuming local foods, and changes to access and identified no significant adverse effects. To instill confidence in the EIS findings and the effectiveness of the follow-up monitoring, CNL will involve the MNO and other Indigenous Nations, communities and organizations in the monitoring program, which aims to confirm the predictions of the EIS. The PostSA TSD addresses the potential for concerns about loss of connection to land and water, and about food safety. The PostSA and EIS (and other supporting studies) have demonstrated that, there are no concerns about the accessibility or safety of the NPD site in the long term based on several different future use scenarios, including self-sufficient Indigenous receptors. The EIS concludes that no adverse residual effects on Indigenous health, socio-economics, and land and resource use will occur as a result of the NPD Closure Project. The proposed activities will result in an enhancement of current conditions at the NPD site and will improve the ability to practice traditional activities in the area surrounding the NPD site. These findings, which will be confirmed by monitoring, may reduce concerns about loss of connection to land and water, and about food safety.	TKLUS. CNL evaluated the new Indigenous health and socio-economic VCs and the traditional land and resource use VCs in Section 9.9 and 9.10 of the EIS.	
14. Traditional Land and Resource Use and Cultural Impacts	(d) Separate assessment of the effects to Métis rights and interests. It is important to the MNO that the EIS consider the potential effects of the project on Métis rights and interests, as they differ from those of other Indigenous Nations, communities and organizations . This is a project-specific concern.	CNL has responded in writing to the MNO comments on the EIS, describing how Métis-specific information has been collected (e.g., the MNO TKLUS and VC Workshop) and incorporated into the EIS. <u>CNL Response</u> CNL acknowledges that the citizens of the Métis Nation have distinctive cultural perceptions, ways of life and activities. CNL notes that the practice of Indigenous assessments under CEAA (2012) is to not assess individual Indigenous Nations, communities and organizations separately. However, CNL has updated the EIS to incorporate the information obtained from the MNO TKLUS and meetings with the MNO (including information about Métis traditional land use and perceptions) and to address VCs identified by the MNO.	<u>Where is this topic discussed in the EIS?</u> Section 6.2.4.4 of the EIS discusses the Métis-specific information obtained from the MNO as part of engagement activities. Section 8.9 of the EIS presents a description of traditional land and resource uses, including information incorporated from the MNO TKLUS. Table 6.3-3 was added to the EIS, summarizing VCs identified as important in the MNO TKLUS, and how they have been represented in the EIS. The potential impacts to these VCs are assessed in Section 9 of the EIS, including: Sections 9.4 and 9.6 for	<u>Status:</u> Resolved. CNL considers that this concern will be fully addressed through an appropriate commitment to provide capacity for monitoring and engagement to be established as part of the LTRA. Continued engagement between CNL and the MNO may result in additional

Topic	MNO Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
			wildlife VCs, Section 9.9 for Indigenous health and socio-economic VCs and Section 9.10 for the traditional land and resource use VCs. <u>What changes have been made (and where)?</u> Findings from the MNO TKLUS study and more recent engagement activities have been incorporated into Sections 5, 6, 8 and 9 of the EIS as follows: In Section 5 of the EIS, CNL added new Indigenous Health and Socio-economic components and VCs and assessed project interactions. Table 6.3-3 was added to the EIS, summarizing VCs identified as important in the MNO TKLUS, and how they have been represented in the EIS. CNL expanded the description of traditional uses in Section 8.9 of the EIS based on information from the MNO TKLUS. CNL evaluated the new Indigenous health and socio-economic VCs and the traditional land and resource use VCs in Section 9.9 and 9.10 of the EIS.	mitigation measures or commitments that support MNO involvement in monitoring activities that will enhance confidence and trust in CNL's assessment.
15. Valued Components	(a) Inclusion of VCs identified by MNO This is of interest to the MNO because these species and features are of particular importance to the MNO. The VCs selected need to consider Metis rights and interests in the assessment and the potential for interaction with the project activities. This is a project-specific concern.	With funding support from the CNSC and CNL, the MNO completed a Traditional Knowledge and Land Use (TKLUS) study, which was shared with CNL in February 2019. Findings from the MNO TKLUS study have been incorporated into the EIS. CNL and the CNSC provided capacity funding to the MNO to conduct a Valued Components (VC) workshop which was also submitted to CNL in 2019. Findings from the VCs study have been incorporated into the EIS. In April 2019, CNL met with MNO Councilors and staff for a NPD Closure Project update, including a presentation on proposed NPD VCs. The VCs presentation included definition and identification, types of VCs, approach and selection of NPD VCs and the MNO VCs addressed in the NPD EIS. All questions were addressed verbally at the meeting. This meeting also included a review and discussion of the draft dispositions to MNO VCs workshop comments. CNL also held a community information session in North Bay for MNO citizens. MNO citizens were able to discuss and share feedback on VC, TKLUS, and the NPD Closure Project in general with CNL representatives. CNL has also responded in writing to all MNO's comments on this topic, citing relevant sections of the EIS as part of the comment responses. In August 2021, the MNO indicated that they had no further comments on this topic. <u>CNL Response:</u> CNL agrees that VC selection should consider Metis rights and interests. CNL has contributed funding to the preparation of a MNO TKLUS and a targeted VC workshop and has integrated findings and into the EIS. CNL initially created a Master List of Candidate Valued Components by reviewing relevant reference documents and applying EA process and site knowledge. These candidate VCs include biota such as fish or birds, as well as abiotic qualities such as cultural and heritage sites, or socio-economic entities such as fishing. CNL provides rationale for including or not including species as a VC.	<u>Where is this topic discussed in the EIS?</u> Section 6.3 of the EIS captures VCs identified by Indigenous Nations, communities and organizations, including mapping of Indigenous VCs to the effects assessment. Table 6.3-1(c) shows the new VCs added to the assessment and Table 6.3-3 of the EIS highlights how VCs identified by MNO are represented by the species that are evaluated in the NPD EIS. The EIS includes an expanded description of traditional uses in Section 8.9. Section 9.6.3.2 describes the mitigation, monitoring and follow up activities for the Terrestrial Environment VCs. Section 9.9 describes the VCs related to Traditional Land Use, including the rationale, the mitigation, monitoring and follow-up activities related to the Traditional Land Use VCs. The EIS does not predict any adverse residual effects to traditional land and resource use (Section 9.9.3.3). The EIS does not predict any residual effects for the terrestrial environment (Section 9.6.3.3). <u>What changes have been made (and where)?</u> CNL has developed a detailed table for Section 6.3 of the EIS that captures VCs of Indigenous Nations, communities and organizations and demonstrates how they are either directly or indirectly assessed in the EIS and shared this with MNO for comment on November 4, 2021. With respect to the VCs indicated by the MNO, some were	<u>Status:</u> Resolved The MNO indicated in a meeting in August 2021 that they had no further comments on this topic.

Topic	MNO Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
		The VCs selected for the NPD Closure Project reflect a wide range of Indigenous interests. Many of the interests and concerns raised by Indigenous Nations, communities and organizations, correspond directly or indirectly to the VCs selected for the project. Based on Indigenous group feedback received during engagement activities, CNL has added several human and non-human VCs that were identified as being of importance to Indigenous Nations, communities and organizations. Berries, mushrooms, mink, river otter, weasel, red fox, moose and monarch butterflies were added as VCs, as well as soil quality, groundwater quality, groundwater flow and several Indigenous socio-economic and Indigenous health VCs. In some cases, no new VCs were added, because direct, representative or related VCs that encompass the value or interest of the Indigenous Nation, community or organization were already included in the assessment. CNL includes a detailed table (Table 6.3-1 (c)) that shows how the interests and concerns and specific species VCs identified by the MNO are considered and captured by CNL’s assessment.	added to the EIS, and others were represented by species that CNL was already evaluating as VCs. The EIS also includes an expanded description of existing traditional uses.	

Valued Components	Inclusion of VCs identified by MNO This is of interest to the MNO because these species and features are of particular importance to the MNO. The VCs selected need to consider Metis rights and interests in the assessment and the potential for interaction with the project activities. This is a project-specific concern.	With funding support from the CNSC and CNL, the MNO completed a Traditional Knowledge and Land Use (TKLUS) study, which was shared with CNL in February 2019. Findings from the MNO TKLUS study have been incorporated into the EIS. CNL and the CNSC provided capacity funding to the MNO to conduct a Valued Components (VC) workshop which was also submitted to CNL in 2019. Findings from the VCs study have been incorporated into the EIS. In April 2019, CNL met with MNO Councillors and staff for a NPD Closure Project update, including a presentation on proposed NPD VCs. The VCs presentation included definition and identification, types of VCs, approach and selection of NPD VCs and the MNO VCs addressed in the NPD EIS. All questions were addressed verbally at the meeting. This meeting also included a review and discussion of the draft dispositions to MNO VCs workshop comments. CNL also held a community information session in North Bay for MNO citizens. MNO citizens were able to discuss and share feedback on VC, TKLUS, and the NPD Closure Project in general with CNL representatives. CNL has also responded in writing to all MNO’s comments on this topic, citing relevant sections of the EIS as part of the comment responses. In August 2021, the MNO indicated that they had no further comments on this topic. CNL Response: CNL agrees that VC selection should consider Metis rights and interests. CNL has contributed funding to the preparation of a MNO TKLUS and a targeted VC workshop and has integrated findings and into the EIS. CNL initially created a Master List of Candidate Valued Components by reviewing relevant reference documents and applying EA process and site knowledge. These candidate VCs include biota such as fish or birds, as well as abiotic qualities such as cultural and heritage sites, or socio-economic entities such as fishing. CNL provides rationale for including or not including species as a VC. The VCs selected for the NPD Closure Project reflect a wide range of Indigenous interests. Many of the interests and concerns raised by Indigenous Nations, communities and organizations, correspond directly or indirectly to the VCs selected for the project. Based on Indigenous group feedback received during engagement activities, CNL has added several human and non-human VCs that were identified as being of importance to Indigenous Nations, communities and organizations. Berries, mushrooms, mink, river otter, weasel, red fox, moose and monarch butterflies were added as VCs, as well as soil quality, groundwater quality, groundwater flow and several Indigenous socio-economic and Indigenous health VCs. In some cases, no new VCs were added, because direct, representative or related VCs that encompass the value or interest of the Indigenous Nation, community or organization were already included in the assessment. CNL includes a detailed table (Table 6.3-1 (c)) that shows how the interests and concerns and specific species VCs identified by the MNO are considered and captured by CNL’s assessment.	Where is this topic discussed in the EIS? Section 6.3 of the EIS captures VCs identified by Indigenous Nations, communities and organizations, including mapping of Indigenous VCs to the effects assessment. Table 6.3-1(c) shows the new VCs added to the assessment and Table 6.3-3 of the EIS highlights how VCs identified by MNO are represented by the species that are evaluated in the NPD EIS. The EIS includes an expanded description of traditional uses in Section 8.9. Section 9.6.3.2 describes the mitigation, monitoring and follow up activities for the Terrestrial Environment VCs. Section 9.9 describes the VCs related to Traditional Land Use, including the rationale, the mitigation, monitoring and follow-up activities related to the Traditional Land Use VCs. The EIS does not predict any adverse residual effects to traditional land and resource use (Section 9.9.3.3). The EIS does not predict any residual effects for the terrestrial environment (Section 9.6.3.3). What changes have been made (and where)? CNL has developed a detailed table for Section 6.3 of the EIS that captures VCs of Indigenous Nations, communities and organizations and demonstrates how they are either directly or indirectly assessed in the EIS and shared this with MNO for comment on November 4, 2021. With respect to the VCs indicated by the MNO, some were added to the EIS, and others were represented by species that CNL was already evaluating as VCs. The EIS also includes an expanded description of existing traditional uses.	Status: Resolved The MNO indicated in a meeting in August 2021 that they had no further comments on this topic.

Appendix M Algonquin Anishinabeg Nation Tribal Council (AANTC) Record of Engagement and Interests and Concerns

This appendix provides a complete record of all engagement between CNL and AANTC from June 2016 to March 2024 (Table M.1). Table M.1 includes the date and method of the communication / engagement, the topics discussed and participants. The table also highlights engagements where key EA topics were discussed. The key EA topics align with “Generic Guidelines for Preparation of an Environmental Impact Statement Pursuant to the Canadian Environmental Assessment Act, 2012” as well as the requirements of REGDOC 3.2.2 “Indigenous Engagement” and guidance specific to NPD provided by the CNSC in January 2021 (e-doc # 6467843).

Following the record of engagement is a mapping of how the summary of interests and concerns were compiled (Table M.2), as well as a summary of interests and concerns raised by AANTC (M.3).

Section 4.4.4.1 of the IER summarizes the engagement activities that have taken place to date between CNL and the AANTC.

M.1 Record of Engagement – AANTC – 2016 June to 2024 March

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
July 15, 2016 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the Director General of the AANTC introduced the project and requested community input on any potential adverse impacts from project activities. To demonstrate requirements of CEAA, 2012 Section 5(1)(c), the letter requested meaningful feedback on the following: Whether the project may have environmental effect on any lands and/or resources currently used by Aboriginal peoples for traditional purposes; Whether the project may have any perceived impacts on Aboriginal and Treaty Rights; Whether local and traditional knowledge can assist in describing the existing environment; and, The view of Aboriginal communities on proposed valued ecosystems components (environmental attributes) that have been identified for the assessment.				v	v				v	v
November 10, 2016 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the Director General of the AANTC inquired about asserted rights and traditional activities in the region around CRL. To demonstrate requirements of CEAA 2012 Section 5(1)(c), the letter requested a better understanding of AANTC’s historic and/or modern day use of lands in and/or near both of the projects and asked the following questions: • Do members of the AANTC have traditional territory near the NSDF and/or NPD Closure Project? • What is the history of the AANTC using the areas around the two projects? • Do you have any members that currently live in close or reasonable proximity to either of the projects? • Do you have any members that currently practice traditional activities such as, trapping, hunting, fishing and/or gathering, near the two projects? • Does the AATNC have sites of cultural significance in close proximity to either of the two sites, or more generally, any cultural activities near either of the two sites? • CNL also indicated interested in learning more about the AANTC and any asserted rights, interests or activities members might undertake in the local or regional areas in proximity to the project.				v	v				v	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
April 26, 2017 Meeting	This meeting occurred in Maniwaki, Quebec with representatives from the AANTC (including the Grand Chief and the Director General), CNL (including the Director of Corporate Communications and the Director of Environmental Protection), the CNSC (including the Participant Funding Program Administrator) and representatives from two member First Nations of the AANTC – KZA and KFN. CNL shared information in English and French and heard some interests and concerns from the AANTC. Information shared on the NPD Closure Project included: • Site location; • Project components; • Timeline; • Species at risk; • Proposed end state; • Safety barriers (how the environment will remain protected).			✓	✓					✓	
November 15, 2017 Outgoing email	This email from a communications officer with CNL to the Director General of the AANTC enclosed links to the full draft EIS, an interactive “public-friendly” executive summary of the draft EIS, the CNSC’s public notice, a short overview of the project and environmental assessment, as well as detailed information on the timing of the EA process and how to participate in the public comment period.	✓	✓	✓	✓	✓	✓	✓	✓	✓	
November 17, 2017 Outgoing email	This email from a communications officer to the Director General of the AANTC enclosed the draft Aboriginal Engagement Report for the NPD Closure Project and stated, per CEAA, 2012 requirements: “CNL would be pleased to update information in this current draft with input from your community.”	✓	✓	✓	✓	✓	✓	✓	✓	✓	
December 14, 2017 Incoming email	This email from the AANTC’s consultant to CNL’s Director of Corporate Communications requested a tour of the NPD site and more information on the existing groundwater and surface water conditions at the site, as well as annual compliance and monitoring information. This was one of the first indications of the AANTC’s interest in monitoring.	✓								✓	
December 19, 2017 Outgoing email	This email from a communications officer with CNL to the AANTC’s Director General and the AANTC consultant sharing the requested information (the two most recent ACMRs and the Updated Groundwater Modeling Report), as well as all the technical support documents to the draft EIS.	✓	✓		✓		✓	✓		✓	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
January 11, 2018 Meeting	This meeting between six representatives of CNL on the NPD Closure Project (including the Decommissioning Manager, a hydrogeological subject matter expert and a communications officer) and the Director General of the AATNC and the AANTC consultant included a site visit at NPD. Discussions and presentations covered the following topics: • An overview of the project; • Current hydrology and surface water conditions; • Groundwater modelling; • Post closure Safety Assessment. The AANTC's consultant also brought forward a number of information requests and questions at this meeting, related to the following: • Derived Release Limits for the NPD site; • Monitoring locations and groundwater flow on a map; • Surface water generated from precipitation; • Hydrogeological characterization of the site; • Tritium; • Licensing information; • Interim end state; • Former decommissioning plans.	√	√	√	√		√	√	√	√	
January 22, 2018 Outgoing email	This email from a communications officer with CNL to the AANTC consultant was in follow-up to the meeting at the beginning of January. CNL shared 17 documents and written responses to the questions the AANTC consultant had brought forward on January 11, 2018.	√			√					√	
February 13, 2018 Letter to the CNSC	This letter was addressed to the CNSC from the Grand Chief of the AANTC and copying the Director of Corporate Communications. The letter enclosed the AANTC's comments on the Project Description, which outlined the AANTC's interests in the following: • Alternatives; • Baseline Characterization; • Monitoring; • Technical; • EA Process and Methodology; • EIS – Language.		√		√					√	
February 15, 2018 Incoming letter	This letter from the Grand Chief of the AANTC to the CEO of CNL requested that CNL cease liquid effluent releases from the NPD site.									√	
March 08, 2018 Outgoing letter	This letter from the CEO of CNL to the Grand Chief of the AANTC provided context on the releases from the NPD site and shared information on how the releases fall within safe regulatory limits.									√	
July 09, 2018 Outgoing email	This email from CNL staff to the AANTC Director General and their consultant provided an additional annual monitoring report (2017 ACMR), which had been requested by the AANTC.	√								√	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
December 05, 2019 Outgoing email	This email from a communications officer with CNL to the AANTC’s consultant was in follow-up to the AANTC’s previously identified areas of interest by sharing seven documents related to the following; Surveillance during the institutional control period; Geocharacterization; Draft follow-up monitoring plans.	√					√		√	√	
In March 2020, the COVID-19 pandemic impacted in-person engagement activities. CNL adapted to the restrictions providing online platforms for virtual meetings, workshops, webinars, Project updates and open houses.											
March 23, 2020 Incoming email	This email from the AANTC consultant to CNL’s Director of Corporate Communications inquired about the updated timeline for the project.			√							
March 25, 2020 Outgoing email	This email from CNL’s Director of Corporate Communications to the AANTC’s consultant was in response to the previous email and provided updates on the project timeline for the NPD Closure Project, the EA process and regulatory timelines. The letter also indicated interest in meeting.									√	√
May 06, 2020 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the AANTC Director General enclosed a preliminary version of the 2020 revised draft EIS and an updated IER and indicated an interest in meeting with the AANTC to discuss the previously shared documents in December 2019, as well as the AANTC’s comments on the 2017 draft EIS. This letter also asked for feedback in the following seven areas: - Do any AANTC communities have additional information that they would like to provide in the context of traditional territory near the NPD site? (Based on the above noted value placed on the Ottawa River, CNL would be interested to learn of community practices near the NPD project as they pertain to traditional use and modern day harvesting). - Do the AANTC communities have any members who currently live close or in reasonable proximity to the NPD site? - Do any AANTC communities have historical and/or current traditional practices near the NPD site, specifically we are interested in AANTC communities’ traditional uses such as trapping (traditional or commercial), hunting, fishing (traditional or commercial), gathering and practicing cultural ceremonies? (Recognizing the Ottawa River as a component on which the AANTC places a high value, CNL is interested in knowing if the AANTC can describe any member use in close proximity to the NPD site). - Do any AANTC communities have sites of ceremonial significance in close proximity or more generally any cultural activities near the NPD site? - Tell us about any important resources, uses, activities, values and interests to AANTC communities near the NPD site. - If there is use in close proximity to the NPD site, is current AANTC community use different than historic use and can a description of those difference be provided? - Let us know of any potential concerns you have with respect to effects and any potential impacts on rights.	√	√		√	√	√	√	√		
May 14, 2020 Incoming letter	This letter from Kebaowek First Nation Chief and the AANTC Grand Chief was addressed to Prime Minister Trudeau outlining concerns with inconsistencies in the EA processes which included the NPD Closure Project. CNL’s Director of Corporate Communications was copied on the letter.					√					

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
May 26, 2020 Outgoing email	This email from a communications officer with CNL to the Director General of the AANTC indicated interest in pursuing a contribution agreement with the AANTC to support their participation in the environmental assessment process for the NPD Closure Project.										✓
May 28, 2020 Incoming email	This email from the Director General of the AANTC to CNL staff indicated that the AANTC were interested in being involved in the EA process and would be interested in support for continued participation.									✓	
June 12, 2020 Incoming email	This email from the AANTC consultant to CNL staff requested a hard copy of 2020 draft EIS to support their review on behalf of the AANTC.									✓	
June 17, 2020 Virtual meeting	This meeting between eight CNL representatives (including the Director of the NPD Closure Project, the Manager of Regulatory Approvals and the Manager of Stakeholder Relations) and five representatives of the AANTC (including the Grand Chief, the Director General, a policy consultant with KFN, an economic development officer and a consultation coordinator with the AANTC) was not considered engagement or consultation by the AANTC. It focused on how CNL could support AANTC participation in the environmental assessment process through a contribution agreement or other formal mechanism.									✓	
June 24, 2020 Outgoing email	This email from a communications officer with CNL to the AANTC Director General was to follow-up on items from the virtual meeting in June.										✓
July 16, 2020 Outgoing email	This email from a communications officer with CNL to the AANTC Director General shared an overview presentation on the NPD Closure Project and inquired on a follow-up meeting with respect to the contribution agreement discussions.										✓
July 25, 2020 Incoming email	This email from the AANTC consultant to a communications officer with CNL was to confirm that they were beginning review of the 2020 draft EIS.										✓
July 29, 2020 Incoming email	This email from the AANTC consultant to a communications officer with CNL was to request a number of supplementary documents in hard copy to assist in their review of the 2020 draft EIS.			✓	✓					✓	
July 29, 2020 Outgoing emails	These two emails from a communications officer with CNL to the AANTC’s consultant were to confirm that the following documents would be mailed out: • Groundwater Modelling TSD, REV 0; • Geosynthesis TSD, REV 1; • Environmental Site Assessment Report; • 2020 Resaturation Modelling Report; • Draft Effluent Follow-Up Monitoring Plan; • Draft Environmental Follow-Up Monitoring Plan; • Draft Groundwater Follow-Up Monitoring Plan.	✓					✓		✓	✓	
August 14, 2020 Outgoing email	This email from CNL staff to the AANTC Director General inquired on a follow-up meeting with respect to the contribution agreement discussions.										✓
August 26, 2020 Incoming letter	This letter from the AANTC and Kebaowek First Nation to the Minister of Natural Resources, copying CNL and the CNSC, indicated dissatisfaction with the regulatory process for a number of projects including the NPD Closure Project.					✓					
August 31, 2020 Outgoing email	This email from a communications officer with CNL to the AANTC Director General inquired on a follow-up meeting with respect to the contribution agreement discussions.										✓

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
September 01, 2020 Outgoing letter	This letter from CNL’s Manager of ERM Stakeholder Relations to the AANTC Director General enclosed CNL’s draft responses to the Algonquin of Anishinabeg Nation Tribal Council’s (AANTC) comments on the 2017 draft EIS and inquired on a meeting with the AANTC.		✓		✓					✓	
September 03, 2020 Incoming email	This email from the AANTC Director General to a communications officer with CNL stated that the AANTC was not interested in meeting until the letter to the Minister sent in August had been addressed.									✓	
September 04, 2020 Incoming email	This email from the AANTC consultant to a communications officer with CNL was to confirm their receipt of the responses sent on September 01 and to confirm that these responses would be considered in their review of the 2020 draft EIS.										✓
October 02, 2020 Outgoing email	This email from a communications officer with CNL to the AANTC Director General enclosed a French translation of CNL’s draft response to the AANTC comments on the 2017 draft EIS.		✓		✓					✓	
October 26, 2020 Incoming email	This email from the AANTC consultant to a communications officer with CNL responded to the CNL responses to AANTC comments sent on September 01, 2020 with a number of follow-up questions relating to effluent, waste water management and groundwater.		✓		✓					✓	
October 28, 2020 Outgoing email	This email from a communications officer with CNL to the AANTC consultant responded to the AANTC consultant’s questions from October 26, 2020.		✓		✓					✓	
October 30, 2020 Incoming email	This email from the AANTC consultant a communications officer with CNL had a few further clarifying questions on waste water management.		✓		✓					✓	
November 05, 2020 Outgoing email	This email from a communications officer with CNL to the AANTC consultant responded to the clarifying questions on waste water management.		✓		✓					✓	
November 05, 2020 Incoming letter	This letter from the Minister of Natural Resources to the AANTC Grand Chief and Kebaowek First Nation Chief responded to the letter of August 2020. CNL’s Director of Corporate Communications was copied.					✓					
November 18, 2020 Incoming email	This email from the AANTC consultant to a communications officer with CNL was to inquire on further information related to waste water management.		✓		✓					✓	
November 18, 2020 Outgoing email	This email from a communications officer with CNL to the AANTC consultant confirmed that CNL would provide more information and offered a virtual meeting to discuss the issue further.		✓		✓					✓	
November 27, 2020 Outgoing email	This email from a communications officer with CNL to the AANTC consultant provided the requested information to address the question from November 18.		✓		✓					✓	
January 11, 2021 Incoming letter	This letter from the AANTC’s Grand Chief and Kebaowek FN Chief to the Minister of Natural Resources (copying CNL’s Director of Corporate Communications) outlined concerns with the resolution of problems regarding supporting Indigenous participation for CNL and CRL-based projects. The letter requested a meeting to discuss issues in detail and arrive at mutually satisfactory conditions supporting Indigenous consultation and engagement.					✓					
January 19, 2021 Outgoing email	This email from a communications officer with CNL to the Director General of the AANTC offered a meeting and further discussion on a contribution agreement.										✓
April 12, 2021 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the Director General of the AANTC enclosed a preliminary list of commitments and indicated interest in meeting to discuss.										✓
April 22, 2021 Incoming letter	This letter from the Grand Chief of the AANTC and the Chief of KFN to CNL’s Manager of Stakeholder Relations indicated that neither was in agreement with the list of commitments and indicated that engagement with the AANTC and KFN was essential.									✓	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
April 30, 2021 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the Grand Chief of the AANTC and the Chief of KFN shared that the letter was not intended to provide a final set of commitments and CNL was interested in engaging with the AANTC and KFN to determine a mutually agreed upon set of commitments.									√	
May 06, 2021 Outgoing email	This email from a communications officer with CNL to a consultation coordinator with KFN (copying the Director General of the AANTC) followed up on the previous letter.										√
May 27, 2021 Outgoing email	This email to the consultation coordinator with the AANTC from a communications officer with CNL was to determine who the primary point of contact with the AANTC was.										√
June 21, 2021 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the Director General of the AANTC enclosed a draft summary of the AANTC’s interests and concerns for the NPD Closure Project for the AOO’s review and verification.									√	√
July 5, 2021 Outgoing email	This email from a communications officer with CNL to the Director General of the AANTC was to follow-up on the June 21, 2021 letter.										√
July 13, 2021 Outgoing email	This email from a communications officer with CNL to a consultation coordinator with the AANTC was to follow-up on the June 21, 2021 letter.										√
July 14, 2021 Outgoing email	This email from a communications officer with CNL to the AANTC’s general mailbox was to follow-up on the June 21, 2021 letter and to seek a point of contact.										√
August 12, 2021 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the KFN Chief and AANTC Grand Chief enclosed CNL’s response to the July 15, 2021 letter from AANTC’s Grand Chief and the KFN Chief. CNL’s response included information on the role of CNL in the EA process, how CNL documents comments from the AANTC and KFN on the NSDF and NPD Closure Project, CNL’s willingness to a draft letter of Intent and draft process Agreement for AATNC and KFN, information on a regional assessment, the opportunity to provide into follow-up monitoring, and CNL’s response to the request to include the letter of July 15, 2021 in the IAA registry. This letter also indicated a need for any additional feedback on the Summary of Interests and Concerns to be brought forward by August 31, 2021 in order to be reflected in the NPD revised draft EIS.									√	√
October 21, 2021 Outgoing Email	This email from a CNL Senior Communications Officer to the AANTC consultation coordinator and the Director General sought confirmation that the AANTC’s interests (attached in the email) on the NPD Closure Project were accurate and up to date. CNL informed AANTC of the new timeline for submission of the revised draft EIS and the need to receive any feedback on AANTC’s summary of interests and concerns by November 15, 2021.										√
March 08, 2022 Outgoing email	This email from a CNL Senior Communications Officer to AANTC consultation that the NPD Closure Project had to revise how they presented the summary table of interests and concerns and requested that the AANTC verify that the new table still reflects their interests and concerns. CNL requested that AANTC review the table within the next 2 weeks.										√
April 18, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the AANTC Consultation Coordinator was to extend an invitation to Industry Day on June 2, 2022.										√
May 06, 2022 Outgoing email	Email invitation to AANTC to the CNL Industry Day at the Chalk River Laboratories on June 2, 2022 to promote the broader engagement between CNL’s nuclear industry partners and our local supply chain.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
October 03, 2022 Outgoing letter	This letter addressed to the Director General of the AANTC from CNL’s Director of Indigenous Relations provided a project update and the engagement status with the AANTC. CNL stated it is committed to incorporating the ANNTC’s interests and concerns into the EIS. CNL provided an engagement status and next steps, including a site visit and establishing commitments to ensure that all interests and concerns are addressed and tracked to resolution. CNL offered to discuss capacity and establish commitments before December 2022. CNL requested that the ANNTC respond confirming their agreement to proceed with the engagement activities, or modified engagement activities.									√	
October 03, 2022 Outgoing email	Email from a CNL Senior Communications Officer to the Director General of the AANTC attached the NPD Project’s updated draft set of commitment for the ANNTC’s review.									√	
October 26, 2022	Email from CNL Senior Communications Officer to the Director General of the AANTC following up on a letter sent from CNL’s Director of Indigenous Relations about CNL’s NPD Closure Project and if they would like to discuss further.									√	
November 23, 2022 Outgoing telephone call	Telephone call from a CNL Senior Communications Officer to the general inbox for the AANTC stating CNL was following up on October 3, 2022 letter for NPD Closure Project. CNL left a message.									√	
January 20, 2023 Outgoing email	This email from a CNL Senior Communications Officer to the AANTC (including, AANTC Consultation AANTC Director General) to inform of the decision to postpone the submission of the NPD Closure Project’s draft EIS until 2023 May to allow for additional Indigenous input. CNL proposed the next step would be to discuss the ANTC’s interest and desired involvement in the NPD project.										√
March 14, 2023 Outgoing email	This email from a CNL Senior Communications Officer to the AANTC (including, AANTC Consultation AANTC Director General) sharing CNL's Indigenous Relations Procurement Strategy.										√
March 16, 2023 Outgoing email	This email from a CNL Communications Officer to AANTC Consultation is to confirm with AANTC that CNL accurately recorded the interests and concerns of AANTC related to the NPD Closure Project. CNL shared the current version of the AANTC Interests and Concerns Table (AANTC I&C) for AANTC verification. CNL also included a mapping table that indicates where/how the interest was received (AANTC Mapping). CNL requested AANTC verify its completeness and accuracy by 2023 June 20.									√	
June 01, 2023 Outgoing email	This email from a CNL Communications Officer to AANTC Consultation is to follow up on CNLs correspondence from 2023-05-16.									√	√
June 12, 2023 Outgoing email	This email from a CNL Communications Officer to AANTC Consultation is to request AANTC verification that CNL had accurately recorded the interests and concerns of your organization related to the NPD Closure Project. CNL welcomed feedback and offered to schedule a meeting to discuss.									√	√
July 05, 2023 Outgoing email	This email from a CNL Communications Officer to AANTC Consultation is to follow up on CNLs correspondence from 2023-05-16.									√	√
October 17, 2023 Outgoing Email	This email from CNL Manager of Communications and Engagement to AANTC FN is to provide an invite to the 2023 October 20 Career Fair being held In Pembroke										√

M.2 AANTC-Mapping of Key Interests and Concerns

Table C-11 presents a mapping of how the key interests and concerns relate to detailed feedback and input from the AANTC, up to March 2024.
Table C-11 has 3 columns:

- Column 1 identifies the topic, i.e., the subject area the key interest(s) or concern(s) falls under.

- Column 2 presents a key interest or concern, why it is important to the Indigenous Nation, community or organization, and connects it to a project aspect or an Aboriginal or treaty right wherever possible. This may be a summary of multiple related interests or concerns that have been expressed by the Indigenous Nation, community or organization.
- Column 3 presents details of the key interest or concern that the Indigenous Nation, community or organization has identified formally in writing and/or verbally to CNL.

Topic	Key Interests and Concerns	Specific feedback provided by the AANTC on this interest/concern
1. Alternatives	(a) Concern that the alternative means assessment does not provide sufficient detail on each alternative, or assess all potential effects. It is important to the AANTC that they have enough information to be able to evaluate the alternatives in terms of potential impact to traditional land and resource use / AANTC rights. This is a project-specific concern.	In comments on the 2017 draft EIS, the AANTC expressed concern about the alternative means assessment (AMA). The AANTC indicated that the AMA needed to be expanded and rewritten to better present and articulate the relative advantages and disadvantages of each option.
2. Baseline Characterization	(a) Characterization of the bedrock groundwater flow system This is important to the AANTC because an understanding of current conditions and characteristics of the groundwater system surrounding the NPD facility is necessary in order to assess the potential impacts from the project to traditional land and resource use / AANTC rights. This is a project-specific concern.	In comments on the 2017 draft EIS, the AANTC raised concerns about the geological and hydrogeological characterization of the site. Specifically, the AANTC expressed that insufficient work has been done to characterize and understand the bedrock groundwater flow system.
3. Engagement	(a) Meaningful participation and consultation It is important to the AANTC that its members be engaged/consulted meaningfully, not just informed. This is both a project-specific concern and a concern for the Crown.	In 2021 correspondence, the AANTC and KFN expressed concern about meaningful Indigenous Participation and adequate Crown consultation in environmental assessments (EA) for the NPD Closure Project and the NSDF Project.
3. Engagement	(b) Capacity for technical review of the EIS It is important to the AANTC that plans and agreements are in place with CNL, to support technical reviews and provide other opportunities for discussion to ensure that the AANTC’s interests and values are taken into consideration with respect to the project.	The AANTC indicated an interest in financial support to participate in the EA process in 2020 May in response to CNL’s offer of capacity.
4. EA Process and Methodology	(a) Relevant legislation It is important to the AANTC that the NPD Closure Project Environmental Assessment is carried out using up-to-date legislation (e.g., the <i>Impact Assessment Act</i>) as the new Act directly recognizes the need for reconciliation. This is not a project-specific interest.	In a May 2020 letter to the Prime Minister, the AANTC expressed concern about the continued use of <i>CEAA</i> (2012) for the NPD Closure Project rather than the new <i>Impact Assessment Act</i>.
4. EA Process and Methodology	(b) Aggressive timelines for the project The AANTC want to understand the decision-making behind the NPD Closure Project timeframes as the AANTC believes there are potential impacts to traditional land and resource use and AANTC rights. This is a project specific concern.	In comments on the 2017 draft EIS, the AANTC raised a number of technical concerns, including general concern about the project timeline being too aggressive, given that the potential impacts are long term. With respect to the timeline of the project itself, the AANTC is particularly concerned with the 100 year institutional control period being arbitrary.
4. EA Process and Methodology	(c) Availability of the EIS in both official languages. It is important to the AANTC that the EIS be available in English and in French, so that it is	In May 2017 the AANTC requested that the EIS be available in both official languages.

Topic	Key Interests and Concerns	Specific feedback provided by the AANTC on this interest/concern
	accessible to more community members for review to enable meaningful engagement. This is both a site-wide and project-specific concern.	
5. Monitoring	(a) Timeline of the follow-up monitoring program It is important to the AANTC that CNL commit to monitoring the proposed disposal for as long as necessary to ensure the environment is protected, as the environment are of particular value to the AANTC. This is a project-specific concern.	In comments on the 2017 draft EIS, the AANTC raised concerns about the time frame of CNL's follow-up monitoring program: whether the duration is long enough and whether it will be updated over time. Specific comments include: • CNL should commit to monitoring "as long as required" (and at a minimum, for the desired period of at least 100 years), with no automatic termination at all. • CNL should prepare a "Check Point Report" outlining the results of a full final site investigation (including field studies and a future-risk analysis). This type of report should be required prior to any proposed termination of monitoring and Institutional Controls to confirm that it is safe to abandon the site. The "Check Point Report" should be submitted for regulatory consideration and circulated to the public and Aboriginal groups for review and comment beforehand. • CNL should commit to updating and improving the follow-up and monitoring program over time. A commitment from CNL to adaptively update the follow-up and monitoring program in concert with technological advances is essential, but is currently missing from the draft EIS.
5. Monitoring	(b) Sharing monitoring program results with the public and Indigenous Nations, communities and organizations, and having them reviewed by independent researchers As long-term stewards and users of the land, it is important for the AANTC to be involved and informed of the monitoring program to confirm and build knowledge of any impacts to the environment. This is a project-specific concern	In comments on the 2017 draft EIS, the AANTC raised concerns about CNL sharing the results of the follow-up monitoring program. Specifically: • Rather than a commitment to provide results to the public and Indigenous Nations, communities and organizations, it states that this will be done "as required". • There is no actual commitment for CNL to have the results of the follow-up monitoring program reviewed by independent researchers – only that this "will also be assessed". • CNL should add a provision to the follow-up monitoring program to subject it to independent and proponent-funded review, make the full monitoring program results readily available to the public and Aboriginal communities, and as a result, ensure the programs remain relevant and up-to-date.
5. Monitoring	(c) The proposed follow-up monitoring program for groundwater and surface water quality is missing details As long-term stewards and users of the land and waters, it is important to the AANTC that appropriate controls and plans are in place to protect the environment. This is a project-specific concern.	In comments on the 2017 draft EIS, the AANTC raised concerns about the lack of details provided in the EIS for CNL's proposed follow-up monitoring program for groundwater and surface water quality. The AANTC provided a list of components, including a map, parameter list, trigger levels and contingency plans) that should be included.
6. Protection of the Ottawa River	(a) Impacts on groundwater and surface water quality As stewards of lands and waters, it is important to the AANTC that the environment is protected and that potential impacts to traditional land and resource use / AANTC rights are examined. This is both a site-wide and project-specific concern.	In comments on the 2017 draft EIS, the AANTC raised several technical questions about the completeness of information on effluent discharges at the site, and plans for overall surface water management. Also in February 2018, CNL received a letter from the Grand Chief of the AANTC requesting that CNL cease liquid effluent releases from the NPD site. The AANTC raised concerns about the potential impacts of the project on water quality. Concerns included: • Releases from current NPD operations to the aquatic environment; • Liquid effluent releases from other CNL facilities along the Ottawa River, including CRL; • Potential merit of constructing a surface water management pond for site runoff during Decommissioning; • Inadequacy of the assessment of potential impacts on groundwater and surface water.

Topic	Key Interests and Concerns	Specific feedback provided by the AANTC on this interest/concern
7. Technical	(a) Concrete Cap and Engineered Barrier design details are missing. As long-term stewards and users of the land and waters, it is important to the AANTC that barriers are in place to protect the environment.	In comments on the 2017 draft EIS, the AANTC raised several technical questions about the concrete cap and engineered barrier. Specific details of interest included: - The proposed precise footprint, thickness, and other construction details for the reinforced concrete cap (designed to prevent intrusion into the concrete monolith). - The design longevity and permeability of the engineered barrier (designed to minimize infiltration into the concrete monolith). - Specific details on any inspection/monitoring program intended to verify that the engineered barrier is performing as intended, and specific details regarding what if anything would trigger replacement of the engineered barrier. - Detail(s) and thickness(es) of any material(s) which will separate the concrete cap from the overlying engineered barrier. - Details of the proposed grading below and above the engineered barrier.

M.3 AANTC-Key Interests and Concerns

Table M.3 below summarizes the key interests and concerns that the AANTC have raised on the NPD Closure Project, up to March 2024, through comments submitted on the 2017 draft EIS to the CNSC or through direct discussion and engagement between AANTC and CNL.

The full submission of AANTC comments on the 2017 draft EIS can also be found online: [Comments on the 2017 draft EIS for NPD from Algonquin Anishinabeg Nation Tribal Council](#). These comments were summarized by CNSC and included as part of the CNL Table: Consolidated Public and Indigenous Groups’ Comments on the Nuclear Power Demonstration Closure Project Draft EIS: [IAA - NPD - Consolidated Public and Indigenous Comments](#) (April 2018).

The AANTC includes two First Nations that CNL has communicated with on the NPD Closure Project: Kebaowek First Nation (see Section C.4.1) and Kitigan Zibi Anishinabeg First Nation (see Section C.4.2).

Table M.3 has five columns:

- Column 1 identifies the topic, i.e., the subject area the key interest(s) or concern(s) falls under.
- Column 2 presents a key interest or concern, why it is important to the Indigenous Nation, community or organization, and connects it to a project aspect or an Aboriginal or treaty right wherever possible. This may be a summary of multiple related interests or concerns that have been expressed by the Indigenous Nation, community or organization.
- Column 3 summarizes CNL’s response or conclusions as well as CNL’s efforts to address this key interest or concern
- Column 4 identifies where in the EIS the key interest or concern is addressed, and whether any changes were made to the EIS in response to the interest/concern. If these changes resulted in a different outcome in the EIS, this is also discussed; Column 5 summarizes the “Status” of the key interest or concern and the anticipated Next Steps towards achieving resolution of the key interest or concern. Not all concerns can be quickly or easily resolved, as some concerns go beyond the scope of the EA process, or there may divergent perspectives on certain interests or concerns. Note: this column does not, unless specifically confirmed by the Indigenous Nation, community or organization, mean that they have verified that the interest or concern has been dealt with to their satisfaction.

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
1. Alternatives	(a) Concern that the alternative means assessment does not provide sufficient detail on each alternative, or assess all potential effects. It is important to the AANTC that they have enough information to be able to evaluate the alternatives in terms of potential impact to traditional land and resource use / AANTC rights. This is a project-specific concern.	In response to the AANTC request (and requests from other), CNL has added some quantitative assessments to the Alternative Means Assessment (AMA) TSD; for example, the projected radiological dose and Industrial Safety risk to workers for each option were added. CNL also updated the alternatives considered to include an additional scenario where a new disposal facility, such as a geological repository for intermediate level waste becomes available during the Institutional Control period for all waste that is shipped back to the Chalk River site for storage. CNL incorporated additional information from the AMA TSD into the EIS to provide	<u>Where is this topic discussed in the EIS?</u> Section 4.2 of the EIS contains a summary of the Alternative Means Assessment TSD. <u>What changes have been made (and where)?</u> CNL has included additional information from the AMA TSD in Section 4.2 of the EIS, to provide greater clarity on how the AMA was completed and what the results mean. In addition, both the Alternative Means TSD and Section 4.2 of the EIS were updated to assess the	<u>Status:</u> Resolved. CNL believes that they have addressed this concern with the revisions to the EIS. CNL remains committed to ongoing engagement with the AANTC.

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
		greater clarity on how the AMA was completed and what the results mean. As requested, CNL shared all TSDs, including the Alternative Means TSD, to the AANTC in December 2017. CNL has responded in writing to AANTC comments on alternatives citing relevant sections of the EIS as part of the comment response. CNL has also offered to meet with the AANTC and AANTC consultants to understand and discuss this concern. <u>CNL Response:</u> CNL acknowledges that the AANTC has requested more details on the advantages and disadvantages of each alternative. The EIS provides a summary of the information in the AMA Technical Support Document (TSD). The TSD, which was made available to the AANTC in 2017, provides a thorough evaluation of the alternatives considered by CNL. With respect to the assessment of effects, the objective of the AMA is to provide a qualitative analysis of the environmental risks (including health) of alternative decommissioning techniques and select a preferred means. CNL followed the framework laid out in the <i>Canadian Environmental Assessment Act (CEAA)</i> Operational Policy Statement: Addressing “Purpose of” and “Alternative Means” under the <i>Canadian Environmental Assessment Act, 2012 (CEAA 2015)</i> for the evaluation of alternatives, which allows for a qualitative assessment. The potential impacts of each alternative on each Valued Component group developed as part of the EIS, were assessed and compared against the three timeframes of the project (i.e., Decommissioning Execution, Institutional Controls and Post Institutional Controls).	projected radiological dose and industrial safety risk to workers for each option.	
2. Baseline Characterization	(a) Characterization of the bedrock groundwater flow system This is important to the AANTC because an understanding of current conditions and characteristics of the groundwater system surrounding the NPD facility is necessary in order to assess the potential impacts from the project to traditional land and resource use / AANTC rights This is a project-specific concern.	In response to AANTC concern on the characterization of bedrock flow system, CNL has completed additional geoscientific characterization and updated its geosynthesis report to better understand the local geology and hydrogeology. CNL has also updated and calibrated the groundwater flow model used to define hydrogeological conditions into the future to support Postclosure Safety Analysis. As requested, CNL shared all TSDs, including the Geosynthesis and Groundwater Modelling TSD, to the AANTC in December 2017. CNL has responded in writing to AANTC comments on baseline characterization citing relevant section of the EIS as part of the comment response. CNL also met with the AANTC and AANTC’s consultant in January 2018 to understand and discuss this concern. <u>CNL Response:</u> In 2018/2019, in response to AANTC concerns, CNL completed a fieldwork campaign to sample and characterize the bedrock around the NPD facility. The fieldwork included coring of 10 boreholes to a depth of 50 metres into bedrock and several overburden boreholes, with installation of wells for sampling and hydraulic property determinations. The Geoscientific Characterization Report was used to revise the Geosynthesis TSD and the various models (i.e., Groundwater Modelling TSD, Resaturation Modelling). The results of these reports were incorporated into	<u>Where is this topic discussed in the EIS?</u> Section 8.5 of the EIS presents information on geological and hydrogeological conditions around the NPD site and study areas. <u>What changes have been made (and where)?</u> Section 8.5 of the EIS includes the improved understanding of baseline geological and hydrogeological conditions, resulting from completion of the additional geoscientific characterization work, groundwater flow modelling results as well as updates to the Geosynthesis report.	<u>Status:</u> Resolved. CNL believes that they have addressed this concern by conducting additional geoscientific characterization, groundwater modelling and subsequent revisions to the EIS. CNL remains committed to ongoing engagement with the AANTC.

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
		the third iteration of the PostSA TSD, enabling CNL to assess potential effects to valued components (VC) in the aquatic and terrestrial ecosystems. The additional field investigations and updated models support the conclusion that the NPD Closure Project is protective of human health and the environment. The EIS has been updated to contain this new information.		
3. Engagement	(a) Meaningful participation and consultation It is important to the AANTC that its members be engaged/consulted meaningfully, not just informed. This is both a project-specific concern and a concern for the Crown.	CNL heard the AANTC’s concern about meaningful Indigenous participation in the environmental assessment (EA) for the NPD Closure Project, has sought feedback from and offered engagement opportunities for AATNC on numerous occasions since the beginning of the project. CNL and the AANTC have had several meetings and other correspondence related to the NPD Closure Project since initial discussions in 2016. Within its role as project proponent, CNL remains committed to ongoing engagement with the AANTC on the NPD Closure Project, and will continue to work towards an agreement with the AANTC to support engagement. <u>CNL Response:</u> Note that this concern was raised with the federal government. For the NPD Closure Project the Crown’s responsibility for consultation falls with the CNSC. CNL acknowledges the AANTC’s request for meaningful two-way engagement on both the NPD Closure Project and the NSDF project and is committed to open, transparent and continuing engagement with the AANTC within its role as the project proponent. CNL continues to communicate with and provide engagement opportunities for the AANTC. <u>Engagement Highlights:</u> CNL first reached out to the AANTC in 2016 with two letters addressed to the Grand Chief; both letters shared information and one inquired on traditional land use. CNL and the AANTC met several times between 2016 and 2018, including a meeting at the NPD site with the AANTC’s consultant. In June 2020, CNL and AANTC began a discussion on a contribution agreement to support the AANTC’s participation in the EA process. Although CNL attempted further correspondence with the AANTC through July and August 2020, in September 2020, the AANTC informed CNL that they would not be willing to meet again until the latest letter sent to the Minister received a response. CNL sought feedback from the AANTC in 2021 on preliminary project commitments and on the summary of interests and concerns. CNL has and will continue to communicate with and provide engagement opportunities to the AANTC.	<u>Where is this topic discussed in the EIS?</u> Section 6.2.4.5 of the EIS summarizes CNL engagement with AANTC to date. <u>What changes have been made (and where)?</u> CNL updated Sections 6.2, 6.3, 8.9, 9.9, 12 of the EIS in response to comments from the AANTC (and other Indigenous Nations, communities and organizations), and to reflect developments in the relationship between the AANTC and CNL.	<u>Status:</u> Resolution is in progress. CNL remains committed to ongoing engagement with the AANTC.
3. Engagement	(b) Capacity for technical review of the EIS It is important to the AANTC that plans and agreements are in place with CNL, to support technical reviews and provide other	In May 2020, CNL initiated discussions with the AANTC to establish a contribution agreement for the NSDF and NPD Closure Project to ensure support of the AANTC’s participation in the EA process. A first meeting occurred on 2020 June 17. Although CNL attempted further correspondence on the concern with the AANTC	<u>Where is this topic discussed in the EIS?</u> Section 6.2.4.5 of the EIS summarizes CNL engagement with the AANTC to date. <u>What changes have been made (and where)?</u>	<u>Status:</u> Resolution in Progress. CNL will continue to follow-up with the AANTC on provision of capacity through a contribution agreement or

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
	opportunities for discussion to ensure that the AANTC's interests and values are taken into consideration with respect to the project. This is a project specific interest.	through July and August 2020, in September 2020, the AANTC informed CNL that they would not be willing to meet again until the latest letter sent to the Minister receives a response and requests are met. CNL followed up on this in January 2021 and responded to correspondence from the AANTC in April 2021 indicating interest in continuing discussions and a contribution agreement. CNL continues to follow-up with the AANTC. CNL reached out four times in 2021 with respect to verification of EIS information; each time CNL inquired whether the AANTC needed support for participation. <u>CNL Response</u> CNL agrees that it is important to provide support to the AANTC in conducting technical reviews. CNL and the AANTC have had initial discussions on the development of a contribution agreement that would support the AANTC's participation in the EA process for NPD.	No changes were made to the EIS in response to this comment.	via another mechanism that is preferable to the AANTC.
4. EA Process and Methodology	(a) Relevant legislation It is important to the AANTC that the NPD Closure Project Environmental Assessment is carried out using up-to-date legislation (e.g., the <i>Impact Assessment Act</i>) as the new Act directly recognizes the need for reconciliation. This is not a project-specific interest.	No actions - the NPD Closure Project EA will continue under <i>CEAA</i> (2012). <u>CNL Response</u> Note this concern was raised with the federal government. This interest is generally beyond the scope of the project. As per direction from the CNSC and transitional provisions of the <i>Impact Assessment Act</i> , CNL is continuing its EA for the NPD Closure Project under <i>CEAA</i> (2012). Letter to CNL - Changes to Federal Legislation . CNL recognizes that what AANTC is requesting is consistent with the new provisions and commitments under the <i>Impact Assessment Act</i> (IAA) but is beyond the scope of <i>CEAA</i> (2012) and this EA, and therefore is not required to be considered. The final NPD EIS will meet the requirements of <i>CEAA</i> (2012) but will also incorporate good practices consistent with the IAA.	<u>Where is this topic discussed in the EIS?</u> Section 3.5 of the EIS discusses the regulatory framework of the project. <u>What changes have been made (and where)?</u> CNL added text to Section 3.5 to the EIS, providing clarification on this issue. A reference was added to a letter received from the CNSC, which indicates that the NPD Closure Project will continue under <i>CEAA</i> (2012).	<u>Status:</u> Resolved. With respect to the NPD Closure Project, CNL believes that they have addressed this concern with the revisions to the EIS that provide the regulatory framework and outline CNL's approach and commitment to reconciliation. CNL understands that the AANTC may still prefer that the project is subject to the <i>Impact Assessment Act</i> . For the NPD Closure Project, the CNSC has determined that the project will be evaluated under <i>CEAA</i> (2012).
4. EA Process and Methodology	(b) Aggressive timelines for the project The AANTC want to understand the decision-making behind the NPD Closure Project timeframes as the AANTC believes there are potential impacts to traditional land and resource use and AANTC rights. This is a project specific concern.	CNL has responded in writing to the AANTC comments on project timelines citing relevant section of the EIS as part of the comment response. <u>CNL Response:</u> Responsibly enacting solutions for Canada's legacy waste is part of CNL's commitment to Canadians. The timeline for the NPD Closure Project was developed with the goal of completing the project in a manner that allowed sufficient time for public engagement and participation in the regulatory process and was cost-effective to the Canadian public. This timeline is also taking into account CNL's effective management of legacy liabilities such as NPD to reduce uncertainty and increase control. The timeline for the NPD Closure Project was never static and has adapted to ensure applicable changes are incorporated based on regulatory, as well as Indigenous feedback. As it stands, the NPD Closure Project initiated engagements in 2015 October, and the two-part hearing with the CNSC is expected to take place in 2023, with the final decision on whether the project will go ahead later that same year. Within this	<u>Where is this topic discussed in the EIS?</u> Section 5.2.1.2 of the EIS discusses the project timeline. <u>What changes have been made (and where)?</u> CNL modified the text in Section 5.2.1.2 of the EIS, to clarify that the Institutional Control period is to be a minimum of 100 years or as long as necessary, as determined by regulatory authorities.	<u>Status:</u> Resolved. CNL believes that they have addressed this concern, with the responses provided and the EIS updates. CNL remains committed to ongoing engagement with the AANTC.

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
		roughly eight year timeframe there is significant time and capacity for Indigenous participation and input into decisions on the project. It is important to note that the timeline of the NPD Closure Project is ultimately dependent on regulatory decisions made by the Canadian Nuclear Safety Commission. The Institutional Control period was set at 100 years to model the impacts to the environment in the case that features like the concrete cap and tile drains hypothetically start to fail at 100 years. In reality the Institutional Controls phase (and associated follow-up monitoring) will last as long as necessary, as determined by regulatory agencies.		
4. EA Process and Methodology	(c) Availability of the EIS in both official languages. It is important to the AANTC that the EIS be available in English and in French, so that it is accessible to more community members for review to enable meaningful engagement. This is both a site-wide and project-specific concern.	CNL continues to translate versions of the EIS into French. CNL has evolved in communication of the NPD Closure Project from hosting regular in-person information sessions to hosting quarterly and now bi-monthly webinars in English and French, which is a more accessible approach to disseminate information to individuals from all regions as well as the opportunity for their questions to be answered. CNL has offered simultaneous interpretation to accommodate meetings with the AANTC. CNL has provided the AANTC with draft responses to AANTC comments in English and French (May 2019, September 2020). <u>CNL Response</u> CNL agrees that it is important that the EIS be provided in both English and French. CNL submitted English and French versions of the 2017 Draft EIS and posted these publicly. CNL also shared French and English versions of CNL responses to the AANTC comments with the AANTC. The Final EIS will be available in both English and French. CNL has also provided communications, including presentation and handout material, with the AANTC in French and English.	<u>Where is this topic discussed in the EIS?</u> French translation is discussed in Section 3.5 of the EIS in general, and in Section 6.2.4.5.2 of the EIS with respect to AANTC concerns. <u>What changes have been made (and where)?</u> No changes were made to the EIS in response to this comment however CNL has evolved its overall communication efforts on the NPD Closure Project to offer webinars and meetings with simultaneous interpretation.	<u>Status:</u> Resolved. CNL believes that they have addressed this concern by providing translations and other communications in both English and French. CNL remains committed to ongoing engagement with the AANTC, with continued provision of French translation for the EIS as well as simultaneous interpretation to accommodate meetings in English and French.
5. Monitoring	(a) Timeline of the follow-up monitoring program It is important to the AANTC that CNL commit to monitoring the proposed disposal for as long as necessary to ensure the environment is protected. This is a project-specific concern.	CNL is seeking feedback on the draft monitoring plans. The follow-up monitoring reports were provided to the AANTC in 2019 December. CNL is interested in meeting with the AANTC to review these plans and receive feedback. CNL is open to working with the AANTC to ensure AANTC involvement in reviewing the draft follow-up monitoring plans during the Institutional Control period. CNL has responded in writing to AANTC comments on the timeframe of Institutional Control and monitoring citing relevant section of the EIS as part of the comment response. CNL has also offered to meet with the AANTC and AANTC consultants to understand and discuss this concern. <u>CNL Response</u> CNL wishes to clarify that follow-up monitoring will continue for as long as required. The Institutional Control period was set at 100 years to model the impacts to the environment in the case that features like the concrete cap and tile	<u>Where is this topic discussed in the EIS?</u> Section 5.2.1.2 of the EIS discusses the project timeline. Section 12 of the EIS summarizes the follow-monitoring plans developed for the project. <u>What changes have been made (and where)?</u> CNL modified the text in Section 5.2.1.2 of the EIS, to clarify that the Institutional Control period is to be a minimum of 100 years or as long as necessary, as determined by regulatory authorities.	<u>Status:</u> Resolution is in progress. CNL believes that they have addressed the AANTC’s concern about the timeline of the follow-up monitoring program, with the responses provided and the EIS updates. CNL will propose meetings with the AANTC, to discuss and receive feedback on the monitoring program.

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
		drains hypothetically start to fail at 100 years. In reality the Institutional Controls phase (and associated follow-up monitoring) will last as long as necessary, as determined by regulatory agencies. This is stated in Section 5.2.1.2 of the EIS where the project phases are described: “Institutional Controls, or a period of at least 100 years, but lasting as long as necessary, as determined by regulatory agencies that follows the Decommissioning Execution phase, where long term care and maintenance, oversight, and environmental monitoring would be performed by CNL in order to ensure that the disposal system performs as expected, that human safety is ensured until the short lived nuclear wastes decay to below the acceptance criteria and that problems that may impact the long-term stability of the facility can be rectified...” CNL acknowledges the AANTC suggestion to prepare a “Check Point Report” prior to any proposed termination of monitoring and Institutional Controls. CNL would like to discuss this idea with the AANTC to ensure that this requirement is appropriately incorporated in the draft follow-up monitoring plans. With respect to updating the monitoring plans over time: The plans incorporate a requirement for periodic review of the monitoring plans and results, in order to determine if any modifications to monitoring are required (for example if new monitoring locations or additional parameters are required). Any changes to the monitoring plan would require a supporting rationale. Monitoring plans for the Chalk River Laboratories site currently undergo an annual review in order to ensure that the plans are modified as required to stay meaningful and that technological advances are incorporated where possible. The draft follow-up monitoring plans for the NPD Closure Project would also follow this system of annual review.		
5. Monitoring	(b) Sharing monitoring program results with the public and Indigenous Nations, communities and organizations, and having them reviewed by independent researchers As long-term stewards and users of the land, it is important for the AANTC to be involved and informed of the monitoring program to confirm and build knowledge of any impacts to the environment. . This is a project-specific concern	CNL is open to working with the AANTC to ensure AANTC involvement in reviewing the draft follow-up monitoring plans. In addition, CNL is interested in hearing more specific details on the AANTC’s recommendation for independent review of the annual results and invites AANTC for further engagement with CNL on this topic. CNL has responded in writing to AANTC comments on sharing and review of monitoring program results, citing relevant section of the EIS as part of the comment response. CNL has also offered to meet with the AANTC and AANTC consultants to understand and discuss this concern. <u>CNL Response</u> CNL would like to clarify that results of the follow up monitoring program will be submitted annually to the Canadian Nuclear Safety Commission (CNSC) (as the Responsibly Authority) and will be made available to Indigenous Nations, communities and organizations and the public on the CNL website. At this time CNL does not commit to independent review of the results. The EA follow-up program is considered draft until the EA and license process is complete. As part of the development of the follow-up program expert federal authorities (such as Environment and Climate Change Canada) will be reviewing the draft follow-up monitoring plans. The CNSC will provide final direction on the program. In addition, the CNSC also performs occasional independent monitoring through their	<u>Where is this topic discussed in the EIS?</u> Section 6.2.4.5 of the EIS summarizes CNL engagement with AANTC to date, including discussions about AANTC feedback on the monitoring programs. Section 12 of the EIS summarizes the follow-monitoring plans developed for the project. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this concern.	<u>Status:</u> Resolution is in progress. CNL believes that they have addressed the AANTC’s concern about distribution and review of the follow-up monitoring program, with the responses to AANTC comments. CNL will propose meetings with the AANTC, to discuss and receive feedback on the monitoring program.

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
		Independent Environmental Monitoring Program.		
5. Monitoring	(c) The proposed follow-up monitoring program for groundwater and surface water quality is missing details As long-term stewards and users of the land and waters, it is important to the AANTC that appropriate controls and plans are in place to protect the environment. This is a project-specific concern.	CNL has provided written responses to these AANTC comments, addressing each of the requested pieces of information. In response to these comments, CNL has revised the EIS to include more details about follow-up monitoring from the three draft monitoring plans. CNL is seeking feedback on the draft monitoring plans, which were provided to the AANTC in 2019 December. CNL proposes a workshop or meeting to discuss and obtain AANTC feedback. <u>CNL Response</u> CNL acknowledges the AANTC's concerns about the lack of detail in the EIS.	<u>Where is this topic discussed in the EIS?</u> Section 9.5 of the EIS presents the proposed groundwater monitoring locations. Section 12 of the EIS presents the proposed monitoring locations in the Ottawa River. <u>What changes have been made (and where)?</u> CNL has added more details to Section 12 of the EIS, summarizing and/or referring to the details in the monitoring program documents.	<u>Status:</u> Resolution is in progress. CNL believes that they have addressed each of the AANTC's requests for detailed information on the follow-up monitoring programs, within the responses to AANTC comments. CNL will propose meetings with the AANTC, to discuss and receive feedback on the monitoring program.
6. Protection of the Ottawa River	(a) Impacts on groundwater and surface water quality As stewards of lands and waters, it is important to the AANTC that the Ottawa River is protected. This is both a site-wide and project-specific concern.	CNL provided detailed responses to each individual technical question from the AANTC. CNL's responses included description of upcoming additional information-gathering (e.g., flow sampling), and reference to the detailed monitoring plans that have been developed for the NPD Closure Project. CNL has revised sections of the EIS to include more detail. CNL has responded in writing to AANTC comments on groundwater and surface water quality citing relevant section of the EIS as part of the comment response. CNL has also offered to meet with the AANTC and AANTC consultants to understand and discuss this concern. <u>CNL Response</u> In 2018, in response to public and Indigenous concerns, CNL ceased the practice of discharging liquid effluent from the NPD facility sumps to the Ottawa River, and arranged for water to be sent to the Waste Treatment Centre at the CRL site. This is CNL's plan for all collected water from the sump, including that water which will make up the final pump-out prior to grouting. Full details regarding liquid effluent releases from all CNL facilities are given in the Annual Compliance Monitoring Reports available at the following CNL webpage: https://www.cnl.ca/en/home/environmental-stewardship/performance-report/default.aspx. With respect to the need for constructing a stormwater pond: During the Decommissioning Execution phase of the project, existing drainage features at the site will be maintained and silt fencing will be placed in areas used for stockpiles of raw material (i.e., sand) to prevent runoff into the Ottawa River. For the Institutional Control period, the need for a storm water management pond was taken into consideration during the design of the cover system. The cover is designed to convey storm water to ditches on the south, east and western perimeters of the mound which then connect to the existing ditch systems which are on the east and west sides of the NPD facility. The ditch systems are lined with rock and would enable infiltration of storm water. Because of this design of water conveyance features, it was determined that a storm water management pond was not required. Since this design was developed after the draft EIS was prepared, CNL is willing to meet with the AANTC to discuss the design of the cover system with respect to storm water management, including design drawings illustrating the	<u>Where is this topic discussed in the EIS?</u> Section 4.3 of the EIS describes the project activities and presents CNL's plans with respect to surface drainage. Section 4.5 of the EIS describes CNL's plans for handling project-related liquid releases. Sections 9.3 and 9.5 of the EIS presents the assessment of potential impacts to surface water and groundwater respectively. Mitigation measures for the protection of surface water and groundwater are provided, including CNL's process for non-routine discharges. No un-assessed liquid effluent releases are permitted. The EIS does not predict any adverse residual effects on the surface water or groundwater environments. Section 12 of the EIS summarizes the Monitoring Plans developed for the project. <u>What changes have been made (and where)?</u> CNL modified the text in Sections 2.2 and 4.5 of the EIS to add details on liquid wastes (generation and handling) during the Decommissioning Execution phase. CNL provided additional explanation in Section 8.3.3 of the EIS to clarify the history and basis for monitoring of the wells area sump. CNL added text about management of liquid waste to Section 9.3.3.2 of the EIS (Mitigation Measure). CNL modified text in several sections of the EIS (Sections 1, 2, 4, 5 and 6) to clarify the duration of the Institutional Controls period. CNL has added substantial detail to the summary of the follow up monitoring program in Section 12 of the EIS.	<u>Status:</u> Resolution in progress For the NPD Closure Project, CNL believes that they have mostly addressed this concern with the revisions to the EIS. CNL will follow up with the AANTC on the need for any additional discussion, such as a meeting to discuss the draft follow-up monitoring plans or the draft restoration plan.

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
		water conveyance features. CNL has assessed the potential impact of the NPD Closure Project on surface water and groundwater quality. The EIS concludes that no significant residual adverse environmental effects from the project are expected, including to surface and ground water. CNL has developed mitigation measures for the protection of surface water and groundwater during all phases of the project. This finding will be confirmed with the NPD Closure Project follow-up monitoring activities, which will include monitoring groundwater and surface water quality.		
7. Technical	(a) Concrete Cap and Engineered Barrier design details are missing. As long-term stewards and users of the land and waters, it is important to the AANTC that barriers are in place to protect the environment. This is a project-specific concern.	CNL has provided written responses to these AANTC comments, addressing each of the requested pieces of information. CNL has revised sections of the EIS to include more detail. CNL has responded in writing to AANTC comments on the concrete cap and engineered barrier citing relevant section of the EIS as part of the comment response. In 2019 December, CNL shared high-level information about the concrete cap and engineered barrier and Institutional Control Surveillance Plan to the AANTC and offered to meet to further discuss this topic. <u>CNL Response</u> The reinforced concrete cap will be placed over the Nuclear Area of the NPD Waste Facility (NPDWF), as a barrier against inadvertent human intrusion. The concrete cap is designed to support the loads of the Engineered Barrier and its construction. The cap will be present only over the Nuclear Area because of the long-lived radionuclides present here, within the irradiated reactor components and Reactor Vault, and consequences of intrusion are higher than elsewhere in the facility. The design life of the Engineered Cover (and the concrete cap) is 100 years. The concrete cap will be placed on the Reactor Hall Floor, following completion of grouting. The cap has a thickness of 0.40 metres (1'-4") at the edge, and rises to a thickness of 0.71 metres (2'-4") at the centre. The area of the cap is approximately 600 m² (6430 ft²), and it is dowelled to the foundation walls of the existing structure for anchorage. A multi-layered engineered cover will be placed over the grouted facility, following placement of the concrete cap. The engineered cover consists of a compacted layer of select fill at the bottom a minimum of 1.2 m thick. This bottom layer is overlain by a very low permeability membrane called a geosynthetic clay liner (GCL) and a geogrid, and covered by a 0.15 m thick sand cushion supporting a 0.15 m thick layer of clear stone. The GCL is designed to intercept water percolating through the top of the engineered cover and direct the water to the outside of the engineered cover where it can drain away. The clear stone serves as a drainage layer while the sand cushion also provides some drainage capability and acts as a protective layer to the GCL. Over the clear stone, a geotextile will be placed and covered by a 0.3 m thick layer of select fill, upon which 0.15 m of topsoil is placed and seeded, to form a shallow-rooted vegetative cover at the top of the engineered cover. The geotextile allows water to drain through the select fill to the drainage layer below, while preventing the select fill from being washed into and clogging the drainage layer. Permeability through the barrier is projected to be 0.96 mm/yr based on	<u>Where is this topic discussed in the EIS?</u> Section 4.3.1 of the EIS describes the Concrete Cap and Engineered Cover and Long Term Care and Maintenance. <u>What changes have been made (and where)?</u> CNL modified the text in Section 4.3.1.9 of the EIS to provide additional details for the concrete cap and engineered barrier, CNL added Section 4.3.1.10 of the EIS to provide a summary of long term care and maintenance activities.	<u>Status:</u> Resolution in progress For the NPD Closure Project, CNL believes that they have mostly addressed this concern with the revisions to the EIS. CNL will follow up with the AANTC on the need for any additional discussion, such as a meeting to discuss the design of the concrete cap and plans for long term care and maintenance.

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
		total precipitation of 870 mm/year. The engineered barrier is designed to limit the infiltration of surface water into the facility to slow resaturation and thus limit releases of tritium. Groundwater monitoring around the site would indicate the release rate of tritium. The Institutional Control Surveillance Plan (provided to the AANTC in 2019 December) has been developed to verify the integrity of accessible passive barriers and support structures, and to enable the prompt identification of conditions that may lead to a migration or release of radionuclides or other contaminants to the environment. The plan outlines the maintenance program to be executed to ensure accessible features of the new disposal facility are maintained (e.g. periodic inspection of the cover and maintenance when required) over the Institutional Control period. The only mechanism that would require the replacement of the cover would be a catastrophic failure of both the geosynthetic clay liner and the geotextile membrane in conjunction with levels of tritium released in excess of acceptance criteria.		

Appendix N Kitigan Zibi Anishinabeg First Nation Record of Engagement and Interests and Concerns

This appendix provides a complete record of all engagement between CNL and Kitigan Zibi Anishinabeg First Nation (KZA, a member nation of AANTC) from June 2016 to March 2024 (Table C-16). Table N.1 includes the date and method of the communication / engagement, the topics discussed and participants. The table also highlights engagements where key EA topics were discussed. The key EA topics align with “Generic Guidelines for Preparation of an Environmental Impact Statement Pursuant to the Canadian Environmental Assessment Act, 2012” as well as the requirements of REGDOC 3.2.2 “Indigenous Engagement” and guidance specific to NPD provided by the CNSC in January 2021 (e-doc # 6467843).

Following the record of engagement is a mapping of how the summary of interests and concerns were compiled (Table N.2), as well as a summary of interests and concerns raised by Kitigan Zibi Anishinabeg First Nation (Table N.3).

Section 4.4.6.1 of the EIS summarizes the engagement activities that have taken place to date between CNL and the KZA.

N.1 Record of Engagement-Kitigan Zibi Anishinabeg First Nation – 2016 June to 2024 May

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
July 17, 2016 Incoming letter	This letter from the Kitigan Zibi Anishinabeg First Nation (KZA) Chief to the CNSC’s Director of the Environmental Assessment Division raised interests and concerns on the NPD Closure Project related to the following: Protection of the Ottawa River; Interest in viewing the Environmental Impact Statement; Indigenous rights.				✓	✓				✓	
July 15, 2016 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the KZA Chief introduced the project and requested community input on any potential adverse impacts from project activities. To demonstrate requirements of CEAA, 2012 Section 5(1)(c), the letter requested meaningful feedback on the following: Whether the project may have environmental effect on any lands and/or resources currently used by Aboriginal peoples for traditional purposes; • Whether the project may have any perceived impacts on Aboriginal and Treaty Rights; • Whether local and traditional knowledge can assist in describing the existing environment; and, • The view of Aboriginal communities on proposed valued ecosystems components (environmental attributes) that have been identified for the assessment.				✓	✓				✓	
October 24 Outgoing telephone call	This telephone call from a communications officer with CNL to the KZA staff in the Department of Natural Resources and Wildlife to follow-up on the July letters. CNL offered a presentation and meeting or to send poster information. KZA stated that they would be interested in poster information and CNL shared the posters for the NPD Closure Project via email.										✓

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		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
November 10, 2016 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the KZA Chief inquired about asserted rights and traditional activities in the region around CRL. To demonstrate requirements of CEAA 2012 Section 5(1)(c), the letter requested a better understanding of KZA’s historic and/or modern day use of lands in and/or near both of the projects and asked the following questions: - Does Kitigan Zibi Anishinabeg First Nation have traditional territory or reserve lands near the NSDF and/or NPD Closure Project? - What is the history of Kitigan Zibi Anishinabeg First Nation using the areas around the two projects? - Do you have any members of Kitigan Zibi Anishinabeg First Nation that currently live in close or reasonable proximity to either of the projects? - Does Kitigan Zibi Anishinabeg First Nation have any members that currently practice traditional activities such as, trapping, hunting, fishing and/or gathering, near the two projects? - Does Kitigan Zibi Anishinabeg First Nation, or any members, have sites of ceremonial significance in close proximity to either of the two sites, or more generally, any cultural activities near either of the two sites? CNL also indicated interested in learning more about the KZA and any asserted rights, interests or activities members might undertake in the local or regional areas in proximity to the project.				✓	✓				✓	
November 14, 2016 Outgoing email	This email to the KZA staff in the Department of Natural Resources and Wildlife and the Forestry Department from a communications officer with CNL was to follow-up on the November letter.										✓
April 26, 2017 Meeting	This meeting occurred in Maniwaki, Quebec with representatives from the AANTC (including the Grand Chief and the Director General), CNL (including the Director of Corporate Communications and the Director of Environmental Protection), the CNSC (including the Participant Funding Program Administrator) and representatives from two member First Nations of the AANTC – KZA and KFN. CNL shared information in English and French and heard some interests and concerns from the AANTC. Information shared on the NPD Closure Project included: - Site location; - Project components; - Timeline; - Species at risk; - Proposed end state; - Safety barriers (how the environment will remain protected).			✓	✓					✓	

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May 03, 2017 Meeting	This meeting, between three representatives of KZA, including two specialists in biology and forestry and one Councilor, and four representatives of CNL, including one environmental specialist and the Manager of Decommissioning) It was an opportunity for open discussion on the project with and to discuss KZA’s comments on the project description. The presentation focused on: • Environmental assessment and environmental monitoring; • Indigenous requirements in an EIS; • A project overview; • Timeline; • End state. Interests raised during this meeting included the following: • Species at risk (Chimney Swift and turtles); • Interest in a visit to the NPD site.	√		√	√						
July 19, 2017 Outgoing email	This email from a communications officer with CNL to the KZA staff in the Department of Natural Resources and Wildlife and the Forestry Department was to follow-up on a number of items from the May meeting. The email indicated that hard copies of requested information including CNL’s species at risk handbook and environmental monitoring reports would be made available for collection on July 20, when the KZA came for the site visit at NPD.	√			√					√	
July 20, 2017 Meeting	This meeting between representatives from CNL (including the Manager of Decommissioning, a communications officer and an environmental specialist) and the KZA staff in the Department of Natural Resources and Wildlife and the Forestry Department included a visit to the NPD site. One of CNL’s environmental specialists discussed ecological and archeological studies. The KZA representatives had the opportunity to ask questions or offer feedback on the project, including feedback on species at risk. Interests discussed included species at risk (Chimney Swift, Monarch butterflies). All questions were addressed verbally.				√					√	
November 15, 2017 Outgoing email	This email from a communications officer with CNL to the KZA Chief enclosed links to the full draft EIS, an interactive “public-friendly” executive summary of the draft EIS, the CNSC’s public notice, a short overview of the project and EA, as well as detailed information on the timing of the EA process and how to participate in the public comment period.	√	√	√	√	√	√	√	√	√	
November 17, 2017 Outgoing email	This email from a communications officer with CNL to the KZA Chief enclosed the draft Aboriginal Engagement Report for the NPD Closure Project and stated, per CEAA, 2012 requirements: “CNL would be pleased to update information in this current draft with input from your community.” Note that this had been a requested document and CNL had indicated in their email of July 19 that it would be shared with KZA, once it was complete.	√	√	√	√	√	√	√	√	√	
January 17, 2020 Outgoing telephone call	This call from a CNL communications officer to from a communications officer with CNL to the KZA staff in the Department of Natural Resources and Wildlife and the Forestry Department was to confirm that the previous Chief was still the current KZA Chief. CNL was informed that he was on indefinite leave.										√
January 17, 2020 Outgoing email	This email from a communications officer with CNL to the KZA staff in the Forestry Department was to confirm new contact name for Biologist.										√
January 17, 2020 Incoming email	This email from the KZA staff in the Forestry Department to CNL communications staff was to confirm that the Forestry Management email address was to be used and a new biologist was being recruited.										√
In March 2020, the COVID-19 pandemic impacted in-person engagement activities. CNL adapted to the restrictions providing online platforms for virtual meetings, workshops, webinars, Project updates and open houses.											

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May 06, 2020 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the KZA Chief enclosed a preliminary version of the 2020 EIS and an updated IER. This letter also asked for feedback in the following seven areas: - Does Kitigan Zibi Anishinabeg First Nation have additional information that they would like to provide in the context of traditional territory near the NPD site? - Does Kitigan Zibi Anishinabeg First Nation have any members who currently live close or in reasonable proximity to the NPD site? - Does Kitigan Zibi Anishinabeg First Nation have historical and/or current traditional practices near the NPD site, specifically we are interested in members’ traditional uses such as trapping (traditional or commercial), hunting, fishing (traditional or commercial), gathering and practicing cultural ceremonies? - Does Kitigan Zibi Anishinabeg First Nation have sites of ceremonial significance in close proximity or more generally any cultural activities near the NPD site? - Tell us about any important resources, uses, activities, values and interests to Kitigan Zibi Anishinabeg First Nation near the NPD site. - If there is use in close proximity to the NPD site, is current community use different than historic use and can a description of those difference be provided? - Let us know of any potential concerns you have with respect to effects and any potential impacts on rights. This letter also indicated an interest in meeting with KZA to discuss any interests or concerns.	√	√		√	√	√	√	√	√	
May 26, 2020 Outgoing email	This email from a communications officer with CNL to the KZA staff in the Forestry Department was to follow up on the May 6 letter.										√
April 12, 2021 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the KZA Chief enclosed a preliminary list of commitments and indicated interest in meeting to discuss.										√
April 22, 2021 Incoming letter	This letter from the Grand Chief of the AANTC and the Chief of KFN to CNL’s Manager of Stakeholder Relations (copying the KZA Chief) indicated that neither was in agreement with the list of commitments and indicated that engagement with the AANTC and KFN was essential.									√	
April 30, 2021 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the Grand Chief of the AANTC and the Chief of KFN (copying the KZA Chief) shared that the letter was not intended to provide a final set of commitments and CNL was interested in engaging with the AANTC and KFN to determine a mutually agreed upon set of commitments.									√	
June 15, 2021 Outgoing email	This email from a communications officer with CNL to the KZA staff in the Department of Forestry was to follow-up on the April letter.										√
June 21, 2021 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the Chief of KZA enclosed a draft summary of KZA’s interests and concerns for the NPD Closure Project for the KZA’s review and verification.									√	√
July 5, 2021 Outgoing email	This email from a communications officer with CNL to the KZA Chief was to follow-up on the June 21, 2021 letter.										√
July 13, 2021 Outgoing email	This email from a communications officer with CNL to the KZA staff in the Department of Forestry was to follow-up on the June 21, 2021 letter.										√
July 14, 2021 Incoming email	This email from the KZA staff in the Forestry Department to a CNL communications officer was in response to follow-up emails on the June 21 letter. This email stated that CNL could expect a response to the June 21 letter from KZA soon.										√

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August 3, 2021 Outgoing email	This email from a communications officer with CNL to the KZA staff in the Department of Forestry was to follow-up on the June letter and inquire if CNL had the correct contact with KZA.										✓
August 4, 2021 Incoming email	This email from the KZA staff in the Forestry Department to a CNL communications officer was to confirm the contact and reiterate that KZA would have a general consultation email to CNL soon.										✓
August 17, 2021 Outgoing letter	This email from a communications officer with CNL to the KZA staff in the Department of Forestry resent the June 21, 2021 letter from CNL's Manager of Stakeholder Relations to the Chief of KZA enclosing a draft summary of KZA's interests and concerns for the NPD Closure Project for the KZA's review and verification. CNL requested feedback by August 31, 2021.									✓	
September 28, 2021 Outgoing Email	This email from a senior communications officer to KZA staff in the Forestry Department who had been identified as the new KZA primary contact moving forward. CNL suggested that a meeting be set up with this new KZA primary contact to inform them of the NPD Closure Project and NSDF Closure Project in detail in order to familiarize the KZA consultant with the projects. CNL also provided the most recent correspondence between CNL and the former KZA contact regarding the Table of Interests and Concerns for the NPD Closure Project.										✓
October 18, 2021 Outgoing Email	This email was sent by a senior communications officer with CNL to the new KZA primary contact, in the Forestry Department, upon not receiving a response to the previous email.										✓
October 19, 2021 Incoming Email	This email from KZA staff in the Forestry Department (identified as the new primary contact) to a senior communications officer with CNL was to apologize for not responding sooner and informing CNL that the KZA team were in the process of reviewing the Appendix A table. KZA let CNL know they were in a transitional period with key staff members and proposed a meeting for mid-November to review with CNL.										✓
October 19, 2021 Outgoing Email	This email from a senior communications officer from CNL to KZA staff in the Forestry Department was to propose three dates in mid-November for a meeting for review.										✓
October 20, 2021 Incoming Email	This email from KZA staff in the Forestry Department to a senior communications officer with CNL was to confirm November 17, 2021 as a meeting date and asked CNL to add another KZA staff member onto the meeting list.										✓
October 28, 2021 Outgoing email	This email from a Senior Communications Officer with CNL to KZA staff in the Forestry Department included an attachment of a rough agenda for the meeting on November 17, 2021. This email also informed KZA of the decision to delay the revised draft EIS Submission and invited KZA to provide any further feedback that KZA may have on the updated summary table of interests and concerns, which would need to be received by November 26, 2021 in order to be included in the 2021 submission of the revised draft EIS.										✓
November 17, 2021 Virtual Meeting	This email between CNL representatives (including the Manager of ERM Stakeholder Relations and Communications Officers) and KZA staff in the Forestry Department was a general overview of the NPD Closure Project and NSDF Project. The KZA representatives had a number of questions related to the environmental assessment timeline for the NPD Closure Project, baseline environmental studies that had been done so far and the waste inventory at the NPD facility. No new interests were raised.	✓		✓						✓	✓

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November 22, 2021 Outgoing Email	This email from a Senior Communications Officer with CNL to KZA staff in the Forestry Department was to follow-up on some items that were discussed at the previous meeting, some of which were related to the NPD Closure Project. CNL provided some attached slides to address some of KZA's questions on waste inventory and shared links to a number of studies where baseline environmental information for the NPD Closure Project could be found. As requested by KZA, CNL also provided all interests and concerns that had been raised to date by Indigenous Nations, communities and organizations. CNL informed KZA of the timeline to submit the revised version of the draft EIS for NPD in December 2021. CNL informed KZA that they will need any information to be included in this revision by November 26, 2021. CNL noted there was interest in looking at an example of a contribution agreement, which CNL agreed to provide.	√		√						√	√
December 09, 2021 Outgoing Email	This email from a Senior Communications Officer with CNL to KZA staff in the Forestry Department was to share a template of a contribution agreement in follow-up to the meeting on November 17, 2021.									√	√
January 11, 2022 Outgoing Email	This email from a CNL Senior Communications Officer to KZA staff in the Forestry Department was to follow-up to confirm that they had received the example of a contribution agreement and the other information that was shared in November.										√
March 08, 2022 Outgoing Email	This email from a CNL Senior Communications Officer to KZA staff in the Forestry Department was to inform KZA that CNL is revising how they present the summary table of interests and concerns to address a request from the Canadian Nuclear Safety Commission (CNSC). CNL requested that KZA confirm whether they would like to verify that the revised table still reflects their interests and concerns, focusing on the new column that ties their interest/concern to the project or Aboriginal and treaty right, and identify why it is of concern to your community.									√	
April 01, 2022 Outgoing Email	This email from a CNL Senior Communications Officer to KZA staff in the Forestry Department provided the repackaged summary table of interests and concerns referenced in the March 8, 2022 email. CNL offered capacity for KZA's review of the table.									√	
April 08, 2022 Incoming Email	This email from KZA staff in the Forestry Department to a CNL Senior Communications Officer acknowledging receipt of the repackaged summary table of interests and concerns and provided CNL a timeline for their review. KZA indicated the need to hire experts to assist in understanding how the NPD Project will impact the environment and therefore their traditional rights. KZA request a meeting to specifically go over what funding is available to hire experts and what is a reasonable timeframe to have this work carried out.									√	
April 08, 2022 Outgoing Email	This email from a CNL Senior Communications Officer to KZA staff in the Forestry Department thanked KZ FN for their willingness to the review the interests and concerns table and acknowledged KZA's interest in expert technical reviews of the project at a broader level. CNL suggest dates for a meeting.									√	
April 18, 2022 Outgoing email	Email invitation to Kitigan Zibi Anishinabeg First Nation to the CNL Industry Day at the Chalk River Laboratories on Thursday, June, 2, 2022 to promote the broader engagement between CNL's nuclear industry partners and our local supply chain.										√
April 25, 2022 Outgoing Email	This email from a CNL Senior Communications Officer to KZA staff in the Forestry Department to follow-up on the dates suggested for a meeting discuss funding.									√	
May 09, 2022 Outgoing Email	This email from a CNL Senior Communications Officer to KZA staff in the Forestry Department to follow-up on the dates suggested for a meeting discuss funding.									√	
May 24, 2022 Outgoing telephone call	This telephone call from a CNL Senior Communications Officer to KZA staff in the Forestry Department discussed the timeline for review of the interests and concerns table. CNL offered capacity to fund the review and offered a meeting to discuss engagement needs.									√	√
May 27, 2022 Incoming Email	This email from KZA staff in the Forestry Department to a CNL Senior Communications Officer provided Kitigan Zibi Anishinabeg First Nation's comments on the interests and concerns table. KZA offered a meeting to discuss the edits. CNL acknowledged receipt and confirmed a 'clean copy' would be shared.									√	

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June 23, 2022 Outgoing Email	This email from a CNL Senior Communications Officer to KZA staff in the Forestry Department sent the updated interests and concerns table (and a version with tracked changes). CNL offered a meeting to discuss KZA's interest in greater participation in the environmental assessment process for the NPD Closure Project.									✓	
July 15, 2022 Incoming Email	This email from KZA staff in the Forestry Department to a CNL request to participate in the July 28, 2022 Environmental Stewardship meeting. The NPD Closure Project provides updates at the ESC meetings.										✓
July 26, 2022 Incoming Email	This email from KZA staff in the Forestry Department to a CNL Senior Communications Officer requested a tour of the Chalk River Laboratories site. CNL asked KZA to confirm if they would also be interested in a tour of the NPD site.										✓
August 05, 2022 Outgoing telephone call	This email from KZA Consultation Coordinator to a CNL Senior Communications Officer confirmed that KZA's priority was touring the Chalk River site.										✓
October 03, 2022 Outgoing Letter	This letter addressed to Kitigan Zibi Anishinabeg First Nation's Chief from CNL's Director of Indigenous Relations provided a project update and the engagement status with KZA. CNL stated it is committed to incorporating KZA's interests and concerns into the EIS. CNL provided an engagement status and next steps, including offering capacity through a contribution agreement and establishing commitments to ensure that all interests and concerns are addressed and tracked to resolution. CNL sent an updated draft set of commitments for KZA's review. CNL offered to discuss capacity and establish commitments before December 2022. CNL requested that KZA respond confirming their agreement to proceed with the engagement activities, or modified engagement activities.									✓	
October 04, 2022 Outgoing telephone call	This telephone call from CNL's Director of Indigenous Engagement to KZA staff in the Forestry Department discussed coordinating a meeting with a KZA Councillor. CNL followed up October 06, 2022.										✓
October 11, 2022 Incoming email	This email from KZA staff in the Forestry Department to CNL's Director of Indigenous Relations proposed a date for a meeting to discuss engagement related to the NSDF project, suggestions from CNL on how to improve the relationship between CNL and KZA, developing a long-term framework agreement and funding for related activities. CNL acknowledged receipt and provided availability for a meeting.										✓
October 12, 2022 Outgoing email	This email from a CNL Senior Communications Officer to KZA staff in the Forestry Department shared that CNL has posted a position for an Indigenous Engagement Coordinator.										✓
October 19, 2022 Incoming email	This email from KZA staff in the Forestry Department to a CNL Senior Communications Officer requested more information on the Indigenous Engagement Coordinator position posted.										✓
October 24, 2022 Outgoing email	This email from a CNL Senior Communications Officer to KZA staff in the Forestry Department shared more information about the Indigenous Engagement Coordinator position posted.										✓

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October 24, 2022 Outgoing email	This email from CNL’s Director of Indigenous Relations to KZA staff in the Forestry Department to followed up on the October 12, 2022 email offering to coordinate a meeting.										✓
October 25, 2022 Incoming email	This email from KZA’s Consultation Coordinator to CNL’s Director of Indigenous Relations confirmed a meeting with CNL, CNSC and KZA’s Councillor on October 27, 2022. KZA confirmed the agenda: A meeting to go over the commitments list that CNL has submitted as part of the impact assessment; Schedule a community outreach session where representatives from CNL come to the community, present the NSDF Project and answer questions that community members may have about NSDF and Chalk River; Suggestions from CNL on how to improve the relationship between CNL and KZA; Developing a long-term framework agreement; Funding for related activities.										✓
October 25, 2022 Outgoing email	This email from CNL’s Director of Indigenous Relations to KZA’s Consultation Coordinator asking if an AECL representative should be invited to the October 27, 2022 meeting. CNL ask KZA to confirm whether this joint, multi-party meeting was meeting KFN’s expectations for a meeting with CNL as the CNSC was invited.										✓
October 25, 2022 Incoming email	This email from KZA’s Consultation Coordinator to CNL’s Director of Indigenous Relations indicated the interest in meeting with CNL, AECL and the CNSC at the same to be more efficient for communication. KZA agreed to only meeting with CNL October 27, 2022.										✓
October 26, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Kitigan Zibi Anishinabeg First Nation’s Chief followed-up on the letter sent October 03, 2022.										✓
October 27, 2022 Virtual Meeting	Meeting between Kitigan Zibi Anishinabeg First Nation (KZA Nation Consultation and Councillor) and CNL (including CNL, Director Indigenous Relations and ERM Stakeholder Relations). CNL and Kitigan Zibi Anishinabeg First Nation discussed the NSDF commitments list and next steps for the list, CNL’s support for a community outreach session specific to the NPSDF project, the development of a contribution agreement and a framework agreement. CNL and Kitigan Zibi Anishinabeg First Nation discussed at length the relationship and how it can be improved.										✓
October 28, 2022 Outgoing email	This email from CNL’s Director of Indigenous Relations to KZA’s Consultation Coordinator, Councillor and KZA staff in the Forestry Department thanked the First Nation for the meeting on Thursday, October, 27, 2022 and sharing a template for a Capacity Agreement. CNL also confirmed the interest in planning a leadership meeting.										✓
November 01, 2022 Outgoing email	This email from a CNL Senior Communications Officer to KZA’s Consultation Coordinator and KZA staff in the Forestry Department suggested dates for a leadership meeting in December 2022. The leadership meeting would discuss the relationship between CNL and KZA. CNL sent a follow up email November 08, 2022.										✓
November 08, 2022 Incoming email	This email from a Kitigan Zibi Anishinabeg First Nation Councillor to a CNL Senior Communications Officer confirmed that KZA will follow up with Chief and Council about a leadership meeting date.										✓
November 14, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Kitigan Zibi Anishinabeg First Nation’s Consultation Coordinator asked if there had been a decision on the leadership meeting yet. KZA replied that there was no decision on a date yet.										✓
November 28, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Kitigan Zibi Anishinabeg First Nation’s Consultation Coordinator to a meeting discuss to confirm a leadership meeting date and next steps on contribution agreement and engagement activities.										✓

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November 30, 2022 Incoming email	This email from Kitigan Zibi Anishinabeg First Nation’s Councillor to a CNL Senior Communications Officer informed CNL that no council or chief representation from KZA was available for the Wednesday, November, 30, 2022 meeting. KZA asked that CNL continue to share information as it does with other First Nations and municipalities but noted that information sharing is not considered consultation.										✓
November 30, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Kitigan Zibi Anishinabeg First Nation’s Councillor proposed to move the Wednesday, November, 30, 2022 meeting to Thursday, December, 1, 2022.										✓
November 30, 2022 Incoming email	This email from Kitigan Zibi Anishinabeg First Nation’s Councillor to a CNL Senior Communications Officer informed CNL that Chief and Council were busy and could not meet. KZA asked to be distributed information on activities. CNL cancelled the meeting.										✓
November 30, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Kitigan Zibi Anishinabeg First Nation’s Councillor and Consultation Coordinator confirmed receipt of the information shared about Chief and Councils availability. CNL noted that the leadership meeting and contribution agreement discussion can wait until the new year.										✓
January 20, 2023 Outgoing Email	This email from CNL’s Director Indigenous Relations to KZA Consultation to follow up on the several unanswered emails sent to KZA.										✓
January 20, 2023 Outgoing Email	This email from a CNL Communications Officer to the KZA Consultation Coordinator to inform of the decision to postpone the submission of the NPD Closure Project’s draft Environmental Impact Statement (EIS) until 2023 May to allow for additional Indigenous input. CNL proposed the next steps would be to continue working together to ensure the KFN’s interests and concerns are reflected in the EIS by CNL sending KFN a draft set of commitments for KFN review on 2022 October 03.										✓
February 16, 2023 Outgoing Email	This email from CNL Communications Officer to KZA Consultation with follow-up email concerning the email sent on 2023 January 20 in which no answer was received.										✓
February 21, 2023 Webinar	Representatives from KZA participated in the NPD webinar. The webinar topic was Changes to the EIS Resulting from Feedback.										✓
May 05, 2023 Incoming email	This email from KZA a CNL Communications Senior Officer requesting the addition of a presentation on the NPD project and CNL’s Commitments list to the agenda for the newly establish monthly meeting planned for May 10.										✓
May 05, 2023 Outgoing email	This email from CNL Communications Senior Officer to KZA suggesting dedicating the June 14 monthly meeting to discussing the NPD project. KZA confirmed.										✓
May 16, 2023 Outgoing email	This email from a CNL Communications Officer to KZA provided the updated Interests and Concerns Table. CNL is seeking verification from KZA that the interests and concerns of KZA have been recorded. CNL respectfully requested KZA response by 2023 June 20.									✓	
June 13, 2023 Incoming email	This email from KZA a CNL Communications Senior Officer requesting to cancel the June 14 monthly meeting due to conflicts.										✓
June 29, 2023 Outgoing email	This email from a CNL Communications Officer to KZA to follow up on the May 16 email.									✓	✓
June 29, 2023 Incoming email	This email from KZA a CNL Communications Senior Officer acknowledging the May 16 email and suggesting the Interests and Concerns Table as a topic for the July monthly meeting.									✓	✓
June 30, 2023 Emails	These emails between KZA and CNL Communications Officer is to discuss the agenda for the 2023 July monthly meeting.										✓

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
July 13, 2023 Meeting	This meeting was held between CNL (including Manager, Communications and Engagement, Communications Officer, Indigenous Engagement Coordinator, Manager NPD Regulatory Approvals, Manager, ERM Licencing Support, Director Communications and Engagement) and KZA (Including KZA elder, and KZA Consultation Coordinator, and KZA Councillor), while the focus was the NSDF project CNL and KZA did discuss the next steps for the NPD Revise Draft EIS submission.										✓
July 13, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to KZA is to provide KZA with the action items from the 2023 July 12 CNL/KZA meeting.										✓
July 13, 2023 Outgoing Email	This email from CNL Communications Officer to KZA is to provide KZA with the two action items from the 2023 July 12 CNL/KZA meeting. CNL provided both the information for the Port Granby project and the information on simplified list of KZA NPD Closure Project Interests and Concerns Table recorded to date.									✓	✓
July 28, 2023 Incoming Email	This email from KZA consultation coordinator to CNL Communications Officer is to provide CNL with KZA’s preliminary comments on the list of concerns and interests about the NPD. CNL confirmed receiving the response.									✓	
August 14, 2023 Outgoing Email	This email from CNL Manager, Communications and Engagement to KZA is to provide KZA with a copy of the draft agenda for the 2023 August 16 Monthly Working Group Meeting.										✓
August 16, 2023 Meeting	This meeting between CNL (including CNL Manager, Communications and Engagement, Manager of NPD Regulatory Affairs, Indigenous Engagement Coordinator and Director, Communications and Engagement, and Manager, NSDF regulatory Approvals) and KZA (Including Consultation Coordinator, Councillor and KZA Impact Assessment Coordinator and Manager, Natural Resource and Wildlife Office), and AECL, (Including ,Director’ Communications and Government Reporting and Manager Communications and Engagement) introduce the new KZA Impacts Assessment Coordinator. The NPD Project I&C Table was an agenda item; however the focus of the meeting was on the NSDF Project.									✓	
August 16, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator, to KZA is to provide them with a copy of the actions from the 2023 August 16 Monthly meeting. KZA responded with 2 additional actions.										✓
August 22, 2023 Outgoing Email	This email from CNL Communications Officer to KZA is to provide KZA the CNL NPD Action items. CNL noted that a dedicated NPD meeting would also be an opportunity to bring the new IAA Coordinator and others up to speed with an overview of the NPD Project. CNL requested KZA propose date options. CNL further noted that they recognize and appreciate the KZA had some specific questions. CNL is currently preparing responses that will be ready to share early in September									✓	✓
August 29, 2023 Outgoing Email	This email from CNL Communications Officer to KZA is to express CNL commitment to incorporating KZA’s interests and concerns into the Revised Draft EIS, as KZA input is essential to the environmental assessment process. CNL asked that KZA propose times. CNL also noted that they understand that KZA is interested in reviewing the revised draft EIS. CNL offered capacity to support KZA’s participation in the EA process. CNL suggested provision of funding through a contribution agreement (a template was sent August 21, 2023).									✓	
August 29, 2023 Incoming Email	This email from KZA Impact Assessment Coordinator to CNL Communications Officer is in response to the email from CNL on 2023 August 29. KZA proposed dates for a meeting to discuss NPD. CNL confirmed that 2023 September 7th works for CNL and sent a meeting invite (3 emails).										✓
September 06, 2023 Outgoing Email	This email from CNL Communications Officer to KZA is to provide KZA with the draft agenda for the 2023 September 07 KZA - NPD Interest and Concerns and Commitment list discussion.										✓
September 06, 2023 Incoming Email	This email from KZA Impact Assessment Coordinator to CNL Communications Officer is to request the latest version of the NPD Closure Project EIS. CNL provided a copy of the EIS to KZA.										✓

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
September 07, 2023 Meeting	This meeting with CNL (including, Manager, NPD Closure Project, Decommissioning and Environmental Specialist, Communications Officer, Indigenous Engagement Coordinator, and Manager Communications and Engagement) and KZA including (Including Consultation Coordinator, and Impact Assessment Coordinator) provided KZA with an overview presentation of the project with the opportunity to ask questions and seek clarification. CNL and KZA also discussed the Reviewed Draft EIS submission timeline and capacity support.									✓	
September 09, 2023 Outgoing Email	This email from CNL Communications Officer to KZA is to provide KZA with follow-up from the KZA NPD meeting held on 2023 September 06. CNL attached the presentation, links to the CNSC website and a review of the Consolidated Table of Federal and Provincial Comments on the Draft Environmental Impact Statement for the NPD Closure Project (also on the IAA website).										✓
September 11, 2023 Outgoing Email	This email from CNL Manager, Communications and Engagement to KZA is to provide the draft agenda for the 2023 September monthly meeting being held on 2023 September 13. NPD was not a topic on the agenda.										✓
September 15, 2023 Outgoing Email	This email from CNL Communications Officer to KZA is to provide KZA with follow-up from the KZA NPD meeting held on 2023 September 06. CNL attached the response to KZA questions shared during the review of the Interests and Concerns list (received July 28), Section 6 of the EIS, Table C-16 KZA Record of engagement, Table C-17 Mapping of key interests and concerns to detailed input from KZA, and Table C-18 (of the EIS).				✓	✓	✓			✓	✓
September 15, 2023 Incoming Email	This email from KZA Impact Assessment Coordinator to CNL Communications Officer is to inform CNL that the KZA Natural Resource and Wildlife office, on Wednesday, September 13th 2023, held an open community engagement session. KZA provided community members a high-level overview of the NPD Closure Project and a brief explanation of the current stage of the EIS. KZA shared the main areas of interest and questions. CNL confirmed receipt of the email; CNL also noted providing answers to questions soon.									✓	
September 29, 2023 Outgoing Email	This email from CNL Communications Officer to KZA is to provide the draft agenda for the 2023 October 11 KZA- Monthly Meeting. CNL proposed the meeting focus on the NPD Closure Project. CNL is working to put together a presentation to address the areas of interest identified in the KZA September 15 email.										✓
October 06, 2023 Outgoing Email	This email from CNL Communications Officer to KZA is to follow-up from their email on 2023 September 29 looking to confirm the monthly meeting for 2023 October 11. CNL re-attached the proposed draft agenda.										✓
October 11, 2023 Meeting	This meeting with CNL (including, NPD Closure Project, Decommissioning and Environmental Specialist, Director of Communications and Engagement, Communications Officer, and manager Communications and Engagement) and KZA including (Including Consultation Coordinator, and Impact Assessment Coordinator) and AECL (Manager Communications and Engagement) was to discuss an update on the NPD funding agreement (EIS review) and have an update from KZA on their EIS review. CNL also gave a presentation to address questions and areas of interest from the community information session on the NPD Project.									✓	
October 17, 2023 Outgoing Email	This email from CNL Manager of Communications and Engagement to KZA is to provide an invite to the 2023 October 20 Career Fair being held In Pembroke. KZA looked to confirm registration requirements. CNL confirmed registration is not required. (3 Emails).										✓
October 18, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to KZA is to provide the actions from the 2023 October 11 KZA - CNL monthly meeting.										✓
November 01, 2023 Incoming Email	This email from KZA Impact Assessment Coordinator to CNL Communications Officer is to request the slide deck for the NPD specific meeting held on October 11, as well as a copy of the capacity funding agreement. CNL Director, NPD provided both.									✓	✓

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
November 07, 2023 Emails	This email from CNL Manager Communications and Engagement to KZA is to provide KZA with the draft agenda for the 2023 November 08 KZA – AECL - CNL monthly meeting. KZA confirmed receipt of the draft agenda and requested to add discussion on KZA points of concern/areas of interest on the NPD EIS as well as providing some high-level comments on some of the CNL actions and accommodation measures added to the tracking table back in July. CNL recommended an NPD - Specific meeting to discuss the KZA concerns / area of interest.									✓	
November 08, 2023 Meeting	This meeting between CNL (including CNL Manager, Communications and Engagement, Director NPD Closure Project, Indigenous Engagement Coordinator, Director, Communications and Engagement, Communications Officer, and decommissioning and Environmental Specialist, and CNL Legal Counsel), AECL (Including, Manager of Communication and Engagement) and, KZA (Including Consultation Coordinator, and Impact Assessment Coordinator) is to discuss the NPD Closure Project Status Update, Discuss dates for an NPD project specific meeting to discuss KZA’s interests and concerns table (NPD EIS), and CNL Waste Strategy and Fuel Inventory Overview Presentation and Discussion. KZA noted they had comments on the I&C table and requested an NPD focused meeting.									✓	
November 09, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to KZA is to provide KZA with the Actions from the 2023 November 08 CNL-AECL-KZA Monthly meeting.										✓
November 14, 2023 Outgoing Email	This email from CNL Communications Officer to KZA is to request the KZA-NPD meeting time be changed to 1:30 pm. KZA confirmed.										✓
November 14, 2023 Meeting	This meeting between CNL (including Director NPD Closure Project, Decommissioning and Environmental Specialist, Communications Officers and Indigenous relations coordinator) and KZA (including Impact Assessment coordinator) is to discuss the NPD KZA interests and concerns table, and KZA's initial feedback.									✓	
November 14, 2023 Outgoing Email	This email from CNL Communications Officer to KZA is to provide the initial materials as requested in the monthly meeting for the Community engagement session. CNL attached the image with all the CNL monitoring locations (not just NPD) and the Archaeological Technical Supporting Document.									✓	✓
November 20, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to KZA is to provide KZA with the meeting notes from the 2023 November 14 NPD Interests and Concerns meeting.									✓	✓
November 27, 2023 Outgoing Email	This email from CNL Communications Officer to KZA is to follow-up from the last meeting and see how the community engagement session was and if there is any feedback to share with CNL? Community feedback can be incorporated into the updates to the table that captures KZA’s interests and concerns. CNL also inquired about where the KZA office will be closing for the holidays. KZA noted that they will be providing notes from the town hall meeting.									✓	✓
November 30, 2023 Outgoing Email	This email from CNL Communications Officer to KZA is to note that CNL has used the feedback from the conversation on November 14, 2023 and made additions to the Interests and Concerns Table. CNL attached the tracked changes files (CNL also included the Mapping Table (Table C-17) which works together with the Interests and Concerns Table (Table C-18) to paint a fuller picture of KZAs concerns while Table C-18 focuses on CNL’s response to the concern).									✓	✓
December 19, 2023 Incoming Email	This email from KZA Impact Assessment Coordinator to CNL Communications Officer is to provide CNL with KZA's submission of feedback on the V3 draft EIS for the NPD closure project. CNL confirmed the receipt of the submission.	✓	✓	✓	✓	✓	✓	✓	✓	✓	
December 20, 2023 Meeting	This meeting between KZA (Including KZA Impact Assessment Coordinator), CNL (Director NPD, Communications Officer, Indigenous Engagement Coordinator, and Environmental and Decommissioning Specialist), and AECL (Manager, Communications and Engagement) is to discuss the feedback from the KZA Community session, and the KZA EIS review.	✓	✓	✓	✓	✓	✓	✓	✓	✓	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
January 02, 2024 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to KZA is to provide the actions from the 2023 December 20 KZA - CNL Monthly meeting (NPD Focused). In the email, CNL also shared the link to the updated CNL Integrated Waste Strategy, and the link to the GCT #3 Nuclear 101 Guidebook.										✓
January 05, 2024 Outgoing Email	This email from CNL Communications Officer to KZA Impact Assessment Coordinator is to confirm the 2024 January KZA - CNL monthly meeting. CNL also asked if KZA had topics they wished to discuss. KZA requested that the meeting be moved to 2024 February. CNL confirmed receipt of date change.										✓
January 29, 2024 Outgoing Email	This email from CNL Communications Officer to KZA Impact Assessment Coordinator provided CNL's response to the KZA EIS review (December 19, 2023). CNL provided an updated Interests and Concerns table based on the feedback, highlighted the themes, corrected the misinformation related to the KFN visit in Spring 2023 and offered further discussions on areas of interest and a site tour.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
January 29, 2024 Incoming Email	This email from the KZA Impact Assessment Coordinator to a CNL Communications Officer confirmed receipt of the updated Interests and Concerns table. KZA indicated they would review the updates for accuracy by February 14, 2024, and requested time at the February monthly meeting to discuss.									✓	
February 20, 2024 Incoming Email	This email from the KZA Impact Assessment Coordinator to CNL provided feedback on the NPD Interests and Concerns table (sent January 29, 2023). KZA indicated that Table C-17 has thoroughly captured the majority of KZA's comments and they appreciated the use of language taken directly from previous submissions to ensure concerns were appropriately described. KZA stated they maintain that the project poses significant risk of detrimental impact to Kitigan Zibi Anishinabeg. CNL's response to address KZA's concerns has not been enough to erase them, specifically those listed in Table C-18 under the following topic numbers 5 d & e, 9, 11 a and 15 a. KZA recognized that the parties may not always be able to reach a consensus or agree on a topic and they would like to reiterate that KZA remain committed to working respectfully and collaboratively with CNL. KZA noted that outstanding concerns will be addressed with the CNSC.	✓	✓	✓	✓	✓	✓	✓	✓	✓	
February 20, 2024 Outgoing Email	This email from a CNL Communications Officer to the KZA Impact Assessment Coordinator confirmed receipt of the email providing feedback on the NPD Interests and Concerns table. CNL offered to address any NPD topic of interest at the next working group meeting.									✓	✓
March 07, 2024 Outgoing Email	This email from a CNL Communications Officer to the KZA Impact Assessment Coordinator noted that the KZA - CNL monthly meeting falls on March Break. CNL asked if the meeting could be postponed due to staff shortages. KZA confirmed postponing the meeting. CNL proposed 2024 March 20 as the new meeting date.										✓
March 20, 2024 Meeting	This meeting between KZA (Including KZA Impact Assessment Coordinator) and CNL (Communications Officer, Director of Engagement and Communications, Director NPD, Communications Officer, and Environmental and Decommissioning Specialist) focused on CNL demonstrating to KZA how feedback was used to update the Table of Interest and Concerns and Sections of the EIS. KZA noted satisfaction with the language used to capture KZA's interest and concerns, specifically, that CNL used KZA own language. CNL and KZA discussed including language in the EIS to reflect the Summary of KZA Key interests and concerns has been developed at the working group level based on community feedback but that this information has not been reviewed or vetted by KZA leadership.	✓	✓	✓	✓	✓	✓	✓	✓	✓	

N.2 Mapping of KZA Key Interests and Concerns

Table N.2 presents a mapping of how the key interests and concerns relate to detailed feedback and input from KZA, up to March 2024.
Table N.2 has 3 columns:

- Column 1 identifies the topic, i.e., the subject area the key interest(s) or concern(s) falls under.
- Column 2 presents a key interest or concern, why it is important to the Indigenous Nation, community or organization, and connects it to a project aspect or an Aboriginal or treaty right wherever possible. This may be a summary of multiple related interests or concerns that have been expressed by the Indigenous Nation, community or organization.
- Column 3 presents details of the key interest or concern that the Indigenous Nation, community or organization has identified formally in writing and/or verbally to CNL.

Topic	Key Interests and Concerns	Specific feedback provided by KZA on this interest/concern (validated)
1. Accidents and Malfunctions	(a) KZA expressed concern about proximity of the disposal facility to the Ottawa River and potential effects of malfunctions, accidents and deterioration of the disposal facility over time The Kichi-Sibi is a major artery and is very important to KZA and must be protected from long-term impacts from the disposal facility. The Kichi-Sibi not only paramount to the Anishinabe, it is the main drinking water source for millions of people living along the river, in particular the Country’s capital, Ottawa. Many KZA community members live in the Ottawa and Gatineau region. This is a project-specific concern.	During a community meeting in November 2022, KZA First Nation community members expressed concerns about the proximity of disposal facilities to the river and the potential for waste and contamination to leak into the water. In July 2023, KZA shared context about KZA’s heightened concerns related to drinking water. Drinking water within the KZA community has unsafe levels of uranium and radium. Although drinking water advisories for the community center, the local school and the wellness centre have been lifted (the public systems), private wells within the community are still unusable. KZA lives with, knows and faces the impacts of naturally occurring radioactivity (in groundwater) in its daily life. Its community’s health, safety and wellbeing is affected by it. KZA highlights that it is essential that the potential impacts and risks from the NPD closure project be assessed cumulatively in light of the psychological and physical harm colonization continues to cause upon Indigenous peoples. KZA highlights that clean water is also essential to local economy health (agriculture), especially in a context where domestic production will be more important (national security). In KZA’s preliminary written feedback on the EIS (2023 December), KZA notes that the EIS contains little to no information on the expected lifespan of the concrete, particularly how many years is it expected to last before it cracks and what effect a crack in the grout would have on the release of contaminants to the environment. Other gaps in the EIS include what the actual steps are following a disaster resulting in the release of contaminants, or the failure of one or more barriers described in the current EIS.
2. Alternatives	(a) Technical suitability of the ISD concept KZA has expressed concern about the societal and ethical choice of in-situ decommissioning, in particular about the future impacts to Indigenous Nations, communities and organizations. Further KZA has expressed interest that the NPD Closure Project selected alternative of ISD be compared against international best practices. It is the position of KZA to advocate for that all materials and contaminants present at the NPD site should be removed and permanently stored in a deep geological repository off-site. This is a project-specific concern.	In July 2023, KZA highlighted that the IAEA (Specific Safety Guide SSG-47, article 5.18) states: “.... If entombment is selected, it will impose a burden on future generations owing to the need for long term monitoring of the site and owing to possible future actions necessary to prevent and reduce leakages of radioactive material from the facility.” Since contact, First Nations have been harmed by the impacts of colonization, and are still today facing these impacts and their burden in their communities. KZA is concerned that Canada would select entombment and impose ongoing burden on future generations, including First Nations generations. KZA believes that pursuing ISD for the decommissioning of NPD is not in alignment with genuine (re)conciliation. Further, in KZA’s comparison of the NPD project to international best practices, KZA raises the

Topic	Key Interests and Concerns	Specific feedback provided by KZA on this interest/concern (validated)
		following concerns and questions : • Why choose <i>in situ</i> disposal when disposal technologies and designs evaluated by the IAEA for radioactive waste management do not tend to include <i>in situ</i> management for non-mining facilities? • Why choose an entombment method when the IAEA does not accept "entombment" for planned decommissioning? • What objectives, criteria and thresholds are included in the decision-making process/assessment? In KZA's preliminary written feedback on the EIS (2023 December), KZA advocates for all materials and contaminants present at the NPD site to be removed and permanently stored in a deep geological repository off-site. Based on current level of information and understanding by KZA on Canada's Policy for Radioactive Waste Management and Decommissioning. KZA views the complete removal of all contaminants at the NPD site for the eventual long-term disposal in a deep geological repository as the safest, most responsible, and preferred method.
2. Alternatives	(b) Inadequate consideration of long-term risk KZA is concerned that the evaluation of alternatives did not include a thorough risk assessment, considering worst-case scenarios, emergency protocols and remediation measures. This is a project-specific concern.	In July 2023, KZA expressed concern about CNL's evaluation of project alternatives. KZA highlighted that the evaluation does not properly account for long-term risks and remediation plans including their costs. KZA re-enforced that the principle of precaution should paramount at all times and for all decisions.
2. Alternatives	(c) Process for Assessment of Alternatives It is important to KZA that the process of assessing and accepting alternative means includes KZA. KZA highlights that joint assessment of alternatives is considered best practice and are commonly implemented for projects that are of high concern to Indigenous peoples. This is both a CNL-wide and a project-specific concern.	In KZA's preliminary written feedback on the EIS, KZA notes that the weighting structure used in the CNL assessment of alternative means is unclear and the methods used to calculate potential risk are not specified. Potential contamination of the Ottawa River and the risk to surrounding wildlife are of great concern for KZA. KZA's values and the weight placed on risks to wildlife and water health may be different from CNL's weighting structure due to cultural differences. Indigenous Nations, communities and organizations should be given the opportunity to be involved in the initial selection of the project method. This would help build Trust. It would allow for increased ability on proponents' behalf to design projects that greater reflect First Nations values and principles. It would also increase the ease of incorporation of future accommodation measures for First Nations groups identified throughout the consultation process which could streamline the entire process and avoid unnecessary conflicts. If Indigenous Nations, communities and organizations had been allowed to voice concerns before the project method was formalized, perhaps the feedback received coupled with public opinion from other groups would have driven further investigation into the alternative means and the in-situ model would not have been chosen as the preferred method.
3. Archaeology and Cultural Heritage	a) KZA has expressed concern about the archaeological potential on the site. In that context, KZA has expressed interest in the archaeological studies for the NPD site. It is important to KZA First Nation to be aware of the archaeological potential and activities at the site, to ensure that	In May 2022, KZA requested a discussion related to archeological studies of the NPD site. KZA is concerned that artefacts by returned to rightful Anishinabeg owners if discovered.

Topic	Key Interests and Concerns	Specific feedback provided by KZA on this interest/concern (validated)
	artefacts with cultural value and significance are identified and protected. This is a project-specific concern.	
4. Engagement	a) Effective, transparent, understandable and timely information sharing. As of May 2022, KZA has indicated improved understanding by their technical team treating nuclear files and have brought forward more project specific concerns. This is a project-specific concern.	Representatives of KZA have had general questions about the NPD Closure Project (engagement in 2017 and 2021). The natural resource and consultation team has changed significantly since 2017 and would like to review the communication protocol and engagement possibilities. In July 2023, KZA highlighted that effective information sharing also includes answering KZA questions and information requests with the best information available, in a clear and transparent way and in a timely manner. KZA has also highlighted that effective information sharing should include answering KZA questions and information requests with the best information available, again in a clear and transparent way and in a timely manner.
4. Engagement	b) Meaningful engagement It is important to KZA that meaningful Indigenous participation and adequate Crown consultation occurs for the NPD Closure Project and the NSDF Project environmental assessments. This is both a project-specific concern and a concern for the Crown.	During a community meeting in November 2022, KZA community members expressed concerns that their Nation had not been engaged at the outset of the project and that they had not been properly consulted on the project. In July 2023, KZA shared preliminary concerns on the project itself but also on the consultation process, looking at meaningful consultation, accommodation and (re)conciliation. KZA highlighted that it cannot speak of reconciliation since no “conciliation” or Nation-to-Nation relationship ever happened. KZA continue to assert its rights as a Nation and, ever since colonization, is still looking at a Nation-to-Nation relationship and respect. KZA has identified that comments are only preliminary and will evolve through the consultation process which should be flexible and dynamic. KZA highlights that the Interests and Concerns list does not constitute consultation, as meaningful consultation goes far behind exchanging a list of concerns and interests. It has to include KZA in the decision-making process, early in the process, to enable effective accommodation measures. This obligation is yet to be fulfilled. This concern has been repeated in KZA’s preliminary written feedback on the EIS (2023 December). As a rights-holder, KZA’s early participation in the decision-making process – in this case in the identification of the best-suited method for long-term disposal of the NPD facility waste – is a pre-requisite for meaningful consultation. KZA highlights that meaningful consultation must include KZA early in the decision-making process to enable effective accommodation measures and respect of KZA rights. It remains a concern that this obligation is currently not met through a poor informative approach.
5. EA Process and Methodology	a) Relevant legislation and current framework KZA expressed concern on continued use of <i>CEAA</i> (2012) rather than the more recent <i>Impact Assessment Act</i> . KZA expects that the NPD Closure Project Environmental Assessment is carried out using up-to-date legislation, fulfilling Canada’s international engagements, especially regarding Indigenous rights. This is not a project-specific concern.	During a community meeting in November 2022, KZA expressed concerns about the project continuing under <i>CEAA</i> (2012). In order to be meaningfully consulted, in July 2023 KZA has requested to review the scope of the NPD environmental assessment (EA), to ensure it enables assessing all impacts to KZA rights and interests thoroughly.

Topic	Key Interests and Concerns	Specific feedback provided by KZA on this interest/concern (validated)
		In KZA’s preliminary written feedback on the EIS, KZA notes that the current framework used to assess the NPD project fails to acknowledge the colonial context. KZA’s sacred responsibilities for this land have never ceased despite our displacement however CNL fails to acknowledge how our Anishinabe laws and governance systems still apply, reinforcing our jurisdiction in this matter; the rights that flow from these responsibilities are broader than any specific fishing, harvesting, trapping, or plant gathering activities noted in the EIS. These underlying responsibilities, laws and governance systems are also much broader than any criteria referenced in <i>Canadian Environmental Assessment Act, 2012 (CEAA 2012)</i> in s. 5(1)(c) or elsewhere. The act of the Crown’s definition of terms and criteria results in a restriction of voice and shifts the exploration of impacts to a search for evidence to prove an argument based on a predetermined set of values that do not serve KZA. The viewpoint of KZA is that the criteria set out in <i>CEAA (2012)</i> section 5.1.c is very limiting and does not address specifically how the NPD Closure Project impacts KZA members. KZA notes that <i>CEAA (2012)</i> section 5.1.c and the four criteria it defines will not be there to help when the intermediate level waste at the NPD site begins to leach into the soils and rivers.
5. EA Process and Methodology	b) Cumulative effects KZA is interested in the overall protection of the Ottawa River and land at, and in the vicinity of, CNL sites, not just the impacts of a single project. This is a CNL-wide concern.	During a community meeting in November 2022, KZA expressed concern about cumulative effects from all CNL sites and operations. In July 2023 KZA also identified that the EA process should include cumulative effects studies and an ecosystem approach. KZA would like to see a cumulative effects study conducted by CNL that measures the impacts and effects of CNL’s activities and legacy waste in and around CNL sites, including the NPD site using a pre-disturbance baseline. KZA is looking for a more holistic impact analysis study that considers the impact of NPD in the area.
5. EA Process and Methodology	c) Access to, and use of, information KZA is interested in data sovereignty and in conducting its own environmental and impact assessment, inventories and monitoring studies. KZA is concerned that failing to observe Indigenous knowledge in favour of the more limited CNL studies conducted to date cannot be fully relied on to adequately protect the land. Specifically, KZA notes that data access and governance must approach the First Nation as authorities and partners, rather than subjects of study. This is a project-specific concern.	In July 2023, KZA identified the importance of data sovereignty (e.g. ensuring Indigenous peoples’ data access) and in conducting its own environmental and impact assessment, inventories and monitoring studies along with the need for capacity to perform this work. KZA also highlighted the importance of protection of Indigenous data as outlined by the OCAP® principles (The First Nations principles of ownership, control, access, and possession, https://fnigc.ca/ocap-training/). This concern has been highlighted in KZA’s preliminary written feedback on the EIS (December 2023). KZA notes that Traditional Ecological Knowledge (TEK) and Indigenous Knowledge (IK) – Anishinaabe gikendaasowin – is co-produced by all Creation. Over thousands of years, KZA has developed this knowledge and the approaches to governance and stewardship of our lands and waters that it requires. KZA keeps this knowledge alive from generation to generation, and the body of knowledge continues to grow and deepen to this day, despite colonial displacement and attempts to root our language which contains so much of this knowledge. The brief surveys used to inform CNL’s current EIS cannot compare to this knowledge, and cannot be relied on to adequately protect the land on their own. Conforming to the Crown’s system of formal reports, lengthy essays, and peer-reviewed studies all fail to capture the essence of what KZA is trying to express.

Topic	Key Interests and Concerns	Specific feedback provided by KZA on this interest/concern (validated)
		KZA is concerned for the health of the land, the waters, the plants, the animals, and the people, and call on CNL to address this gap in research.
5. EA Process and Methodology	d) Lack of integration of KZA information and knowledge in the NPD EIS KZA is concerned that CNL has not incorporated available information on KZA’s history in the region or outlined the harmful past interactions between the nuclear industry and KZA in general. This is both a project-specific concern and company-wide concern.	Within KZA’s preliminary written feedback on the EIS, KZA identified that available information and knowledge for KZA’s correspondence with the NSDF Project has not been acknowledged or incorporated into the EIS for the NPD Closure Project. Those submissions detailed several aspects of KZA’s relationships with this region of our territory and outlined the harmful past interactions between the nuclear industry and KZA. A great deal of time, resources, and effort goes into preparing submissions in hopes of contributing to better cultural understanding, which in turn results in more sensitive and responsive communication. It is disrespectful and unreasonable to expect all projects (especially those with the same proponents, and in the same Indigenous territories) to start at square one each time. Such an approach unfairly burdens Indigenous Nations with all the responsibilities of consultation for nuclear facilities we have never given permission for in the first place – and for projects we are not responsible for proposing. In order to demonstrate good faith, CNL must show and acknowledge how it is learning from our past interventions and incorporating the knowledge shared by KZA into future proceedings. Further, CNL has an obligation to provide clear summarized information in easy to follow formats. KZA has found the structure of the EIS difficult to follow, and therefore needs improvement.
5. EA Process and Methodology	e) Concern about the methodology for conducting the effects assessment KZA is concerned that the First Nation is being asked to restrict KZA’s exploration of impacts to the health and socioeconomic conditions, the physical and cultural heritage, the use of lands and resources, and the historical archeological, paleontological or architecturally significant structure or thing based on limited methodology. This is a project-specific concern.	Within KZA’s preliminary written feedback on the EIS, KZA identified CNL asked KZA to address specifically how the NPD Closure Project impacts them based on the criteria set out in <i>CEAA</i> (2012) section 5.1.c. There are four categories identified in this piece of legislation that every interested Indigenous party in Canada must use to structure every piece of information they interact with during their exploration of impacts in order for it to be considered valid by CNL and the Crown. This is a legal text written by the Crown to achieve its own goals. The cultures, values, resources, and histories of the various Indigenous peoples in Canada are extremely diverse and unique. KZA is being asked to restrict our exploration of impacts to the health and socio economic conditions, the physical and cultural heritage, the use of lands and resources, and the historical archeological, paleontological or architecturally significant structure or thing. These explorations are costly, time-consuming, resource-draining, and historically ineffective at changing the outcome of project progression.
6. End State, Site Restoration and Future Use of the Land	a) Collaborative end land use planning There is a strong desire from KZA for future use of the NPD site. It is important to KZA that it receives reassurance that the area will move towards renaturalization and healing over time, so that KZA community members can reconnect with the site and be able to practice traditional activities. KZA affirms that the NPD site should be remediated before being returned to the care of Indigenous peoples who have always been responsible for these lands and waters. This is both a CNL-wide and project-specific concern.	During an NPD-specific meeting with the KZA Working Group in November 2023, KZA expressed preliminary interest to be involved in site restoration and end state planning at the NPD site. This concern has been repeated in KZA’s preliminary written feedback on the EIS (December 2023). It is the position of KZA that the NPD site should be remediated before being returned to the care of Indigenous peoples who have always been responsible for these lands and waters. If there is a possibility for the return of these lands for Indigenous use, they should not be returned to Indigenous peoples contaminated and destroyed.

Topic	Key Interests and Concerns	Specific feedback provided by KZA on this interest/concern (validated)
7. Free Prior and Informed Consent (FPIC)	a) Principle of consent KZA asserts that permission for the construction of the NPD site was never originally given by KZA. It is important to KZA that CNL work to secure its free, prior and informed consent through meaningful consultation. This is both a CNL-wide and project-specific concern.	In July 2023, KZA highlighted that in order for KZA to consider providing consent, CNL and KZA should work to develop, agree and implement accommodation and mitigation measures. KZA also highlighted that with respect to KZA prior and informed consent, KZA expects effective information sharing with CNL. KZA has indicated that all relevant information should be shared to KZA in a clear, transparent and understandable way and in a timely manner. KZA needs sufficient time to review and comment on this information and that information should be “word-count effective” (focusing on the main information/fact, without diluting it through a lot of general text). Permission for the NPD site has never been given by KZA; in KZA’s words “our forced displacement from many parts of our homelands due to the reserve system and other measures; our sacred responsibilities for this land have never ceased despite our displacement however CNL fails to acknowledge how our Anishinabe laws and governance systems still apply, reinforcing our jurisdiction in this matter; the rights that flow from these responsibilities are broader than any specific fishing, harvesting, trapping, or plant gathering activities noted in the EIS.” As a rights-holder, KZA’s early participation in the decision-making process – in this case in the identification of the best-suited method for long-term disposal of the NPD facility waste – is a pre-requisite for meaningful consultation.
8. Impacts on Rights	a) Impacts on KZA Rights It is important to KZA that the rights and interests of the Nation are understood and upheld. This is both a CNL-wide and project-specific concern.	KZA submitted comments to the CNSC on the Project Description, (July 2016) KZA stated that it had never given up nor sold its traditional ancestral territory. KZA territory has never been under treaty and is subject to Algonquin Aboriginal Title. KZA asserts its rights to co-governance and sovereignty over the lands to which the NPD Closure Project is subject. As the recognized stewards, it is KZA’s duty to protect the lands and waters that have allowed our people to thrive from time immemorial. These responsibilities constitute the laws and governance systems that underpin the Anishinabe jurisdiction. KZA has strong environmental, legal, and ethical concerns linked to these aforementioned rights and the NPD Closure Project. As the true stewards of the land, it is KZA’s duty to respect it and maintain its health and wealth for the next 7 generations. KZA asserts its sovereignty and laws over its traditional land and this project, and asserts its rights to consultation and accommodation.
9. Inventory	a) Inventory of the NPD disposal facility KZA is concerned about the nuclear waste that will remain on site and the radiological content (inventory) of the proposed NPD disposal facility. This is a project-specific concern.	In July 2023, KZA expressed concern about the nuclear waste on site, including legacy waste, and radiological content (inventory) of the proposed NPD disposal facility.
10. Long-term Safety	a) Long-term site integrity It is important to KZA that there is confidence in the performance of the facility over the long-term and that there are barriers in place to protect the environment, taking into account the worst case scenario in terms of climate change and	During a community meeting in November 2022, KZA community members expressed concern about the changing environment. There was a lack of confidence in the science behind the long-term performance of waste disposal facilities and an overall concern for

Topic	Key Interests and Concerns	Specific feedback provided by KZA on this interest/concern (validated)
	extreme natural disturbance. This is a project-specific concern.	protection of the environment. In July 2023, KZA also expressed concerns about the long-term performance of the barriers, since no barrier have been shown remain effective for the hazardous lifetime of some of the waste material.
11. Monitoring	a) Monitoring locations and implementation of mitigation measures. KZA has expressed concern about water management and monitoring specifically locations for monitoring to occur and mitigation measures in the event that water becomes contaminated. This is a project-specific concern.	In July 2023, KZA identified that it expects monitoring to occur both at the NPD site and offsite. This monitoring should check all waters (groundwater and surface water) coming into or leaving the NPD site. This water should be monitored to ensure it remains uncontaminated with particularly attention given to water flowing to the Kichi Sibì. KZA is concerned that any contaminated water be isolated from the water network and remediated.
11. Monitoring	b) Participation in Monitoring KZA would be interested in being involved in a monitoring strategy to provide assurance to KZA members that CNL is regularly monitoring the environment around CNL sites. This is both a CNL-wide and project-specific concern.	During an NPD-specific meeting with the KZA Working Group in November 2023, KZA expressed interest in being involved in regular monitoring.
12. Protection of Flora and Fauna	a) Biota and Species at Risk KZA expressed concerns about potential project impacts to biota, and its natural habitat, specifically SAR at the NPD site – chimney swifts and Monarch butterflies. In particular, KZA has questions about leaving the ventilation stack in place. This is a project-specific concern.	KZA expressed concerns about impacts to biota, specifically chimney swifts, at a meeting in May 2017. KZA identified the potential for Monarch butterflies on a site tour at NPD in July 2017 when KZA biologists identified SAR habitat (milkweed). In July 2023 KZA also expressed concerns about leaving the NPD ventilation stack in place. Specifically, KZA was interested in knowing the contamination levels in the ventilation stack, the toxicity thresholds that have been set for the Chimney Swift and a desire to see conservative thresholds set.
13. Protection of the Ottawa River	a) KZA expressed concern about the potential impacts of nuclear waste on the health of the Ottawa River), and its entire watershed, including wildlife and flora. This is a concern for KZA because for the Anishinaabe peoples, water is sacred and essential for all life and must be protected. This is a project-specific concern.	KZA submitted comments to the CNSC on the Project Description (July 2016) In July 2023, KZA voiced concerns about the proximity of the NPD Project to natural waterways (the Ottawa River) and the potential for impacts on the health of the Ottawa River For the Anishinaabe peoples, water is sacred and essential for all life. As noted under topic 1(a) KZA has historically and continues to be impacted by a lack of clean drinking water within their community and therefore have a heightened concern about the protection of water. KZA has requested that the project apply the most modern and stringent environmental protection measures to ensure that contamination does not enter waterways. This concern has been repeated in KZA’s preliminary written feedback on the EIS (2023 December). KZA continues to raise concerns that the EIS contains little to no information on the pathways for contamination or the potential repercussions of contamination. Instead it states that levels of radioactive waste that will reach the river are negligible, the risks are low, and the parameters will be closely monitored. This information is too vague to alleviate the worries of KZA. For example, KZA is still unclear on what risk the in-situ disposal method poses for aquatic species considering the phenomena of bio-magnification.

Topic	Key Interests and Concerns	Specific feedback provided by KZA on this interest/concern (validated)
14. Socio-economic	a) Contracting opportunities KZA is interested in contracting opportunities with CNL to enhance community opportunities. This is a CNL-wide interest.	KZA expressed some interest in contracting opportunities.
15. Traditional Land and Resource Use and Cultural Impacts	a) Impact on ability to practice traditional activities KZA is concerned that the EIS neglects to acknowledge CNL’s responsibility in creating and perpetuating avoidance of the area by KZA members. KZA notes that there is a lack of desire to hunt and fish near the site and reluctance to gather plants that were grown in soils affected by radioactive contamination. The idea that KZA must hunt, fish and gather at the site to validate KZA claims to the right to co-manage and protect it is a shortfall in the understanding of KZA culture and values. This is a project-specific concern.	In KZA’s preliminary written feedback on the EIS (2023 December), KZA notes that the EIS neglects to acknowledge CNL’s responsibility in creating and perpetuating First Nations avoidance of the area. Many First Nations people presently avoid the area due to its history of nuclear activity and contamination. CNL’s current occupation, the inventory of radioactive waste, and a history of nuclear disasters on-site have created a dynamic of fear, avoidance, and grief for First Nations people. It is the viewpoint of KZA that the loss of the land on the NPD site and its subsequent mistreatment by CNL also contribute to the avoidance of the area. However, KZA stresses that the lack of desire to hunt and fish near the Chalk River site and reluctance to gather plants that were grown in soils ravaged by radioactive contamination does not mean that KZA is no longer connected to this area nor negates responsibility to protect it. Oral cultures value person-to-person interaction. They require intensive listening skills and an equal commitment from all parties involved to share the burden of understanding. All listeners (including CNL and CNSC representatives) ultimately have individual and personal responsibilities as well as collective ones to contribute their knowledge and incorporate what they learn into their actions moving forward. Addresses, presentations, and stories from Elders, leadership, and community members require considerable work on the part of listeners to understand and implement. More work is required on the part of CNL to gain a greater understanding of KZA culture and values.

N.3 Kitigan Zibi Anishinabeg (KZA) – Summary of Interests and Concerns

Table N.3 below summarizes the key interests and concerns that Kitigan Zibi Anishinabeg First Nation (KZA) have raised on the NPD Closure Project, up to March 2024. KZA is part of the AANTC and did not submit separately comments on the 2017 draft EIS.

Note: The Summary of KZA key interests and concerns has been developed at the Working Group level based on community feedback. The KZA community consultation information has been shared with KZA leadership. This information has not been reviewed or vetted by KZA leadership, however KZA representation in the Working Group have confirmed that KZA has fully participated in pre-consultation efforts to the best of KZA’s availability. CNL has tried to accurately portray the interests and concerns of KZA however it is understood the KZA may articulate these concerns differently. KZA and CNL remain committed to working respectfully and collaboratively at the Working Group level and will seek opportunities to present this information to leadership.

Table N.3 has five columns:

- Column 1 identifies the topic, i.e., the subject area the key interest(s) or concern(s) falls under.
- Column 2 presents a key interest or concern, why it is important to the Indigenous Nation, community or organization, and connects it to a project aspect or an Aboriginal or treaty right wherever possible. This may be a summary of multiple related interests or concerns that have been expressed by the Indigenous Nation, community or organization.
- Column 3 summarizes CNL’s response or conclusions as well as CNL’s efforts to address this key interest or concern
- Column 4 identifies where in the EIS the key interest or concern is addressed, and whether any changes were made to the EIS in response to the interest/concern. If these changes resulted in a different outcome in the EIS, this is also discussed;
- Column 5 summarizes the “Status” of the key interest or concern and the anticipated Next Steps towards achieving resolution of the key interest or concern. Not all concerns can be quickly or easily resolved, as some concerns go beyond the scope of the EA process, or there may divergent perspectives on certain interests or concerns. Note: this column does not, unless specifically confirmed by the Indigenous Nation, community or organization, mean that they have verified that the interest or concern has been dealt with to their satisfaction.

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
1. Accidents and Malfunctions	a) KZA expressed concern about proximity of the disposal facility to the Ottawa River and potential effects of malfunctions, accidents and deterioration of the disposal facility over time. The Kichi-Sìbì is a major artery and is very important to KZA and must be protected from long-term impacts from the disposal facility. The Kichi-Sìbì is not only paramount to the Anishinabe, it is the main drinking water source for millions of people living along the river, in particular the Country’s capital, Ottawa. Many KZA community members live in the Ottawa and Gatineau region. This is a project-specific concern.	CNL is attempting to address concerns related this topic by: (i) Involving the Indigenous Nations, communities and organizations, including KZA if interested, in monitoring activities that will confirm the conclusions of the EIS (ii) Developing an Indigenous-driven risk-informed communications program for the NPD Closure Project to promote understanding of the EIS results and to help alleviate the concerns related to negative perceptions and feelings of discomfort and concern (Section 9.9.5 of the EIS). <u>CNL Response:</u> CNL’s Emergency Procedure for the NPD site includes actions for specific staff roles in the event of a wide range of emergency conditions including fires, floods, and hazardous spills, loss of power, earthquakes, and tornados. This procedure was developed and is updated in accordance with CNL’s company-wide Emergency Preparedness Program, which has been accepted by the CNSC and meets the requirements of REGDOC 2.10.1 Nuclear Emergency Preparedness and Response. It will remain in place and be updated as required throughout the Decommissioning Execution and Institutional Control phases of this project. As per the plan, as soon as it is safe to do so following an emergency event, CNL staff will evaluate site and facility conditions and arrange for any necessary repairs to be made. CNL has assessed the probabilities and potential impacts of flooding, seismic activity, above-ground natural hazards and extreme temperature change through all project phases (Decommissioning Execution, Institutional Control and Post-Institutional Control) and has concluded that these events will have no undue effects on people or the environment around the site. CNL models several scenarios in its PostSA TSD which considers how accidents and natural hazards could affect the facility. These scenarios are called disruptive events. One such case models severe erosion (flood) while another case models extreme degradation of the facility (the concrete structure and the grout). In both of these cases, the predicted doses to receptors are still well below the dose criterion of 0.25 mSv/yr; 0.009 mSv/yr and 0.0009 mSv/yr, respectively. To verify that the engineered barriers as a whole are	<u>Where is this topic discussed in the EIS?</u> Section 8.12 of the EIS discusses the natural disasters to which NPD may be exposed. Section 9.14 of the EIS discusses the potential effects on the project of climate change, forest fires, floods, earthquakes, severe weather such as tornados, lightning strikes, ice storms, and changes to the Ottawa River. Additional details and a range of scenarios that encompass the potential impacts from extreme weather and natural hazards are examined in the Decommissioning Safety Assessment TSD and the PostSA TSD. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this comment.	<u>Status:</u> Resolution is in progress. CNL's technical assessment shows that accidents and natural hazards which could affect the facility will not result in undue effects on people and the environment around the site. Further engagement may result in additional commitments which will enhance confidence and trust in CNL's assessment. CNL remains committed to ongoing engagement with KZA within CNL’s role as the project proponent. <u>Next steps:</u> CNL and KZA to discuss forward communication for the project and support needed for continued involvement by KZA in the NPD EA.

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
		performing as expected/designed, CNL will monitor groundwater. Groundwater wells will be located between the NPD facility and the Ottawa River in order to monitor groundwater quality after it interacts with the facility and before it reaches the Ottawa River. CNL will conduct monitoring for as long as necessary to verify the results of the assessment in the EIS. CNL is open to increased engagement, education and participatory involvement in monitoring activities at CNL operated sites to help alleviate any concerns.		
2. Alternatives	a) Technical suitability of the ISD concept KZA has expressed concern about the societal and ethical choice of <i>in-situ</i> decommissioning, in particular about the future impacts to Indigenous Nations, communities and organizations. Further KZA has expressed interest that the NPD Closure Project selected alternative of ISD be compared against international best practices. It is the position of KZA that all materials and contaminants present at the NPD site should be removed and permanently stored in a deep geological repository off-site. This is a project-specific concern.	CNL would be happy to provide an overview of the in-situ disposal concept to KZA, including how CNL conducted the AMA and why in-situ disposal is the preferred approach. <u>CNL Response:</u> The risks associated with in-situ disposal are lower than other options. In-situ disposal is a well-known technique used since the 1960's at many nuclear sites worldwide. Sites contaminated with toxic and hazardous wastes are also remediated using this technique. This approach requires the project to apply for a license as a disposal facility, and hence the facility must also meet the regulations for a disposal facility. In the case of the NPD reactor, the decommissioning strategy is to incorporate the reactor into a new disposal facility, which is in accordance with the IAEA definition of decommissioning, IAEA Safety Glossary (IAEA 2019). This strategy also meets the Canadian regulatory requirements, in particular the requirements of Section 5.1 of REGDOC-2.11.2, Decommissioning (CNSC 2021b). Therefore, entombment is not being used as a decommissioning strategy for the decommissioning of the NPD reactor. The NPD reactor has a low inventory. Tritium is the major radionuclide and will decay to low levels during the Institutional Control period. The longer-lived Intermediate Level Waste (ILW) consists of small quantities of low energy beta emitters. The beta emitters have low radiotoxicity and do not generate heat. These are activation products inside the metal of the calandria in the reactor vault. The reactor vault is reinforced concrete with walls 3 m thick located around 10 m below grade in bedrock. The location of the reactor vault isolates the wastes making it hard to access. These are all features that are consistent with IAEA Safety Standard SSR-5, Disposal of Radioactive Waste (IAEA 2014d), regarding cavern or vault disposal for ILW.	<u>Where is this topic discussed in the EIS?</u> The in-situ disposal approach is described in Section 3.2 of the EIS. Alternative means are discussed in the Alternative Means Assessment TSD (64-509200-ASD-002 Revision 1) and Section 4.2 of the EIS. Section 4.1 of the EIS highlights the in-design mitigation measures that act to isolate and contain the waste inventory within the NPD Disposal Facility to ensure protection of the surrounding environment. Section 11.2 of the EIS confirms that in-situ disposal is a proven technology in use for over 50 years. <u>What changes have been made (and where)?</u> As a result of its engagement with Indigenous peoples on Alternative Means, CNL has revised Section 4.2 (Alternative Means) in the EIS to include alternative perspectives. The 2020 EIS already included the following improvements: • CNL incorporated additional information from the AMA TSD in the EIS (Section 4.2) to provide greater clarity on how the alternative means was completed and what the results mean. • CNL enhanced the assessment of alternatives in the AMA TSD; for example, the projected radiological dose and industrial safety risk to workers for each alternative means was presented. Though all alternatives can be performed safely, there is an increased risk to workers from industrial hazards and radiological dose for the removal alternative means compared to in-situ disposal.	<u>Status:</u> Further alignment on this concern is unlikely CNL's technical assessment shows that the in-situ design is appropriate for the hazardous timeframe of the contaminants and is consistent with national and international standards. KZA and CNL disagree on the preferred option to decommission the NPD site. CNL understands that this concern is outstanding from KZA's perspective based on KZA feedback in July 2023 and February 2024. KZA's laws require that KZA continues to advocate for the complete removal of all contaminated materials as KZA's assessments have determined this to be the preferred option. <u>Next steps:</u> Through continued engagement at the Working Group, CNL hopes that the parties are able to find common ground on this topic which may include proposed commitments.

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
		CNL has written a report summarizing facilities worldwide that use in-situ disposal, (Aikens 2019b). The report is not limited to nuclear reactors or processing facilities, and also includes mines and hazardous waste sites. The report also describes what each of the facilities have in common, why in-situ disposal is the preferred approach and how it applies to NPD. In summary, in-situ disposal is a viable option for NPD. It is CNL's belief that the NPD facility has characteristics that support in-situ disposal. CNL is committed to ongoing engagement with KZA to gain a greater understanding of their concerns about the long-term safety of nuclear waste.		
2. Alternatives	b) Inadequate consideration of long-term risk KZA is concerned that the evaluation of alternatives did not include a thorough risk assessment, considering worst-case scenarios, emergency protocols and remediation measures. This is a project-specific concern.	In October 2023, CNL provided a presentation to the KZA Monthly Working Group with additional information on the contaminants involved in the NPD Closure Project, including: • main contaminants of concern; • half-life and LLW/HLW categorization; • threshold limits and how they are established; • lifespan of the grout/concrete structure; • effects of the contaminants at higher levels on the environment and human health; • the mobility of the contaminants (how they move within the environment and how they affect the things around them); • overview of the various proposed protection measures (the role of grout and other barriers); • how in-situ disposal compares and contrasts with Deep Underground Repositories; and • what route would the contaminants (even if they are at 'acceptable levels') travel after the concrete/grout decays. <u>CNL Response:</u> CNL acknowledges KZA's concerns about the long-term safety of the NPD site. CNL followed the framework laid out in the <i>Canadian Environmental Assessment Act (CEAA)</i> Operational Policy Statement: Addressing "Purpose of" and "Alternative Means" under the <i>Canadian Environmental Assessment Act, 2012 (CEAA 2015)</i> for the evaluation of alternatives, which allows for a qualitative assessment. The level of analysis conducted for each alternative is consistent with the <i>CEAA</i> requirements. CNL has assessed the probabilities and potential impacts of	<u>Where is this topic discussed in the EIS?</u> Alternative means are discussed in the Alternative Means Assessment TSD (64-509200-ASD-002 Revision 1) and Section 4.2 of the EIS. Section 8.5 of the EIS presents the geological baseline data. Section 8.12 of the EIS discusses the relevant natural disasters to which NPD may be exposed. Section 9.14 of the EIS discusses the potential effects on the project of climate change, forest fires, floods, earthquakes, severe weather such as tornados, lightning strikes, ice storms, and changes to the Ottawa River. The follow-up monitoring program is described at a high level in Section 12 of the EIS, details of which derive from the development of the effluent, environment and groundwater draft follow-up monitoring plans. Additional details and a range of scenarios that encompass the potential impacts from extreme weather and natural hazards are examined in the DecomSA TSD and the PostSA TSD <u>What changes have been made (and where)?</u> CNL has revised the EIS (Section 4.2) to include additional information from the AMA TSD, to provide greater clarity on how the AMA was completed and what the results mean. In addition, both the Alternative Means TSD and Section 4.2 of the EIS were updated to assess the projected radiological dose and industrial safety risk to workers for each option.	<u>Status:</u> Further alignment on this concern is unlikely CNL's technical assessment shows that the in-situ design is appropriate to ensure long term safety. KZA and CNL disagree on the process for assessing alternatives and on the preferred option to decommission the NPD site. CNL understands that this concern is outstanding from KZA's perspective based on KZA feedback in July 2023 and February 2024. <u>Next steps:</u> Through continued engagement at the Working Group, CNL hopes that the parties are able to find common ground on this topic, which may include proposed commitments.

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
		flooding, seismic activity, above ground natural hazards and extreme temperature change through all project phases (Decommissioning Execution, Institutional Controls and Post-Institutional Controls), and has concluded that these events will have no undue effects on people or the environment around the site. CNL models several scenarios in its PostSA TSD which take into account how accidents and natural hazards could affect the facility. These scenarios are called disruptive events. One such case models severe erosion (flood) while another models extreme degradation of the facility (the concrete structure and the grout). In both of these cases the predicted doses to receptors are still well below the dose criterion. In 2018/19, CNL undertook a geoscientific fieldwork campaign to sample and characterize the bedrock around the NPD facility. The fieldwork included coring of 10 boreholes to a depth of 50 meters into bedrock and several overburden boreholes, with installation of wells for sampling and hydraulic property determinations. The Geoscientific Characterization Report was used to revise the Geosynthesis report and the various models (i.e., Groundwater Model, Resaturation Model). The results of these reports were incorporated into the PostSA TSD enabling CNL to assess potential effects to valued components (VC) in the aquatic and terrestrial ecosystems. The additional field investigations and updated models support the conclusion that the NPD Closure Project is protective of human health and the environment. CNL, as the licensee, is responsible for conducting the long-term management of the site during the Institutional Controls period, which will last a minimum of 100 years and will be extended as long as is necessary to ensure protection of people and the environment. The EIS predicts no effects to surface water (including the Ottawa river); CNL will conduct monitoring for as long as necessary to verify the results of the assessment in the EIS. CNL is open and willing to meet with KZA to discuss the four alternatives used in the AMA TSD and how long term risk was considered in the assessment. In particular, CNL is interested in going over the changes incorporated in the revised version of the AMA TSD with KZA to discuss the additional quantitative analyses conducted for each of the alternatives that were considered.		
2. Alternatives	c) Process for Assessment of Alternatives It is important to KZA that the process of assessing and accepting alternative means includes KZA. KZA highlights that joint assessment of alternatives is considered best practice and are commonly implemented for projects that are of high concern to Indigenous peoples. This is both a CNL-wide and a project-specific concern.	CNL would be open and willing to provide an overview of the in-situ disposal concept to KZA, including how CNL conducted the AMA and why in-situ disposal is the preferred approach. <u>CNL Response:</u> When conducting the AMA, CNL followed the regulatory framework laid out in the Canadian Environmental Assessment Agency (CEAA) Operational Policy Statement: Addressing “Purpose of” and “Alternative Means” under the	<u>Where is this topic discussed in the EIS?</u> The in-situ disposal approach is described in Section 3.2 of the EIS. Alternative means are discussed in the Alternative Means Assessment TSD (64-509200-ASD-002 Revision 1) and Section 4.2 of the EIS. <u>What changes have been made (and where)?</u>	<u>Status:</u> Further alignment on this concern is unlikely CNL’s technical assessment was conducted in accordance with the requirements of <i>CEAA</i> (2012), and concludes that ISD is the preferred means to execute the NPD Closure Project. KZA disagrees that this concern is adequately addressed.

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
		<i>Canadian Environmental Assessment Act, 2012 (CEAA 2015)</i> for the evaluation of alternatives. The level of analysis conducted for each alternative is consistent with the <i>CEAA</i> requirements. The waste at NPD has been there for over 55 years. CNL is reducing the waste liability by converting the waste into a form that provides safe, permanent waste disposal. It is CNL's belief that the NPD facility has characteristics that support in-situ disposal. CNL is interested in continuing engagement with KZA to gain a greater understanding of KZA concerns on the alternative assessment methodology.	No changes have been made to the EIS in response to this comment.	KZA and CNL disagree on the process for assessing alternatives and on the preferred option to decommission the NPD site. CNL understands that this concern is outstanding from KZA's perspective based on KZA preliminary feedback on the EIS in December 2023 and February 2024. <u>Next steps:</u> Through continued engagement at the Working Group, CNL hopes that the parties are able to find common ground on this topic, which may include proposed commitments.
3. Archaeology and Cultural Heritage	a) KZA has expressed concern about the archaeological potential on the site. In that context, KZA has expressed interest in the archaeological studies for the NPD site. It is important to KZA to be aware of the archaeological potential and activities at the site, to ensure that artefacts with cultural value and significance are identified, protected and returned to the community. This is a project-specific concern.	In July 2017, KZA staff toured the site with technical and environmental experts. CNL's biologist was on hand to discuss ecological and archaeological studies. KZA First Nation had the opportunity to ask questions or offer feedback on the project, including feedback on species at risk. All questions were addressed verbally at the tour. CNL will share the results of the archaeological assessment with KZA and would be pleased to provide a summary and overview presentation on the archaeological work conducted on the site. <u>CNL Response:</u> CNL's archaeology consultant determined that there was no archeological potential for the Site Study Area (where project activities will take place), because that area has already been completely disturbed during site construction. However, in response to concerns expressed by Indigenous Nations, communities and organizations, CNL did conduct a Stage 1 archaeological assessment of the remainder of the NPD site. No further archaeological work is planned for NPD.	<u>Where is this topic discussed in the EIS?</u> The NPD EIS includes a summary of the archaeological assessment (Section 8.11.4). CNL describes proposed mitigation measures that will be employed if undocumented archaeological resources (including burial sites) are discovered during the project in Section 9.9.3.2 of the EIS. The EIS does not predict any adverse residual effects on the socio-economic environment (Section 9.11.3.3) or traditional land and resource use (Section 9.9.3.3) (encompassing archaeological resources). <u>What changes have been made (and where)?</u> In Section 9.9.3.2 of the EIS, CNL added proposed mitigation measures that will be employed if undocumented archaeological resources are discovered during the project.	<u>Status:</u> Resolution in Progress CNL understands that there is renewed interest from KZA First Nation in the archaeological studies of the NPD site. CNL remains committed to ongoing engagement with KZA within CNL's role as the project proponent. <u>Next Steps:</u> CNL will share the Stage 1 archaeological assessment results.
4. Engagement	a) Effective, transparent, understandable and timely information sharing As of May 2022, KZA has indicated improved understanding by their technical team treating nuclear files and have brought forward more project specific concerns. This is a project-specific concern.	As a part of the AANTC, KZA attended a meeting between the AANTC and CNL in 2017 April to share project information and hear feedback from the AANTC leadership. CNL's presentation included: site location, project components and timeline, species at risk, proposed end state, and safety barriers for the protection of the environment. In May 2017, CNL met with KZA, including two specialists in biology and forestry and one Councilor. This was an opportunity for open discussion on the project with NPD Closure Project team members as well as discuss KZA's comments on the Project Description. CNL provided an overview presentation and shared information on: EA and environmental monitoring, Indigenous requirements in an EIS, project overview and timeline and end state.	<u>Where is this topic discussed in the EIS?</u> Section 6.2 4.7.1 of the EIS summarizes CNL engagement with KZA. <u>What changes have been made (and where)?</u> CNL has updated Section 6.2.4.7.1 of the EIS with all engagement efforts to the May of 2023.	<u>Status:</u> Resolution in Progress There were no outstanding questions from KZA following the 2017 engagements. CNL remains committed to ongoing engagement with KZA within CNL's role as the project proponent. <u>Next Steps:</u> CNL and KZA to discuss forward communication for the project and support needed for continued involvement by KZA in the NPD EA.

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		In July 2017, KZA staff, which included technical experts, toured the NPD site. CNL’s biologist was on hand to discuss ecological and archeological studies. KZA staff asked questions and offered feedback on the project, including feedback on species at risk. All questions were addressed verbally at the tour. CNL has responded to all questions, comments, and information requests to date. CNL has reached out to KZA on an ongoing basis since the beginning of the project and has met with KZA in 2017 and in 2021. At the meeting in November 2021, CNL expressed interest in entering into an agreement to provide capacity funding to enable participation in the EA process. <u>CNL Response:</u> CNL responded to all questions from KZA in real-time during the 2017 engagements. Since the summer of 2023, CNL and KZA have been meeting monthly about the NPD Closure Project. CNL has provided reference material and discussed topics identified by KZA. CNL will continue to work with KZA to respond to areas of concern and identify additional opportunities for engagement.		
4.Engagement	b) Meaningful engagement It is important to KZA that meaningful Indigenous participation and adequate Crown consultation occurs for the NPD Closure Project and the NSDF Project environmental assessments. This is both a project-specific concern and a concern for the Crown.	CNL has heard KZA’s concern about meaningful Indigenous participation in the EAs for CNL’s designated projects and has sought feedback from and offered engagement opportunities for KZA on numerous occasions since the beginning of the NPD Closure Project. <u>CNL Response:</u> For the NPD Closure Project, the responsibility for assessing that adequate Crown consultation has been undertaken falls with the CNSC. CNL is committed to open, transparent and continuing engagement with KZA within CNL’s role as the project proponent. CNL and KZA have been meeting monthly since summer 2023 and CNL will continue to provide engagement opportunities for KZA. <u>Engagement Highlights:</u> CNL first reached out to KZA in 2016 with two letters addressed to the Chief; both letters shared information and	<u>Where is this topic discussed in the EIS?</u> Section 6.2.4.7.1 of the EIS summarizes CNL engagement with KZA. <u>What changes have been made (and where)?</u> CNL has updated Section 6.2.4.7.1 of the EIS to reflect new and planned engagement activities to support KZA’s meaningful participation in the EA process.	<u>Status:</u> Resolution in Progress CNL remains committed to ongoing engagement with KZA within CNL’s role as the project proponent. It is noted that this topic extends beyond the scope of the NPD Closure Project. <u>Next Steps:</u> CNL and KZA to discuss forward communication for the project and support needed for continued involvement by KZA in the NPD EA.

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		one inquired on traditional land use. As a part of the AANTC, KZA attended an introductory project meeting between the AANTC and CNL in 2017 April to share project information and hear feedback from the AANTC leadership. The CNL presentation included: site location, project components and timeline, species at risk, proposed end state, and safety barriers for the protection of the environment. In May 2017, CNL met with KZA including two specialists in biology and forestry and one Councilor. This was an opportunity for open discussion on the project with NPD Closure Project team members as well as discuss KZA’s comments on the Project Description. CNL provided an overview presentation and shared information on: EA and environmental monitoring, Indigenous requirements in an EIS, project overview and timeline and end state. In July 2017, KZA staff, which included technical experts, toured the NPD site. CNL’s biologist was on hand to discuss ecological and archeological studies. KZA staff asked questions and offered feedback on the project, including feedback on species at risk. All questions were addressed verbally at the tour. CNL has responded to all questions, comments, and information requests to date. CNL has reached out to KZA on an ongoing basis since the beginning of the project and has met with KZA in 2017 and in 2021. At the meeting in November 2021, CNL expressed interest in entering into an agreement to provide capacity funding to enable participation in the EA process. Since the summer of 2023, CNL and KZA have been meeting monthly about the NPD Closure Project. CNL has provided reference material and discussed topics identified by KZA. In May 2024, KZA community members, including high school students and elders, visited the CRL site. KZA community members shared feelings with CNL about projects, including the NPD project. CNL will continue to work with KZA to respond to areas of concern and identify additional opportunities for engagement.		
5. EA Process and Methodology	a) Relevant legislation and current framework KZA expressed concern on continued use of <i>CEAA, 2012</i> rather than the more recent <i>Impact Assessment Act</i> . KZA	No actions – the NPD Closure Project EA will continue under <i>CEAA</i> (2012).	<u>Where is this topic discussed in the EIS?</u> Section 3.5 of the EIS summarizes the regulatory	<u>Status:</u> Further alignment on this concern is unlikely

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	expects that the NPD Closure Project Environmental Assessment is carried out using up-to-date legislation, fulfilling Canada’s international engagements, especially regarding Indigenous rights. This is not a project-specific concern.	<u>CNL Response:</u> Note this concern was raised with the Federal Government. This interest is generally beyond the scope of the project. As per direction from the CNSC and transitional provisions of the <i>Impact Assessment Act</i>, CNL is continuing its EA for the NPD Closure Project under <i>CEAA</i> (2012). Letter to CNL - Changes to Federal Legislation. While the topic of regulatory requirements for an EA process is broad and not specific to the NPD Closure Project, KZA’s comments were directed at the regulatory regime under which the NPD Closure Project should be assessed. CNL recognizes the importance of addressing this concern. Therefore, the NPD EIS was revised to include a reference to the <i>IAA</i> transitional provisions for continuing the NPD Closure Project EA under <i>CEAA</i> (2012) given that it was commenced under <i>CEAA</i> (2012) before the <i>IAA</i> came into force in 2019.	framework for the NPD Closure Project. Section 6.4 outlines CNL’s approach and commitment to reconciliation. <u>What changes have been made (and where)?</u> Section 3.5 of the EIS reflects the provisions in subsection 182 of the <i>IAA</i> for continuation of ongoing projects under <i>CEAA</i> (2012).	For the NPD Closure Project, CNL considers this concern addressed by the revisions to the EIS that provide the regulatory framework and outline CNL’s approach and commitment to reconciliation. While KZA may still prefer that the project is subject to the <i>Impact Assessment Act</i>, the CNSC has determined that the project will be evaluated under <i>CEAA</i> (2012). In feedback provided by KZA in December 2023 and February 2024, KZA is addressing concerns on the current legislative framework with the CNSC who on behalf of the Crown holds the responsibility and duty to consult with and accommodate KZA for the proposed NPD closure project. KZA’s laws require that KZA continue to advocate for the complete removal of all contaminated materials as the preferred option. CNL remains committed to ongoing engagement with KZA within CNL’s role as the project proponent.
5. EA Process and Methodology	b) Cumulative effects KZA is interested in the overall protection of the Ottawa River and land at, and in the vicinity of, CNL sites, not just the impacts of a single project. This is a CNL-wide concern.	In November 2023, KZA’s Impact Assessment Coordinator shared that KZA is looking for a more holistic cumulative effects study that considers the impact of NPD in the area. KZA would like this study to consider all CNL projects on KZA traditional territory and measure the impacts and effects of CNL’s activities and legacy waste in and around CNL sites. CNL proposes a dedicated meeting on this topic to fully understand KZA’s interest on cumulative effects and continue dialogue on a desired KZA cumulative effects study. <u>CNL Response:</u> CNL acknowledges KZA’s concern about the effects on the Ottawa River and land at, and in the vicinity of the NPD site from various activities in the past, present and future. As discussed in the EIS and outlined in the <i>CEAA</i> technical guidance Assessing Cumulative Environmental Effects under the <i>Canadian Environmental Assessment Act</i>, 2012 (2018), a cumulative effects assessment is only required to be undertaken for residual effects of the project. For all environmental components, since it was determined that no adverse residual effects are expected to occur from the NPD Closure Project, there is no potential for the occurrence of cumulative effects, including no potential for	<u>Where is this topic discussed in the EIS?</u> Section 9.13 of the EIS describes the process for evaluating cumulative effects, and presents CNL’s assessment of cumulative effects for the NPD Closure Project. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this comment.	<u>Status:</u> Resolution in progress CNL considers that this concern will be fully addressed through an appropriate commitment to provide capacity for including Indigenous peoples in CNL’s monitoring programs. Engagement between CNL and the KZA may result in specific project commitments on additional mitigations measures or commitments that support KZA’s involvement in monitoring activities that will enhance confidence and trust in CNL’s assessment. CNL remains committed to ongoing engagement with KZA within CNL’s role as the project proponent. <u>Next steps:</u> CNL and KZA to discuss continued involvement by KZA in the NPD EA, which may include a dedicated discussion on cumulative effects.

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		synergistic and/or additive effects. CNL respects that Indigenous Nations, communities and organizations often prefer to evaluate the effects assessment against a different baseline than CNL. The baseline used in the EIS reflects current-day conditions, in accordance with <i>CEAA</i> (2012) requirements. CNL maintains the view that past disturbances, i.e., those that occurred during the pre-construction of the NPD facility, are not in scope. CNL notes that the proposed NPD Closure Project will improve the long-term environmental conditions and safety of the NPD site and surroundings, which will be confirmed by Indigenous-led monitoring programs.		
5. EA Process and Methodology	c) Access to, and use of, information KZA is interested in data sovereignty and in conducting its own environmental and impact assessment, inventories and monitoring studies. KZA is concerned that failing to observe Indigenous knowledge in favour of the more limited CNL studies conducted to date cannot be fully relied on to adequately protect the land. Specifically, KZA notes that data access and governance must approach the First Nation as authorities and partners, rather than subjects of study. This is a project-specific concern.	CNL Response: CNL acknowledges that KZA is interested in conducting its own EA, inventories and monitoring studies. The EIS and supporting studies have assumed that traditional uses do occur adjacent to the NPD site, whether on the Ottawa River or outside the restricted/fenced area. CNL has also assumed that there will be future interest in re-establishing traditional use activities on the NPD site. CNL has determined that there are no adverse impacts on Traditional Land and Resource Use resulting from the NPD Closure Project. Indigenous Nations, communities and organizations often prefer a different approach, consider different factors, and evaluate against a different baseline than CNL and, subsequently, the findings of the Indigenous Nations, communities and organizations, and CNL, differ. The proposed NPD Closure Project has the potential to help reduce concerns of alienation and/or fears. The proposed project involves a long-term solution to ensure the waste that currently resides at the NPD site is effectively contained and isolated from the environment, ensuring public safety. This solution has the potential to result in additional lands being freed up for traditional harvest or other uses by Indigenous peoples or the public. CNL stands by its conclusion that the project will not interfere with traditional activities or have a negative impact on the biological resources on which they are dependent. Ultimately, the decision of impacts to rights rests with the CNSC. If the CNSC finds any potential impacts to KZA’s Indigenous and/or treaty rights, CNL remains committed to understanding these rights and working collaboratively to ensure that they are appropriately mitigated to the greatest extent possible.	Where is this topic discussed in the EIS? Section 8.9 of the EIS presents information about traditional land and resource use. Section 9.9 of the EIS assesses risk to traditional land and resource use VCs, including new VCs (Sections 6.3 and 9.9 within the EIS). Section 9.1.1.1 of the EIS presents the future exposure scenarios and groups that are considered in the PostSA TSD. What changes have been made (and where)? CNL expanded the description of traditional uses and added and evaluated new traditional land and resource use VCs (Sections 6.3 and 9.9 of the EIS). The EIS update includes additional detail on the VC-related engagement process (Section 6.3) and how Indigenous interests have been incorporated into the VCs selected for the NPD Closure Project.	Status: Resolution in progress CNL’s technical assessment was conducted in accordance with the requirements of <i>CEAA</i> (2012). CNL understands that this concern is outstanding from the KZA’s perspective based on KZA feedback in July 2023. Next steps: Through continued engagement at the Working Group, CNL hopes that the parties are able to find common ground on this topic.
5. EA Process and Methodology	d) Lack of integration of KZA information and knowledge in the NPD EIS KZA is concerned that CNL has not incorporated available	CNL Response: CNL is working to incorporate KZA feedback and knowledge shared with CNL on the NPD and NSDF project in its next	Where is this topic discussed in the EIS? Section 6.2 4.7.1 of the EIS summarizes CNL engagement with KZA.	Status: Resolution in progress CNL’s technical assessment was conducted in accordance with the requirements of <i>CEAA</i> (2012). KZA disagrees that this concern is

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	information on KZA’s history in the region or outlined the harmful past interactions between the nuclear industry and KZA in general. This is both a project-specific and company-wide concern.	revision of the NPD EIS. NPD Closure Project representatives are eager to hear from KZA to learn more about KZA history, traditions and culture through the method desired by KZA. CNL will continue to communicate openly and transparently with KZA, and provide engagement opportunities for KZA within CNL’s role as the project proponent.	<u>What changes have been made (and where)?</u> CNL has updated Section 6.2.4.7.1 of the EIS with all engagement efforts to the May of 2023. <u>Where is this topic discussed in the EIS?</u> Section 6.2.4.7.1 of the EIS summarizes CNL engagement with KZA. <u>What changes have been made (and where)?</u> CNL has updated Section 6.2.4.7.1 of the EIS to reflect new and planned engagement activities to support KZA’s meaningful participation in the EA process.	adequately addressed based on KZA feedback from December 2023 and February 2024. <u>Next Steps:</u> CNL is working to incorporate KZA feedback and knowledge shared with CNL on the NPD and NSDF project in its next revision of the EIS.
5. EA Process and Methodology	e) Concern about the methodology for conducting the effects assessment KZA is concerned that the First Nation is being asked to restrict KZA’s exploration of impacts to the health and socioeconomic conditions, the physical and cultural heritage, the use of lands and resources, and the historical archeological, paleontological or architecturally significant structure or thing based on limited methodology. This is a project-specific concern.	CNL is continuing its efforts to address these concerns by: (i) Involving Indigenous Nations, communities and organizations, including KZA, in monitoring activities that will confirm the conclusions of the EIS. An Indigenous-driven monitoring program can help to reduce fear or anxiety associated with traditional uses occurring adjacent to and near CNL operated sites and build confidence that the decommissioning strategy and mitigation measures are effective. (ii) Developing an Indigenous-driven risk-informed communications program for the NPD Closure Project to promote understanding of the EIS results and to help alleviate the concerns related to negative perceptions and feelings of discomfort and concern. <u>CNL Response:</u> The methodology used in the EIS for assessing the significance of residual effects for the NPD Closure Project is an established methodology that was used in the EA for the Darlington New Nuclear Project, which currently has an approved License to Prepare Site. The criteria for the evaluation of significance are from the CNSC REGDOC 2.9.1(2020), Environmental Protection: Environmental Principles, Assessments and Protection Measures. The baseline used in the EIS reflects current-day conditions, in accordance with <i>CEAA</i> (2012) requirements. CNL notes that the proposed NPD Closure Project will improve the long-term	<u>Where is this topic discussed in the EIS?</u> Section 9.1.2 of the EIS explains the methodology used for determining the significance of residual effects. It also presents the criteria used to evaluate significance, which are from CNSC REGDOC 2.9.1 (2020), Environmental Protection: Environmental Principles, Assessments and Protection Measures. Section 11 of the EIS, Conclusion on Significance, discusses the assessment findings. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this comment.	<u>Status:</u> Further alignment on this concern is unlikely CNL’s technical assessment was conducted in accordance with the requirements of <i>CEAA</i> (2012). KZA disagrees that this concern is adequately addressed based on KZA feedback from December 2023 and February 2024. <u>Next Steps:</u> KZA and CNL remain committed to working respectfully and collaboratively with each other. CNL wishes to continue discussions with KZA to better understand the community’s perspective and values and any fears, or concerns associated with the NPD site and traditional use near the site.

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		environmental conditions and safety of the NPD site and surroundings, which will be confirmed by Indigenous-led monitoring programs. The participation of KZA in monitoring work for the NPD Closure Project would help to ensure consideration of Indigenous knowledge, collaboration, mutual respect, ongoing participation and relationship building for the future. CNL is open and willing to have a dedicated meeting with KZA to review all environmental effects of the project and present the methodology for determining significance of adverse residual effects.		
6. End State, Site Restoration and Future Use of the Land	a) Collaborative end land use planning There is a strong desire from KZA for future use of the NPD site. It is important to KZA that it receives reassurance that the area will move towards renaturalization and healing over time, so that KZA community members can reconnect with the site and be able to practice traditional land use activities. KZA affirms that the NPD site should be remediated before being returned to the care of Indigenous peoples who have always been responsible for these lands and waters. This is both a CNL-wide and project-specific concern.	CNL received preliminary feedback on KZA’s desire to be involved in site restoration and end state planning during an NPD-specific meeting with the KZA Working Group in November 2023. CNL is committed to sharing the draft restoration plan with KZA once it is developed. <u>CNL Response</u> CNL acknowledges KZA’s desire for the NPD site to move towards renaturalization and healing. CNL has used the terms renaturalize/renaturalization to mean: return to natural. As the majority of the site is forested, disturbed areas outside the final licensed area will be left to return to natural via natural succession. Renaturalization will have a positive impact on terrestrial biodiversity because vegetation will provide habitat for nests and dens, cover for animals as they roam, and will promote movement of animals by increasing connectivity (reducing habitat fragmentation). Future land use is a discussion topic that requires the participation of AECL as the owner of the NPD site, in consultation with Indigenous Nations, communities, and organizations, the public, as well as industry and government. As the licensee, CNL is committed to engagement and consultation with Indigenous Nations, such as KZA, on future end state and land use. The potential land options will not be fully determined until the NPD Closure Project EA and license amendment process proceeds further. In the meantime, CNL is preparing a plan for site restoration after decommissioning is complete, which CNL is committed to sharing with KZA.	<u>Where is this topic discussed in the EIS?</u> General plans for restoration and end state are described in Section 4.3.1.9. of the EIS. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this comment.	<u>Status:</u> Resolution in progress. This interest and concern is in progress pending engagement on site restoration and end-state planning. <u>Next Steps:</u> CNL will engage with KZA through targeted discussions to seek input prior to and during restoration plan development. The restoration and end state plan draft will be shared with KZA to verify that input has been adequately recorded. CNL is committed to seeking input from the KZA on the proposed ISD project end state, including KZA input on lands restoration of the disturbed areas.
7. Free Prior and Informed Consent (FPIC)	a) Principle of consent KZA asserts that permission for the construction of the NPD site was never originally given by KZA. It is important to KZA that CNL work to secure its free, prior and informed consent through meaningful consultation. This is both a CNL-wide and project-specific concern.	CNL Response: CNL acknowledges that it is understood by KZA that an Indigenous Nation, community or organization’s consent is required for the creation of a permanent hazardous waste disposal facility in its traditional territory, per Section 29.2 of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).	<u>Where is this topic discussed in the EIS?</u> Section 3.5 of the EIS summarizes the regulatory framework for the NPD Closure Project. Section 6.4 outlines CNL’s approach and commitment to reconciliation Section 6.2 4.7.3 of the EIS summarizes KZA’s interests and concerns including governance.	<u>Status:</u> Resolution in progress CNL understands that UN guiding principles for human rights and UNDRIP are areas of importance for KZA. CNL remains committed to seeking common ground with KZA in the interest of moving closer towards consent.

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		As the licensee, CNL is committed to work towards consensus and consent, with an understanding that UNDRIP does not necessitate a veto in decision-making. CNL is committed to ensuring meaningful participation of Indigenous peoples in decisions that affect their nations, communities and territories.	<u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this comment.	<u>Next Steps:</u> Through continued engagement at the Working Group, CNL hopes that the parties are able to find common ground on this topic.
8. Impacts on Rights	a) Impacts on KZA Rights KZA is concerned about the impacts of the NPD Closure Project on its Aboriginal Title rights. It is important to KZA that the rights and interests of the Nation are understood and upheld. This is both a CNL-wide and project-specific concern.	CNL has sent 3 targeted letters asking specific questions of KZA to align with the requirements of CEAA 2012 Section 5(1)(c) including Indigenous rights. CNL has reached out to KZA on an ongoing basis since the beginning of the project and has met with KZA in 2017 and in 2021. At the meeting in November 2021, CNL expressed interest in entering into an agreement to provide capacity funding to enable participation in the EA process. CNL seeks to develop a mutual understanding of the perceived effects of NPD Closure Project activities on the environment and any potential negative impacts on Aboriginal and/or treaty rights. This includes, but is not limited to, rights to trap, hunt, fish, gather, or harvest as well as the continuation and uninterrupted access to cultural and spiritual activities on the lands and waters. CNL is continuing its efforts to address this concern by committing to: (i) Involving the Indigenous Nations, communities and organizations in monitoring activities that will confirm the conclusions of the EIS. An Indigenous-driven monitoring program can help to reduce fear or anxiety associated with traditional uses occurring adjacent to and near CNL operated sites and build confidence that the decommissioning strategy and mitigation measures are effective. (ii) Developing an Indigenous-driven risk-informed communications program for the NPD Closure Project to promote understanding of the EIS results and to help alleviate the concerns related to negative perceptions and feelings of discomfort and concern (Section 9.9.5 of the EIS). <u>CNL Response:</u> Table 6.2-1 of the EIS notes that the NPD site is located within the vicinity of known traditional territory of the AANTC. It also indicates assertion of rights. CNL acknowledges KZA’s concerns about assessment of impacts to rights and traditional land and resource use, driven	<u>Where is this topic discussed in the EIS?</u> Table 6.2-2 of the EIS summarizes the identified Indigenous Nations, Communities and Organizations for the NPD Closure Project including information about the location of their traditional territory and assertion of rights. <u>What changes have been made (and where)?</u> Note that this concern was raised at the Project Description stage and therefore no changes were made to the EIS as Table 6.2-2 has been present since the initial draft.	<u>Status:</u> Further alignment on this concern unlikely CNL stands by its conclusion that the project will not interfere with traditional activities or have a negative impact on the biological resources on which they are dependent. CNL’s technical assessment was conducted in accordance with the requirements of CEAA (2012). CNL acknowledges that the findings of the KZA-CNSC rights impact assessment may require additional engagement and a mutually agreed upon resolution of any found impacts on rights. CNL considers this concern addressed by the draft EIS content and CNL’s ongoing outreach to engage the KZA through a variety of means. KZA remains concerned that the project poses significant risk of detrimental impact to KZA, as communicated in KZA preliminary feedback on the EIS in December 2023 and February 2024. <u>Next steps:</u> Through continued engagement at the Working Group, CNL hopes that the parties are able to find common ground on this topic, which may include proposed commitments.

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		by concerns about contamination of and distrust in the safety of the land and water. CNL is open to increased engagement, education, and participatory involvement in monitoring activities at its sites to address these concerns. The proposed NPD Closure Project has the potential to help reduce concerns of alienation and/or fears. The proposed project involves a long-term solution to ensure the waste that currently resides at the NPD site is effectively contained and isolated from the environment, ensuring public safety. This solution has the potential to result in additional lands being freed up for traditional harvest or other uses by Indigenous peoples or the public. CNL stands by its conclusion that the project will not interfere with traditional activities or have a negative impact on the biological resources on which they are dependent. Ultimately, the decision of impacts to rights rests with the CNSC, therefore CNL is unable to comment on an assessment of impacts to rights at this time. If the CNSC finds any potential impacts to KZA’s Indigenous and/or treaty rights, CNL remains committed to understanding these rights and working collaboratively to ensure that they are appropriately mitigated to the greatest extent possible.		
9. Inventory	a) Inventory of the NPD Disposal Facility KZA is concerned about the nuclear waste that will remain on site and the radiological content (inventory) of the proposed NPD disposal facility. This is a project-specific concern.	<u>CNL Response:</u> CNL agrees that protection of future land users is an important concern and has addressed this subject. CNL has assessed the suitability of in-situ disposal for the NPD site, and the EIS shows that such a disposal is safe for human health and the environment in the short term and long term. The NPD reactor has a low radionuclide inventory. Tritium is the major radionuclide and will decay to low levels during the Institutional Control period (~100 years). The proposed waste disposal facility barriers have a design life consistent with that timeframe. The longer-lived ILW consists of small quantities of low energy beta emitters. The beta emitters have low radiotoxicity. The main barrier to containing the radioactivity on long timescales is that 83% of the initial inventory (mostly activation products) is embedded within steels and zircaloy which corrode very slowly, particularly in an alkaline environment. The metals used in the reactor vault are corrosion-resistant alloys, with stainless steel taking approximately 30,000 years to fully corrode and zircaloy up to 300,000 years to fully corrode. The low corrosion rates allow the radioactivity to decay before it is released into the reactor vault. Once in the reactor vault the radioactive contaminants sorb onto the grout which further delays its diffusion out of the facility.	<u>Where is this topic discussed in the EIS?</u> Section 4.1 of the EIS highlights the in-design mitigation measures that act to isolate and contain the waste inventory within the NPD Disposal Facility to ensure protection of the surrounding environment. <u>What changes have been made (and where)?</u> No changes were made to the EIS as a result of this concern.	<u>Status:</u> Resolution In progress CNL's technical assessment shows that the in-situ design is appropriate for the hazardous timeframe of the contaminants and is consistent with national and international standards. CNL understands that this concern is outstanding from KZA’s perspective based on feedback in July 2023. <u>Next steps:</u> Through engagement, CNL hopes that the parties are able to find common ground on this topic, including the development of commitments to build confidence and trust in the in-situ disposal concept.

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
		Based on its consideration of national and international standards and guidelines, CNL continues to believe that the NPD facility has characteristics that support in-situ disposal.		
10. Long-term Safety	a) Long-term site integrity It is important to KZA that there is confidence in the performance of the facility over the long-term and that there are barriers in place to protect the environment, taking into account the worst case scenario in terms of climate change and extreme natural disturbance.. This is a project-specific concern.	In October 2023, CNL provided a presentation to the KZA Monthly Working Group with additional information on the contaminants involved in the NPD Closure Project, including: - main contaminants of concern; - half-life and LLW/HLW categorization; - threshold limits and how they are established; - lifespan of the grout/concrete structure; - effects of the contaminants at higher levels on the environment and human health; - the mobility of the contaminants (how they move within the environment and how they affect the things around them); - overview of the various proposed protection measures (the role of grout and other barriers); - how in-situ disposal compares and contrasts with Deep Underground Repositories; and - what route the contaminants would travel (even if they are at ‘acceptable levels’) after the concrete/grout decays. CNL is attempting to address concerns related to long-term safety at the NPD site by: (i) Involving the Indigenous Nations, communities and organizations, including KZA if interested, in monitoring activities that will confirm the conclusions of the EIS. (ii) Developing an Indigenous-driven risk-informed communications program for the NPD Closure Project to promote understanding of the EIS results and to help alleviate the concerns related to negative perceptions and feelings of discomfort and concern (Section 9.9.5 of the EIS). <u>CNL Response:</u> CNL has assessed the probabilities and potential impacts of flooding, seismic activity, above-ground natural hazards and extreme temperature change on the integrity of the grouted facility and concluded that these events will have no undue short-term or long-term effects on people or the environment around the site.	<u>Where is this topic discussed in the EIS?</u> Section 8.12 of the EIS discusses the relevant natural disasters to which NPD may be exposed. Section 9.14 of the EIS discusses the potential effects on the project of climate change, forest fires, floods, earthquakes, severe weather such as tornados, lightning strikes, ice storms, and changes to the Ottawa River. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this comment.	<u>Status:</u> Further alignment on this concern is unlikely CNL's technical assessment shows that there are no long-term effects resulting from the NPD Closure Project. KZA disagrees that this concern is adequately addressed based on KZA feedback from December 2023 and February 2024. KZA's laws require that KZA continues to advocate for the complete removal of all contaminated materials as KZA's assessments have determined this to be the preferred option. CNL remains committed to ongoing engagement with KZA within CNL's role as the project proponent. <u>Next Steps:</u> Through engagement, CNL hopes that the parties are able to find common ground on this topic, including the development of commitments to build confidence and trust in the in-situ disposal concept.

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
		The PostSA TSD demonstrates that beyond the Institutional Controls period, under all scenarios, the impact on the public, Indigenous and the environment is negligible. To verify that the engineered barriers as a whole are performing as expected/designed, CNL will monitor groundwater. Groundwater wells will be located between the NPD facility and the Ottawa River in order to monitor groundwater quality after it interacts with the facility and before it reaches the Ottawa River. CNL will conduct monitoring for as long as necessary to verify the results of the assessment in the EIS. The proposed NPD Closure Project conforms with all applicable Canadian codes and standards as well as international best practices to ensure protection of the environment and safety throughout the life of the facility. CNL is committed to further engagement with KZA to obtain a greater understanding of their concerns about the long-term safety of nuclear waste.		
10. Long-term Safety	b) Consideration of unique pathways for potential contamination exposure It is the view of KZA that there is a significant gap in research on the unique pathways for exposure to contaminants for Anishinabe people that needs to be addressed in the EIS in order for the project to move forward. It is important to KZA that CNL recognizes the unique pathways of potential exposure, therefore KZA would like to be involved in identifying the source of these of pathways to instill confidence for KZA members practicing traditional activities on the site in the future. This is a project-specific concern.	CNL received preliminary input on this concern during an NPD-specific meeting with KZA in November 2023. CNL re-iterates that the details of CNL’s research on the unique pathways for exposure to contaminants are described in CNL’s PostSA and associated TSDs. The NPD EIS contains a summary of the results. CNL is open and willing to hold a dedicated Working Group meeting to further describe the studies that have been done and provide an explanation of the results. CNL is continuing its efforts to address these concerns by committing to: (i) Involving the Indigenous Nations, communities and organizations, including KZA, in monitoring activities that will confirm the conclusions of the EIS. An Indigenous-driven monitoring program can help to reduce fear or anxiety associated with traditional uses occurring adjacent to and near CNL operated sites and build confidence that the decommissioning strategy and mitigation measures are effective. (ii) Developing an Indigenous-driven risk-informed communications program for the NPD Closure Project to promote understanding of the EIS results	<u>Where is this topic discussed in the EIS?</u> The EIS presents the PostSA results for the Indigenous receptor group in Section 9.10.2. <u>What changes have been made (and where)?</u> CNL’s has updated its PostSA TSD. This update includes an Indigenous receptor whose characteristics have been based on the results of a local Indigenous Nation harvest and diet study. Two additional medicinal pathways have been added in addition to ingestion (inhalation and skin application). The human health assessment in the PostSA also includes an even more conservative scenario where an Indigenous receptor where characteristics match a pre-European contact lifestyle. The results of the PostSA have been integrated into the EIS.	<u>Status:</u> Resolution is in progress CNL believes that they have addressed this concern. CNL's technical assessment shows that there are no predicted impacts to Indigenous biophysical health resulting from the NPD Closure Project. Continued engagement with KZA may result in commitments that will enhance confidence and trust in CNL's assessment. <u>Next Steps:</u> Review with KZA the exposure pathways included in CNL’s assessment and hear feedback from KZA on any pathways that may have not been adequately considered. KZA’s primary goal is to responsibly assess the project to ensure the health and well-being of its people and the environment. KZA appreciates CNL’s willingness to continue to explore this topic.

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
		and to help alleviate the concerns related to negative perceptions and feelings of discomfort and concern (Section 9.9.5 of the EIS) <u>CNL Response:</u> CNL agrees that traditional activities and resource use is important to integrate into the EIS with consideration of potential unique pathways of exposure for materials harvested or gathered in the area. In the third iteration of the PostSA TSD issued in March 2020, CNL included a Potential Exposure Group consisting of a family of self-sufficient Indigenous receptors in the NPD Area. The exposure profile in the postclosure period was developed based on a traditional Indigenous lifestyle pre-European contact (SENES 2014). This lifestyle results in a more cautious dose estimate than that based on current-day lifestyle, where some food is store-bought and likely not from the contaminated area. The predicted peak dose to an Indigenous receptor (from the 3rd iteration PostSA) is 0.0004 mSv/yr, which is 500 times less than the dose criterion. The analysis demonstrates that the impact on the public, Indigenous peoples and the environment is negligible under all scenarios. Through use of a Diet and Harvest Study prepared by a local Indigenous Nation, CNL has updated the exposures to an Indigenous receptor within its PostSA TSD. This receptor already included pathways to wild foods harvested from the area but now also considers exposure through traditional use of materials harvested or gathered from the area. The new pathways include inhalation of smoke from burning medicinal plants and rubbing of plants into the skin. To instill confidence in the EIS findings and the effectiveness of the follow-up monitoring, CNL will involve the KZA and other Indigenous Nations, communities and organizations in the monitoring program, which aims to confirm the predictions of the EIS.		
11. Monitoring	a) Monitoring locations and implementation of mitigation measures KZA has expressed concern about water management and monitoring specifically locations for monitoring to occur and mitigation measures in the event that water becomes contaminated. This is a project-specific concern.	In July 2023, KZA identified that it expects monitoring to occur both at the NPD site and offsite. <u>CNL Response:</u> The potential for contamination to reach the Ottawa river is assessed in the EIS, and is supported by long term modelling and detailed groundwater modelling. The EIS predicts no effects to surface water (including the Ottawa river). CNL has added information to the EIS about the washout pit and historic water discharges from the wells area sump. Monitoring results capture the effects of historic activities. Groundwater modelling was conducted for the NPD site. The PostSA TSD incorporates the results of groundwater modelling and, where necessary, uses conservative assumptions, (e.g., the tile drains remain functional and serve	<u>Where is this topic discussed in the EIS?</u> Section 4.1 of the EIS highlights the in-design mitigation measures that act to isolate and contain the waste inventory within the NPD Disposal Facility to ensure protection of the surrounding environment, including the Ottawa River. Mitigation measures for the protection of surface water are described in Section 9.3.3.2 of the draft EIS. The EIS does not predict any adverse residual effects on the surface water environment (Section 9.3.3.3 and 9.3.3.5). The follow-up monitoring program is described at a	<u>Status:</u> Resolution in progress. CNL understands that this concern is outstanding from KZA’s perspective. A dedicated Indigenous-led, Indigenous Knowledge driven component integrated into the site monitoring at NPD can help build confidence and trust in CNL’s assessment. <u>Next Steps:</u> Through engagement, CNL hopes that the parties are able to find common ground on this topic. CNL and KZA to have a dedicated discussion to discuss KZA’s involvement in monitoring at the NPD site.

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
		as a faster pathway to the Ottawa River), and considers the tile drains to have failed (so that the facility resaturates more quickly). The PostSA TSD concludes that no residual effects are expected from potential contaminant migration in groundwater. The tile drain system is expected to fail at some point during the Institutional Controls phase. In addition, monitoring of the environment will be undertaken to verify the EIS predictions of no significant adverse effect and to confirm that mitigation measures are effective. Groundwater wells will be located between the NPD facility and the Ottawa River in order to monitor groundwater quality after it interacts with the facility and before it reaches the Ottawa River. CNL will conduct monitoring for as long as necessary to verify the results of the assessment in the EIS. Through engagement, CNL is open and willing to collaboratively discuss the list of mitigation measures proposed for the NPD Closure Project as well as KZA's interests in water monitoring and mitigation efforts.	high level in Section 12 of the EIS. Groundwater modelling has been conducted in the Groundwater Modelling TSD. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this comment.	
11. Monitoring	b) Participation in monitoring KZA would be interested in being involved in a monitoring strategy to provide assurance to KZA members that CNL is regularly monitoring the environment around CNL sites. This is both a CNL-wide and project-specific concern.	CNL received preliminary feedback on this topic during an NPD-specific meeting with the KZA Working Group in November 2023. As follow-up from the meeting, CNL sent an infographic to KZA that illustrates CNL's environmental monitoring (i.e., water sampling locations) throughout the Regional Study Area. <u>CNL Response:</u> CNL is committed to involving Indigenous Nations, such as KZA, in its monitoring programs, and is open and willing to explore options for KZA's desired involvement in monitoring at the NPD site. The participation of KZA in monitoring work for the NPD Closure Project ensures consideration of Indigenous knowledge, collaboration, mutual respect, ongoing participation and potential relationship building for the future.	<u>Where is this topic discussed in the EIS?</u> Section 4.1 of the EIS highlights the in-design mitigation measures that act to isolate and contain the waste inventory within the NPD Disposal Facility to ensure protection of the surrounding environment, including the Ottawa River. Mitigation measures for the protection of surface water are described in Section 9.3.3.2 of the draft EIS. The EIS does not predict any adverse residual effects on the surface water environment (Section 9.3.3.3 and 9.3.3.5). The follow-up monitoring program is described at a high level in Section 12 of the EIS. Groundwater modelling has been conducted in the Groundwater Modelling TSD. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this comment.	<u>Status:</u> Resolution in progress. CNL understands that this concern is outstanding from KZA's perspective. A dedicated Indigenous-led, Indigenous Knowledge driven component integrated into the site monitoring at NPD can help build confidence and trust in CNL's assessment. <u>Next Steps:</u> Through engagement, CNL hopes that the parties are able to find common ground on this topic. CNL and KZA to have a dedicated discussion to discuss KZA's involvement in monitoring at the NPD site.
12. Protection of Flora and Fauna	a) Biota and Species at Risk KZA expressed concerns about potential project impacts to biota and its natural habitat, specifically SAR at the NPD site -chimney swifts and Monarch butterflies. In particular, KZA had questions about leaving the ventilation stack in place This is a project-specific concern.	In May 2017, CNL met with KZA including two specialists in biology and forestry and one Councilor. This was an opportunity for open discussion on the project with NPD Closure Project team members as well as to discuss KZA's comments on the Project Description. CNL provided an overview presentation and shared information on: EA and environmental monitoring, Indigenous requirements in an EIS, project overview and timeline and end state. The discussion also included Species at Risk and interest	<u>Where is this topic discussed in the EIS?</u> Collectively, mitigation measures for the protection of flora and fauna, specifically species at risk are outlined in Sections 9.6.3.2 (Terrestrial Environment). No residual effects for the terrestrial environment are predicted (Section 9.6.3.5). <u>What changes have been made (and where)?</u> As a result of feedback from KZA staff and technical	<u>Status:</u> Resolution in Progress CNL considers this concern has been addressed by changes to the EIS, including the addition of monarch butterfly to the VC list, as well as the site tour and meetings. CNL understands that the concerns of KZA relating to protection of flora and fauna have greatly evolved since 2017. CNL remains committed to ongoing engagement

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
		in a visit to NPD. In July 2017, KZA staff toured the site with technical and environmental experts. CNL’s biologist was on hand to discuss ecological and archaeological studies. KZA had the opportunity to ask questions or offer feedback on the project, including feedback on species at risk. All questions were addressed verbally on the tour. <u>CNL Response:</u> CNL involved third party experts through a workshop and evaluated all possible options to best protect the chimney swift. The recommendations from the workshop was to retain the ventilation stack as critical habitat. CNL has submitted a permit to Environment and Climate Change Canada as part of the project. The draft conditions of that permit (mitigations for the protection of the chimney swift) are included in the EIS. In response to observations of milkweed at the NPD site by KZA staff during their site visit, monarch butterfly has been added as a valued component to the EIS and mitigations are in place to preserve and reseed with milkweed (critical habitat).	experts, monarch butterflies were added as a VC (see Section 6.2.4.7 and Appendix B of the EIS). Habitat effects on the monarch butterfly are considered and mitigations are outlined in Section 9.6.3.2. The EIS includes additional mitigations related to milkweed (important habitat for monarch butterflies), migratory birds, bats, chimney swifts and milksnakes.	with KZA within CNL’s role as the project proponent. <u>Next Steps:</u> CNL proposes a meeting with KZA to discuss how the species they have identified are considered and included in CNL’s assessment.
13. Protection of the Ottawa River	a) KZA expressed concern about the potential impacts of nuclear waste on the health of the Ottawa River and its entire watershed including wildlife and flora. This is a concern for KZA because for the Anishinaabe peoples, water is sacred and essential for all life and must be protected. This is a project-specific concern.	As a part of the AANTC, KZA attended a meeting with the AANTC and CNL in 2017 April to share project information and hear feedback from the AANTC leadership. CNL’s presentation included: site location, project components and timeline, species at risk, proposed end state, and safety barriers for the protection of the environment. In May 2017, CNL met with KZA including two specialists in biology and forestry and one Councilor. This was an opportunity for open discussion on the project with NPD Closure Project team members as well as discuss KZA’s comments on the Project Description. CNL provided an overview presentation and shared information on: EA and environmental monitoring, Indigenous requirements in an EIS, project overview and timeline and end state. In July 2017, the KZA staff toured the NPD site with technical and environmental experts. CNL’s biologist was on hand to discuss ecological and archeological studies. KZA staff asked questions and offered feedback on the project, including feedback on species at risk. All questions were addressed verbally at the tour. CNL has reached out to KZA on an ongoing basis since the	<u>Where is this topic discussed in the EIS?</u> Section 4.1 of the EIS highlights the in-design mitigation measures that act to isolate and contain the waste inventory within the NPD Disposal Facility to ensure protection of the surrounding environment including the Ottawa River. Mitigation measures for the protection of surface water (Section 9.3.3.2) (including the Ottawa River) have been updated and expanded from the 2017 draft EIS. The EIS does not predict any adverse residual effects on the surface water environment (Section 9.3.3.3). <u>What changes have been made (and where)?</u> Note that this concern was raised at the Project Description stage and therefore no changes were made to the EIS as the above assessment has been present since the initial draft.	<u>Status:</u> Resolution in Progress CNL considers this concern has been addressed by the draft EIS content and CNL’s ongoing outreach to engage the KZA through a variety of means. CNL remains committed to ongoing engagement with KZA within CNL’s role as the project proponent. <u>Next Steps:</u> CNL will continue to follow-up with the KZA on opportunities for involvement in monitoring.

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
		beginning of the project and has met with KZA in 2017 and in 2021. At the meeting in November 2021 CNL expressed interest in entering into an agreement to provide capacity funding to enable participation in the EA process. <u>CNL Response:</u> CNL has assessed in-situ disposal of the waste as safe for the public and the environment, particularly the Ottawa River, over both short and long-term periods (e.g.,100,000 years). If the EA for in-situ disposal of the NPD facility is approved, the CNSC will require CNL to monitor and control access to the site during the Institutional Control period currently proposed for a minimum of 100 years. Once the regulator allows for Institutional Controls to cease, there will be no requirement for future monitoring or maintenance as the in-design features or passive barriers of the disposal facility, such as the grout, will help protect the public and the environment from radioactive and non-radioactive wastes. To verify that the engineered barriers as a whole are performing as expected/designed, CNL will monitor groundwater. Groundwater wells will be located between the NPD facility and the Ottawa River in order to monitor groundwater quality after it interacts with the facility and before it reaches the Ottawa River. CNL will conduct monitoring for as long as necessary to verify the results of the assessment in the EIS. CNL is working to involve Indigenous Nations, communities and organizations, including KZA if interested, in monitoring activities that will confirm the conclusions of the EIS. An Indigenous-driven monitoring program can help to reduce fear or anxiety associated with traditional uses occurring adjacent to and near CNL operated sites and build confidence that the decommissioning strategy and mitigation measures are effective.		
14. Socioeconomic	a) Contracting opportunities KZA is interested in contracting opportunities with CNL to enhance community opportunities. This is a CNL-wide interest.	CNL discussed contracting opportunities with KZA at a May 2017 meeting. <u>CNL Response:</u> CNL is committed to improved economic outcomes and benefits for Indigenous peoples from its projects. CNL has	<u>Where is this topic discussed in the EIS?</u> Not applicable. <u>What changes have been made (and where)?</u> No impact to the EIS.	<u>Status:</u> Resolved Economic opportunities for KZA are considered to be a broader CNL issue and not specific to the NPD Closure Project. It is noted that this topic extends beyond the

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
		acknowledged this gap and is working to develop a company-wide Indigenous Procurement Strategy, as well as a Reconciliation Action Plan, which includes a commitment to advance economic reconciliation.		scope of CEAA (2012) and the EA for the NPD Closure Project.
15. Traditional Land and Resource Use and Cultural Impacts	a) Impact on ability to practice traditional activities KZA is concerned that the EIS neglects to acknowledge CNL’s responsibility in creating and perpetuating avoidance of the area by KZA members. KZA notes that there is a lack of desire to hunt and fish near the site and reluctance to gather plants that were grown in soils ravaged by radioactive contamination. The idea that KZA must hunt, fish and gather at the site to validate KZA claims to the right to co-manage and protect it is a shortfall in the understanding of KZA culture and values. This is a project-specific concern.	CNL is continuing its efforts to address these concerns by committing to: (i) Involving the Indigenous Nations, communities and organizations, including KZA, in monitoring activities that will confirm the conclusions of the EIS. An Indigenous-driven monitoring program can help to reduce fear or anxiety associated with traditional uses occurring adjacent to and near CNL operated sites and build confidence that the decommissioning strategy and mitigation measures are effective (ii) Developing an Indigenous-driven risk-informed communications program for the NPD Closure Project to promote understanding of the EIS results and to help alleviate the concerns related to negative perceptions and feelings of discomfort and concern. CNL seeks to develop a mutual understanding of the perceived effects of the NPD Closure Project activities on the environment and any potential negative impacts on Aboriginal and/or treaty rights. This includes, but is not limited to, rights to trap, hunt, fish, gather, or harvest as well as the continuation and uninterrupted access to cultural and spiritual activities on the lands and waters. <u>CNL Response:</u> CNL acknowledges KZA’s concerns about the safety of the NPD site and the potential impacts on the rights of the KZA and other Indigenous Nations, communities and organizations to practice traditional activities around the NPD site. CNL has assessed potential effects related to dust and noise nuisance, loss of connection, safety of harvesting and consuming local foods, and changes to access and identified no significant adverse effects. To instill confidence in the EIS findings and the effectiveness of the follow-up monitoring, CNL will involve the KZA and other Indigenous Nations, communities and organizations in the monitoring program, if desired, which aims to confirm the predictions of the EIS. CNL notes that the final end state is the only time when changes to access will occur; the final end state of the NPD	<u>Where is this topic discussed in the EIS?</u> The EIS discusses concerns about potential loss of connection to land and water (e.g., feeling of discomfort or concern), and loss of land and water use in Section 9.9.5. General plans for restoration and end state, including access considerations, are described in Section 4.3.1.9 of the EIS. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this comment.	<u>Status:</u> Further alignment on this concern is unlikely. CNL’s conclusion is that the project will not interfere with traditional activities or have a negative impact on the biological resources on which they are dependent. CNL’s technical assessment was conducted in accordance with the requirements of CEAA (2012). KZA remains concerned that the project poses significant risk of detrimental impact to KZA, as communicated in KZA preliminary feedback on the EIS in December 2023 and February 2024. <u>Next steps:</u> CNL wishes to continue discussions with KZA to better understand the community’s perspective and values and any fears, or concerns associated with the NPD site and traditional use near the site. CNL proposes a dedicated Working Group meeting focused on effects to traditional land and resource use.

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
		site will be an improvement from current conditions. The PostSA TSD addresses the potential for concerns about loss of connection to land and water, and about food safety. The PostSA and EIS (and other supporting studies) have demonstrated that, there are no concerns about the accessibility or safety of the NPD site in the long term based on several different future use scenarios, including self-sufficient Indigenous receptors. The proposed activities will result in an enhancement of current conditions at the NPD site and will improve the ability to practice traditional activities in the area surrounding the NPD site. These findings, which will be confirmed by monitoring, may reduce concerns about loss of connection to land and water, and about food safety.		

Appendix O Kebaowek First Nation Record of Engagement and Interests and Concerns

This appendix provides a complete record of all engagement between CNL and Kebaowek First Nation (a member nation of AANTC) from June 2016 to March 2024 (Table O.1). Table O.1 includes the date and method of the communication / engagement, the topics discussed and participants. This table also highlights engagements where key EA topics were discussed. The key EA topics align with “Generic Guidelines for Preparation of an Environmental Impact Statement Pursuant to the Canadian Environmental Assessment Act, 2012” as well as the requirements of REGDOC 3.2.2 “Indigenous Engagement” and guidance specific to NPD provided by the CNSC in January 2021 (e-doc # 6467843).

Following the record of engagement is a mapping of how the summary of interests and concerns were compiled (Table O.2), as well as a summary of interests and concerns raised by Kebaowek First Nation (Table O.3).

Section 4.4.5.1. of the IER summarizes the engagement activities that have taken place to date between CNL and the KFN.

O.1 NPD Record of Engagement-Kebaowek First Nation – 2016 June to 2024 March

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
July 15, 2016 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the Kebaowek (then Eagle Village) First Nation (FN) Chief introduced the project and requested community input on any potential adverse impacts from project activities. To demonstrate requirements of CEAA, 2012 Section 5(1)(c), the letter requested meaningful feedback on the following: Whether the project may have environmental effect on any lands and/or resources currently used by Aboriginal peoples for traditional purposes; Whether the project may have any perceived impacts on Aboriginal and Treaty Rights; Whether local and traditional knowledge can assist in describing the existing environment; and, The view of Aboriginal communities on proposed valued ecosystems components (environmental attributes) that have been identified for the assessment.				√	√				√	
October 24, 2016 Outgoing telephone call	This call from a communications officer with CNL to the office of the Kebaowek FN Chief was to follow up on the July letter.									√	
November 10, 2016 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the Kebaowek (then Eagle Village) FN Chief inquired about asserted rights and traditional activities in the region around CRL. To demonstrate requirements of CEAA 2012 Section 5(1)(c), the letter requested a better understanding of Kebaowek FN’s historic and/or modern day use of lands in and/or near both of the projects and asked the following questions: - Does Eagle Village First Nation have traditional territory or reserve lands near the NSDF and/or NPD Closure Project? - What is the history of Eagle Village First Nation using the areas around the two projects? - Do you have any members of Eagle Village First Nation that currently live in close or reasonable proximity to either of the projects? - Does Eagle Village First Nation have any members that currently practice traditional activities such as, trapping, hunting, fishing and/or gathering, near the two projects? - Does Eagle Village First Nation, or any members, have sites of ceremonial significance in close proximity to either of the two sites, or more generally, any cultural activities near either of the two sites? CNL also indicated interested in learning more about the FN and any asserted rights, interests or activities members might undertake in the local or regional areas in proximity to the project.				√	√				√	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
April 26, 2017 Meeting	This meeting occurred in Maniwaki, Quebec with representatives from the AANTC (including the Grand Chief and the Director General), CNL (including the Director of Corporate Communications and the Director of Environmental Protection), the CNSC (including the Participant Funding Program Administrator) and representatives from two member First Nations of the AANTC – KZA and KFN. CNL shared information in English and French and heard some interests and concerns from the AANTC. Information shared on the NPD Closure Project included: • Site location; • Project components; • Timeline; • Species at risk; • Proposed end state; • Safety barriers (how the environment will remain protected).			✓	✓					✓	
November 15, 2017 Outgoing email	This email from a CNL communications officer to the Kebaowek FN Chief enclosed links to the full draft EIS, an interactive “public-friendly” executive summary of the draft EIS, the CNSC’s public notice, a short overview of the project and environmental assessment, as well as detailed information on the timing of the EA process and how to participate in the public comment period.	✓	✓	✓	✓	✓	✓	✓	✓	✓	
November 17, 2017 Outgoing email	This email from a CNL communications officer to the Kebaowek FN Chief enclosed the draft Aboriginal Engagement Report for the NPD Closure Project and stated, per CEAA, 2012 requirements: “CNL would be pleased to update information in this current draft with input from your community.”	✓	✓	✓	✓	✓	✓	✓	✓	✓	
In March 2020, the COVID-19 pandemic impacted in-person engagement activities. CNL adapted to the restrictions providing online platforms for virtual meetings, workshops, webinars, Project updates and open houses.											
May 06, 2020 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the Kebaowek FN Chief enclosed a preliminary version of the 2020 revised draft EIS and an updated IER. This letter also asked for feedback in the following seven areas: • Does Kebaowek First Nation have additional information that they would like to provide in the context of traditional territory near the NPD site? • Does Kebaowek First Nation have any members who currently live close or in reasonable proximity to the NPD site? • Does Kebaowek First Nation have historical and/or current traditional practices near the NPD site, specifically we are interested in members’ traditional uses such as trapping (traditional or commercial), hunting, fishing (traditional or commercial), gathering and practicing cultural ceremonies? • Does Kebaowek First Nation have sites of ceremonial significance in close proximity or more generally any cultural activities near the NPD site? • Tell us about any important resources, uses, activities, values and interests to Kebaowek First Nation near the NPD site. • If there is use in close proximity to the NPD site, is current community use different than historic use and can a description of those difference be provided? • Let us know of any potential concerns you have with respect to effects and any potential impacts on rights. This letter also indicated an interest in meeting with Kebaowek FN to discuss any interests or concerns.	✓	✓		✓	✓	✓	✓	✓	✓	

Date/Method	Details	Key EA Topics									
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May 14, 2020 Incoming letter	This letter from Kebaowek First Nation Chief and the AANTC Grand Chief was addressed to Prime Minister Trudeau outlining concerns with inconsistencies in the EA processes which included the NPD Closure Project. CNL's Director of Corporate Communications was copied on the letter.					✓					
May 26, 2020 Outgoing email	This email from a communications officer with CNL to the Kebaowek FN Chief was to follow up on the May letter.									✓	
June 17, 2020 Virtual meeting	This meeting between eight CNL representatives (including the Director of the NPD Closure Project, the Manager of Regulatory Approvals and the Manager of Stakeholder Relations) and five representatives of the AANTC (including the Grand Chief, the Director General, a policy consultant with KFN, an economic development officer and a consultation coordinator with the AANTC) was not considered engagement or consultation by the AANTC. It focused on how CNL could support AANTC participation in the environmental assessment process through a contribution agreement or other formal mechanism.									✓	
June 24, 2020 Outgoing email	This email from a communications officer with CNL to the KFN representatives, including the economic development officer, was to follow-up on items from the virtual meeting in June.										✓
July 16, 2020 Outgoing email	This email from a communications officer with CNL to the AANTC Director General and the KFN representatives, including the economic development officer, shared an overview presentation on the NPD Closure Project and inquired on a follow-up meeting with respect to the contribution agreement discussions.			✓							✓
August 26, 2020 Incoming letter	This letter from the AANTC and Kebaowek First Nation to the Minister of Natural Resources, copying the Director of Corporate Communications with CNL, indicated dissatisfaction with the regulatory process for a number of projects including the NPD Closure Project.					✓					
November 05, 2020 Incoming letter	This letter was from the Minister of Natural Resources to the Grand Chief of the AANTC and Kebaowek First Nation Chief (copying the Director of Corporate Communications with CNL) responding to the letter of August 2020.					✓					
January 11, 2021 Incoming letter	This letter from the AANTC's Grand Chief and Kebaowek FN Chief to the Minister of Natural Resources (copying CNL's Director of Corporate Communications) outlined concerns with the resolution of problems regarding supporting Indigenous participation for CNL and CRL-based projects. The letter requested a meeting to discuss issues in detail and arrive at mutually satisfactory conditions supporting Indigenous consultation and engagement.					✓					
January 19, 2021 Outgoing email	This was an email from a communications officer with CNL to the Director General of the AANTC copying the Kebaowek FN Chief, which offered a meeting and further discussion on a contribution agreement.										✓
April 12, 2021 Outgoing letter	This letter from CNL's Manager of Stakeholder Relations to the Director General of the AANTC enclosed a preliminary list of commitments and indicated interest in meeting to discuss.										✓
April 22, 2021 Incoming letter	This letter from the Grand Chief of the AANTC and the Chief of KFN to CNL's Manager of Stakeholder Relations indicated that neither was in agreement with the list of commitments and indicated that engagement with the AANTC and KFN was essential.									✓	
April 30, 2021 Outgoing letter	This letter from CNL's Manager of Stakeholder Relations to the Grand Chief of the AANTC and the Chief of KFN shared that the letter was not intended to provide a final set of commitments and CNL was interested in engaging with the AANTC and KFN to determine a mutually agreed upon set of commitments.									✓	
May 06, 2021 Outgoing email	This email from a communications officer with CNL to a consultation coordinator with KFN followed up on the previous letter.										✓
June 21, 2021 Outgoing letter	This letter from CNL's Manager of Stakeholder Relations to the KFN Chief enclosed a draft summary of KFN's interests and concerns for the NPD Closure Project for the KFN's review and verification.									✓	✓
July 5, 2021 Outgoing email	This email from a Communications Officer with CNL to the Chief of KFN was to follow-up on the June 21, 2021 letter.										✓

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July 14, 2021 Incoming email	This email from the Consultation Coordinator with KFN to a communications officer with CNL was to confirm they would be responding.										✓
July 15, 2021 Incoming letter	This letter from the KFN Chief to the Manager of ERM Stakeholder Relations described a number of issues with Crown consultation and the duty to consult, asked for a pause on the EA process and an agreement with the government on consultation. The letter also stated an interest in an LOI and process agreement with CNL.					✓				✓	✓
July 15, 2021 Outgoing email	This email from the ERM Stakeholder Relations Manager to the KFN Chief was to confirm receipt of the July 15, 2021 letter.										✓
August 12, 2021 Outgoing letter	This letter from CNL's Manager of Stakeholder Relations to the KFN Chief and AANTC Grand Chief enclosed CNL's response to the July 15, 2021 letter from AANTC's Grand Chief and the KFN Chief. CNL's response included information on the role of CNL in the EA process, how CNL documents comments from the AANTC and KFN on the NSDF and NPD Closure Project, CNL's willingness to a draft letter of Intent and draft process Agreement for AATNC and KFN, information on a regional assessment, the opportunity to provide into follow-up monitoring, and CNL's response to the request to include the letter of July 15, 2021 in the IAA registry. This letter also indicated a need for any additional feedback on the Summary of Interests and Concerns to be brought forward by August 31, 2021 in order to be reflected in the NPD revised draft EIS.									✓	✓
August 26, 2021 Incoming email	This email from the KFN Consultation Coordinator to CNL's Manager of Stakeholder Relations and communications officer expressed that KFN would share a draft LOI towards the development of a Process Agreement(s) for the NSDF Project and NPD Closure Project.									✓	✓
September 8, 2021 Incoming letter	This letter from the KFN Consultation Coordinator to CNL's Manager of Stakeholder Relations enclosed a draft LOI for project consultation agreement(s) with CNL.									✓	✓
September 24, 2021 Incoming email	This email from the KFN Consultation Coordinator to a CNL communications officer was to inquire whether CNL had reviewed the LOI yet and proposed to set up an October meeting on the LOI.									✓	✓
September 24, 2021 Outgoing email	This email from an ERM Communications Officer to the KFN Consultation Coordinator informed KFN FN that CNL's legal team was currently reviewing the LOI, and that CNL will touch base internally and prioritize having the draft LOI back in advance of the next meeting. CNL asked KFN FN what dates would work for a meeting.									✓	✓
October 20, 2021 Outgoing letter	This email from a Senior Communications Officer to the KFN Consultation Coordinator enclosed a covering letter and CNL's revisions to the LOI.									✓	✓
October 28, 2021 Outgoing email	This email from a CNL Communications Officer to the KFN Consultation Coordinator proposed several meeting dates to further discuss the LOI and informed KFN of the decision to delay the EIS submission for the NPD Closure Project. CNL welcomed KFN FN to provide further feedback on the updated summary table of interest and concerns (attached) by November 26, 2021.									✓	✓
November 12, 2021 Incoming email	This email from a consultant for KFN to a Senior Communications Officer at CNL responded to the email from CNL, seeking to coordinate a meeting date on the LOI.									✓	✓
November 15, 2021 Emails	These emails between a consultant for KFN and a Senior Communications Officer at CNL coordinated a meeting to discuss the LOI on December 8, 2021.									✓	✓
December 8, 2021	This meeting between representatives of KFN (including a councillor for KFN, a consultant and a consultation coordinator) and CNL (the Manager of ERM Stakeholder Relations and a Senior Communications Officer) and AECL (the Director of Communications and Government Reporting was to discuss a draft LOI to progress with a relationship.									✓	
December 8, 2021 Incoming email	This email from KFN to CNL attached KFN's revisions to CNL's last LOI draft. KFN requested that CNL coordinate complete the revisions.									✓	

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December 9, 2021 Outgoing email	This email from a CNL Senior Communications Officer to KFN noted that CNL had shared the revisions and KFN's contact information to CNL's legal team. CNL noted that they will connect again soon to coordinate next steps once KFN and CNL had clarified the draft LOI.									✓	
December 9, 2021 Outgoing email	This email from CNL's legal department (articling student) was to get an understanding of KFN's thoughts on the purpose of the LOI. CNL noted that they were open to covering KFN's costs to reach a Framework Agreement. CNL attached a copy of the draft LOI to that effect. For a more comprehensive commitment regarding all of KFN's costs for engagement, CNL noted that a Framework Agreement would be more suited for purpose instead of an LOI. CNL noted that they could accelerate the process and go directly into negotiations regarding capacity funding and the Framework Agreement at the next meeting if KFN would like.									✓	
December 14, 2021 Incoming email	This email from KFN to CNL's legal department noted that KFN would do a close review and consideration of the proposed path forward and get back to CNL soon.									✓	
January 26, 2022 Incoming email	This email from KFN's legal contact to CNL's legal department confirmed that KFN is agreeable with the proposed changes to the LOI and to the approach to covering KFN costs that CNL had outlined. KFN's legal contact included a suggested limit on costs and attached to the email. KFN's legal contact noted that if this is agreeable to CNL, they would propose that the LOI is signed as soon as possible so that both parties could move into Framework Agreement discussions.									✓	
January 26, 2022 Outgoing email	This email from the ERM Communications Manager to KFN Consultation to confirm with legal what next steps are, but safe to say we can all do a review of edits to make sure we are ok with the attached.										✓
February 8, 2022 Incoming email	This email from KFN informed CNL that the KFN negotiation team will be KFN legal counsel supported by Leadership. KFN and CNL coordinated the next meeting.										✓
February 8, 2022 Incoming email	This email from the KFN economic development officer to CNL asked CNL to share a copy of the LOI signed by both parties.										✓
February 18, 2022 Outgoing email	This email from a CNL Senior Communications Officer to KFN included a poll to determine the next meeting date to discuss the LOI.										✓
March 8, 2022 Outgoing email	This email from a CNL Senior Communications Officer to KFN was to inform KFN that CNL had included a revised column to link each of KFN's interests and concerns to a specific aspect of the project, and/or an Aboriginal and treaty right, where possible. The interest and concerns previously identified will remain unchanged as part of the Environmental Impact Statement (EIS) and Indigenous Engagement Report that is submitted alongside the EIS. CNL asked KFN to confirm whether you would like to verify that the revised table reflects your interests and concerns, focusing on the new column that ties your interest/concern to the project or Aboriginal and treaty right, and identify why it is of concern to your community. CNL requested that KFN confirm whether they would like to review the updated interest and concerns table before submission.										✓
March 9, 2022 Incoming email	This email from KFN to CNL confirmed KFN's interest to review the table and requested CNL to add a consultation request as it relates to a broader discussion on completing the consultation Framework Agreement and actions on CNL's various projects at CRL and NPD.										✓
March 9, 2022 Meeting invitation	Email invitation sent to Kebaowek First Nation for a Thursday, March, 10, 2022 meeting to discuss project consultation on the NSDF and NPD Projects, the Framework Agreement and next steps.										✓
March 10, 2022 Virtual Meeting	This meeting between Kebaowek First Nation (including KFN consultation staff, Councillor and legal counsel) and CNL (including a Senior Communications Officer and Manager of ERM Stakeholder Relations) was to discuss the project consultation opportunities and requests related to the NSDF Project and NPD Closure Project and the next steps to develop a Framework Agreement.										✓

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March 10, 2022 Incoming email	This email from Kebaowek First Nation’s consultation consultant to a CNL Senior Communications Officer sharing a news story about Combining Malacology and Underwater Cave Diving in the Ottawa River and a video about the Algonquin Aki Sibi Project. Both items were mentioned during the Thursday, March, 10, 2022 meeting.										√
April 01, 2022 Outgoing email	This email from a CNL Senior Communications Officer to KFN attached the repackaged summary table of interests and concerns. This repackaging is based on feedback from the Canadian Nuclear Safety Commission (CNSC) on our December 2021 draft EIS submission package. To meet the CNSC needs, CNL added a column called ‘Project Aspects of Interest/Concern.’ CNL requested KFN review the updated table and offered to provide time and capacity for the review.									√	
April 14, 2022 Outgoing email	Email invitation sent to Kebaowek First Nation for the Thursday, April, 14, 2022 meeting to discuss project consultation on the NSDF and NPD Projects, the Framework Agreement and next steps.										√
April 14, 2022 Virtual Meeting	This meeting between Kebaowek First Nation (including KFN consultation staff, Councillor and legal counsel) and CNL (including a Senior Communications Officer and Manager of ERM Stakeholder Relations) was to discuss the project consultation opportunities and requests related to the NSDF Project and NPD Closure Project.										√
April 18, 2022 Outgoing email	This email invitation a CNL Senior Communications Officer to Kebaowek First Nation’s consultation consultant to the CNL Industry Day at the Chalk River Laboratories on Thursday, June, 2, 2022 to promote the broader engagement between CNL’s nuclear industry partners and our local supply chain.										√
May 09, 2022 Outgoing email	This email from a CNL Senior Communications Officer to KFN to follow up on the April 01, 2022 email requesting CNL to review the repackaged summary table of interests and concerns.									√	
May 10, 2022 Incoming email	This email from Kebaowek First Nation’s consultation consultant to a CNL Senior Communications Officer confirmed KFN would send CNL comments on the repackaged summary table of interests and concerns. KFN indicated this working would be billed against the framework agreement negotiations budget until a separate study budget is established.									√	
May 10, 11 & 12, 2022 Incoming/Outgoing email	These emails from Kebaowek First Nation’s consultation consultant to a CNL Senior Communications Officer discussed the availability of the EIS revision history. CNL sent the most recent EIS submission.										√
May 20, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Kebaowek First Nation’s consultation consultant shared the proposed Framework Agreement, to be discussed at the next meeting. Kebaowek First Nation requested to postpone the Tuesday, May, 24, 2022 meeting. The meeting was cancelled due to scheduling conflicts.										√
May 06, 2022 Incoming email	This email from Kebaowek First Nation’s consultation consultant to a CNL Senior Communications Officer provided CNL KFN’s comments on the repackaged summary table of interests and concerns. CNL confirmed receipt and committed to sharing an updated copy back to KFN.									√	
June 08, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Kebaowek First Nation’s consultation consultant shared a draft agenda for the Thursday, June 9, 2022 meeting. The agenda included: Opportunity to open in a good way; Reflections from KFN and CNL on the NSDF hearing; Discussion on the draft Framework Agreement provided by KFN; Next steps – principles for engagement and alignment with Framework Agreement. CNL also asked if Kebaowek First Nation’s legal counsel will be present at the meeting.										√

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June 08, 2022 Incoming email	This email from Kebaowek First Nation’s consultation consultant to a CNL Senior Communications Officer confirmed Kebaowek First Nation’s legal counsel will be present at the Thursday, June 9, 2022 meeting.										√
June 09, 2022 Virtual meeting	Meeting between Kebaowek First Nation (including KFN consultation staff, Councillor and legal counsel) and CNL (including a Senior Communications Officer and Manager of ERM Stakeholder Relations) to discuss the Framework Agreement.										√
July 17, 2022 Outgoing email	Email invitation from a CNL Senior Communications Officer to Kebaowek First Nation’s consultation consultant to register and attend the Chalk River Open House on Saturday, August 6, 2022.										√
July 18, 2022 Incoming email	This email from Kebaowek First Nation’s consultation consultant to a CNL Senior Communications Officer proposed a meeting and requesting a marked-up version of the Framework Agreement in advance. CNL sent a meeting invitation and agree to send a marked-up version of the Framework Agreement in advance.										√
July 21, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Kebaowek First Nation’s consultation consultant sent the updated summary tables of interests and concerns for Kebaowek First Nation. CNL offered a meeting to discuss and additional feedback on the table.									√	
July 25, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Kebaowek First Nation’s consultation consultant shared a revised draft of the Framework Agreement, in both clean and blackline versions, for consideration in advance of the Tuesday, July 26, 2022 meeting. The meeting was rescheduled for July 29, 2022 due to a network outage.										√
July 29, 2022 Virtual Meeting	Meeting between Kebaowek First Nation (including KFN consultation staff, Councillor and legal counsel) and CNL (including a Senior Communications Officer and Manager of ERM Stakeholder Relations) to discuss the Framework Agreement.										√
August 6, 2022 Open House	Kebaowek First Nation (including the Chief and consultation consultant) attended CNL’s 2022 Open House at the Chalk River Laboratories site. The open house included a NPD project booth.										√
August 9, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Kebaowek First Nation’s legal counsel to shared Kebaowek First Nation’s revisions to the latest draft Framework Agreement.										√
August 11, 2022 Meeting	Meeting between Kebaowek First Nation (including KFN consultation staff, Councillor and legal counsel) and CNL (including a Senior Communications Officer, CNL legal counsel and Manager of ERM Stakeholder Relations) to discuss legal update on Framework Agreement and further plan a leadership meeting.										√
August 18, 2022 Incoming email	This email from Kebaowek First Nation’s consultation consultant to a Senior Communications Officer proposed a leadership meeting for CNL, AECL and KFN to Tuesday, August, 31, 2022 at Fitzpatrick Island. CNL accepted the invitation.										√
August 31, 2022 Meeting	Meeting between Kebaowek First Nation leadership (including KFN consultation staff, Councillor and Chief) and CNL (including the Manager of ERM Stakeholder Relations, AECL President and CEO and CNL President and CEO) at Fitzpatrick Island.										√
September 07, 2022 Incoming email	This email from Kebaowek First Nation’s legal counsel to legal counsel for CNL requested CNL’s changes or comments to the draft agreement that KFN sent on Tuesday, August, 9th, 2022. KFN requested a copy before the planned September 8th, 2022 meeting. The meeting was rescheduled.										√
September 13, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Kebaowek First Nation’s legal counsel shared the revised draft of the Framework Agreement for review.										√
September 13, 2022 Incoming email	This email from Kebaowek First Nation’s legal counsel to legal counsel for CNL requesting a Word version of the “Compare” PDF of the Framework Agreement. CNL sent the version requested.										√

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September 15, 2022 Meeting	Meeting between Kebaowek First Nation (including KFN consultation staff, Councillor and legal counsel) and CNL (including a Senior Communications Officer and Manager of ERM Stakeholder Relations) to discuss legal update on Framework Agreement, provide updates on an activities schedule and further plan a leadership meeting.										√
September 29, 2022 Outgoing email	This email from legal counsel for CNL to Kebaowek First Nation’s legal counsel asking KFN to confirm whether CNL can expect to hear back from KFN on the draft agreement after the Thursday, October, 6th, 2022 meeting? CNL offered a separate to discuss the framework if needed.										√
October 03, 2022 Outgoing letter	This letter addressed to Kebaowek First Nation’s Chief from CNL’s Director of Indigenous Relations provided a project update and the engagement status with KFN. CNL stated it is committed to incorporating KFN’s interests and concerns into the EIS. CNL provided an engagement status and next steps, including a site visit and establishing commitments to ensure that all interests and concerns are addressed and tracked to resolution. CNL sent an updated draft set of commitments for KFN’s C review. CNL acknowledge the work done to date including the signature of a Letter of Intent and the progression towards a Framework Agreement.									√	
October 06, 2022 Incoming email	This email from Kebaowek First Nation’s legal counsel to legal counsel for CNL shared the latest edits to the Framework Agreement. KFN requested a separate meeting Tuesday, October, 11th, 2022 to discuss the edits. CNL proposed an alternative date to discuss edits.										√
October 07, 2022 Meeting	Meeting between Kebaowek First Nation (legal counsel) and CNL (including legal counsel) to discuss the Framework Agreement.										√
October 07, 2022 Incoming email	This email from Kebaowek First Nation’s legal counsel to legal counsel for CNL shared the latest edits to the Framework Agreement.										√
October 12, 2022 Meeting	Meeting between Kebaowek First Nation (including KFN consultation staff, Councillor and legal counsel) and CNL (including a Senior Communications Officer, CNL legal counsel and Manager of ERM Stakeholder Relations) to discuss legal update on Framework Agreement and further plan a leadership meeting.										√
October 24, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Kebaowek First Nation’s legal counsel shared the revised draft of the Framework Agreement for review. CNL offered to meeting with Kebaowek First Nation Legal Counsel to discuss the framework.										√
October 25, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Kebaowek First Nation’s consultation consultant sent date options for a leadership meeting. CNL requested KFN vote on the date options. CNL later revised the dates based on CNL’s President and CEO is availability. KFN confirmed receipt.										√
October 07, 2022 Meeting	Meeting between CNL (including CNL legal counsel) and Kebaowek First Nation (legal counsel) to discuss the Framework Agreement.										√
October 27, 2022 Meeting	Meeting between Kebaowek First Nation (including KFN consultation staff, Councillor and legal counsel) and CNL (including a Senior Communications Officer, CNL legal counsel and Manager of ERM Stakeholder Relations) to discuss legal update on Framework Agreement and further plan a leadership meeting.										√
October 31, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Kebaowek First Nation’s legal counsel shared a revised draft of the Framework Agreement in clean and compare. CNL offered to coordinate a meeting to discuss if needed.										√
November, 2022 Outgoing/incoming email	This email from a CNL Senior Communications Officer to a Kebaowek First Nation councillor was to coordinate a date for the leadership meeting to sign the Framework Agreement.										√

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November 07, 2022 Meeting	Meeting between CNL (including CNL legal counsel) and Kebaowek First Nation (legal counsel) to discuss the Framework Agreement.										√
November 18, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Kebaowek First Nation’s consultation consultant shared the revised draft of the Framework Agreement as well as Schedules B and C to the Agreement.										√
November 23, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Kebaowek First Nation’s consultation consultant was to follow up on the status of the KFN review of the revised draft of the Framework Agreement as well as Schedules B and C to the Agreement shared Thursday, November 17th, 2022. CNL offered to coordinate a separate meeting before the Thursday, December, 8th, 2022 working group meeting.										√
November 24, 2022 Incoming email	This email from Kebaowek First Nation’s legal counsel to CNL’s legal counsel provided comments on the Framework Agreement as well as Schedules B and C. KFN Legal Counsel requested a clean version once CNL had time to review the changes. CNL confirmed receipt of the comments on the Framework Agreement as well as Schedules B and C.										√
November 29, 2022 Telephone call	CNL’s legal counsel telephoned Kebaowek First Nation’s legal counsel to discuss comments on the Framework Agreement as well as Schedules B and C.										√
December 05, 2022 Incoming email	This email from Kebaowek First Nation’s consultation consultant to a CNL Senior Communications Officer shared that December 16th Leadership Meeting was set for 10:00 a.m. or 11:00 a.m. CNL confirmed that 11:00 a.m. works for both CNL and AECL. CNL asked KFN to confirm if the intent is to sign the Framework Agreement on this date.										√
December 06, 2022 Telephone call	CNL’s Senior Communications Officer telephoned Kebaowek First Nation’s consultation consultant to confirm logistics for the Friday, December, 16th 2022 leadership meeting.										√
December 07, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Kebaowek First Nation’s consultation consultant sent the proposed agenda for the Thursday, December, 8th 2022 working group meeting. Proposed agenda: • Land acknowledge; • Opening / introductions; • Framework Agreement; • Leadership Meeting Logistics; • Waste Management Tour Logistics; • Extension letter.										√
December 07, 2022 Outgoing email	This email from CNL’s legal counsel to Kebaowek First Nation’s legal counsel shared the Framework Agreement, Engagement Schedule and CNL’s proposal to address the outstanding points. CNL offered a meeting separate of the working group meeting to discuss the edits.										√
December 08, 2022 Meeting	Meeting between Kebaowek First Nation (including KFN legal counsel) and CNL (including CNL legal counsel) to discuss outstanding issues of the Framework Agreement.										√
December 12, 2022 Outgoing email	This email from CNL’s legal counsel to Kebaowek First Nation’s legal sent the updated Agreement. CNL proposed that if no further edits were need CNL would prepare the execution version for execution at the December 15th 2022 meeting.										√

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December 15, 2022 Meeting	Meeting between Kebaowek First Nation leadership (including KFN consultation staff, Councillor and Chief) and CNL (including the Manager of ERM Stakeholder Relations, AECL President and CEO and CNL President and CEO) in person at KFN’s band office to discuss the ongoing relationship between CNL and KFN. The Framework Agreement was not signed.										√
January 20, 2023 Outgoing Email	Email correspondence from a CNL Communications Officer to a KFN Consultant with information and update on the NPD Closure Project. CNL updated KFN on the new submission date of 2023 May. CNL proposed the next steps would be to coordinate a meeting to discuss the NPD project to ensure KFN’s interest and concerns are reflected in the NPD EIS.										√
April 03, 2023 Incoming Email	This email from a KFN Consultant to a CNL Communications Officer with KFN's comments on Section 6.2.4.6.1 of the EIS prepared for CNL on 2022 June 6, and request to coordinate a meeting to discuss KFN's key interests in consultation and the next steps in the EA and CNL's EIS submission. CNL thanked KFN for their feedback, KFN requested a meeting to move towards the next steps for NPD.										√
April 04, 2023 Incoming	Email correspondence from the KFN Consultant to a CNL Communications Officer asking that prior to the meeting on 2023 April 19, CNL confirm what legacy materials, and soils from the NPD reactor are as well going into the NSDF mound.			√							√
April 05, 2023 Emails	Email correspondence between a CNL Communications Officer to the KFN Consultant to coordinate a meeting in 2023 April to discuss NPD Closure Project and the Federal Environmental Assessments and NSDF Project.										√
April 13, 2023 Virtual Meeting	This Meeting was between CNL representatives (Including Communications Officers, the Manager of ERM Stakeholder Relations, Director of Corporate Environmental Projects, Manager of NPD Regulatory Approvals, Manager of ERM Licensing Support, CNL Legal Counsel) AECL (including the Manager of Engagement and Communications), and Kebaowek First Nation (including the KFN Consultant and Councillor). CNL and KFN reviewed the I&C table, discussed next steps and planned a tour for the next week.									√	√
April 19, 2023 Outgoing Email	Email correspondence from CNL Communications Officer to the KFN Consultant with follow-up to the 2023 April 29 NPD Closure Project meeting and information on the NPD Swift Night Count and the Federal Environmental Assessments and NSDF Project.										√
April 21, 2023 This email from CNL to Kebaowek First Nation (3 Emails).	This email from CNL Communications Officer to the KFN Consultant with information (including agenda) to prepare for KFN's tour of the Nuclear Power Demonstration (NPD) Closure Project site on 2023 April 26.										√
April 26, 2023 Site Tour of NPD	CNL welcome KFN members to the NPD site for a tour. Following the days pre-job CNL answered questions from KFN. The areas of interest were monitoring, operational history and the similarities between the NPD and WR-1 Projects. KFN has a tour of the NPD facility and walked to the River with CNL staff.										√
May 01, 2023 Outgoing email	This email from a CNL Communications Officer to KFN sharing the invitation to attend the NPD Chimney Swift Count Night on 2023 May 24.										√
May 11, 2023 Meeting	This meeting was held between CNL (including Manager, Stakeholder Relations, Communications Officer, Indigenous Engagement Coordinator, Manager NPD Regulatory Approvals, CNL Legal Counsel, Manager, ERM licencing support) and KFN (Including KFN council member, legal counsel, and Consultation) and next steps of the NPD Closure Project. CNL and KFN addressed the concern felt by the community remembers who tested for radon at the April 26 tour. KFN and CNL agreed to develop a site access protocol for future visits.										√
May 16, 2023 Outgoing email	This email from a CNL Communications Officer to KFN provided the updated Interests and Concerns Table. CNL is seeking verification from KFN that the interests and concerns of KFN have been recorded. CNL respectfully requested KFN response by 2023 June 20.									√	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
June 01, 2023 Outgoing email	This email from a CNL Communications Officer to KFN is to follow up on an email sent on 2023-May-16.										√
June 01, 2023 Incoming email	This email from KFN to a CNL Communications Officer noted that KFN has limited capacity to work on the NPD project. In the interim KFN requested CNL draft the LOI for the framework agreement and arrange funding resources. CNL confirmed receipt of the email.										√
June 05, 2023 Outgoing email	This email from CNL legal counsel to KFN attached a draft Letter of Intent (LOI) in respect of the NPD closure project.										√
June 09, 2023 Outgoing email	This email from CNL Indigenous Engagement Coordinator to KFN provided KFN with an updated actions list from the 2023 June 08 Monthly Meeting and a first draft of the site access protocol for KFN's feedback.										√
June 29, 2023 Outgoing email	This email from a CNL Communications Officer to KFN following up on the draft LOI sent June 5 and the Table of Interest and Concerns.										√
June 29, 2023 Incoming email	This email from KFN to a CNL Communications Officer provided KFN's comments on the Proposed and Requested Commitments between Kebaowek First Nation and CNL for the NPD Closure Project as of September 2022 and a previous version of the Interests and Concerns table. KFN requested Section 6.2.4.6.1 of the EIS for review.						√			√	
July 04, 2023 Outgoing Email	This email from CNL Communications Officer to KFN is to provide KFN with Section 6.2 4.6.1 of the Revised Draft EIS. CNL has made our best efforts to record and document the engagement with KFN to date, while acknowledging that KFN may articulate their position and perspective somewhat differently. CNL also shared updated I&C and Mapping tables based on KFN feedback.									√	
July 06, 2023 Incoming Email	This email from KFN to CNL provided KFN's comments on NPD EIS Section 6.2.4.6.1. CNL confirmed receipt.									√	
July 06, 2023 Outgoing Email	This email from CNL Communications Officer to KFN sharing the updates to EIS Section 6.2.4.6.1 based on KFN's feedback.									√	√
August 02, 2023 Outgoing	This email from CNL Communications Officer to KFN is to provide KFN with an updated list of Commitments between Kebaowek First Nation and CNL for the NPD Closure Project as of August 2023, for KFN review and comments. CNL updated the table based on KFN comments from June 29, 2023.						√			√	
August 29, 2023 Outgoing Email	This email from CNL Communications Officer to KFN is to express CNL commitment to incorporating KFN's interests and concerns into the EIS, as KFN input is essential to the environmental assessment process. CNL also captured KFN's interest and concerns, CNL proposes this as the topic for the upcoming monthly meeting on September 14, 2023.									√	
August 29, 2023 Incoming Email	This email from KFN to CNL Manager, Communications and Engagement is in response to the email from CNL Communications Officer sent on 2023 August 29; KFN asked CNL to add NPD Letter of intent to the next monthly meeting draft agenda. CNL confirmed.										√
September 20, 2023 Meeting	This meeting between CNL (Including, Manager, ERM Licensing Support, Environmental and Decommissioning Specialist, Manager, NPD, Indigenous Engagement Coordinator, Director, Communications and Engagement, Manager, Communications and Engagement, Communications Officer, CNL Legal Counsel, Acting Section Head, Impact Assessment), AECL (Including, Manager of Engagement and Communications) and KFN (including, KFN Consultant, Legal Counsels, KFN Engineering Advisor, and Councillor). This meeting was to discuss Chalk River Section 82 project AECL follow-up, Confirm KFN staff and KFN Legal staff email and meeting distribution, Kebaowek - NSDF Project final billing, Photo pick up at Wolf den, NPD Letter of Intent (LOI), and NPD EIS review and capacity support.									√	√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
September 20, 2023 Outgoing email	This email from CNL Communications Officer to KFN is to provide NPD Letter of Intent, and NPD EIS Chapter 6 and NPD EIS.						√			√	√
September 20, 2023 Outgoing email	This email from CNL Indigenous Engagement Coordinator to KFN is to provide a copy of the Actions from the 2023 KFN - AECL- CNL monthly meeting.										√
October 19, 2023 Meeting	This meeting between CNL (Including the acting Director NPD Closure Project, Director, Communications and Engagement, Manager, Communications and Engagement, Communications Officer, CNL Legal Counsel), and KFN (including, KFN Consultant, Legal Counsels, KFN Engineering Advisor, Councillor). This meeting was to discuss other areas of interest to KFN and the NPD Closure Project Letter of Intent (LOI). CNL and KFN legal counsel discussed language in the LOI. CNL asked if KFN had an update on their EIS review.										√
October 26, 2023 Outgoing Email	This email from CNL Communications Officer to KFN is to provide an action list from the 2023 October 19 NSDF/NPD KFN-CNL monthly meeting.										√
December 19, 2023 Emails	This email from CNL Director of Communications and Engagement to KFN is to follow-up on their capacity to work with us and review the NPD materials. CNL noted the existing framework agreement in place that we can add additional schedules and funding to by a simple amendment. CNL has and will provide capacity for KFN and CNL to effectively work together, we know through dialogue at our last meeting that there is an immediate need for this funding so we are hopeful that we can get clarity in the very near term and move forward with the work and corresponding invoicing to meet both parties’ objectives. KFN confirmed they will proceed with the funding schedules for the NPD under the existing CNL KFN consultation and engagement funding agreement. KFN noted sending costs over by the 2024 January 11 meeting.										√
January 11, 2024 Meeting	This meeting between CNL (Including the Indigenous Engagement Coordinator, Communications Officers, Senior Communications Officer, Manager, and Director of Communications and Engagement, and Manager of Environmental Protection, and Environmental Specialist, Acting director of NPD, and Decommissioning Specialist), and KFN (Including Councillor, Legal Counsels, and Consultant) is to act as the January monthly meeting. Discussion included next steps for Section 82 projects, work details for NPD Closure Project (adding "Schedule D" to existing Framework Agreement), and NSDF Project update (if required).										√
January 12, 2024 Outgoing Email	This email from CNL Legal Counsel to KFN is to provide a draft amendment to the Consultation and Engagement Framework Agreement between KFN, CNL and AECL in order to incorporate a new Schedule to the Agreement which will provide the work plan and budget for the NPD Project as a Project-Specific Agreement. KFN Confirmed receipt of the draft agreement.										√
January 19, 2024 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to KFN is to follow-up from the actions from the 2024 January 11 KFN - CNL January Working Group meeting. CNL requested dates to discuss the MCECE, and the NPE EIS review.										√
January 31, 2024 Incoming Email	This email from KFN Legal Counsel to CNL Legal Counsel provided an update on the NPD amendment to the Consultation and Engagement Framework Agreement. KFN noted they were still working to prepare a workplan and budget. CNL confirmed receipt.										√
February 21, 2024 Outgoing Email	This email from a CNL Communications Officer to KFN requested KFN provide CNL with their review of the NPD EIS and other activities that KFN may identify related to the NPD Project. CNL noted the timeline for submitting the revised draft EIS and asked that the NPD Project-Specific Agreement and associated engagement schedule and initial EIS review be completed by March 15, 2024, to allow for inclusion in the revised draft EIS submission.										√
February 24, 2024 Incoming Email	This email from KFN to a CNL Communications Officer offered availability to meet with CNL to go over KFN's NPD work plan and budget on February 26, 2024.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
February 24, 2024 Incoming Email	This email from a CNL Communications Officer to KFM confirmed meeting on February 26, 2024, to discuss NPD work plan and budget. CNL requested KFN provide the draft NPD work plan and budget in advance of the meeting.										√
February 26, 2024 Meeting	This in-person meeting was held on site between CNL (including, Communications Officer, Acting Director, NPD, Manager of Communications and Engagement, Director of Communications and Engagement and Indigenous Engagement Officer) AECL (including Manager of Engagement and Communications) and, KFN (including Consultants) to discuss the proposed NPD Work Plan and Budget and amendment to the consultation framework agreement to include work on the NPD EIS. KFN presented the draft workplan to CNL.										√
March 07, 2024 Outgoing Email	This email from CNL Manager of Communications and Engagement to KFN is to request that the 2024 March monthly meeting be postponed due to the March break. KFN confirmed, and CNL proposed a new meeting date of 2024 March 19, or 20.										√
March 08, 2024 Outgoing Email	This email from CNL Communications Officer to KFN provided KFN with the draft Schedule D for the NPD work as an amendment to the Consultation and Engagement Framework Agreement. CNL also noted having material that will assist in KFN’s technical review (line item 4 in Schedule D). CNL provided KFN with NPD documents and WR-1 related information. CNL followed-up on 2024 March 13 to confirm KFN received the email from CNL. CNL sent • PostSA TSD 3rd Iteration • Chimney Swift Studies Technical Supporting Document • Comment Table on the Draft Environmental Impact Statement for the Nuclear Power Demonstration Closure Project • Federal and Provincial Technical Review with Quebec Comments – Revision 2 (2021 December) • Alternative Means Presentation.										√
March 13, 2024 Incoming Email	This email from KFN to CNL Communications Officer requested the drafted Schedule D (this was sent March 08, 2024).										√
March 13, 2024 Outgoing Email	This email from a CNL Communications Officer to KFN is to resend KFN the work plan and budget presented at the 26th meeting and the amendment to Schedule D. The document also included proposed timelines for deliverables. KFN confirmed receipt of Schedule D.										√
March 19, 2024 Outgoing Email	This email from a CNL Communications Officer to KFN requested KFN input on the outstanding item to include in the Framework Agreement Schedule D. CNL stated that once KFN is ready to sign off then the amendment will be executed.										√
March 19, 2024 Incoming Email	This email from KFN to CNL Communications Officer noted that they would follow up after a meeting with their legal counsel.										√
April 02, 2024 Outgoing email	This email from CNL Communications Officer to KFN to follow up from CNL’s email sent on 2024 March 19 looking to confirm if KFN had the opportunity to discuss the NPD costs to date so CNL and KFN can work towards finalizing the agreement amendment for NPD. KFN confirmed they are waiting on outstanding invoices, and will get back to CNL as soon as possible.										√
April 09, 2024 Emails	This email from KFN to CNL Manager of Communications and Engagement is to request the draft agenda for the 2024 April 11 KFN- AECL- CNL monthly meeting. CNL noted they would provide a draft agenda before the end of the day on April 09. CNL provided an agenda.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
April 10, 2024 Meeting	This virtual meeting between CNL (including, Communications Officers, Director of Communications and Engagement, Indigenous Engagement Officer, Legal Counsel, Senior Communications Officer, Director NPD Closure Project, NPD Decommissioning Specialist) AECL (including Manager of Engagement and Communications, and Senior Indigenous Relations Advisor and, KFN (including Consultants, and legal counsel) is to act as the 2024 April KFN - AECL - CNL monthly meeting. Discussion included updates on the NPD Work Plan and Budget, EIS feedback and review timeline.									√	√
April 18, 2024 Outgoing Email	This email from CNL Communications Officer to KFN Consultant is to follow up with KFN on their review of the NPD EIS material. KFN noted that they will provide a timeline for their review to CNL.									√	√
April 29, 2024 Outgoing Email	This email from CNL Director of Communications and Engagement to KFN is to follow-up on the KFN timeline for review for the NPD EIS. CNL noted the desire to have KFN’s comments such that concerns of the community can be included the upcoming revised draft EIS submission. CNL looked to confirm when KFNs review of the EIS can be completed.									√	√
May 01, 2024 Outgoing Email	This email from CNL Indigenous Engagement Officer to KFN is to invite KFN to the 2024 May 22 Chimney Swift night count night being held at the NPD site.										√
May 09, 2024 Meeting	This virtual meeting between CNL (including, Communications Officer, Director and Manager of Communications and Engagement, Indigenous Engagement Officer, Legal Counsel, Senior Communications Officer, Director NPD Closure Project, NPD Decommissioning Specialist and Director of Corporate Environmental Protection) AECL (including Manager of Engagement and Communications, and Senior Indigenous Relations Advisor) and, KFN (including Councillor, KFN Consultants, and legal counsel) is to act as the 2024 May KFN - AECL - CNL monthly meeting. Discussion included, the KFN letter to the CNSC on the NPD Project and the NPD EIS.									√	√
May 09, 2024 Incoming Email	This email from KFN Legal Counsel to CNL Director of Communications and Engagement is to provide CNL with a copy of the letter KFN sent to the CNSC, requesting a Procedural Order. CNL acknowledged receipt of the referenced letter.									√	
May 23, 2024 Event at NPD	KFN members attended the Chimney Swift Count Night at the NPD site.										√
May 23, 2024 Incoming Email	This email from KFN Consultant to CNL Indigenous Engagement Officer is to provide CNL with KFN's Information Requests (IR's) on the NPD Project. CNL confirmed receipt and noted further follow-up.									√	

O.2 KFN-Mapping of Key Interests and Concerns

KFN - Mapping of Key Interests and Concerns

Table O.2 presents a mapping of how the key interests and concerns relate to detailed feedback and input from KFN, as of June 2024. Table O. 2 has 3 columns:

- Column 1 identifies the topic, i.e., the subject area the key interest(s) or concern(s) falls under.
- Column 2 presents a key interest or concern, why it is important to the Indigenous Nation, community or organization, and connects it to a project aspect or an Aboriginal or treaty right wherever possible. This may be a summary of multiple related interests or concerns that have been expressed by the Indigenous Nation, community or organization.
- Column 3 presents details of the key interest or concern that the Indigenous Nation, community or organization has identified formally in writing and/or verbally to CNL.

Topic	Project Aspects of Interest/Concern	Specific feedback provided by KFN on this interest/concern
1. Alternatives	a) Alternative project options and technologies It is important that KFN and CNL collaborate on the evaluation of alternatives and that alternatives are evaluated using a balance of land use, social and cultural aspects important to KFN, because the approach selected has implications for the Algonquin people’s future use of the site. This is a project-specific concern.	In June 2022, KFN provided feedback to CNL on the interests and concerns recorded for their community. KFN identified the need to collaborate on alternative project options and technologies taking into account land use, social, and cultural impacts. KFN has concerns that internationally, the practice of “in situ” decommissioning is only permitted in the case of an emergency or an accident which does not apply in the case of the NPD Closure Project (TBD by KFN third party review).
1. Alternatives	b) Emphasis on financial costs in determining preferred alternative means. KFN is interested in understanding more fully NPD’s financial guarantee. This is a project-specific concern.	In May 2024, KFN provided an Information Request (IR) to CNL as part of KFN’s technical review of the NPD EIS. KFN is interested in the detailed cost break down for each alternative option for NPD. KFN understands that the current proposal for decommissioning the NPD site would replace the preliminary decommissioning plans that informed the basis for the NPD’s financial guarantee.
1. Alternatives	c) Technical suitability of the ISD concept KFN is inquiring about CNL’s approach to applying relevant IAEA standards. This is a project-specific concern.	In May 2024, KFN provided an Information Request (IR) to CNL as part of KFN’s technical review of the NPD EIS. KFN understands that the in-situ disposal option is not a method that has been employed yet at a Canadian-regulated nuclear facility. KFN is interested in obtaining more information on CNL’s consideration and application of IAEA standards for decommissioning and their application to the in-situ option.
2. Baseline Characterization	a) Geological site characterization It is important to KFN that baseline geological conditions are accurate and well understood, so that the long-term impacts of the NPD Closure Project can be accurately assessed. This is a project-specific interest.	During a site visit in April 2023, a Kebaowek community member asked questions about the quality of the bedrock around the facility and CNL’s characterization work. The community member was also interested in how the facility will resaturate.
3. Engagement	a) Meaningful Indigenous participation and adequate Crown consultation in environmental assessments for the NPD Closure Project and the NSDF Project; Meeting the requirements of CEAA 2012 Section 5 (c) and United Nations Declaration on the Rights of Indigenous peoples Act (UNDA) 2021. This is both a project-specific concern and a concern for the Crown.	Meaningful Indigenous participation and adequate Crown consultation in environmental assessments for the NPD Closure Project and the NSDF Project. AANTC and KFN sent a letter to the Prime Minister (May 14, 2020), which expressed consultation process concerns and a second letter was sent to the Minister of Natural Resources (August 26, 2020). This concern was reiterated in KFN’s April 2021 response to CNL’s letter outlining a preliminary commitment list for the NPD Closure Project and in KFN’s July 2021 response to CNL’s letter enclosing a summary of interests and concerns on the NPD Closure Project. KFN expressed their interest via a letter to CNL in summer 2021 to develop framework agreement with CNL. KFN is looking for Algonquin engagement protocols to be established and recognized. In June 2022, KFN reiterated that it is seeking a fair legislative opportunity to engage. KFN highlighted that Section 19 (3) CEAA (2012) provides for meaningful consultation, early engagement, and consideration of Indigenous Knowledge in EA. KFN must be provided adequate notice, relevant information, and opportunity to comment on Project Description, EIS, and draft EA as per CEAA 2012. KFN is seeking a fair legislative opportunity to engage and does not agree with CNL’s assessment of “lack of participation” by KFN. The time period of no comments was in keeping with KFN correspondence with the Federal government seeking the opportunity to engage using the evolved legislative environment (Impact Assessment Act) and UNDA 2021 and 2023 Action Plan items.
3. Engagement	b) KFN wants to ensure that consultation and/or accommodation occurs with the Algonquin Anishinaabeg rights holders. This is both a project-specific concern and a concern for the Crown.	KFN takes issue that CNL has established project “Relationship Agreements” with umbrella organizations. KFN wants to ensure that non-Indigenous or non-Section 35 rights holders’ participation in engagement with CNL and consultation with the CNSC, and Canada does not negatively impact human rights of true Algonquin Anishinaabeg rights holders. KFN has highlighted the non-Section 35 Rights holders are only entitled to

Topic	Project Aspects of Interest/Concern	Specific feedback provided by KFN on this interest/concern
		engagement. KFN seeks collective clarity from CNL and CNSC as to how the NPD assessment distinguishes engagement from consultation with non-Section 35 Rights holders. KFN seeks definition and distinction in the CNL EIS between Section 35 Rights holders and non-Section 35 Rights holders.
3. Engagement	c) Funding for Participation in NPD EA process including review of existing studies and the EIS and community consultation. It is important to KFN that they have an opportunity to review the NPD Closure Project assessment and supporting documents and that there is meaningful engagement because the project is located within the traditional territory of KFN. This is a project-specific interest.	KFN has requested an opportunity to review the existing studies and NPD Closure Project EIS. As of June 6, 2022, KFN has only reviewed the Indigenous Engagement Section of the EIS. CNL and KFN have not established a budget that will support review of the entirety of the EIS. KFN highlighted that Section 19 (3) CEAA 2012 provides for meaningful consultation, early engagement, and consideration of Indigenous Knowledge in EA. KFN is seeking, with adequate notice, the relevant information, and an opportunity to comment on the Project Description, EIS, and draft EA. Through the negotiation of the Framework Agreement, CNL understands that KFN wants to ensure that information is disseminated to, and perspectives are heard from, community members through a Community Consultation Process. The objectives of a Community Consultation Process are: - to inform the people of the First Nation regarding CNL’s designated projects. - to learn what members of the First Nation think about (i) CNL’s designated projects, (ii) how the CNL’s designated projects may affect their Aboriginal rights and interests, (iii) how they would like to participate in the review of the EIS for the NPD Closure Project (the “EIS”) and community-led studies. - to provide additional information supporting community led assessment studies relevant to the EIS.
4. EA Process and Methodology	a) Continued use of CEAA, 2012 for the NPD Closure Project rather than the new <i>Impact Assessment Act</i>. It is important to KFN that the environmental assessment be carried out using the more recent <i>Impact Assessment Act</i> because it expressly recognizes the need for reconciliation. This is not a project-specific interest.	Continued use of CEAA (2012) for the NPD Closure Project rather than the new Impact Assessment Act (May 2020 Letter to Prime Minister). KFN has communicated on numerous occasions that CEAA 2012 legislation is not in parallel with the evolving EA landscape. KFN is seeking a fair legislative opportunity to engage and does not agree with CNL’s assessment of “lack of participation” by KFN. The time period of no comments was in keeping with KFN correspondence with the Federal government seeking the opportunity to engage using the evolved legislative environment (Impact Assessment Act). Further, KFN is seeking clarity from CNL and CNSC to distinguish consultation and engagement between non-Section 35 and Section 35 Rights holders as it applies to the NPD Assessment. In May 2024, KFN provided an Information Request (IR) to CNL as part of KFN’s technical review of the NPD EIS. KFN has asked how or if CNL has considered environmental justice within its assessment highlighting that Indigenous communities are disproportionately impacted by environmental harms and underrepresented in applicable decision-making processes.
4. EA Process and Methodology	b) Concern about the methodology of the cumulative effects assessment KFN is inquiring about CNL’s assessment of cumulative effects, including CNL’s assertion that only a high-level assessment is required due to its assertions of no residual effects associated with its preferred option for the NPD Closure Project. This is a project-specific interest.	In May 2024, KFN provided an Information Request (IR) to CNL as part of KFN’s technical review of the NPD EIS that highlights topics of interests and concerns for KFN that KFN would like additional information on. KFN is inquiring about CNL’s assertion that an absence of residual effects should allow only a high-level consideration of possible cumulative effects. KFN is interested in obtaining more information on work that CNL has done on the identification, assessment, and analysis of potential cumulative effects.

Topic	Project Aspects of Interest/Concern	Specific feedback provided by KFN on this interest/concern
5. End State, Site Restoration and Future Use of the Land	a) Preparation of on-site landfills for the post-closure period KFN is inquiring into plans for managing the on-site landfills for all project alternatives. This is a project-specific interest.	In May 2024, KFN provided an Information Request (IR) to CNL as part of KFN’s technical review of the NPD EIS. KFN is looking for additional information on the two legacy landfills on the NPD site including management of the land area and continuation of monitoring, if required. Closure plans for the on-site landfills are important to KFN because it wants to ensure that the environment around the site of the NPD Closure Project is protected.
6. Environmental Effects and Mitigation Measures	a) Implementation of appropriate measures to prevent or mitigate any negative impacts from the project. KFN would like provide input on mitigation to ensure reduction and elimination of potential effects. It is important to KFN that the mitigation measures address the potential impacts on KFN, taking into consideration the importance of and balancing of interrelationships among cultural, environmental, and social elements. This is a project-specific interest.	In June 2022, KFN provided feedback to CNL on the interests and concerns recorded for their community. KFN expressed concern that appropriate measures are not being taken to prevent or mitigate any negative impacts of proposed studies, developments, or monitoring. This evaluation is to properly consider the importance of balancing interrelationships among cultural, environmental, and social elements, including Trauma Informed Impact Assessment. As of 2023 June, KFN has communicated that researching and defining CEAA 2012 project impact pathways is a priority area of interest for Kebaowek.
6. Environmental Effects and Mitigation Measures	b) Potential impacts to aquatic species from NPD decommissioning activities The Kichi-Sibi and aquatic species are of particular importance to KFN. KFN would like additional information on plans, protocols, or strategies for Indigenous engagement/consultation on potential impacts to the aquatic environment. This is a project-specific concern	In May 2024, KFN provided an Information Request (IR) to CNL as part of KFN’s technical review of the NPD EIS. KFN is seeking information relating to any aquatic <i>Species at Risk Act</i> and <i>Fisheries Act</i> permitting assessments for the NPD Closure Project and how consultation activities required by those Act, relevant agencies and MOU agreements are being undertaken. KFN is seeking more information relating to historical practices at the NPD site whereby contaminated water was released into the Kichi-Sibi. KFN is seeking more information that comprehensively assesses all potential sources of contamination from the NPD site to Kichi-Sibi as this is not clearly delineated in the most recent EIS.
7. Free Prior and Informed Consent (FPIC)	a) United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and UNDA 2021. KFN is seeking incorporation and advancement of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) including the principle of Free Prior and Informed Consent (FPIC) prior to proceeding with the proposed ISD Project. This is a project-specific concern.	KFN is seeking recognition of Algonquin jurisdiction within the context of FPIC and UNDRIP. In June 2022, KFN provided feedback to CNL on the interests and concerns recorded for their community. KFN is seeking to incorporate UN guiding Principles for Human Rights and Business and UNDRIP. Additionally, KFN highlights that the <i>IAA</i> works to advance UNDRIP, endorsed and enacted by the Government of Canada, including FPIC. KFN has identified a pilot Impact Assessment for the Temiskaming Dam Replacement Project under CEAA 2012 that takes into consideration historic rights and UNDRIP.
8. Indigenous Health	a) Methodology for conducting the Indigenous health assessment, receptors, and diet. KFN is interested in how Indigenous receptors have been defined in CNL’s assessment and how CNL meets the requirements under CSA N288.1. This is a project-specific concern.	In May 2024, KFN provided an Information Request (IR) to CNL as part of KFN’s technical review of the NPD EIS. KFN is looking for additional information on the definitions for “Indigenous People” and “Indigenous Worker” which are identified as specific receptors for calculating exposure to potential health risks.
9. Inventory	a) Inventory of the NPD disposal facility KFN is seeking further information about the nuclear waste that may remain on site and the radiological inventory of the proposed NPD disposal facility. This is a project-specific concern.	In May 2024, KFN provided an Information Request (IR) to CNL as part of KFN’s technical review of the NPD EIS. KFN wants to better understand the nuclear waste/contamination that is expected to be present at the NPD site, and requests more information on the radiological inventory (quantities and radioactivity) of the proposed NPD disposal facility.
10. Long-term Safety	a) Technical suitability of In-Situ Disposal concept It is important to KFN that CNL demonstrate the design is appropriate in terms of waste inventory, containment, grouting of the NPD structure, and international best practice, because the NPD site is located	In June 2022, KFN provided feedback to CNL on the interests and concerns recorded for their community. KFN identified the need to incorporate long-term nuclear waste effect-related concerns into the evaluation of the NPD Closure Project. This evaluation should properly account for cultural, environmental, and social concerns and interests of the community, including gender-based analysis.

Topic	Project Aspects of Interest/Concern	Specific feedback provided by KFN on this interest/concern
	within KFN traditional territory, and it is important that future users of the land at the NPD site are protected. This is a project-specific concern.	In April 2023 KFN asked questions about the waste inventory, radionuclides and their half-lives.
10. Long-term Safety	b) Long term site integrity KFN is interested in seeing examples of in-situ disposal used elsewhere and the performance of this concept. KFN wants confidence in the performance of the facility over the long-term to protect humans and the environment. This is a project-specific concern.	In May 2024, KFN provided an Information Request (IR) to CNL as part of KFN’s technical review of the NPD EIS. KFN is inquiring about the comparative studies and assessments for in-situ disposal used by CNL and how they account for the significant differences in surface ecology and climate at NPD, as well as impacts to subsurface conditions and behaviour at less than 5m depth. KFN is inquiring about social and cultural considerations in CNL’s comparisons between analogous sites for their proposed NPD in-situ disposal.
10. Long-term Safety	c) Potential effects of the environment on the facility KFN is seeking more information about how CNL determines whether or to what extent environmental events may affect the long-term safety of the facility. This is a project-specific concern.	In May 2024, KFN provided an Information Request (IR) to CNL as part of KFN’s technical review of the NPD EIS. KFN seeks more information about potential impacts of extreme weather or natural hazards on the NPD facility. KFN is interested to understand how the effects of extreme weather, climate change including storm projections and severe forest fires are considered in the NPD Closure Project’s assessment. KFN is also interested in the effect of seismic events on long term safety.
11. Monitoring	a) Current monitoring and impacts from site operation. KFN is interested to understand CNL’s past environmental performance at the NPD site via access to environmental monitoring plans and data. This is a project-specific concern.	In April 2023 KFN asked questions about the operational history, accidents, and details of the NPD intake/outfall. KFN was interested to know if there was a sediment plume at the outfall for NPD similar to the contaminated Ottawa riverbed sediments near the Chalk River site. In May 2024, KFN provided an Information Request (IR) to CNL as part of KFN’s technical review of the NPD EIS. KFN is interested in learning more about the current routine environmental monitoring at NPD. KFN is concerned that there is no publicly accessible Environmental Risk Assessment (ERA) or other publicly accessible source of monitoring data or monitoring plan descriptions for the NPD Closure Project. KFN requires a more comprehensive list and description of routine monitoring activities.
11. Monitoring	b) EA Follow-up Monitoring KFN is interested in the proposed EA follow-up monitoring plans, especially comprehensive descriptions of monitoring pathways, locations, and frequencies. This is a project-specific concern.	In May 2024, KFN provided an Information Request (IR) to CNL as part of KFN’s technical review of the NPD EIS.
12. Protection of Flora and Fauna	a) Biota and Species at Risk KFN is inquiring about the potential impacts to Chimney Swifts from remedial and closure activities for the NPD ventilation stack. This is a project-specific concern	In May 2024, KFN provided an Information Request (IR) to CNL as part of KFN’s technical review of the NPD EIS. KFN is inquiring about potential impacts to the chimney swift. KFN is interested in current contaminant levels present in the stack, specifically frequency of stack monitoring, sampling methodologies, and disaggregated monitoring results.
12. Protection of Flora and Fauna	b) Species at Risk permits. KFN is inquiring about a lack of engagement/consultation during the SAR permitting process. This is a project-specific concern.	In May 2024, KFN provided an Information Request (IR) to CNL as part of KFN’s technical review of the NPD EIS. KFN is interested in the constitutional and regulatory aspects of species at risk permitting assessments. Specifically, KFN is looking for actions taken and status on CNL’s plans, protocols, or strategies for Indigenous engagement/consultation on species at risk.
13. Protection of the Ottawa River	a) KFN expressed concern about watershed sustainability. As stewards of the lands and waters, it is important to KFN that the environment around the site of the NPD Closure Project including the Ottawa River is protected. KFN exercises rights and carries out traditional and contemporary activities, many of which rely on the health and well-being of the Ottawa River to maintain the health of the Anishnabeg Peoples.	In June 2022, KFN provided feedback to CNL on the interests and concerns recorded for their community. KFN identified the need to incorporate watershed sustainability concerns into the NPD EIS. This evaluation should properly account for cultural, environmental, and social concerns and interests of the community, including gender-based analysis.

Topic	Project Aspects of Interest/Concern	Specific feedback provided by KFN on this interest/concern
	This is a project-specific concern.	
13. Protection of the Ottawa River	b) Impacts on groundwater and surface water quality KFN is inquiring about contamination releases to surface water during proposed decommissioning activities on the NPD site. As stewards of the lands and waters, it is important to KFN that the Ottawa River is protected. This is a project-specific concern.	In May 2024, KFN provided an Information Request (IR) to CNL as part of KFN’s technical review of the NPD EIS. KFN is concerned that the Ottawa River is protected. KFN is interested in both historic liquid effluent discharge practices for the NPD facility sumps to the Ottawa River, as well as the current process involved in transferring the wastewater to the CRL site. KFN is also inquiring about the additional potential sources or pathways of liquid emissions from the NPD site during proposed decommissioning: the two tile drainage systems on site; stormwater channels (surface ditches); an equipment washout pit, and potential wastewater generated by the proposed grout mixing plant for the NPD decommissioning activities. It is unclear to KFN from the EIS how all these potential sources of water contamination will be addressed in proposed decommissioning activities. Further, KFN is also interested in any studies, assessments, or documents specifically relating to whether expected releases to surface water may require a <i>Fisheries Act</i> authorization.
14. Technical	a) Technical details for the batch mixing plant. It is important for KFN to understand CNL’s plans for the proposed batch mixing plant to ensure that potential effects on the aquatic environment are properly assessed. This is a project-specific concern.	In May 2024, KFN provided an Information Request (IR) to CNL as part of KFN’s technical review of the NPD EIS. KFN is interested in the technical details of the batch mixing plant including additional information on the water source, volume, or intake rate required for the grout mixing plant.
15. Traditional Land and Resource Use and Cultural Impacts	a) Algonquin traditional knowledge should be collected and incorporated into the EIS. It is important to KFN that CNL solicit and use KFN’s community-specific knowledge in order to properly characterize current site conditions, develop scenarios that accurately represent potential future uses of the site, and ensure that species and traditional uses are properly considered by the project. This is a project-specific concern.	KFN is seeking recognition and support of Algonquin community-led assessment. In June 2022, KFN provided feedback to CNL on the interests and concerns recorded for their community. KFN identified that traditional knowledge needed to be properly incorporated and considered within the EIS. KFN also identified their capacity to carry out independent studies as part of environmental, social, and cultural impact-assessment processes, with due regard to ownership of and the need for the protection and safeguarding of traditional knowledge. KFN is seeking to collaborate with CNL on appropriate land use, social, and cultural impact study methodologies with suitable timeframes to implement studies within a mutually agreed upon consultation framework agreement. As noted through the framework agreement, KFN was interested in several studies for the NSDF project that may be applicable to NPD. These supplemental Indigenous-led studies are related to Indigenous land and resource use, occupancy, socio-economic conditions, health and well-being and knowledge verification, applicable for CNL’s designated projects: • Terrestrial animals’ displacement, engineering and resettlement effects and traditional use assessment • Historical overview, displacement and resettlement effects, spatial and temporal boundaries, ceremonial jurisdiction • Baseline overview, historical effects, cumulative effects of CNL’s sites
16. Valued Components	a) Selection of valued components KFN is interested in the identification, selection, and assessment of “candidate species” (i.e., VCs) This is a project-specific concern.	In May 2024, KFN provided an Information Request (IR) to CNL as part of KFN’s technical review of the NPD EIS. KFN is interested to understand how VCs at all trophic levels were selected for the project, as well as the frequency and duration of any field studies to confirm the selection of VCs, and any further assessments relating to CNL’s application of an “ecosystem approach” to the identification and representativeness of VCs for the project.

O.3 Kebaowek First Nation – Summary of Interests and Concerns

Table O.3 below summarizes the key interests and concerns that Kebaowek First Nation (KFN) have raised on the NPD Closure Project, up to June 2024. CNL also includes engagement beyond this cut-off date in order to capture receiving KFN’s preliminary EIS review comments. KFN is part of the AANTC and did not submit separately comments on the 2017 draft EIS. As noted above, the full submission of AANTC comments on the 2017 draft EIS can be found online: [Comments on the 2017 draft EIS for NPD from Algonquin Anishinabeg Nation Tribal Council](#).

Table O.3 has five columns:

- Column 1 identifies the topic, i.e., the subject area the key interest(s) or concern(s) falls under.
- Column 2 presents a key interest or concern, and why it is important to the Indigenous Nation, community or organization. This interest or concern is also connected to a project aspect or an Aboriginal or treaty right wherever possible. This column may present a summary of multiple related interests or concerns that have been expressed by the Indigenous Nation, community or organization.
- Column 3 summarizes CNL’s response or conclusions as well as CNL’s efforts to address this key interest or concern.
- Column 4 identifies where in the EIS the key interest or concern is addressed, and whether any changes were made to the EIS in response to the interest/concern. If these changes resulted in a different outcome in the EIS, this is also discussed;
- Column 5 summarizes the “Status” of the key interest or concern and the anticipated Next Steps towards achieving resolution of the key interest or concern. Not all concerns can be quickly or easily resolved, as some concerns go beyond the scope of the EA process, or there may divergent perspectives on certain interests or concerns. Note: this column does not, unless specifically confirmed by the Indigenous Nation, community or organization, mean that they have verified that the interest or concern has been dealt with to their satisfaction.

The summary of KFN *Key Interests and Concerns* are derived from CNL’s various engagements with KFN, including oral and written correspondence since 2016 when CNL introduced the NPD Closure Project proposal. Of note, KFN submitted information requests (IRs) to CNL on May 23, 2024, for specific topic areas where more information and data is required (as indicated below), based on KFN’s technical review of the EIS. It is understood that the specific topic areas identified through the IRs are based on KFN’s preliminary review of the EIS and does not constitute specific issues of concern for KFN as it remains too early in the review process for KFN to make this determination. CNL recognizes that KFN’s review and assessment of the draft EIS remains underway, and therefore, the interests and concerns of KFN as described may change once the review and studies are completed and such changes will be captured in the final EIS.

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
1. Alternatives	a) Alternative project options and technologies It is important that KFN and CNL collaborate on the evaluation of alternatives and that alternatives are evaluated using a balance of land use, social and cultural aspects important to KFN, because the approach selected has implications for the Algonquin people’s future use of the site. This is a project-specific concern.	CNL would be happy to provide an overview of the in-situ disposal concept to KFN, including how CNL conducted the alternative means assessment (AMA) and why in-situ disposal is the preferred approach. KFN has requested further information from CNL on this issue as the most recent EIS does not contain enough information for its third party experts to conduct their assessments. CNL shared with KFN the requested supplemental reference documents in July 2024. Further discussions may proceed after CNL responds to KFN’s requests (planned for Fall 2024). <u>CNL Response:</u> When conducting the AMA, CNL followed the regulatory framework laid out in the Canadian Environmental Assessment Agency (CEAA) Operational Policy Statement: Addressing “Purpose of” and “Alternative Means” under the <i>Canadian Environmental Assessment Act, 2012 (CEAA 2012)</i> for the evaluation. of alternatives. The level of analysis conducted for each alternative is consistent with the <i>CEAA</i> requirements. The NPD site has been safely managed for over 55 years. CNL is reducing the waste liability by converting the waste into a form that provides safe, permanent waste disposal. CNL agrees that protection of future land users is an important concern and has addressed this subject. CNL has assessed the suitability of in-situ disposal for the NPD site, and the EIS shows that such a disposal option is safe for human health and the environment in the short term and long term. Based on its consideration of national and international standards and	<u>Where is this topic discussed in the EIS?</u> Alternative means are discussed in the Alternative Means Assessment TSD (64-509200-ASD-002 Revision 1) and Section 4.2 of the EIS. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback (received June 2022).	<u>Status:</u> Outstanding CNL understands that project alternatives are an area of interest for KFN, and respects that KFN has a different opinion on the most suitable decommissioning approach for NPD. CNL maintains that the proposed in-situ disposal is the preferred option to undergo an environmental assessment (EA) and will await the outcome of the CNSC’s decision on the Project. CNL remains committed to ongoing engagement with KFN within CNL’s role as the project proponent. <u>Next Steps:</u> KFN has requested further information from CNL on topics of importance to KFN as the most recent EIS does not contain enough information for its third party experts to conduct their assessments. CNL will provide responses in writing to its queries on this issue. Through engagement, CNL hopes that the parties are able to find common ground on this topic, including the development of

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
		guidelines, CNL continues to believe that the NPD facility has characteristics that support in-situ disposal. CNL is committed to meeting with KFN to hear community perspectives on alternatives.		commitments to build confidence and trust in the in-situ disposal concept.
1. Alternatives	b) Emphasis on financial costs in determining preferred alternative means. KFN is interested in understanding more fully NPD's financial guarantee. This is a project-specific concern.	CNL would be happy to provide an overview of the in-situ disposal concept to KFN, including how CNL conducted the AMA and why in-situ disposal is the preferred approach. KFN has requested further information from CNL on this issue as the most recent EIS does not contain enough information for its third party experts to conduct their assessments. CNL shared with KFN the requested supplemental reference documents in July 2024. Further discussions may proceed after CNL responds to KFN's requests (planned for Fall 2024). <u>CNL Response:</u> CNL's role is to determine the most effective method to safely and securely manage the nuclear liabilities at the NPD site. In alignment with the CEAA Operational Policy Statement: Addressing "Purpose of" and "Alternative Means" under the CEAA (2012), an AMA was completed. According to the AMA, in-situ disposal was not determined to be the fastest and cheapest of all the options, however in-situ disposal was the most preferable based on several factors such as technical feasibility (proven technology and compliance with regulatory requirements), financial feasibility and effects on the people and the environment. CNL evaluated the various options based on an analysis of not only the technical possibilities, but also of their costs to lead to a decision that is in the best interests of Canada. In-situ disposal was found to be the preferred means for completing the NPD Closure Project, an option which was supported by AECL to undergo an EA.	<u>Where is this topic discussed in the EIS?</u> Alternative means are discussed in the Alternative Means Assessment TSD (64-509200-ASD-002 Revision 1) and Section 4.2 of the EIS. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback (received May 2024).	<u>Status:</u> Outstanding CNL understands that project alternatives are an area of interest for KFN, and respects that KFN has a different opinion on the most suitable decommissioning approach for NPD. CNL maintains that the proposed in-situ disposal is the preferred option to undergo an EA and will await the outcome of the CNSC's decision on the Project. CNL remains committed to ongoing engagement with KFN within CNL's role as the project proponent. <u>Next Steps:</u> KFN has requested further information from CNL on topics of importance to KFN as the most recent EIS does not contain enough information for its third party experts to conduct their assessments. CNL will provide responses in writing to its queries on this issue. Through engagement, CNL hopes that the parties are able to find common ground on this topic, including the development of commitments to build confidence and trust in the in-situ disposal concept.
1. Alternatives	c) Technical suitability of the ISD concept KFN is inquiring about CNL's approach to applying relevant IAEA standards. This is a project-specific concern.	CNL would be happy to provide an overview of the in-situ disposal concept to KFN, including how CNL conducted the AMA and why in-situ disposal is the preferred approach. KFN has requested further information from CNL on this issue as the most recent EIS does not contain enough information for its third party experts to conduct their assessments. CNL shared with KFN the requested supplemental reference documents in July 2024. Further discussions may proceed after CNL responds to KFN's requests (planned for Fall 2024). <u>CNL Response:</u> The proposal to create a disposal facility on the NPD reactor site through in-situ decommissioning has been chosen as a safe and immediate decommissioning option for the NPD reactor with respect to	<u>Where is this topic discussed in the EIS?</u> Alternative means are discussed in the Alternative Means Assessment TSD (64-509200-ASD-002 Revision 1) and Section 4.2 of the EIS. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback (received May 2024).	<u>Status:</u> Outstanding CNL understands that project alternatives are an area of interest for KFN, and respects that KFN has a different opinion on the most suitable decommissioning approach for NPD. CNL maintains that the proposed in-situ disposal is the preferred option to undergo an EA and will await the outcome of the CNSC's decision on the Project. CNL remains committed to ongoing engagement with KFN within CNL's role as the project proponent.

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
		the environment, workers, and the public. It is important to highlight that this closure will reduce historic nuclear liabilities for Canada and, at the same time, reduce the footprint of the NPD site. CNL believes that the risks associated with in-situ disposal are lower than other options. In-situ disposal is a well-known technique used since the 1960's at many nuclear sites worldwide. Sites contaminated with toxic and hazardous wastes are also remediated using this technique. This approach requires the project to apply for a license as a disposal facility, and hence the facility must also meet the regulations for a disposal facility. In the case of the NPD reactor, the decommissioning strategy is to incorporate the reactor into a new disposal facility, which is in accordance with the IAEA definition of decommissioning, IAEA Safety Glossary (IAEA 2019). This strategy also meets the Canadian regulatory requirements, in particular the requirements of Section 5.1 of REGDOC-2.11.2, Decommissioning. Therefore, entombment is not being used as a decommissioning strategy for the decommissioning of the NPD reactor. The NPD reactor has a low inventory. Tritium is the major radionuclide and will decay to low levels during the Institutional Control period. The longer-lived Intermediate Level Waste (ILW) consists of small quantities of low energy beta emitters. The beta emitters have low radiotoxicity and do not generate heat. These are activation products inside the metal of the calandria in the reactor vault. The reactor vault is reinforced concrete with walls 3 m thick located around 10 m below grade in bedrock. The location of the reactor vault isolates the wastes making it hard to access. These are all features that are consistent with IAEA Safety Standard SSR-5, Disposal of Radioactive Waste, regarding cavern or vault disposal for ILW. CNL has written a report summarizing facilities worldwide that use in-situ disposal, (Aikens 2019b). The report is not limited to nuclear reactors or processing facilities and includes mines and hazardous waste sites. The report also describes what each of the facilities have in common, why in-situ disposal is the preferred approach and how it applies to NPD. In summary, in-situ disposal is a viable option for NPD. It is CNL's belief that the NPD facility has characteristics that support in-situ disposal. CNL is committed to ongoing engagement with KFN to gain a greater understanding of their concerns about the long-term safety of nuclear waste.		<u>Next Steps:</u> KFN has requested further information from CNL on topics of importance to KFN as the most recent EIS does not contain enough information for its third party experts to conduct their assessments. CNL will provide responses in writing to its queries on this issue. Through engagement, CNL hopes that the parties are able to find common ground on this topic, including the development of commitments to build confidence and trust in the in-situ disposal concept.
2. Baseline Characterization	a) Geological site characterization It is important to KFN that baseline geological conditions are accurate and well understood, so that the long-term impacts of the NPD Closure Project can be accurately assessed.	During the April 2023 site visit CNL summarized verbally some of the geologic and site investigation undertaken to support the project. As a follow-up, CNL shared the Geosynthesis report. <u>CNL Response:</u> In 2018/19 CNL undertook a geoscientific fieldwork campaign to sample and characterize the bedrock around the NPD facility. The fieldwork	<u>Where is this topic discussed in the EIS?</u> Section 8.5 of the EIS presents the geological baseline data. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in	<u>Status:</u> Resolution in Progress The amendment to the Framework Agreement was executed by the parties and came into effect as of July 2024. CNL remains committed to ongoing

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
	This is a project-specific interest	included coring of 10 boreholes to a depth of 50 metres into bedrock and several overburden boreholes, with installation of wells for sampling and hydraulic property determinations. The Geoscientific Characterization Report was used to revise the Geosynthesis report and the various models (i.e., Groundwater Model, Resaturation Model). The results of these reports were incorporated into PostSA TSD, enabling CNL to assess potential effects to valued components (VC) in the aquatic and terrestrial ecosystems. The additional field investigations and updated models support the conclusion that the NPD Closure Project is protective of human health and the environment.	response to this feedback (received June 2022).	engagement with KFN within CNL’s role as the project proponent. <u>Next Steps:</u> CNL and KFN continue to work together towards the development of a work plan on key topics of interest for KFN, enabled through the Framework Agreement.
3. Engagement	a) Meaningful Indigenous participation and adequate Crown consultation in environmental assessments for the NPD Closure Project and the NSDF Project; Meeting the requirements of CEAA 2012 Section 5 (c) and United Nations Declaration on the Rights of Indigenous peoples Act (UNDA) 2021. This is both a project-specific concern and a concern for the Crown.	CNL heard KFN’s concern about meaningful Indigenous participation in the EA for the NPD Closure Project. CNL has sought feedback from, and offered engagement opportunities for, KFN on numerous occasions since the beginning of the project and signed a Letter of Intent for the development of a Framework Agreement. The Framework Agreement was signed in January 2023 detailing how CNL and KFN engage on CNL activities and projects, including the NPD Closure Project. <u>CNL Response:</u> For the NPD Closure Project, the responsibility for assessing that adequate Crown consultation has been undertaken falls with the CNSC. CNL recognizes that the number of emails, meetings, and phone calls does not equate to meaningful consultation. At its core, meaningful consultation is demonstrating integrity through a purposeful attempt to understand and address concerns through the context of reconciliation. CNL is committed to open, transparent, and continuing engagement with KFN within its role as the project proponent. CNL continues to communicate with, and provide engagement opportunities for, KFN. In April 2023, KFN visited the NPD site and had initial discussions about the project. CNL is looking forward to building an NPD specific work plan under the Framework Agreement to work on addressing areas of interest and concern from KFN. <u>Engagement Highlights:</u> CNL first reached out to KFN in 2016 with two letters addressed to the Chief; both letters shared information and one inquired on traditional land use. As a part of the AANTC, KFN attended an introductory project meeting between the AANTC and CNL in 2017 April to share project information and hear feedback from the AANTC leadership. The CNL presentation included: site location, project components and timeline, species at risk, proposed end state, and safety barriers for the protection of the environment. In June 2020, CNL and AANTC, including KFN began a discussion on a contribution agreement to support KFN’s participation in the EA process.	<u>Where is this topic discussed in the EIS?</u> Section 6.2 4.6.1 of the EIS summarizes CNL engagement with KFN including signing a Letter of Intent and a Framework Agreement that details how CNL and KFN engage on CNL activities and projects, including the NPD Closure Project. <u>What changes have been made (and where)?</u> CNL has updated Section 6.2.4.6.1 of the EIS to reflect new and planned engagement activities to support KFN’s meaningful participation in the EA process.	<u>Status:</u> Resolution in Progress CNL remains committed to ongoing engagement with KFN within CNL’s role as the project proponent. It is noted that this topic extends beyond the scope of the NPD Closure Project. <u>Next Steps:</u> CNL and KFN continue to work together towards the development of a work plan on key topics of interest for KFN, enabled through the Framework Agreement.

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
		Although CNL attempted further correspondence with KFN through July and August 2020, in September 2020, the AANTC informed CNL that they would not be willing to meet again until the latest letter, sent to the Minister, received a response. CNL sought feedback from KFN in 2021 on preliminary project commitments and on the summary of interests and concerns. In July 2021 CNL and KFN agreed to move forward with the development of a framework agreement with CNL, with the first step being a Letter of Intent. Two-way communication (correspondence and meetings) in the second half of 2021 resulted in a signed Letter of Intent between CNL and KFN in January 2022. CNL and KFN signed a framework agreement in January 2023. The amendment to the Framework Agreement was executed by the parties and came into effect as of July 2024.		
3. Engagement	b) KFN wants to ensure that consultation and/or accommodation occurs with the Algonquin Anishinaabeg rights holders. This is both a project-specific concern and a concern for the Crown.	<u>CNL Response:</u> CNL appreciates and understands the feedback that as a rights holding Indigenous Nation, KFN needs to be consulted with and engaged directly, and through the right processes with the right representatives. CNL understands the importance of establishing a unique relationship with KFN to ensure that they may bring forward any concerns or interest they have specific to the rights held collectively by the Nation. CNL is committed to building positive long-term relationships with Indigenous Nations and communities who have treaty and Aboriginal rights on the lands for the proposed NPD disposal facility, as well as working with other interested Indigenous Nations, communities and organizations. CNL will continue to directly build a relationship with KFN in a way that KFN wants to be engaged.	<u>Where is this topic discussed in the EIS?</u> CNL presents its record of engagement with all Indigenous Nations, communities and organizations in Section 6.2.4 of the EIS. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback.	<u>Status:</u> Outstanding The amendment to the Framework Agreement was executed by the parties and came into effect as of July 2024. CNL understands that this concern remains outstanding for KFN until CNL and CNSC provide clarity on how the NPD assessment distinguishes engagement from consultation with non-Section 35 Rights holders. CNL remains committed to ongoing engagement with KFN within its role as the project proponent. It is noted that this topic extends beyond the scope of the NPD Closure Project. <u>Next Steps:</u> CNL and KFN continue to work together towards the development of a work plan on key topics of interest for KFN, enabled through the Framework Agreement.
3. Engagement	c) Funding for Participation in NPD EA process including review of existing studies and the EIS and community consultation. It is important to KFN that they have an opportunity to review the NPD Closure Project assessment and supporting documents and that there is meaningful engagement because the	<u>CNL Response:</u> CNL is committed to open, transparent, and continuing engagement with KFN. CNL and KFN have entered into a Framework Agreement, which provides for engagement directly between the parties on the NPD Closure Project as well as capacity funding to support KFN's participation in the EA process. As the engagement has deepened, it is expected that work on NPD will include disseminating communications	<u>Where is this topic discussed in the EIS?</u> Section 6.2.4.6.1 of the EIS summarizes CNL engagement with KFN to date. <u>What changes have been made (and where)?</u> CNL has updated Section 6.2.4.6.1 of the EIS to reflect new and planned engagement activities to support KFN's meaningful participation in	<u>Status:</u> Resolution in Progress The amendment to the Framework Agreement was executed by the parties and came into effect as of July 2024. A work plan is being developed which will identify, amongst other things, capacity to support review of existing studies and the EIS.

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
	project is located within the traditional territory of KFN. This is a project-specific interest.	materials and capturing community members’ perspectives on the NPD Closure Project. CNL looks forward to meaningful engagement with KFN accomplished in good faith by all to understand KFN’s concerns and work towards addressing them together.	the EA process.	CNL remains committed to ongoing engagement with KFN within CNL’s role as the project proponent. <u>Next Steps:</u> CNL and KFN continue to work together towards the development of a work plan on key topics of interest for KFN, enabled through the Framework Agreement.
4. EA Process and Methodology	a) Continued use of <i>CEAA</i> , 2012 for the NPD Closure Project rather than the new <i>Impact Assessment Act</i> . It is important to KFN that the environmental assessment be carried out using the more recent <i>Impact Assessment Act</i> because it expressly recognizes the need for reconciliation. This is not a project-specific interest.	No actions – the NPD Closure Project EA will continue under <i>CEAA</i> (2012). <u>CNL Response:</u> Note this concern was raised with the Federal Government. While the topic of regulatory requirements for an EA process is broad and not specific to the NPD Closure Project, KFN’s comments were directed at the regulatory regime under which the NPD Closure Project should be assessed. As per direction from the CNSC and transitional provisions of the <i>Impact Assessment Act</i> , CNL is continuing its EA for the NPD Closure Project under <i>CEAA</i> (2012). Letter to CNL - Changes to Federal Legislation . CNL recognizes that what KFN is requesting is consistent with the new provisions and commitments under the <i>Impact Assessment Act (IAA)</i> but is beyond the scope of <i>CEAA</i> (2012) and this EA, and therefore is not required to be considered. The final NPD EIS will meet the requirements of <i>CEAA</i> (2012) but will also incorporate good practices consistent with the <i>IAA</i> .	<u>Where is this topic discussed in the EIS?</u> Section 3.5 of the EIS summarizes the regulatory framework for the NPD Closure Project. Section 6.4 outlines CNL’s approach and commitment to reconciliation. <u>What changes have been made (and where)?</u> Section 3.5 of the EIS reflects the provisions in subsection 182 of the <i>IAA</i> for continuation of ongoing projects under <i>CEAA</i> (2012).	<u>Status:</u> Resolved For the NPD Closure Project, CNL considers this concern addressed by the revisions to the EIS that provide the regulatory framework and outline CNL’s approach and commitment to reconciliation. While KFN may still prefer that the project is subject to the <i>Impact Assessment Act</i> , the CNSC has determined that the project will be evaluated under <i>CEAA</i> (2012). CNL understands that this concern remains outstanding for KFN until CNL and CNSC provide clarity on how the NPD assessment distinguishes engagement from consultation with non-Section 35 Rights holders. <u>Next Steps:</u> CNL and KFN continue to work together towards the development of a work plan on key topics of interest for KFN, enabled through the Framework Agreement. KFN has requested further information from CNL on the environmental justice issue as the most recent EIS does not contain enough information for its third party experts to conduct their assessments. CNL will provide responses in writing to KFN’s queries on this issue.
4. EA Process and Methodology	b) Concern about the methodology of the cumulative effects assessment KFN is inquiring about CNL’s assessment of cumulative effects, including CNL’s assertion that only a high-level assessment is required due to its assertions of no residual effects associated with its preferred option for the NPD Closure Project.	<u>CNL Response:</u> CNL’s view is that a cumulative effects assessment is required only where adverse residual effects have been identified, a position consistent with <i>CEAA</i> (2012). The EIS identified no adverse residual effects are expected to occur from the NPD Closure Project. According to <i>CEAA</i> (2012), cumulative effects assessment is not required for negligible potential effects. Therefore, conducting a cumulative effects	<u>Where is this topic discussed in the EIS?</u> Section 9.13 of the EIS provides the process for evaluating cumulative effects and the assessment of cumulative effects for the NPD Closure Project. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in	<u>Status:</u> Resolution in Progress CNL’s technical assessment was conducted in accordance with the requirements of <i>CEAA</i> (2012). CNL understands that assessment of cumulative effects is an area of concern for KFN. The amendment to the Framework

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	This is a project-specific interest.	assessment would be beyond the scope of <i>CEAA</i> (2012) and this EA.	response to this feedback (received May 2024).	Agreement was executed by the parties and came into effect as of July 2024. CNL remains committed to ongoing engagement with KFN within CNL’s role as the project proponent. <u>Next Steps:</u> CNL and KFN continue to work together towards the development of a work plan on key topics of interest for KFN, enabled through the Framework Agreement. KFN has requested further information from CNL on topics of importance to KFN as the most recent EIS does not contain enough information for its third party experts to conduct their assessments. CNL will provide responses in writing to its queries on this issue.
5. End State, Site Restoration and Future Use of the Land	a) Preparation of on-site landfills for the post-closure period KFN is inquiring about plans for managing the on-site landfills for all project alternatives. This is a project-specific interest.	<u>CNL Response:</u> CNL acknowledges KFN’s request for more information on the landfill areas at the NPD site. Groundwater near the landfills has been assessed through comprehensive campaigns in 2014 and 2017 and no groundwater impacts were noted related to the landfills. Landfill #1 was used for conventional purposes (e.g., office and cafeteria waste) during the operation of the facility and has a certificate of approval (A413107) from the Ontario MOECC acknowledging closure of the landfill. The certificate of approval includes conditions for regular inspections of Landfill #1. An annual inspection takes place which includes inspecting the landfill for settlement or fallen trees, ensuring survey markers and sign posts are not damaged and ensuring the general aesthetics are maintained. In terms of the impact to the environment from Landfill #1, minor greenhouse gases are emitted from the decomposition of organic matter (wood, cafeteria waste). These emissions are insignificant - approximately 128 tonnes of CO₂ equivalent per year, which is much lower than the reporting threshold to Environment and Climate Change Canada of 10,000 tons of CO₂ equivalent per year. Groundwater quality around Landfill #1 has been evaluated several times over the years (summarized in Section 8.5.6.1 of the Environmental Impact Statement (EIS)). The campaigns assessed radiological, inorganic, and organic water quality and concluded that there was no contaminant concentrations in groundwater that exceeds available federal water quality guidelines for drinking water. Landfill #1 will undergo annual inspections indefinitely. No other assessment or preparation of Landfill #1 is required. Landfill #2 was used as a laydown area during construction of the site and contains mainly construction rubble. An assessment of groundwater	<u>Where is this topic discussed in the EIS?</u> The former landfills are introduced in Section 3.3.1 of the EIS (Structures at the NPD Site). General plans for restoration and end state are described in Section 4.3.1.9 of the EIS. Section 8.5 describes the geology and baseline characterization near the former landfills. Landfill monitoring activities are discussed in Section 12 of the EIS. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback (received May 2024).	<u>Status:</u> Resolution in Progress CNL understands that ensuring that lands on and in the vicinity of the NPD site are responsibly managed is an area of concern for KFN. The amendment to the Framework Agreement was executed by the parties and came into effect as of July 2024. CNL remains committed to ongoing engagement with KFN within CNL’s role as the project proponent. <u>Next Steps:</u> CNL and KFN continue to work together towards the development of a work plan on key topics of interest for KFN, enabled through the Framework Agreement. KFN has requested further information from CNL on topics of importance to KFN as the most recent EIS does not contain enough information for its third party experts to conduct their assessments. CNL will provide responses in writing to its queries on this issue.

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		quality around Landfill 2 was undertaken in 2014 (see Section 8.5.6.1 of the EIS). One of the sample locations north-east of Landfill 2 showed manganese concentrations in exceedance of the Health Canada Drinking Water standards, but the study concluded that this value is likely not due to contamination, and that no groundwater issues were noted for NPD. Manganese is a naturally occurring metal and is abundant. For example, wells in background areas of the Chalk River Laboratories Site (unaffected by site operations) have natural Manganese concentrations up to 800 ug/L. Because it is not a registered landfill, no annual inspections will be required for Landfill #2. No other assessment or preparation of Landfill #2 is required.		
6. Environmental Effects and Mitigation Measures	a) Implementation of appropriate measures to prevent or mitigate any negative impacts from the project. KFN would like to provide input on mitigation to ensure reduction and elimination of potential effects. It is important to KFN that the mitigation measures address the potential impacts on KFN, taking into consideration the importance of and balancing of interrelationships among cultural, environmental, and social elements. This is a project-specific interest.	<u>CNL Response:</u> The EIS identified no adverse residual effects as a result of the project. CNL is continuing its efforts to address concerns related to potential effects and mitigation measures by offering an opportunity to all Indigenous Nations, communities and organizations to be involved in monitoring activities that will confirm the conclusions of the EIS. An Indigenous-driven monitoring program can help build confidence that the decommissioning strategy and mitigation measures are effective. CNL stands by its conclusion that the project will not interfere with traditional activities nor impact biological resources upon which they are dependent. However, CNL is open to increased engagement, education, and participatory involvement in monitoring activities at CNL operated sites to help alleviate any concerns.	<u>Where is this topic discussed in the EIS?</u> Section 10 of the EIS, specifically Table 10.3-1 summarized the mitigation measures identified for the various environmental components assessed under this EIS. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback (received June 2022).	<u>Status:</u> Resolution in Progress CNL understands that further discussions are needed with KFN to help address this concern, based on feedback received in May 2024. The amendment to the Framework Agreement was executed by the parties and came into effect as of July 2024. CNL understands that researching and defining <i>CEAA</i> (2012) project impact pathways is a priority area of interest for KFN. CNL remains committed to ongoing engagement with KFN within CNL’s role as the project proponent. <u>Next Steps:</u> CNL and KFN continue to work together towards the development of a work plan on key topics of interest for KFN, enabled through the Framework Agreement. Forward engagement between CNL and KFN may result in specific project commitments on additional mitigations measures that will enhance confidence and trust that negative impacts are minimized.
6. Environmental Effects and Mitigation Measures	b) Potential impacts to aquatic species from NPD decommissioning activities The Kichi-Sibi and aquatic species are of particular importance to KFN. KFN would like additional information on plans, protocols, or strategies for Indigenous	<u>CNL Response:</u> CNL agrees that protection of aquatic species in the Ottawa is important. The EIS demonstrated there are no predicted adverse impacts from the project on aquatic species. To supplement baseline data, a study of sediment, benthic invertebrates and fish habitat features was undertaken upstream, adjacent to and	<u>Where is this topic discussed in the EIS?</u> The EIS does not predict any adverse residual effects on the Surface Water Environment (Section 9.3.3.5) or the aquatic environment (Section 9.4.3.5). CNL has developed mitigation measures and draft follow-up monitoring plans for the protection of the	<u>Status:</u> Resolution in Progress CNL understands that further discussions are needed with KFN to help address this concern, based on feedback received in May 2024. The amendment to the Framework

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	engagement/consultation on potential impacts to the aquatic environment. This is a project-specific concern.	downstream of the NPD site in 2020. The study determined that the Ottawa River benthic invertebrate community near NPD is healthy and typical of what is observed in many large, soft-bottomed, relatively deep river systems. This study can be repeated when decommissioning is complete, to verify if the project has had an impact. CNL is planning to regularly monitor the Ottawa River water quality before the project begins. CNL is willing to discuss fish tissue sampling with KFN and review past studies of fish tissue in the NPD area. Follow-up monitoring for the NPD Closure Project will include monitoring of the Ottawa River to verify that there are no effects.	Kichi-Sibi (Sections 9.3.3.2 and 12.3 of the EIS). <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback (received May 2024).	Agreement was executed by the parties and came into effect as of July 2024. CNL remains committed to ongoing engagement with KFN within CNL's role as the project proponent. <u>Next Steps:</u> CNL and KFN continue to work together towards the development of a work plan on key topics of interest for KFN, enabled through the Framework Agreement. KFN has requested further information from CNL on topics of importance to KFN as the most recent EIS does not contain enough information for its third party experts to conduct their assessments. CNL will provide responses in writing to its queries on this issue.
7. Free, Prior, and Informed Consent (FPIC)	a) United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and UNDA 2021. KFN is seeking incorporation and advancement of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) including the principle of Free Prior and Informed Consent (FPIC) prior to proceeding with the proposed ISD Project. This is a project-specific concern.	<u>CNL Response:</u> It is the position of KFN that their consent is required for the creation of a permanent hazardous waste disposal facility in its traditional territory, per Section 29.2 of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). CNL will work with KFN towards the achievement of that principle to the extent possible. CNL is committed to ensuring meaningful participation of Indigenous peoples in decisions that affect their nations, communities, and territories. CNL, as the licensee, is committed to work towards consensus and consent, with an understanding that UNDRIP does not necessitate a veto in decision-making. We recognize that we must learn from each other and work together to strengthen relationships and enable fulsome Indigenous participation in CNL's designated projects. The regulatory decision-making process considers UNDRIP and the extent to which its principles are met.	<u>Where is this topic discussed in the EIS?</u> Section 6.2 4.6.3 of the EIS summarizes KFN's interests and concerns including governance. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this concern.	<u>Status:</u> Outstanding The amendment to the Framework Agreement was executed by the parties and came into effect as of July 2024. CNL understands that UN guiding principles for human rights and UNDRIP are areas of importance for KFN. CNL remains committed to seeking common ground with KFN in the interest of moving closer towards consent. <u>Next Steps:</u> CNL and KFN continue to work together towards the development of a work plan on key topics of interest for KFN, enabled through the Framework Agreement.
8. Indigenous Health	a) Methodology for conducting the Indigenous health assessment, receptors, and diet. KFN is interested in how Indigenous receptors have been defined in CNL's assessment and how CNL meets the requirements under CSA N288.1. This is a project-specific concern.	<u>CNL Response:</u> CNL acknowledges KFN's concerns about the methodology used to assess Indigenous health effects from the NPD Closure Project. CNL has added an Indigenous receptor group to the PostSA TSD. In the third iteration of the PostSA TSD issued in March 2020, CNL included a Potential Exposure Group consisting of a family of self-sufficient Indigenous receptors in the NPD Area. The exposure profile in the postclosure period was developed based on a traditional Indigenous lifestyle pre-European contact (SENES 2014). This lifestyle results in a more cautious dose estimate than that based on current-day lifestyle, where some food is store-bought. The predicted peak dose to an	<u>Where is this topic discussed in the EIS?</u> The EIS presents the PostSA results for the Indigenous receptor group in Section 9.10.2 . <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback (received May 2024).	<u>Status:</u> Resolution in Progress CNL believes that they have addressed this concern. CNL's technical assessment shows that there are no predicted impacts to Indigenous biophysical health resulting from the NPD Closure Project. CNL understands that further discussions are needed with KFN to help address this concern, based on feedback received in May 2024.

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		Indigenous receptor (from the 3rd iteration PostSA) is 0.0004 mSv/yr, which is 500 times less than the dose criterion. The analysis demonstrates that the impact on the public, Indigenous peoples and the environment is negligible under all scenarios. To instill confidence in the EIS findings and the effectiveness of the follow-up monitoring, CNL is open and willing for KFN and other Indigenous Nations, communities, and organizations to be involved in the monitoring program, which aims to confirm the predictions of the EIS. CNL maintains that human health has been conservatively assessed for Indigenous Nations, communities, and organizations within the EIS and looks forward to discussing this topic further with KFN.		The amendment to the Framework Agreement was executed by the parties and came into effect as of July 2024. CNL remains committed to ongoing engagement with KFN within CNL’s role as the project proponent. <u>Next Steps:</u> CNL and KFN continue to work together towards the development of a work plan on key topics of interest for KFN, enabled through the Framework Agreement. KFN has requested further information from CNL on topics of importance to KFN as the most recent EIS does not contain enough information for its third party experts to conduct their assessments. CNL will provide responses in writing to its queries on this issue.
9. Inventory	a) Inventory of the NPD disposal facility KFN is seeking further information about the nuclear waste that may remain on site and the radiological inventory of the proposed NPD disposal facility. This is a project-specific concern.	CNL shared the waste inventory report as a follow-up to the 2023 April site visit. <u>CNL Response:</u> The NPD reactor has a low radionuclide inventory. Tritium is the major radionuclide and will decay to low levels during the Institutional Control period (~100 years). The proposed waste disposal facility barriers have a design life consistent with that timeframe. The longer-lived ILW consists of small quantities of low energy beta emitters. The beta emitters have low radiotoxicity. The main barrier to containing the radioactivity on long timescales is that 83% of the initial inventory (mostly activation products) is embedded within steels and Zircaloy which corrode very slowly, particularly in an alkaline environment. The metals used in the reactor vault are corrosion-resistant alloys, with stainless steel taking approximately 30,000 years to fully corrode and zircaloy up to 300,000 years to fully corrode. The low corrosion rates allow the radioactivity to decay before it is released into the reactor vault. Once in the reactor vault the radioactive contaminants sorb onto the grout which further delays its diffusion out of the facility. Based on its consideration of national and international standards and guidelines, CNL continues to believe that the NPD facility has characteristics that support in-situ disposal. CNL is committed to ongoing engagement with KFN to gain a greater understanding of their concerns about the long-term safety of nuclear waste.	<u>Where is this topic discussed in the EIS?</u> Section 4.1 of the EIS highlights the in-design mitigation measures that act to isolate and contain the waste inventory within the NPD Disposal Facility to ensure protection of the surrounding environment. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback (received May 2024).	<u>Status:</u> Resolution in Progress CNL understands that further discussions are needed with KFN to help address this concern, based on feedback received in May 2024. The amendment to the Framework Agreement was executed by the parties and came into effect as of July 2024. CNL remains committed to ongoing engagement with KFN within CNL’s role as the project proponent. <u>Next Steps:</u> CNL and KFN continue to work together towards the development of a work plan on key topics of interest for KFN, enabled through the Framework Agreement. KFN has requested further information from CNL on topics of importance to KFN as the most recent EIS does not contain enough information for its third party experts to conduct their assessments. CNL will provide responses in writing to its queries on this issue.

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10. Long-term Safety	a) Technical suitability of in-situ disposal concept It is important to KFN that CNL demonstrate the design is appropriate in terms of waste inventory, containment, grouting of the NPD structure, and international best practice, because the NPD site is located within Kebaowek traditional territory, and it is important that future users of the land at the NPD site are protected. This is a project-specific concern.	CNL shared the waste inventory report as a follow-up to the 2023 April site visit. <u>CNL Response:</u> CNL agrees that protection of future land users is an important concern and has addressed this subject. CNL has assessed the suitability of ISD for NPD, and the resulting EIS shows that such disposal is safe for human health and the environment in the short term and long term. Design features of the NPD facility make it conducive to disposing of the material in place. The proposed project involves a long-term solution to ensure the waste that currently resides at the NPD site is effectively contained and isolated from the environment, ensuring public safety. CNL includes an Indigenous receptor group in its assessment of long-term safety. The predicted peak dose to an Indigenous receptor is 0.0004 mSv/yr which is 500 times less than the dose criterion. The analysis demonstrates that the impact on Indigenous peoples and the environment is negligible. The proposed NPD Closure Project conforms with all applicable Canadian codes and standards as well as international best practices to ensure protection of the environment and safety throughout the life of the facility. CNL is committed to ongoing engagement with KFN to gain a greater understanding of their concerns about the long-term safety of nuclear waste.	<u>Where is this topic discussed in the EIS?</u> Section 4.1 of the EIS highlights the in-design mitigation measures that act to isolate and contain the waste inventory within the NPD Disposal Facility to ensure protection of the surrounding environment. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback (received June 2022).	<u>Status:</u> Outstanding The amendment to the Framework Agreement was executed by the parties and came into effect as of July 2024. CNL understands that the long-term management and safety of nuclear waste is a concern for KFN, and respects that KFN has a different opinion on the most suitable decommissioning approach for NPD. CNL maintains that the proposed in-situ disposal is the preferred option to undergo an EA and will await the outcome of the CNSC’s decision on the Project. CNL remains committed to ongoing engagement with KFN within its role as the project proponent. <u>Next Steps:</u> CNL and KFN continue to work together towards the development of a work plan on key topics of interest for KFN, enabled through the Framework Agreement.
10. Long-term Safety	b) Long term site integrity KFN is interested in seeing examples of in-situ disposal used elsewhere and the performance of this concept. KFN wants confidence in the performance of the facility over the long-term to protect humans and the environment. This is a project-specific concern.	<u>CNL Response:</u> CNL has written a report that summarizes facilities worldwide that use in-situ disposal. The report is not limited to nuclear reactors or processing facilities but includes mines and hazardous waste sites. The report also describes what each of the facilities have in common, why in-situ disposal is the preferred approach and how it applies to NPD. 16 projects are described, the majority of the examples are reactors, and all are permanent disposal solutions. CNL has assessed the suitability of in-situ disposal for NPD, and the EIS demonstrates that such disposal is safe for human health and the environment in the short term and long term. CNL has considered national and international standards and guidelines and continues to believe that the NPD facility has characteristics that support in-situ disposal.	<u>Where is this topic discussed in the EIS?</u> Section 11.2 of the EIS confirms that in-situ disposal is a proven technology in use for over 50 years. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback (received May 2024).	<u>Status:</u> Outstanding CNL understands that project alternatives are an area of interest for KFN, and respects that KFN has a different opinion on the most suitable decommissioning approach for NPD. CNL maintains that the proposed in-situ disposal is the preferred option to undergo an EA and will await the outcome of the CNSC’s decision on the Project. CNL remains committed to ongoing engagement with KFN within CNL’s role as the project proponent. <u>Next Steps:</u> CNL and KFN continue to work together towards the development of a work plan on key topics of interest for KFN, enabled through the Framework Agreement. KFN has requested further information from CNL on topics of importance to KFN as the

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				most recent EIS does not contain enough information for its third party experts to conduct their assessments. CNL will provide responses in writing to its queries on this issue. Through engagement, CNL hopes that the parties are able to find common ground on this topic, including the development of commitments to build confidence and trust in the in-situ disposal concept.
10. Long-term Safety	c) Potential effects of the environment on the facility KFN is seeking more information about how CNL determines whether or to what extent environmental events may affect the long-term safety of the facility. This is a project-specific concern.	<u>CNL Response:</u> CNL has assessed the probabilities and potential impacts of flooding, seismic activity, above-ground natural hazards and extreme temperature change, and has concluded that these events will have no undue effects on people or the environment around the site. The NPD site has an Emergency Procedure that will remain in place and be updated as required throughout the Decommissioning Execution and Institutional Controls phases of this project. This procedure focuses on the prevention, mitigation of, preparedness for, response to, and recovery from a wide range of abnormal and emergency conditions including fires, floods, hazardous spills, loss of power; earthquakes, and tornados. The Emergency Procedure also defines the actions of specific staff/roles in such events. Following any of these emergency events, as soon as it is safe for staff to do so, site and facility condition are evaluated, and any necessary actions will be taken to make repairs. The NPD Emergency Procedure is developed and maintained in accordance with CNL’s company-wide Emergency Preparedness Program that has been accepted to meet the CNSC’s requirements (under REGDOC 2.10.1 - Nuclear Emergency Preparedness and Response). Further, throughout all project phases (Decommissioning Execution, Institutional Controls and Post-Institutional Controls) CNL has assessed the probabilities and potential impacts of flooding, seismic activity, above-ground natural hazards and extreme temperature change, and has concluded that these events will have no undue effects on people or the environment around the site.	<u>Where is this topic discussed in the EIS?</u> Section 8.12 of the EIS discusses the relevant natural disasters to which NPD may be exposed. Section 9.14 of the EIS discusses the potential effects on the project of climate change, forest fires, floods, earthquakes, severe weather such as tornados, lightning strikes, ice storms, and changes to the Ottawa River. Additional details and a range of scenarios that encompass the potential impacts from extreme weather and natural hazards are examined in the DecomSA TSD and the PostSA TSD. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this concern (from feedback received May 2024).	<u>Status:</u> Resolution in Progress CNL's technical assessment shows that accidents and natural hazards which could affect the facility will not result in undue effects on people and the environment around the site. CNL understands that further discussions are needed with KFN to help address this concern, based on feedback received in May 2024. <u>Next Steps:</u> CNL and KFN continue to work together towards the development of a work plan on key topics of interest for KFN, enabled through the Framework Agreement. KFN has requested further information from CNL on topics of importance to KFN as the most recent EIS does not contain enough information for its third party experts to conduct their assessments. CNL will provide responses in writing to its queries on this issue.
11. Monitoring	a) Current monitoring and impacts from site operation KFN is interested to understand CNL’s past environmental performance at the NPD site via access to environmental monitoring plans and data. This is a project-specific concern.	CNL shared a link to the annual summary or environmental performance as a follow-up to the 2023 April site visit. CNL would be pleased to share any other historic environmental monitoring data as requested by KFN. <u>CNL Response:</u> CNL conducts a rigorous monitoring program and is committed to ensuring that the environment around the NPD site, including the Ottawa River, is protected. Monitoring of the environment	<u>Where is this topic discussed in the EIS?</u> Historic environmental monitoring is summarized in the description of the existing environment (Section 8) of the EIS. Specifically, Sections 8.2 – Atmospheric Environment, 8.3 – Surface Water Environment, 8.5.6 – Groundwater Quality and 8.7 – Ambient Radioactivity. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback (received May 2024).	<u>Status:</u> Resolution in progress CNL considers this interest has been addressed with the information shared to KFN. CNL notes that impacts from past operations are out of scope of this EA. CNL remains committed to ongoing engagement with KFN within its role as the project proponent. <u>Next Steps:</u>

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
		(a) Ottawa River water: Radioactivity measured in the Ottawa River upstream and downstream of the NPD site are very low (<0.01% of the derived release limit). (b) Surface soil and Vegetation: Tritium in soil and vegetation on the NPD site is very low (< 0.01% of the derived release limit). The results demonstrate that the public and the environment around the NPD site continues to be protected. In addition to the CNL monitoring program, the CNSC leads an Independent Environmental Monitoring Program (IEMP) designed to verify that the public and the environment around licensed nuclear facilities are protected. As part of its IEMP, the CNSC samples and analyzes surface water upstream and downstream of the NPD site (including sampling for non-radiological parameters). The CNSC IEMP results confirm that the public and the environment around the NPD site are protected and that there are no expected health impacts.		CNL and KFN continue to work together towards the development of a work plan on key topics of interest for KFN, enabled through the Framework Agreement. KFN has requested further information from CNL on topics of importance to KFN as the most recent EIS does not contain enough information for its third party experts to conduct their assessments. CNL will provide responses in writing to its queries on this issue.
11. Monitoring	b) EA Follow-up Monitoring KFN is interested in the proposed EA follow-up monitoring plans, especially comprehensive descriptions of monitoring pathways, locations, and frequencies. This is a project-specific concern.	<u>CNL Response:</u> CNL conducts a rigorous environmental monitoring program and is committed to ensuring that the environment around the NPD site, including the Ottawa River, is protected. CNL is seeking to work together with Indigenous Nations, communities, and organizations, the public and stakeholders regarding their feedback before finalizing the EA Follow-up Program (Section 12 of the EIS). The monitoring of the environment will be undertaken to verify the EIS predictions of no significant adverse effect and to confirm that mitigation measures are effective. Groundwater wells will be located between the NPD facility and the Ottawa River to monitor groundwater quality after it interacts with the facility and before it reaches the Ottawa River. A dedicated Indigenous-led, Indigenous Knowledge driven component integrated into the site environmental monitoring at NPD can help build confidence and trust in CNL’s assessment. CNL has indicated that it is willing to involve all Indigenous Nations, communities, and organizations in its environmental monitoring programs and is willing to explore involvement in environmental monitoring work with KFN, if desired. CNL is also open and willing to share the draft follow-up monitoring plans with KFN for review, if desired. CNL will conduct environmental monitoring for as long as necessary to verify the results of the assessment in the EIS. The results demonstrate that the public and the environment around the NPD site continues to be protected.	<u>Where is this topic discussed in the EIS?</u> The draft follow-up monitoring plans for the NPD Closure project are included in Section 12 of the EIS. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback (received May 2024).	<u>Status:</u> Resolution in Progress CNL understands that ensuring that lands on and in the vicinity of the NPD site are responsibly managed and monitored is an area of concern for KFN. The amendment to the Framework Agreement was executed by the parties and came into effect as of July 2024. CNL remains committed to ongoing engagement with KFN within CNL’s role as the project proponent. <u>Next Steps:</u> CNL and KFN continue to work together towards the development of a work plan on key topics of interest for KFN, enabled through the Framework Agreement. CNL is open and willing to have a dedicated discussion with KFN on the follow-up monitoring program for the NPD site and is willing to discuss involvement in environmental monitoring by KFN, if desired. KFN has requested further information from CNL on topics of importance to KFN as the most recent EIS does not contain enough information for its third party experts to conduct their assessments. CNL will provide responses in writing to its queries on this

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
				issue. Once responses are received and reviewed by KFN experts, discussions may resume.
12. Protection of Flora and Fauna	a) Biota and Species at Risk KFN is inquiring about the potential impacts to Chimney Swifts from remedial and closure activities for the NPD ventilation stack. This is a project-specific concern	<u>CNL Response:</u> The ventilation stack at NPD is 46 m in height. Chimney Swifts spend the spring and summer months in the area. They arrive in early May and migrate south at the end of August. At the NPD site, swifts roost in the top few metres of the stack. The swifts don't build nests in the stack; swifts that are ready to nest leave the stack and live in the forest during the breeding season (June-July) The level of contamination in the concrete at the top of the stack (where the swifts roost) was measured in 2014 using thermoluminescent dosimeters and the dose was at background levels. CNL is planning to empty water/sludge from the base of the stack to enable inspection of the stack base. This work is planned to take place within the next few months. Pumping out of the water/sludge will take place at a time when swifts are not in the stack. The sludge is composed of rainwater and biological waste from the swifts. It contains tritium and gross beta radioactivity due to contact with the stack concrete. CNL will prepare an “environmental review” document for this activity which will outline the timing restrictions to the work to ensure minimal impact to chimney swifts and outline other measures that must be taken to prevent adverse impacts to the environment (e.g. preventing spills from vehicles). This waste will be managed at the Sewage Treatment Plant at the Chalk River Laboratories site. Once the proposed in-situ decommissioning is complete, the ground level around the ventilation stack will be higher due to the engineered barrier that is proposed to cover the facility. CNL plans to grout the base of the ventilation stack up to a level approximately 8-10 feet above the current ground level. This will isolate the ventilation stack from the rest of the NPD facility and create a new higher “bottom” of the ventilation stack. Several holes will be cored in the stack at the level of the new base to allow the draining of any rain and melt water that might enter the stack from the opening at the top, and to allow for periodic camera inspections of the interior, if required. The holes will also help induce an airflow up the ventilation stack, due to stack effect that is intended to mimic the current passive airflow present in the ventilation stack. Animal-resistant louvers are proposed to be placed over the drain holes, to ensure free drainage of water while denying animals access to the stack interior. The ventilation stack will be inspected periodically for signs of degradation and will be removed when no longer structurally suitable for continued use as a chimney swift roost. For planning purposes, this is assumed to be 50 years following completion of decommissioning.	<u>Where is this topic discussed in the EIS?</u> General plans for the ventilation stack are described in Section 4.3.1.6 of the EIS. Section 9.6.3.2 of the EIS includes comprehensive mitigations to ensure effects on Chimney Swifts are minimized. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback (received May 2024).	<u>Status:</u> Resolution in Progress CNL understands that ensuring that lands on and in the vicinity of the NPD site are responsibly managed and monitored is an area of concern for KFN. The amendment to the Framework Agreement was executed by the parties and came into effect as of July 2024. CNL remains committed to ongoing engagement with KFN within CNL’s role as the project proponent. <u>Next Steps:</u> CNL and KFN continue to work together towards the development of a work plan on key topics of interest for KFN, enabled through the Framework Agreement. CNL is open and willing to have a dedicated discussion with KFN on environmental monitoring activities at the NPD site and is willing to discuss involvement in monitoring by KFN, if desired. KFN has requested further information from CNL on topics of importance to KFN as the most recent EIS does not contain enough information for its third party experts to conduct their assessments. CNL will provide responses in writing to its queries on this issue. Once responses are received and reviewed by KFN experts, discussions may resume.
12. Protection of Flora and Fauna	b) Species at Risk permits. KFN is inquiring about a lack of	<u>CNL Response:</u> CNL is committed to the protection of species at risk and has and will apply for any necessary permits from ECCC. In its effects assessment,	<u>Where is this topic discussed in the EIS?</u> Collectively, mitigation measures for the protection of flora and fauna, specifically	<u>Status:</u> Resolution in Progress CNL understands that further discussions are needed with KFN to help address this

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
	engagement/consultation during the SAR permitting process. This is a project-specific concern.	when considering species at risk, CNL considers impacts to an individual and not just the overall population. Several species at risk have been identified at the NPD site and key aspects of CNL’s plan to protect these species are included below. Early in the NPD Closure Project, CNL undertook investigation of the viability of ventilation stack removal. It was decided that ventilation stack retention would mitigate the risk of abandonment by the Chimney Swift. CNL has applied for a species at risk permit from ECCC for the potential harm and harassment of chimney swifts during decommissioning activities. The draft conditions of that permit (mitigations for the protection of the Chimney Swift) are included in the EIS. In response to observations of milkweed at the NPD site, monarch butterfly has been added as a valued component to the EIS and mitigations are in place to preserve and reseed with milkweed (critical habitat). CNL does not predict any adverse residual effects to the chimney swift, monarch and other species at risk.	species at risk are outlined in Section 9.6.3.2 (Terrestrial Environment). <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback (received May 2024).	concern, based on feedback received in May 2024. The amendment to the Framework Agreement was executed by the parties and came into effect as of July 2024. CNL remains committed to ongoing engagement with KFN within CNL’s role as the project proponent. <u>Next Steps:</u> CNL and KFN continue to work together towards the development of a work plan on key topics of interest for KFN, enabled through the Framework Agreement. KFN has requested further information from CNL on topics of importance to KFN as the most recent EIS does not contain enough information for its third party experts to conduct their assessments. CNL will provide responses in writing to its queries on this issue.
13. Protection of the Ottawa River	a) KFN expressed concern about watershed sustainability. As stewards of the lands and waters, it is important to KFN that the environment around the site of the NPD Closure Project including the Ottawa River is protected. KFN exercises rights and carries out traditional and contemporary activities, many of which rely on the health and well-being of the Ottawa River to maintain the health of the Anishnabeg Peoples. This is a project-specific concern.	<u>CNL Response:</u> The potential for contamination to reach the Ottawa river is assessed in the EIS and is supported by long term modelling and detailed groundwater modelling. The EIS predicts no effects to surface water (including the Ottawa River), and follow-up monitoring will be implemented to confirm these predictions. To verify that the engineered barriers are performing as expected/designed, CNL will monitor groundwater. Groundwater wells will be located between the NPD facility and the Ottawa River in order to monitor groundwater quality after it interacts with the facility and before it reaches the Ottawa River. CNL will conduct monitoring for as long as necessary to verify the results of the assessment in the EIS. CNL is committed to ongoing engagement with KFN to gain a greater understanding of their concerns about watershed sustainability related to the NPD Closure Project.	<u>Where is this topic discussed in the EIS?</u> Section 4.1 of the EIS highlights the in-design mitigation measures that act to isolate and contain the waste inventory within the NPD Disposal Facility to ensure protection of the surrounding environment including the Ottawa River Mitigation measures for the protection of surface water (Section 9.3.3.2) (including the Ottawa River) have been updated and expanded from the 2017 draft EIS. The EIS does not predict any adverse residual effects on the surface water environment (Section 9.3.3.5). <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback (received June 2022).	<u>Status:</u> Outstanding The amendment to the Framework Agreement was executed by the parties and came into effect as of July 2024. CNL understands that watershed sustainability is an area of concern for KFN. CNL remains committed to ongoing engagement with KFN within CNL’s role as the project proponent. <u>Next Steps:</u> CNL and KFN continue to work together towards the development of a work plan on key topics of interest for KFN, enabled through the Framework Agreement.
13. Protection of the Ottawa River	b) Impacts on groundwater and surface water quality KFN is inquiring about contamination releases to surface water during proposed decommissioning	<u>CNL Response:</u> In 2018, in response to public and Indigenous concerns, CNL ceased the practice of discharging liquid effluent from the NPD facility sumps to the Ottawa River and arranged for water to be sent to the Waste Treatment Centre at the CRL site. This is CNL’s plan for all collected water from the	<u>Where is this topic discussed in the EIS?</u> Section 4.3 of the EIS describes the project activities and presents CNL’s plans with respect to surface drainage. Section 4.5 of the EIS describes CNL’s plans for handling project-	<u>Status:</u> Resolution in Progress CNL understands that ensuring that the lands and waters on and in the vicinity of the NPD site are responsibly managed and

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
	activities on the NPD site. As stewards of the lands and waters, it is important to KFN that the Ottawa River is protected. This is a project-specific concern.	sump, including that water which will make up the final pump-out prior to grouting. Full details regarding liquid effluent releases from all CNL facilities are given in the Annual Compliance Monitoring Reports available at the following CNL webpage: https://www.cnl.ca/en/home/environmental-stewardship/performance-report/default.aspx. CNL has assessed the potential impact of the NPD Closure Project on surface water and groundwater quality. The EIS concludes that no significant residual adverse environmental effects from the project are expected, including to surface water and groundwater. CNL has developed mitigation measures for the protection of surface water and groundwater during all phases of the project. This finding will be confirmed with the NPD Closure Project follow-up monitoring activities, which will include monitoring groundwater and surface water quality. With respect to the need for constructing a stormwater pond: During the Decommissioning Execution phase of the project, existing drainage features at the site will be maintained and silt fencing will be placed in areas used for stockpiles of raw material (i.e., sand) to prevent runoff into the Ottawa River. For the Institutional Control period, the need for a storm water management pond was taken into consideration during the design of the cover system. The cover is designed to convey storm water to ditches on the south, east and western perimeters of the mound which then connect to the existing ditch systems which are on the east and west sides of the NPD facility. The ditch systems are lined with rock and would enable infiltration of storm water. Because of this design of water conveyance features, it was determined that a storm water management pond was not required. Since this design was developed after the draft EIS was prepared, CNL is willing to meet with the AANTC to discuss the design of the cover system with respect to storm water management, including design drawings illustrating the water conveyance features. CNL is committed to the protection of the Kichi-Sibi (Ottawa River) and looks forward to continuing discussions on this topic with KFN.	related liquid releases. Sections 9.3 and 9.5 of the EIS presents the assessment of potential impacts to surface water and groundwater respectively. Mitigation measures for the protection of surface water and groundwater are provided, including CNL's process for non-routine discharges. No un-assessed liquid effluent releases are permitted. The EIS does not predict any adverse residual effects on the surface water or groundwater environments. Section 12 of the EIS summarizes the Monitoring Plans developed for the project. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback (received May 2024).	monitored is an area of concern for KFN. The amendment to the Framework Agreement was executed by the parties and came into effect as of July 2024. CNL remains committed to ongoing engagement with KFN within CNL's role as the project proponent. <u>Next Steps:</u> CNL and KFN continue to work together towards the development of a work plan on key topics of interest for KFN, enabled through the Framework Agreement. CNL is open and willing to have a dedicated discussion with KFN on monitoring activities at the NPD site and is willing to discuss involvement in monitoring by KFN, if desired. KFN has requested further information from CNL on topics of importance to KFN as the most recent EIS does not contain enough information for its third party experts to conduct their assessments. CNL will provide responses in writing to its queries on this issue. Once responses are received and reviewed by KFN discussions can resume.
14. Technical	a) Technical details for the batch mixing plant. It is important for KFN to understand CNL's plans for the proposed batch mixing plant to ensure that potential effects on the aquatic environment are properly assessed. This is a project-specific concern.	<u>CNL Response:</u> CNL acknowledges that KFN is interested in the final details for the batch mixing plant. The final design of the mixing plant and items such as a wash out pit will be dependent on the contractor awarded the work. The technical requirements of the work imposed by CNL will include the recycle of wash waters used, back into the grout mix. No release of water will be allowed without first being tested and approved for disposition by the CNL Environmental Program. Typical wash out pits are shallow excavations with polymer liners. Others use large poly sacs to retain the grout debris and allow water to filter through and be collected. CNL has done additional research in the operations of batch plants, and	<u>Where is this topic discussed in the EIS?</u> Batch plant construction details are discussed in Section 4.3.1.2 of the EIS. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback (received May 2024).	<u>Status:</u> Resolution in Progress The amendment to the Framework Agreement was executed by the parties and came into effect as of July 2024. CNL remains committed to ongoing engagement with KFN within CNL's role as the project proponent. <u>Next Steps:</u> CNL and KFN continue to work together towards the development of a work plan on key topics of interest for KFN, enabled

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
		we do not believe that a washout pit will be required. If it is determined one is required, CNL will provide these details to review together to understand any concerns.		through the Framework Agreement. KFN has requested further information from CNL on topics of importance to KFN as the most recent EIS does not contain enough information for its third party experts to conduct their assessments. CNL will provide responses in writing to its queries on this issue.
15. Traditional Land and Resource Use and Cultural Impacts	a) Algonquin traditional knowledge should be collected and incorporated into the EIS. It is important to KFN that CNL solicit and use KFN’s community-specific knowledge in order to properly characterize current site conditions, develop scenarios that accurately represent potential future uses of the site, and ensure that species and traditional uses are properly considered by the project. This is a project-specific concern.	<u>CNL Response:</u> CNL agrees that KFN-specific information and traditional knowledge from the KFN and other Indigenous nations should be integrated into the EIS. Prior to the June 2022 feedback, CNL sent two letters asking specific questions of KFN to align with the requirements of <i>CEAA</i> (2012) Section 5(1)(c). These questions included: - Do you have any members that currently practice traditional activities such as, trapping, hunting, fishing and/or gathering, near the two projects? - Does [Kebaowek], or any members, have sites of ceremonial significance in close proximity [of NPD], or more generally, any cultural activities near [the NPD site]? The EIS and supporting studies have assumed that traditional uses do occur adjacent to the NPD site, whether on the Ottawa River or outside the restricted/fenced area. CNL has also assumed that in the future there is an interest to re-establish traditional use activities on the NPD site. CNL includes an Indigenous receptor group in its PostSA. The predicted peak dose to an Indigenous receptor is 0.0004 mSv/yr which is 500 times less than the dose criterion. The analysis demonstrates that the impact on Indigenous Peoples and the environment is negligible.	<u>Where is this topic discussed in the EIS?</u> Section 8.9 of the EIS presents information about traditional land and resource use, including limited information about KFN (Section 8.9.2.2.6). In lieu of more comprehensive community specific knowledge, CNL includes it’s assumptions (Section 8.9.2.1). The assessment of effects to traditional land and resource use VCs is discussed in Section 9.9 of the EIS. The EIS and supporting studies have assumed that traditional uses do occur adjacent to the NPD site, whether on the Ottawa River or outside the restricted/fenced area. CNL has also assumed that there will be future interest in re-establishing traditional use activities on the NPD site. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback (received June 2022).	<u>Status:</u> Outstanding The amendment to the Framework Agreement was executed by the parties and came into effect as of July 2024, which will enable specific studies. CNL understands that project incorporation of traditional knowledge and community capacity for independent studies as part of the EA process is an area of concern for KFN. CNL recognizes that traditional knowledge, culture, and ceremony will have much to offer the Project as it moves forward. CNL remains committed to ongoing engagement with KFN within CNL’s role as the project proponent. <u>Next Steps:</u> CNL and KFN continue to work together towards the development of a work plan on key topics of interest for KFN, enabled through the Framework Agreement.
16. Valued Components	a) Selection of valued components and application of an ecosystem approach KFN is interested in the identification, selection, and assessment of “candidate species” (i.e., VCs). This is a project-specific concern.	<u>CNL Response:</u> CNL initially created a Master List of Candidate Valued Components by reviewing relevant reference documents and applying EA process and site knowledge. These candidate VCs include biota such as fish or birds, as well as abiotic qualities such as cultural and heritage sites, or socioeconomic entities such as fishing. CNL provides rationale for including or not including species as a VC. The VCs selected for the NPD Closure Project reflect a wide range of Indigenous interests. Many of the interests and concerns raised by Indigenous Nations, communities and organizations, correspond directly or indirectly to the VCs selected for the project. Based on Indigenous feedback received during engagement activities, CNL has added several human and nonhuman VCs that were identified as being of importance to Indigenous Nations, communities	<u>Where is this topic discussed in the EIS?</u> A complete listing of VCs assessed by the project can be found in Table 5.2-3 of the EIS while Appendix B provides a Master List of Candidate Valued Components, providing a rationale for including or not including the species as a VC. Section 6.3 of the EIS captures VCs identified by Indigenous Nations, communities and organizations. CNL has developed a detailed table (Table 6.3-1) for Section 6.3 of the EIS that captures VCs of Indigenous Nations, communities and organizations and demonstrates how they are	<u>Status:</u> Resolution in Progress The amendment to the Framework Agreement was executed by the parties and came into effect as of July 2024. CNL remains committed to ongoing engagement with KFN within CNL’s role as the project proponent. <u>Next Steps:</u> CNL and KFN continue to work together towards the development of a work plan on key topics of interest for KFN, enabled

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
		and organizations. Berries, mushrooms, mink, river otter, weasel, red fox, moose, and monarch butterflies were added as VCs, as well as soil quality, groundwater quality, groundwater flow and several Indigenous socioeconomic and Indigenous health VCs. In some cases, no new VCs were added, because direct, representative, or related VCs that encompass the value or interest of the Indigenous Nation, community or organization were already included in the assessment. CNL has also updated the draft EIS to include a mapping of Indigenous VCs to the effects assessment.	either directly or indirectly assessed in the EIS. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback (received May 2024).	through the Framework Agreement. KFN has requested further information from CNL on topics of importance to KFN as the most recent EIS does not contain enough information for its third party experts to conduct their assessments. CNL will provide responses in writing to its queries on this issue.

Appendix P Williams Treaties First Nation (WTFN) Process Coordinator Record of Engagement

This appendix provides a complete record of all engagement between CNL and Williams Treaties First Nations (WTFN) from June 2016 to March 2024 (Table P.1). A record of engagement for each of the individual WTFN is included in subsequent tables:

- Table Q.1 – Alderville First Nation
- Table U.1 – Curve Lake First Nation
- Table V.1 – Hiawatha First Nation
- Table W.1 – Mississaugas of Scugog Island First Nation
- Table T.1 – Chippewas of Rama First Nation
- Table S.1 – Chippewas of Georgina Island First Nation
- Table R.1 – Chippewas of Beausoleil First Nation

These tables include the date and method of the communication / engagement, the topics discussed and participants. The tables also highlight engagements where key EA topics were discussed. The key EA topics align with “Generic Guidelines for Preparation of an Environmental Impact Statement Pursuant to the *Canadian Environmental Assessment Act, 2012*” as well as the requirements of REGDOC 3.2.2 “Indigenous Engagement” and guidance specific to NPD provided by the CNSC in January 2021 (e-doc # 6467843).

Following the record of engagement tables is a mapping of how the summary of interests and concerns were compiled (Table C-27), as well as a summary of interests and concerns raised by Williams Treaties First Nations (Table C-28).

Section 4.4.7.1, 4.4.8.1, 4.4.9.1, 4.4.10.1, 4.4.11.1, 4.4.12.1, 4.4.13.1 and 4.4.14.1 of the IER summarizes the engagement activities that have taken place to date between CNL and the WTFN

P.1 Record of Engagement-Williams Treaties First Nations (WTFN) Process Coordinator

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
December 16, 2016 Outgoing letter	This was a letter from CNL staff to the Williams Treaties First Nations (WTFN) Process Coordinator introducing the project and included a request for community input on any potential adverse impacts from project activities. To demonstrate requirements of CEAA 2012 Section 5(1)(c), the letter requested meaningful feedback on the following: - Whether the project may have environmental effect on any lands and/or resources currently used by Aboriginal peoples for traditional purposes; - Whether the project may have any perceived impacts on Aboriginal and Treaty Rights; - Whether local and traditional knowledge can assist in describing the existing environment; and, - The view of Aboriginal communities on proposed valued ecosystems components (environmental attributes) that have been identified for the assessment.				✓	✓				✓	
January 05, 2017 Outgoing email	This email from CNL communications staff to the WTFN Process Coordinator was to follow up on previous correspondence, inquiring about whether the WTFN as a whole were interested in engaging with CNL on the NPD Closure Project.										✓
January 20, 2017 Outgoing email	This email from CNL communications staff to the WTFN Process Coordinator was to follow up again on previous correspondence, inquiring about whether the WTFN as a whole were interested in engaging with CNL on the NPD Closure Project.										✓
November 15, 2017 Outgoing email	This email from CNL communications staff to the WTFN Process Coordinator enclosed links to the full draft EIS, an interactive “public-friendly” executive summary of the draft EIS, the CNSC’s public notice, a short overview of the project and environmental assessment, as well as detailed information on the timing of the EA process and how to participate in the public comment period.	✓	✓	✓	✓	✓	✓	✓	✓	✓	
November 17, 2017 Outgoing email	This email from CNL communications staff to the WTFN Process Coordinator enclosed the draft Aboriginal Engagement Report for the NPD Closure Project and stated, per CEAA, 2012 requirements: “CNL would be pleased to update information in this current draft with input from your community.”	✓	✓	✓	✓	✓	✓	✓	✓	✓	
February 20, 2020 Outgoing email	This email from CNL communications staff to the WTFN Process Coordinator inquired about whether the WTFN as a whole were interested in engaging with CNL on the CNL’s projects (NPD Closure Project).										✓
March 02, 2020 Outgoing telephone call	This telephone call from CNL communications staff to the WTFN Process Coordinator was to follow-up on previous correspondence.										✓

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
March 03, 2020 Outgoing email	This email from CNL communications staff to the WTFN Process Coordinator was to follow-up previous efforts at connecting.										✓
March 3, 2020 Outgoing email	This email from CNL communications staff to the Williams Treaties First Nations general email inquiry mailbox was to inquiry/confirm Williams Treaties First Nations Process Coordinator contact details as we have had received no response on any correspondence.										✓

P.2 Williams Treaties First Nations (WTFN)-Mapping of Key Interests and Concerns

WTFN - Mapping of Key Interests and Concerns

Table P.2 presents a mapping of how the key interests and concerns relate to detailed feedback and input from the WTFN, up to March 2024.

Table P.2 has 3 columns:

- Column 1 identifies the topic, i.e., the subject area the key interest(s) or concern(s) falls under.
- Column 2 presents a key interest or concern, why it is important to the Indigenous Nation, community or organization, and connects it to a project aspect or an Aboriginal or treaty right wherever possible. This may be a summary of multiple related interests or concerns that have been expressed by the Indigenous Nation, community or organization.
- Column 3 presents details of the key interest or concern that the Indigenous Nation, community or organization has identified formally in writing and/or verbally to CNL.

Topic	Key Interests and Concerns	Specific feedback provided by WTFN on this interest/concern (Validated)
Alderville First Nation		
Protection of Flora and Fauna	Species at Risk Alderville First Nation expressed general concern for the protection of the Chimney Swift as it is a species that uses the NPD site as habitat and could be impacted by the decommissioning. This is a project-specific concern.	Alderville Lands and Resources staff expressed general concern for the protection of the Chimney Swift (2020 May).
Curve Lake First Nation		
Aquatic environment	Protection of the aquatic environment As stewards of the lands and waters, it is important to Curve Lake First Nation that the environment around the site of the NPD Closure Project including the Ottawa River, are protected, and that the rights and interests of Curve Lake First Nation are upheld in relation to the environment (i.e., hunting, trapping, gathering, fishing and cultural ceremonies). This is a project-specific concern.	In their July 2021 letter to CNL, enclosing review of the NPD Closure Project EIS, Curve Lake First Nation indicated that wetlands are sacred to Curve Lake First Nation, and requested an elaboration about why they are not assessed in the EIS. Also, in their July 2021 letter to CNL, Curve Lake First nation requested more information about the benthic invertebrate community in the Ottawa River
Archaeology and Cultural Heritage	Protection of burial sites Curve Lake First Nation wants to ensure that any archaeological discoveries at the NPD site are handled properly and respectfully to remain protective of Indigenous cultural rights.	In its comments on the 2016 NPD Project Description, Curve Lake First Nation stated their concern for remains of their ancestors and pointed to obligations under the Cemeteries Act. Curve Lake identified that it had trained Archaeological and Environmental Liaisons available to participate in archaeological or environmental assessment activities. Curve Lake Lands and Resources staff continued to express interest in archaeological work at subsequent engagements on

Topic	Key Interests and Concerns	Specific feedback provided by WTFN on this interest/concern (Validated)
	This is both a CNL-wide and project specific concern.	the project (2020 May).
Baseline Characterization	Tritium levels in the Ottawa River It is important to Curve Lake First Nation that baseline tritium levels in the Ottawa River, including soil and vegetation, are well understood for comparison of any potential impacts from the project. This is both a CNL-wide and project specific interest.	Curve Lake First Nation expressed concern about the tritium levels in the Ottawa River, including soil and vegetation, specifically what portion of tritium comes from natural sources versus anthropogenic sources (April 2022 draft follow-up monitoring plan discussion).
Engagement	Funding for Participation in NPD EA process It is important to Curve Lake First Nation that there is meaningful engagement on the project, because the project is located within the traditional territory of Curve Lake First Nation. This is a project-specific interest.	Curve Lake First Nation has indicated their interest in capacity to support meaningful consultation, engagement, and participation in the NPD Closure Project (October 2020 letter).
Engagement	Holistic engagement with CNL (beyond the project-level) It is important to Curve Lake First Nation and Hiawatha First Nation to be engaging with CNL on an ongoing basis with a holistic approach that goes beyond the scope of an individual project so that Curve Lake First Nation's interests and rights can be incorporated in a meaningful way into CNL's activities. This is a CNL-wide concern.	During monthly meetings in September 2021, February 2022 and March 2022 Curve Lake First Nation indicated an interest in broader engagement with CNL as a whole and earlier involvement with planning for activities and projects at CNL.
Engagement	Curve Lake First Nation expressed concern about the use of language within the NPD EIS and the perceived importance and priority of Indigenous engagement. This is both a CNL-wide and project-specific concern.	In their July 2021 letter to CNL, enclosing review of the NPD Closure Project EIS, Curve Lake First Nation noted several instances of colonial language in the EIS about Indigenous Engagement that are not reflective of meaningful engagement. Also the placement of the "Indigenous Engagement" section after the "Public Engagement" section gives the impression that Indigenous Engagement is a lower priority than Public engagement and does not reflect the priority of Indigenous People's rights as stated in the Constitution. In April 2021 and January 2022, Curve Lake First Nation also drew attention the characterization of nuclear as "clean" and how this did not resonate for Indigenous peoples.
EA Process and Methodology	A request for more details on the effects assessment approach and identification of valued components It is important to Curve Lake First Nation that the VCs used for the project incorporate species important to traditional users of the land to ensure the effects on traditional land and resource use are adequately considered. This is a project-specific concern.	In their July 2021 letter to CNL, enclosing review of the NPD Closure Project EIS, Curve Lake First Nation requested a more detailed explanation of several categories of VCs: mushrooms, benthic invertebrates (how will effects be assessed) and why mussels are not identified as a VC.
End State, Site Restoration and Future Use of the Land	Engagement on Final Site Restoration It is important to Curve Lake to be engaged meaningfully about final site restoration. It is important to Curve Lake that the end state of the NPD site is safe for future land users and that the rights and interests of future Indigenous peoples are preserved. This is both a CNL-wide and project-specific concern.	In their July 2021 letter to CNL, enclosing review of the NPD Closure Project EIS, Curve Lake First Nation indicated that the discussion of final site restoration in the EIS gives the impression that Indigenous input will not be considered. During the April 27, 2022 meeting, CLFN also raised concerns about the contamination of the stack and requested confirmation that there is no contamination at the bottom of the stack and if there is, the associated plans in place to address and subsequently monitor the stack and area.
Protection of Flora and Fauna	Curve Lake First Nation expressed general concern for the protection of Species at Risk and non-protected species. As stewards of the lands and waters, it is important to Curve Lake First Nation that the environment around the site of the NPD Closure Project including the Ottawa River, are protected in an interconnected way With respect to Species at Risk this is a project-specific concern. CNL's approach to biodiversity and the non-protected species is a CNL-wide concern.	Curve Lake Lands and Resources staff expressed interest in species at risk (May 2020 meeting) and May 2021 meeting on biodiversity Curve Lake First Nation raised concerns about protection for non-protected species and the importance of an interconnected approach to biodiversity and environmental protection work..
Protection of Flora and Fauna	Potential impacts to Chimney Swifts from remedial and closure activities for the NPD ventilation stack.	Curve Lake First Nation requested further information on ventilation stack contamination and the remedial actions planned at the base of the stack. This interest was focused on potential impacts on Chimney Swifts (May 2020 meeting

Topic	Key Interests and Concerns	Specific feedback provided by WTFN on this interest/concern (Validated)
	As stewards of the lands and waters, it is important to Curve Lake First Nation that the environment around the site of the NPD Closure Project including biota, are protected. This is a project-specific concern.	and April 2022 draft follow-up monitoring plan discussion). During the April 27, 2022 meeting, CLFN also raised concerns about the contamination of the stack and requested confirmation that there is no contamination at the bottom of the stack and if there is, the associated plans in place to address and subsequently monitor the stack and area.
Protection of the Ottawa River	Protection of water, the surrounding environment and natural resources for all future generations. As stewards of the lands and waters, it is important to Curve Lake First Nation that the environment around the site of the NPD Closure Project including the Ottawa River, is protected, and that the rights and interests of Curve Lake First Nation are upheld in relation to the environment (i.e., hunting, trapping, gathering, fishing and cultural ceremonies). This is a project-specific concern.	In its comments on the NPD Project Description, Curve Lake First Nation shared its deep respect for the water and surrounding environment. Through engagement, CNL understands that protection of the environment, specifically the Ottawa River, is important to Curve Lake (2020 engagements).
Socio-economics	Curve Lake expressed concern about how community statistics from NPD's neighboring Indigenous Nations, communities and organizations are portrayed. Curve Lake First Nation wants to ensure that the effects of colonialism and the Indian Act on the socio-economic conditions of Indigenous Nations, communities and organizations are recognized. This is both a CNL-wide and project specific concern.	In their July 2021 letter to CNL, enclosing review of the NPD Closure Project EIS, Curve Lake First Nation noted that statistics on income and unemployment provided in the EIS about the closest First Nation to the NPD (Pikwàkanagàn First Nation) reflect the effects of colonialism and the Indian Act.
Hiawatha First Nation		
Aquatic environment	Protection of the aquatic environment As stewards of the lands and waters, it is important to Hiawatha First Nation that the environment around the site of the NPD Closure Project including the Ottawa River, are protected, and that the rights and interests of Hiawatha First Nation are upheld in relation to the environment (i.e., hunting, trapping, gathering, fishing and cultural ceremonies). This is a project-specific concern.	Wetlands are sacred to the Michisaagiig people and a reason should be provided why they are not assessed in the EIS. At the July 2021 monthly meeting with WTFN, which was focused on a discussion of the summary tables of interests and concerns from the WTFN, Hiawatha First Nation concurred with this concern identified by Curve Lake First Nation in Curve Lake First Nation's EIS review. More information about the benthic invertebrate community in the Ottawa River should be provided. (Hiawatha First Nation concurred with this interest at the July 2021 monthly meeting, which was identified in the Curve Lake First Nation's review of the EIS.)
Engagement	Holistic engagement with CNL (beyond the project-level) It is important to Curve Lake First Nation and Hiawatha First Nation to be engaging with CNL on an ongoing basis with a holistic approach that goes beyond the scope of an individual project so that Hiawatha First Nation's interests and rights can be incorporated in a meaningful way into CNL's activities. This is a CNL-wide concern.	During monthly meetings in September 2021 and February 2022 Hiawatha First Nation indicated an interest in broader engagement with CNL as a whole and earlier involvement with planning for activities and projects at CNL.
Engagement	Hiawatha First Nation expressed concern about the use of language within the NPD EIS and the perceived importance and priority of Indigenous engagement. This is both a CNL-wide and project specific concern.	Several instances of primitive and colonial language occur in the EIS about Indigenous Engagement that are not reflective of meaningful engagement. Also the placement of the "Indigenous Engagement" section after the "Public Engagement" section gives the impression that Indigenous Engagement is a lower priority than Public engagement and does not reflect the priority of Indigenous People's rights as stated in the Constitution. (At the July 2021 monthly WTFN meeting, Hiawatha First Nation concurred with this concern, which was identified in Curve Lake First Nation's review of the EIS)
EA Process and Methodology	A request for more details on the effects assessment approach and identification of valued components It is important to Hiawatha First Nation that the VCs used for the project incorporate species important to traditional users of the land to ensure the effects on traditional land and resource use are adequately considered. This is a project-specific concern.	A more detailed explanation of several categories of VC is required: mushrooms, benthic invertebrates (how will effects be assessed) and why mussels are not identified as a VC. (Hiawatha First Nation concurred with this concern at the July 2021 monthly WTFN meeting identified in Curve Lake First Nation's review of the EIS.)
End State, Site Restoration and Future Use of the Land	Engagement on Final Site Restoration It is important to Hiawatha that it is engaged meaningfully about	The discussion of final site restoration in the EIS gives the impression that Indigenous input will not be considered. (Hiawatha First Nation concurred with this concern identified in the July 16 2021 letter from Curve Lake First Nation to

Topic	Key Interests and Concerns	Specific feedback provided by WTFN on this interest/concern (Validated)
	final site restoration. It is important to Hiawatha that the end state of the NPD site is safe for future land users and that the rights and interests of future Indigenous peoples are preserved. This is both a CNL-wide and project-specific concern.	CNL.)
Protection of Flora and Fauna	Hiawatha expressed interest in CNL’s plans for the NPD ventilation stack in relation to caretaking of the environment, and maintaining this habitat for the Chimney Swift with a secondary interest in the impact of a stack collapse and proximity of this structure to the Ottawa River. This is a project-specific interest.	At a meeting and discussion between the WTFN and CNL in 2020, the Hiawatha First Nation Lands and Resources staff expressed a particular interest in the NPD ventilation stack in particular its design life and stack collapse.
Protection of Flora and Fauna	Hiawatha First Nation expressed concern about potential accumulation of contamination in large game animals. As stewards of the lands and waters, it is important to Hiawatha First Nation that the environment, including flora and fauna around the CRL and NPD sites is protected, to ensure the rights and interests of Hiawatha First Nation are upheld in relation to the environment (i.e., hunting). This is both a CNL-wide and project specific concern.	The Hiawatha First Nation Lands and Resources staff, at a meeting in March 2022, expressed concern about what deer (or other large game) might consume on CNL properties that might be subsequently consumed by hunters and whether there is an accumulation of contamination seen in large game.
Monitoring	Hiawatha First Nation expressed interest in the monitoring plans for the NPD site. This interest stems from the importance of environmental stewardship to Hiawatha First Nation. As stewards of the lands and waters, it is important to Hiawatha First Nation that the environment around the site of the NPD Closure Project including the Ottawa River, are protected, and that the rights and interests of Hiawatha First Nation are upheld in relation to the environment (i.e., hunting, trapping, gathering, fishing and cultural ceremonies). This is a project-specific interest.	The Hiawatha First Nation Lands and Resources staff at a meeting in May 2020, expressed a particular interest in monitoring at the NPD site.
Socio-economics	Hiawatha (and Curve Lake) expressed concern about how community statistics from NPD’s neighboring Indigenous Nations, communities and organizations are portrayed. Hiawatha First Nation wants to ensure that the effects of colonialism and the Indian Act on the socio-economic conditions of Indigenous Nations, communities and organizations are recognized. This is both a CNL-wide and project specific concern.	Statistics on income and unemployment provided in the EIS about the closest First Nation to the NPD (Pikwàkanagàn First Nation) reflect the effects of colonialism and the Indian Act. (Hiawatha First Nation concurred with this concern identified in the July 16 2021 letter from Curve Lake First Nation to CNL.)
Chippewas of Rama First Nation		
Alternatives	Range of alternatives considered and overall suitability of the In-Situ Disposal concept Rama First Nation was concerned that CNL evaluate a range of options and that the design allows for reversibility if improved waste disposal options become available in the future. Rama wants to ensure that changes can be made in the future to ensure the environment remains protected. This is a project-specific concern.	The Rama First Nation consultation worker at a meeting in April 2023, was interested to understand what alternatives were considered for the project. Rama also asked about research into new waste disposal options and the retrievability of the waste.
Alternatives	Is In-Situ Disposal a Proven Technology Rama First Nation was interested in seeing examples of ISD used elsewhere and the performance of the technology. Rama wants confidence that this technology will protect humans and the environment. This is a project-specific concern.	The Rama First Nation legal counsel at a meeting in April 2023 was interested to know more about other sites that had used in-situ disposal.

Topic	Key Interests and Concerns	Specific feedback provided by WTFN on this interest/concern (Validated)
End State, Site Restoration and Future Use of the Land	Long-term liability of the site beyond decommissioning. Rama is interested to know when the site will be safe for reuse. It is important to Rama that the end state of the NPD site is safe for future land users. This is a project-specific interest.	The Rama First Nation legal counsel at a meeting in April 2023 was interested to know when the site would be safe for re-use.
Long-term Safety	Long-term Integrity of the Concrete Cap and Engineered Barrier As long-term stewards and users of the land and waters, it is important to Rama First Nation that the design life of the protective layers for the proposed NPD Disposal Facility are sufficient over time to provide confidence that the environment is protected. This is a project-specific interest.	The Rama First Nation legal counsel at a meeting in April 2023 was interested to know how long it would take before the protective layer degrades.
Monitoring	Impacts from site operation Rama is interested to understand CNL’s past environmental performance at the NPD site. Rama wishes to ensure the environment has not been impacted by past operations. This is a project-specific concern.	The Rama First Nation consultation worker at a meeting in April 2023, expressed a particular interest in historic monitoring data for the NPD site.
4. Monitoring	b) Design of follow-up monitoring It is important that Rama has an opportunity to review the monitoring plans to ensure transparency and promote confidence in these activities. This is project –specific interest.	The Rama First Nation consultation worker at a meeting in April 2023, expressed a particular interest in monitoring plans for the NPD site.

Williams Treaties First Nations (WTFN) – Summary of Interests and Concerns

Table P.3 below summarizes the key interests and concerns that the WTFN communities raised on the 2016 Project Description, participation in webinars in 2020, and through on-going engagement with CNL, up to March 2024.

Curve Lake First Nation submitted comments on the Project Description that can be found online: [Curve Lake First Nation](#).

Table P.3 has five columns:

- Column 1 identifies the topic, i.e., the subject area the key interest(s) or concern(s) falls under.
- Column 2 presents a key interest or concern, why it is important to the Indigenous Nation, community or organization, and connects it to a project aspect or an Aboriginal or treaty right wherever possible. This may be a summary of multiple related interests or concerns that have been expressed by the Indigenous Nation, community or organization.
- Column 3 summarizes CNL’s response or conclusions as well as CNL’s efforts to address this key interest or concern
- Column 4 identifies where in the EIS the key interest or concern is addressed, and whether any changes were made to the EIS in response to the interest/concern. If changes resulted in a change to the EIS outcome, this is also discussed;

Column 5 summarizes the “Status” of the key interest or concern and the anticipated Next Steps towards achieving resolution of the key interest or concern. Not all concerns can be quickly or easily resolved, as some concerns go beyond the scope of the EA process, or there may divergent perspectives on certain interests or concerns. Note: this column does not, unless specifically confirmed by the Indigenous Nations, communities and organizations, mean that they have verified that the interest or concern has been dealt with to their satisfaction.

P.3 WTFN Interests and Concerns

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
Alderville First Nation				
1) Protection of Flora and Fauna	a) Species at Risk Alderville First Nation expressed general concern for the protection of the Chimney Swift as it is a species that uses the NPD site as habitat and could be impacted by the decommissioning. This is a project-specific concern.	In May 2020, the WTFN and CNL met for a discussion and presentation sharing information on the NPD Closure Project. Species at risk was a key focus of the discussion and representatives of Curve Lake First Nation had a number of follow-up question after the meeting. In response, CNL provided the Chimney Swift TSD as well as specific answers to questions from Curve Lake First Nation, Hiawatha First Nation and Alderville First Nation on the ventilation stack and Chimney Swifts. At the May 2021 monthly project update and information sharing meeting between CNL and WTFN, an overview of CNL's biodiversity program was discussed. <u>Additional opportunities:</u> In May 2019, Indigenous Nations, communities and organizations and the public were invited to participate in the National Chimney Swift Roost Counts. Chimney Swifts were the focus topic of the June 2019 breakfast briefing to which Alderville First Nation was invited. In May 2020, Indigenous Nations, communities and organizations and the public were invited to NPD's virtual Chimney Swift count night. In May 2021, Indigenous Nations, communities and organizations and the public were invited to NPD's virtual Chimney Swift count night. <u>CNL Response:</u> Early in the NPD Closure Project, CNL undertook investigation of the viability of ventilation stack removal. It was decided that ventilation stack retention would mitigate the risk of roost abandonment by the Chimney Swift. CNL has applied for a species at risk permit from ECCC for the potential harm and harassment of chimney swifts during decommissioning activities. The draft conditions of that permit (mitigations for the protection of the Chimney Swift) are included in the EIS.	<u>Where is this topic discussed in the EIS?</u> Section 9.6.3.2 of the EIS includes comprehensive mitigations to ensure effects on Chimney Swifts are minimized. <u>What changes have been made (and where)?</u> The EIS includes additional mitigations for Chimney Swifts that are aligned with the conditions in the draft permit from ECCC.	<u>Status:</u> Resolved CNL considers this concern has been addressed with the information shared to Alderville First Nation after the May 2020 webinar meeting. CNL remains committed to ongoing engagement with Alderville First Nation.
Curve Lake First Nation				
1) Aquatic environment	a) Protection of the aquatic environment As stewards of the lands and waters, it is important to Curve Lake First Nation that the environment around the site of the NPD Closure Project including the Ottawa River, are protected, and that the rights and interests of Curve Lake First Nation are upheld in relation to the environment (i.e., hunting, trapping, gathering, fishing and cultural ceremonies). This is a project-specific concern.	CNL has responded in writing to Curve Lake comments on this topic, citing relevant sections of the EIS as part of the comment responses. CNL offered a focused discussion on proposed groundwater monitoring activities and a dedicated session on the draft follow-up monitoring plans (including groundwater) was held in 2022 April. CNL provided a summary of the benthic invertebrate study that was conducted offshore of NPD in 2020, and NPD provided the complete report to Curve Lake First Nation. CNL responded to follow up questions on the benthic invertebrate study. Curve Lake First Nation visited the NPD site in 2022 October. The visit included a facility tour and walk to the river. <u>CNL Response:</u> CNL has studied and modelled groundwater flow at the NPD site. The groundwater source of the wetlands is not affected at all by groundwater from the	<u>Where is this topic discussed in the EIS?</u> Section 4.1 of the EIS highlights the in-design mitigation measures that act to isolate and contain the waste inventory within the NPD Disposal Facility to ensure protection of the surrounding environment, including the aquatic environment. Section 9.3.3.2 of the EIS provides a series of mitigation measures focused on protection of surface water and ultimately the aquatic environment. Mitigation measures for the protection of surface water have been updated and expanded from the 2017 draft EIS. The EIS does not predict any adverse residual effects on the aquatic environment (Section 9.4.3.5) as a result of the NPD Closure Project. <u>What changes have been made (and where)?</u>	<u>Status:</u> Resolution in Progress CNL considers this interest resolved by its responses to the July 2021 letter, sharing of the benthic invertebrate study, draft follow-up monitoring plan discussion and pending the completion of the next steps outlined below. CNL remains committed to ongoing engagement on this topic. <u>Next Steps:</u> CNL and Curve Lake First Nation to consider opportunities for CNL to build awareness of cultural keystone species for Curve Lake First Nation.

		NPD facility. Groundwater on the NPD site flows towards the Ottawa River, so groundwater that interacts with the NPD facility flows away from the wetland, towards the Ottawa River. CNL undertook baseline studies of benthic macroinvertebrate, sediment quality and water quality in the Ottawa River in the summer of 2020. Samples were taken upstream, downstream and adjacent to the NPD facility. This study sets the baseline that will be used for EA follow-up monitoring activities. The results of this study support the description of the baseline aquatic environment in the EIS. CNL's assessment addressed potential effects to VCs in the aquatic environment. The assessment covered the aquatic VCs of interest to Indigenous Nations, communities and organizations, including the fish species identified during Indigenous engagement activities. The assessment concluded that there are no adverse residual effects on the aquatic environment expected from the project.	No changes have been made to the EIS.	CNL and Curve Lake First Nation to consider opportunities for future site visits (either to the NPD site or to the community) as part of ongoing engagement and relationship-building.
2) Archaeology and Cultural Heritage	a) Protection of burial sites Curve Lake First Nation wants to ensure that any archaeological discoveries at the NPD site are handled properly and respectfully to remain protective of Indigenous cultural rights. This is both a CNL-wide and project specific concern.	Curve Lake First Nation requested the archaeological report through comments on the Project Description. CNL shared the report with Curve Lake First Nation in February 2017. At that time Curve Lake First Nation had no comments on the archaeological assessment. In May 2020, CNL provided WTFN with an interactive webinar discussion and presentation sharing information on the NPD Closure Project. Key topic areas were: project overview and timeline, waste inventory, monitoring, VCs, species at risk, traditional land and resource use and effects on the environment. New representatives from Curve Lake First Nation attended and requested the archaeological assessment, which CNL also provided in May 2020. <u>CNL Response:</u> CNL has conducted a Stage 1 archaeological assessment and share the report with Curve Lake First Nation. No further archaeological work is planned for NPD. CNL includes in the proposed mitigation measures for the project an immediate stop work and engagement of appropriately licensed resources if archaeological resources are discovered. This is in line with CNL's procedure on Management of Cultural Resources.	<u>Where is this topic discussed in the EIS?</u> The NPD EIS includes a summary of the archaeological assessment (Section 8.11.4). CNL describes proposed mitigation measures that will be employed if undocumented archaeological resources (including burial sites) are discovered during the project in Section 9.9.3.2 of the EIS. The EIS does not predict any adverse residual effects on the socio-economic environment (Section 9.11.3.5) or traditional land and resource use (Section 9.9.3.5) (encompassing archaeological resources). <u>What changes have been made (and where)?</u> In Section 9.9.3.2 of the EIS, CNL added proposed mitigation measures that will be employed if undocumented archaeological resources are discovered during the project.	<u>Status:</u> Resolved CNL has received no further inquiries from Curve Lake on this topic and remains available to discuss the archaeology of the NPD site further with Curve Lake First Nation, if requested in the future.
3) Baseline Characterization	a) Tritium levels in the Ottawa River It is important to Curve Lake First Nation that baseline tritium levels in the Ottawa River, including soil and vegetation, are well understood for comparison of any potential impacts from the project. This is both a CNL-wide and project specific interest.	CNL has responded in writing with information to address the questions on baseline tritium concentrations. <u>CNL Response:</u> Tritium is produced naturally from interactions of cosmic rays with gases in the upper atmosphere. Levels of naturally produced tritium in surface water are estimated to be between 0.24 and 1.18 Bq/L (depending on geographical area). The major source of anthropogenic tritium in surface water is from weapons testing in the 1960s. The specific percent of natural versus anthropogenic tritium (from weapons testing) in the Ottawa River is not available. For reference and to show the decay of anthropogenic tritium following weapons testing, CNL shared a graph of tritium concentrations in the Great Lakes showing the tritium peak from weapons testing in the 1960s with a subsequent decline in the years following the cessation of weapons testing. The tritium peak and subsequent decay would be similar for the Ottawa River. Tritium levels in the Ottawa River near NPD, measured upstream and downstream	<u>Where is this topic discussed in the EIS?</u> Baseline conditions for surface water quality (including the Ottawa River) are found in Section 8.3.4 of the EIS. <u>What changes have been made (and where)?</u> No changes have been made to the EIS.	<u>Status:</u> Resolved CNL believes this concern has been substantially addressed by the response and information shared that provides explanation of natural and anthropogenic sources of tritium. <u>Continuing Next Steps:</u> Curve Lake First Nation and CNL will continue sharing information about tritium levels in the Ottawa River and the local environment including soil and vegetation. This information sharing will support an improved understanding of natural and anthropogenic sources of

		of NPD averaged approximately 2.5 Bq/L over the past five years, which indicates no measurable impact on tritium levels in the Ottawa River from NPD.		tritium, including historic anthropogenic sources.
4) Engagement	(a) Funding for Participation in NPD EA process It is important to Curve Lake First Nation that there is meaningful engagement on the project, because the project is located within the traditional territory of Curve Lake First Nation. This is a project-specific interest.	CNL met with Curve Lake First Nation in November and December 2020 and January 2021 to discuss capacity and establishing a contribution agreement to support Curve Lake First Nation’s participation in CNL’s Environmental Remediation Projects, including the NPD Closure Project. A letter was sent to Curve Lake First Nation in April 2021 to provide a summary of CNL commitments, including discussions on a contribution agreement, made to Curve Lake First Nation through engagement on the NPD Closure Project. CNL has not received any feedback from Curve Lake on the commitments. Monthly meetings (including a project update) between CNL and Curve Lake First Nation (and other WTFN communities) began in March 2021. The contribution agreement between CNL and Curve Lake First Nation was entered into in November 2021 and remains in effect. <u>CNL Response:</u> CNL has committed to open, transparent and continuing engagement with Curve Lake First Nation. CNL and Curve Lake First Nation worked together to put in place a contribution agreement that provides capacity to Curve Lake First Nation for their participation in the NPD EA Process. As part of this contribution agreement CNL and Curve Lake (and other WTFN) meet monthly for a project update and discussion. Curve Lake has requested and CNL has made specific presentations and had various subject matter experts available to discuss the topics of interest identified by Curve Lake (and other WTFN).	<u>Where is this topic discussed in the EIS?</u> Section 6.2.10.2 of the EIS summarizes CNL engagement with Curve Lake First Nation to date. <u>What changes have been made (and where)?</u> CNL has updated Section 6.2.4.10 and 6.5 of the EIS to reflect new and planned engagement activities to support Curve Lake’s meaningful participation in the EA process.	<u>Status:</u> Resolved CNL believes this concern is substantially addressed by the signing of the contribution agreement that supports meaningful participation of Curve Lake First Nation on the NPD Closure Project environmental assessment (EA).
4) Engagement	(b) Holistic engagement with CNL (beyond the project-level) It is important to Curve Lake First Nation and Hiawatha First Nation to be engaging with CNL on an ongoing basis with a holistic approach that goes beyond the scope of an individual project so that Curve Lake First Nation’s interests and rights can be incorporated in a meaningful way into CNL’s activities. This is a CNL-wide concern.	In 2022 October, CNL (NPD representatives and others) were invited to visit Curve Lake First Nation. CNL’s visit to the community was a day of listening and experiencing the cultural values of the community; CNL visited and observed the historic and sacred Petroglyphs site, shared in a smudging ceremony. The group congregated at the Curve Lake Community Centre and met with the Chief and council. Also in 2022 October, Curve Lake First Nation visited the NPD site. The visit included a facility tour and walk to the river. <u>CNL Response:</u> CNL is committed to open, transparent and continuing engagement with Curve Lake First Nation. CNL has expanded its engagement with Curve Lake First Nation through monthly meetings that are focused on topics chosen by the WTFN community representatives. Meeting focuses have included the Small Modular Reactor (SMR) Program and Siting at CNL, the Cleanup Mission and the Approach to Biodiversity at CNL. CNL is committed to engaging at a broader level with Curve Lake First Nation in the way the community wishes to be engaged. This includes beginning to incorporate in-person meetings at CNL-managed sites, where there is interest from Curve Lake First Nation or any of the other WTFN communities. CNL will continue to engage with Curve Lake First Nation at a corporation to First	<u>Where is this topic discussed in the EIS?</u> Not applicable. <u>What changes have been made (and where)?</u> No changes have been made to the EIS.	<u>Status:</u> Resolution in Progress <u>Next Steps:</u> CNL and Curve Lake First Nation to consider opportunities for: • CNL to build awareness of cultural keystone species for Curve Lake First Nation. • Site assessment, sampling and monitoring activities to gather baseline Indigenous and local knowledge. • Future site visits (either to the NPD site or to the community) as part of ongoing engagement and relationship-building.

		Nation level, on interests beyond individual projects.		
4) Engagement	(c) Curve Lake First Nation expressed concern about the use of language within the NPD EIS and the perceived importance and priority of Indigenous engagement. This is both a CNL-wide and project-specific concern.	Phrases in the EIS with colonial language were replaced with phrases that emphasize the importance and priority of Indigenous engagement and the revised text shared with Curve Lake First Nation. The order of the Indigenous Engagement Section and the Stakeholder Engagement Section has been switched. <u>CNL Response:</u> CNL appreciates the feedback from Curve Lake First Nation on its EIS language and its use of culturally relevant language when engaging with First Nations. CNL is committed to continuously improving its relationship with Indigenous peoples and progressing reconciliation. Specifically, CNL is working on a company-wide Reconciliation Action Plan.	<u>Where is this topic discussed in the EIS?</u> Indigenous Engagement is discussed in Section 6 of the EIS. <u>What changes have been made (and where)?</u> CNL has revised its EIS to remove the colonial language and aspects identified by Curve Lake to appropriately reflect the importance of meaningful engagement. The Indigenous Engagement Section is now Section 6 and the Stakeholder Engagement section is now Section 7.	<u>Status:</u> Resolved CNL considers this interest resolved by changes in the order of EIS sections and revised wording. It is noted that this topic extends beyond the scope of CEAA (2012) and the EA for the NPD Closure Project.
5) EA Process and Methodology	a) A request for more details on the effects assessment approach and identification of valued components It is important to Curve Lake First Nation that the VCs used for the project incorporate species important to traditional users of the land to ensure the effects on traditional land and resource use are adequately considered. This is a project-specific concern.	CNL has responded in writing to Curve Lake comments on this topic, citing relevant sections of the EIS as part of the comment responses. CNL has provided an explanation about the broad categories of VCs, which encompass several species (e.g. the “mushroom” VC include all mushroom species, and the “benthic invertebrates” VC includes mussels.) A summary of the benthic invertebrate study was provided to Curve Lake First Nation, noting that the benthic invertebrate study will be repeated once after decommissioning activities are complete to test the EIS prediction of no adverse effects to benthic invertebrates. CNL has shared the complete benthic study report with Curve Lake First Nation and has responded to follow up questions this topic. Curve Lake First Nation visited the NPD site in 2022 October. The visit included a facility tour and walk to the river. <u>CNL Response:</u> CNL undertook baseline studies of benthic macroinvertebrate, sediment quality and water quality in the Ottawa River in the summer of 2020. Samples were taken upstream, downstream and adjacent to the NPD facility. This study sets the baseline that will be used for EA follow-up monitoring activities. The results of this study support the description of the baseline aquatic environment in the EIS. CNL’s assessment addressed potential effects to VCs in the aquatic and terrestrial environments. The assessment covered the aquatic and terrestrial VCs of interest to Indigenous Nations, communities and organizations, including mushrooms and mussels. The assessment concluded that there are no adverse residual effects on the aquatic or terrestrial environment expected from the project.	<u>Where is this topic discussed in the EIS?</u> The EIS does not predict any adverse residual effects on the aquatic environment (Section 9.4.3.3) or the terrestrial environment (Section 9.6.3.3). CNL has developed mitigation measures and monitoring plans for the protection of the Ottawa River (Sections 9.3.3.2 and 12.3 of the EIS) and for the protection of valued component species (Sections 9.4.3.2 and 9.6.3.2 and 12.3 within the EIS). <u>What changes have been made (and where)?</u> No changes have been made to the EIS.	<u>Status:</u> Resolution in Progress CNL considers this interest resolved by its responses to the July 2021 letter, sharing of the benthic invertebrate study and summary of this work. CNL remains committed to ongoing engagement on this topic. <u>Next Steps:</u> Further follow-up discussion on VC identification, if requested, by Curve Lake First Nation. CNL and Curve Lake First Nation to consider opportunities for future site visits (either to the NPD site or to the community) as part of ongoing engagement and relationship-building.
6) End State, Site Restoration and Future Use of the Land	a) Engagement on Final Site Restoration It is important to Curve Lake to be engaged meaningfully about final site restoration. It is important to Curve Lake that the end state of the NPD site is safe for future land users and that the rights and interests of future Indigenous peoples are	CNL has responded in writing to Curve Lake comments on this topic, citing relevant sections of the EIS as part of the comment responses. <u>CNL Response:</u> Future land use is a discussion topic that requires the participation of AECL as the owner of the NPD site, in consultation with Indigenous Nations, communities, and organizations, the public, as well as industry and government. As the licensee, CNL is committed to engagement and consultation with Curve Lake First Nation on future end state and land use. Future land use and land transfer are beyond the scope of the EA for the NPD	<u>Where is this topic discussed in the EIS?</u> General plans for restoration and end state are described in Section 4.3.1.9 of the EIS. <u>What changes have been made (and where)?</u> No changes have been made to the EIS.	<u>Status:</u> Resolved CNL considers this interest resolved via clarification of EIS wording with Curve Lake First Nation and pending the completion of the next steps outlined below. CNL remains committed to ongoing engagement with the Curve Lake First Nation.

	preserved. This is both a CNL-wide and project-specific concern.	Closure Project. CNL recognizes that the importance of this matter to Curve Lake First Nation, and therefore CNL has committed to sharing the draft site restoration plan with Curve Lake First Nation for feedback.		<u>Next Steps:</u> CNL will share the draft restoration plan with Curve Lake First Nation and other Indigenous Nations, communities and organizations once it is complete.
7) Protection of Flora and Fauna	(a) Curve Lake First Nation expressed general concern for the protection of Species at Risk and non-protected species. As stewards of the lands and waters, it is important to Curve Lake First Nation that the environment around the site of the NPD Closure Project including the Ottawa River, are protected in an interconnected way. With respect to Species at Risk this is a project-specific concern. CNL’s approach to biodiversity and the non-protected species is a CNL-wide concern.	In May 2020, the WTFN and CNL met for a discussion and presentation sharing information on the NPD Closure Project. Species at risk was a key focus of the discussion and representatives of Curve Lake First Nation had a number of follow-up question after the meeting. In response, CNL provided the Chimney Swift TSD as well as specific answers to questions from Curve Lake First Nation, Hiawatha First Nation and Alderville First Nation on the ventilation stack and Chimney Swifts. At the May 2021 monthly project update and information sharing meeting between CNL and WTFN, an overview of CNL’s biodiversity program was discussed. Curve Lake First Nation visited the NPD site in 2022 October. The visit included a facility tour and walk to the river. <u>Additional opportunities:</u> In May 2019, Indigenous Nations, communities and organizations and the public were invited to participate in the National Chimney Swift Roost Counts. Chimney Swifts were the focus topic of the June 2019 breakfast briefing to which the Curve Lake First Nation was invited. In May 2020, Indigenous Nations, communities and organizations and the public were invited to NPD’s virtual Chimney Swift count night. In May 2021, Indigenous Nations, communities and organizations and the public were invited to NPD’s virtual Chimney Swift count night. <u>CNL Response:</u> CNL is committed to the protection of species at risk and has and will apply for any necessary permits from ECCC. In its effects assessment, when considering species at risk, CNL considers impacts to an individual and not just the overall population. Several species at risk have been identified at the NPD site and key aspects of CNL’s plan to protect these species are included below. Early in the NPD Closure Project, CNL undertook investigation of the viability of ventilation stack removal. It was decided that ventilation stack retention would mitigate the risk of abandonment by the Chimney Swift. CNL has applied for a species at risk permit from ECCC for the potential harm and harassment of chimney swifts during decommissioning activities. The draft conditions of that permit (mitigations for the protection of the Chimney Swift) are included in the EIS. In response to observations of milkweed at the NPD site, monarch butterfly has been added as a valued component to the EIS and mitigations are in place to preserve and reseed with milkweed (critical habitat). CNL does not predict any adverse residual effects to the chimney swift, monarch and other species at risk.	<u>Where is this topic discussed in the EIS?</u> Collectively, mitigation measures for the protection of flora and fauna, specifically species at risk are outlined in Section 9.6.3.2 (Terrestrial Environment). No residual effects for the terrestrial environment are predicted (Section 9.6.3.5). <u>What changes have been made (and where)?</u> As a result of feedback, monarch butterflies were added as a VC (see Appendix B of the EIS). Habitat effects on the monarch butterfly are considered and mitigations are outlined in Section 9.6.3.2 of the EIS. The EIS includes additional mitigations related to milkweed (important habitat for monarch butterflies), migratory birds, bats, chimney swifts and milksnakes.	<u>Status:</u> Resolved CNL considers this concern has been addressed with the information shared to Curve Lake First Nation as there were no further follow-up questions related to specific species at risk. CNL remains committed to ongoing engagement with Curve Lake First Nation on non-protected species. <u>Next Steps:</u> CNL and Curve Lake First Nation to consider opportunities for CNL to build awareness of cultural keystone species for Curve Lake First Nation. CNL and Curve Lake First Nation to consider opportunities for future site visits (either to the NPD site or to the community) as part of ongoing engagement and relationship-building.

7) Protection of Flora and Fauna	(b) Potential impacts to Chimney Swifts from remedial and closure activities for the NPD ventilation stack. As stewards of the lands and waters, it is important to Curve Lake First Nation that the environment around the site of the NPD Closure Project including biota, are protected. This is a project-specific concern.	CNL responded in writing with additional information on the planned modifications to the ventilation stack. <u>CNL Response:</u> The ventilation stack at NPD is 46 m in height. Chimney Swifts spend the spring and summer months in the area. They arrive in early May and migrate south at the end of August. At the NPD site, swifts roost in the top few metres of the stack. The swifts don't build nests in the stack; swifts that are ready to nest leave the stack and live in the forest during the breeding season (June-July) The level of contamination in the concrete at the top of the stack (where the swifts roost) was measured in 2014 using thermoluminescent dosimeters and the dose was at background levels. CNL is planning to empty water/sludge from the base of the stack to enable inspection of the stack base. This work is planned to take place within the next few months. Pumping out of the water/sludge will take place at a time when swifts are not in the stack. The sludge is composed of rainwater and biological waste from the swifts. It contains tritium and gross beta radioactivity due to contact with the stack concrete. CNL will prepare an “environmental review” document for this activity which will outline the timing restrictions to the work to ensure minimal impact to chimney swifts, and outline other measures that must be taken to prevent adverse impacts to the environment (e.g. preventing spills from vehicles). This waste will be managed at the Sewage Treatment Plant at the Chalk River Laboratories site. Once the proposed in-situ decommissioning is complete, the ground level around the ventilation stack will be higher due to the engineered barrier that is proposed to cover the facility. CNL plans to grout the base of the ventilation stack up to a level approximately 8-10 feet above the current ground level. This will isolate the ventilation stack from the rest of the NPD facility and create a new higher “bottom” of the ventilation stack. Several holes will be cored in the stack at the level of the new base to allow the draining of any rain and melt water that might enter the stack from the opening at the top, and to allow for periodic camera inspections of the interior, if required. The holes will also help induce an airflow up the ventilation stack, due to stack effect, that is intended to mimic the current passive airflow present in the ventilation stack. Animal-resistant louvers are proposed to be placed over the drain holes, to ensure free drainage of water while denying animals access to the stack interior. The ventilation stack will be inspected periodically for signs of degradation, and will be removed when no longer structurally suitable for continued use as a chimney swift roost. For planning purposes, this is assumed to be 50 years following completion of decommissioning.	<u>Where is this topic discussed in the EIS?</u> General plans for the ventilation stack are described in Section 4.3.1.6 of the revised draft EIS. Section 9.6.3.2 of the EIS includes comprehensive mitigations to ensure effects on Chimney Swifts are minimized. <u>What changes have been made (and where)?</u> No changes have been made to the EIS.	<u>Status:</u> Resolution in Progress CNL believes this concern has been substantially addressed by the response and information shared on plans for the ventilation stack. <u>Next Steps:</u> CNL will continue sharing information with CLFN as project activities progress with the NPD ventilation stack and provide opportunities to participate in the activities where safe to do so.
8) Protection of the Ottawa River	a) Protection of water, the surrounding environment and natural resources for all future generations. As stewards of the lands and waters, it is important to Curve Lake First	In May 2020, CNL provided WTFN with an interactive webinar discussion and presentation sharing information on the NPD Closure Project. Key topic areas were: project overview and timeline, waste inventory, monitoring, VCs, species at risk, traditional land and resource use and effects on the environment. Curve Lake First Nation attended. Based on questions and comments from Curve Lake First Nation CNL understands	<u>Where is this topic discussed in the EIS?</u> Section 4.1 of the EIS highlights the in-design mitigation measures that act to isolate and contain the waste inventory within the NPD Disposal Facility to ensure protection of the surrounding environment including the Ottawa River. Section 9.3.3.2 of the EIS provides a series of mitigation	<u>Status:</u> Resolved CNL considers this concern addressed by the revisions to the EIS. CNL remains committed to ongoing engagement with Curve Lake First Nation.

	Nation that the environment around the site of the NPD Closure Project including the Ottawa River, is protected, and that the rights and interests of Curve Lake First Nation are upheld in relation to the environment (i.e., hunting, trapping, gathering, fishing and cultural ceremonies). This is a project-specific concern.	that protection of the Ottawa River is important to Curve Lake First Nation. <u>CNL Response:</u> CNL has assessed in situ disposal of the waste at as safe for the public and the environment, particularly the Ottawa River, over both short and long-term periods (e.g., 100,000 years). If the facility is approved, the CNSC will require CNL to monitor and control access to the site during the Institutional Control period currently proposed for a minimum of 100 years. Once the regulator allows for Institutional Controls to cease, there will be no requirement for future monitoring or maintenance as the in-design features or passive barriers of the disposal facility, such as the grout, will help protect the public and the environment from radioactive and non-radioactive wastes.	measures focused on protection of surface water (including the Ottawa River). Mitigation measures for the protection of surface water have been updated and expanded from the 2017 draft EIS. The EIS (Section 9.3.3.5) does not predict any adverse residual effects on the surface water environment (encompassing the Ottawa River). <u>What changes have been made (and where)?</u> Note that this concern was raised at the Project Description stage and therefore no changes were made to the EIS as the above assessment has been present since the initial draft.	
9) Socio-economics	a) Curve Lake expressed concern about how community statistics from NPD's neighboring Indigenous Nations, communities and organizations are portrayed. Curve Lake First Nation wants to ensure that the effects of colonialism and the Indian Act on the socio-economic conditions of Indigenous Nations, communities and organizations are recognized. This is both a CNL-wide and project specific concern.	CNL has responded in writing to Curve Lake comments on this topic, citing relevant sections of the EIS as part of the comment responses. CNL understands Curve Lake's concern and has communicated to Curve Lake First Nation that CNL is working directly with AOPFN on EIS content and Algonquin perspective. <u>CNL Response:</u> CNL acknowledges that economic challenges faced by some Indigenous Nations, communities and organizations are likely related to legacies of colonialism and the <i>Indian Act</i> . CNL has and continues to want to offer opportunities and benefits to Indigenous individuals and communities that will enhance their economic well-being. CNL clarified that the inclusion of socio-economic information was in response to comments on the 2017 draft EIS from Indigenous Nations, communities and organizations.	<u>Where is this topic discussed in the EIS?</u> Sections 8.10 and 9.10 of the EIS focus on Indigenous socio-economic conditions, including economy and employment. Section 8.10 summarizes current economic and employment conditions, and Section 9.10 assesses potential effects and discusses CNL's plan to fully realize the potential for economic and employment benefits to Indigenous Nations, communities and organizations. <u>What changes have been made (and where)?</u> No changes have been made to the EIS.	<u>Status:</u> Resolved CNL considers this interest resolved via clarification of the basis for inclusion of Indigenous socio-economic content within the EIS. It is noted that this topic extends beyond the scope of CEAA (2012) and the EA for the NPD Closure Project.
Hiawatha First Nation				
1) Aquatic environment	a) Protection of the aquatic environment As stewards of the lands and waters, it is important to Hiawatha First Nation that the environment around the site of the NPD Closure Project including the Ottawa River, are protected, and that the rights and interests of Hiawatha First Nation are upheld in relation to the environment (i.e., hunting, trapping, gathering, fishing and cultural ceremonies). This is a project-specific concern.	CNL has responded in writing to Curve Lake comments on this topic and shared these responses with Hiawatha First Nation, citing relevant sections of the EIS as part of the comment responses. CNL offered a focused discussion on proposed groundwater monitoring activities. CNL provided a summary of the benthic invertebrate study that was conducted offshore of NPD in 2020, and NPD provided the complete report to Hiawatha (and Curve Lake) First Nations. CNL responded to follow up questions on the benthic invertebrate study. Hiawatha First Nation visited the NPD site in 2022 October. The visit included a facility tour and walk to the river. <u>CNL Response:</u> CNL has studied and modelled groundwater flow at the NPD site. The groundwater source of the wetlands is not affected at all by groundwater from the NPD facility. Groundwater on the NPD site flows towards the Ottawa River, so groundwater that interacts with the NPD facility flows away from the wetland, towards the Ottawa River. CNL undertook baseline studies of benthic macroinvertebrate, sediment quality	<u>Where is this topic discussed in the EIS?</u> Section 4.1 of the EIS highlights the in-design mitigation measures that act to isolate and contain the waste inventory within the NPD Disposal Facility to ensure protection of the surrounding environment, including the aquatic environment. Section 9.3.3.2 of the EIS provides a series of mitigation measures focused on protection of surface water and ultimately the aquatic environment. Mitigation measures for the protection of surface water have been updated and expanded from the 2017 draft EIS. The EIS does not predict any adverse residual effects on the aquatic environment (Section 9.4.3.5) as a result of the NPD Closure Project. <u>What changes have been made (and where)?</u> No changes have been made to the EIS.	<u>Status:</u> Resolution in Progress CNL considers this interest resolved by its responses to the July 2021 letter, sharing of the benthic invertebrate study and summary of this work. CNL remains committed to ongoing engagement on this topic. <u>Next Steps:</u> Focused follow-up discussion on proposed groundwater monitoring activities. CNL and Hiawatha First Nation to consider opportunities for future site visits (either to the NPD site or to the community) as part of ongoing engagement and relationship-building.

		and water quality in the Ottawa River in the summer of 2020. Samples were taken upstream, downstream and adjacent to the NPD facility. This study sets the baseline that will be used for EA follow-up monitoring activities. The results of this study support the description of the baseline aquatic environment in the EIS. CNL's assessment addressed potential effects to VCs in the aquatic environment. The assessment covered the aquatic VCs of interest to Indigenous Nations, communities and organizations, including the fish species identified during Indigenous engagement activities. The assessment concluded that there are no adverse residual effects on the aquatic environment expected from the project.		
2) Engagement	(a) Holistic engagement with CNL (beyond the project-level) It is important to Curve Lake First Nation and Hiawatha First Nation to be engaging with CNL on an ongoing basis with a holistic approach that goes beyond the scope of an individual project so that Hiawatha First Nation's interests and rights can be incorporated in a meaningful way into CNL's activities. This is a CNL-wide concern.	Hiawatha First Nation visited the NPD site in 2022 October. The visit included a facility tour and walk to the river. A CNL visit to Hiawatha First Nation is planned for summer 2023. <u>CNL Response:</u> CNL is committed to open, transparent and continuing engagement with Hiawatha First Nation. CNL has expanded its engagement with Hiawatha First Nation through monthly meetings that are focused on topics chosen by the WTFN community representatives. Meeting focuses have included the Small Modular Reactor (SMR) Program and Siting at CNL, the Cleanup Mission and the Approach to Biodiversity at CNL. CNL is committed to engaging at a broader level with Hiawatha First Nation in the way the community wishes to be engaged. This includes beginning to incorporate in-person meetings at CNL-managed sites, where there is interest from Hiawatha First Nation or any of the other WTFN communities. CNL will continue to engage with Hiawatha First Nation at a corporation to First Nation level, on interests beyond individual projects.	<u>Where is this topic discussed in the EIS?</u> Not applicable. <u>What changes have been made (and where)?</u> No changes have been made to the EIS.	<u>Status:</u> Resolution in Progress <u>Next Steps:</u> CNL and Hiawatha First Nation to consider opportunities for: • CNL community visit to Hiawatha First Nation for a cultural awareness session and community engagement session, as well as future visits to the NPD site. • CNL and Hiawatha First Nation to seek opportunities for site assessment, sampling and monitoring activities to gather baseline Indigenous and local knowledge.
2) Engagement	(b) Hiawatha First Nation expressed concern about the use of language within the NPD EIS and the perceived importance and priority of Indigenous engagement. This is both a CNL-wide and project specific concern.	Phrases in the EIS with colonial language were replaced with phrases that emphasize the importance and priority of Indigenous engagement and the revised text shared with Hiawatha First Nation. The order of the Indigenous Engagement Section and the Stakeholder Engagement Section has been switched. <u>CNL Response:</u> CNL appreciates the feedback from Hiawatha (and Curve Lake) First Nations on its EIS language. CNL is committed to continuously improving its relationship with Indigenous peoples and progressing reconciliation. Specifically, CNL is working on a company-wide Reconciliation Action Plan.	<u>Where is this topic discussed in the EIS?</u> Indigenous Engagement is discussed in Section 6 of the EIS. <u>What changes have been made (and where)?</u> CNL has revised the EIS language and aspects identified by Hiawatha (and Curve Lake) to appropriately reflect the importance of meaningful engagement. The Indigenous Engagement Section is now Section 6 and the Stakeholder Engagement section is now Section 7.	<u>Status:</u> Resolved CNL considers this interest resolved by changes in the order of EIS sections and revised wording. It is noted that this topic extends beyond the scope of CEAA (2012) and the EA for the NPD Closure Project.
3) EA Process and Methodology	a) A request for more details on the effects assessment approach and identification of valued components It is important to Hiawatha First Nation that the VCs used for the project incorporate species important to traditional users of the land to ensure the effects on	CNL has responded in writing to Curve Lake comments on this topic and shared these responses with Hiawatha, citing relevant sections of the EIS as part of the comment responses. CNL has provided an explanation about the broad categories of VCs, which encompass several species (e.g. the "mushroom" VC include all mushroom species, and the "benthic invertebrates" VC includes mussels.) A summary of the benthic invertebrate study was provided to Hiawatha (and Curve Lake) First Nations, noting that the benthic invertebrate study will be repeated once after Decommissioning activities are complete to test the EIS	<u>Where is this topic discussed in the EIS?</u> The EIS does not predict any adverse residual effects on the aquatic environment (Section 9.4.3.5) or the terrestrial environment (Section 9.6.3.5). CNL has developed mitigation measures and monitoring plans for the protection of the Ottawa River (Sections 9.3.3.2 and 12.3 within the EIS) and for the protection of valued component species (Sections 9.4.3.2 and 9.6.3.2 and 12.3 within the EIS).	<u>Status:</u> Resolution in Progress CNL considers this interest resolved by its responses to the July 2021 letter, sharing of the benthic invertebrate study and summary of this work. CNL remains committed to ongoing engagement on this topic. <u>Next Steps:</u> Further follow-up discussion on VC

	traditional land and resource use are adequately considered. This is a project-specific concern.	prediction of no adverse effects to benthic invertebrates. CNL has shared the complete benthic study report with Hiawatha (and Curve Lake) First Nations and has responded to follow up questions this topic. <u>CNL Response:</u> CNL undertook baseline studies of benthic macroinvertebrate, sediment quality and water quality in the Ottawa River in the summer of 2020. Samples were taken upstream, downstream and adjacent to the NPD facility. This study sets the baseline that will be used for EA follow-up monitoring activities. The results of this study support the description of the baseline aquatic environment in the EIS. CNL's assessment addressed potential effects to VCs in the aquatic and terrestrial environments. The assessment covered the aquatic and terrestrial VCs of interest to Indigenous Nations, communities and organizations, including mushrooms and mussels. The assessment concluded that there are no adverse residual effects on the aquatic or terrestrial environment expected from the project.	<u>What changes have been made (and where)?</u> No changes have been made to the EIS.	identification, if requested, by Hiawatha FN. Coordinate a visit to the NPD site for Hiawatha FN representatives, as requested, to verify that there are no impacts to rights. Future visits to the community can also be planned for as part of ongoing engagement and relationship-building.
4) End State, Site Restoration and Future Use of the Land	a) Engagement on Final Site Restoration It is important to Hiawatha that it is engaged meaningfully about final site restoration. It is important to Hiawatha that the end state of the NPD site is safe for future land users and that the rights and interests of future Indigenous peoples are preserved. This is both a CNL-wide and project-specific concern.	CNL has responded in writing to Curve Lake comments on this topic and shared the responses with Hiawatha, citing relevant sections of the EIS as part of the comment responses. <u>CNL Response:</u> Future land use is a discussion topic that requires the participation of AECL as the owner of the NPD site, in consultation with Indigenous Nations, communities, and organizations, the public, as well as industry and government. As the licensee, CNL is committed to engagement and consultation with Hiawatha First Nation on future end state and land use. Future land use and land transfer are beyond the scope of the EA for the NPD Closure Project. CNL recognizes that the importance of this matter to Hiawatha First Nation, and therefore CNL has committed to sharing the draft site restoration plan with Hiawatha First Nation for feedback.	<u>Where is this topic discussed in the EIS?</u> General plans for restoration and end state are described in Section 4.3.1.9 of the EIS. <u>What changes have been made (and where)?</u> No changes have been made to the EIS.	<u>Status:</u> Resolved CNL considers this interest resolved via clarification of EIS wording with Curve Lake and Hiawatha FN. CNL remains committed to ongoing engagement with the Hiawatha First Nation. <u>Next Steps:</u> CNL will share the draft restoration plan with Hiawatha First Nation and other Indigenous Nations, communities and organizations once it is complete.
5) Protection of Flora and Fauna	(a) Hiawatha expressed interest in CNL's plans for the NPD ventilation stack in relation to caretaking of the environment, and maintaining this habitat for the Chimney Swift with a secondary interest in the impact of a stack collapse and proximity of this structure to the Ottawa River. This is a project-specific interest.	In May 2020, the WTFN and CNL met for a discussion and presentation sharing information on the NPD Closure Project. Species at risk was a key focus of the discussion and representatives of Curve Lake First Nation had a number of follow-up question after the meeting. In response, CNL provided the Chimney Swift TSD as well as specific answers to questions from Curve Lake First Nation, Hiawatha First Nation and Alderville First Nation on the ventilation stack and Chimney Swifts. At the May 2021 monthly project update and information sharing meeting between CNL and WTFN, an overview of CNL's biodiversity program was discussed. <u>CNL Response:</u> CNL undertook investigation of the viability of ventilation stack removal. It was decided that ventilation stack retention would mitigate the risk of abandonment by the chimney swift. CNL has applied for a species at risk permit from ECCC for the potential harm and harassment of chimney swifts during decommissioning activities. CNL examines the probability of a stack collapse in the Decommissioning Safety	<u>Where is this topic discussed in the EIS?</u> Section 9.6.3.2 of the EIS includes comprehensive mitigations to ensure effects on Chimney Swifts are minimized. <u>What changes have been made (and where)?</u> No changes have been made to the EIS.	<u>Status:</u> Resolved CNL considers this concern has been addressed with the information shared to Hiawatha First Nation. CNL remains committed to ongoing engagement with Hiawatha First Nation.

		Assessment (Section 9.6.6) focusing on 3 potential causes: earthquake, tornado and heavy equipment operation. The Decommissioning Safety Assessment also presents the maximum dose to a receptor resulting from a potential collapse of the Ventilation stack. Should the stack collapse, its height (of 45 m) means that it would land on the main terrace where the facility is located. For reference the base of the stack is about 140 m away from the shore of the Ottawa River. CNL has a surveillance plan in place at current that will continue for as long as the stack is maintained whereby periodic inspections of the stack are performed to ensure it remains in satisfactory condition.		
5) Protection of Flora and Fauna	(b) Hiawatha First Nation expressed concern about potential accumulation of contamination in large game animals. As stewards of the lands and waters, it is important to Hiawatha First Nation that the environment, including flora and fauna around the CRL and NPD sites is protected, to ensure the rights and interests of Hiawatha First Nation are upheld in relation to the environment (i.e., hunting). This is both a CNL-wide and project specific concern.	CNL's Environmental Protection experts responded directly to the question about large game animals during the monthly meeting. <u>CNL Response:</u> For the CRL site, samples of large game like deer, moose, and black bear are obtained from animals who succumbed as a result of vehicle collisions on the CRL site and from harvested animals (donated by local hunters) from areas within 25 km of CRL. The samples are analyzed for radioactivity and a dose from consumption is calculated. Although radioactivity in large game animals is slightly higher on and within 25 km of the Chalk River site than beyond it, the dose from consuming game animals from on or around the CRL site is a small fraction of the public dose limit of 1 millisieverts/year, indicating a very low risk. Game animals are not sampled around the NPD site because the low emissions to the environment from NPD do not warrant a sampling campaign. The PostSA TSD addresses potential concerns about food safety. The PostSA and EIS (and other supporting studies) demonstrate that, there are no concerns about the accessibility or safety of the NPD site in the long term based on several different future use scenarios, including self-sufficient Indigenous receptors (encompassing hunting). The proposed NPD Closure Project activities will result in an enhancement of current conditions at the NPD site and will improve the ability to practice traditional activities in the area surrounding the NPD site. These findings, which will be confirmed by monitoring, may reduce concerns about food safety. The follow-up monitoring program for the NPD Closure Project will monitor the environmental pathways whereby contamination may be accessible to biota (e.g., surface water).	<u>Where is this topic discussed in the EIS?</u> The draft follow-up monitoring plans for the NPD Closure project are included in Section 12 of the EIS. <u>What changes have been made (and where)?</u> No changes have been made to the EIS.	<u>Status:</u> Resolution in Progress CNL considers this concern has been addressed with the information shared to Hiawatha First Nation. CNL remains committed to ongoing engagement with Hiawatha First Nation. It is noted that this topic extends beyond the scope of the NPD Closure Project.
6) Monitoring	a) Hiawatha First Nation expressed interest in the monitoring plans for the NPD site. This interest stems from the importance of environmental stewardship to Hiawatha First Nation. As stewards of the lands and waters, it is important to Hiawatha First Nation that the environment around the site of the NPD Closure Project including the Ottawa River, are	In May 2020, the WTFN and CNL met for a discussion and presentation sharing information on the NPD Closure Project. Key focus areas were: project overview and timeline, waste inventory, monitoring, VCs, species at risk, traditional land and resource use and effects on the environment. Hiawatha First Nation participated in this webinar and shared a number of questions with CNL related to environmental monitoring. CNL followed up with specific answers to questions from the Hiawatha Lands and Resources staff monitoring, as well as three Annual Compliance and Monitoring reports from 2016, 2017 and 2018. <u>CNL Response:</u> The follow up monitoring program is described at a high level in Section 12 of the	<u>Where is this topic discussed in the EIS?</u> The draft follow-up monitoring plans for the NPD Closure project are included in Section 12 of the EIS. <u>What changes have been made (and where)?</u> No changes have been made to the EIS.	<u>Status:</u> Resolved CNL considers this concern has been addressed with the information shared to Hiawatha First Nation. CNL remains committed to ongoing engagement with Hiawatha First Nation. CNL is planning workshops to gather feedback on the draft follow-up monitoring plans for summer 2023.

	protected, and that the rights and interests of Hiawatha First Nation are upheld in relation to the environment (i.e., hunting, trapping, gathering, fishing and cultural ceremonies). This is a project-specific interest.	EIS with significant details developed compared to the 2017 draft EIS. These details come through the development of the 3 draft follow-up monitoring plans for effluent, environment and groundwater. CNL is seeking to work together with Indigenous Nations, communities and organizations, the public and stakeholders regarding their feedback before finalizing the EA Follow-up Program (Section 12 of the EIS). CNL has indicated that it is willing to involve all Indigenous Nations, communities and organizations in its monitoring programs.		
7) Socio-economics	a) Hiawatha (and Curve Lake) expressed concern about how community statistics from NPD's neighboring Indigenous Nations, communities and organizations are portrayed. Hiawatha First Nation wants to ensure that the effects of colonialism and the Indian Act on the socio-economic conditions of Indigenous Nations, communities and organizations are recognized. This is both a CNL-wide and project specific concern.	CNL has responded in writing to Curve Lake comments on this topic and shared these responses with Hiawatha First Nation, citing relevant sections of the EIS as part of the comment responses. CNL has communicated to Hiawatha First Nation that is working directly with AOPFN on EIS content and Algonquin perspective. <u>CNL Response:</u> CNL acknowledges that economic challenges faced by some Indigenous Nations, communities and organizations are likely related to legacies of colonialism and the <i>Indian Act</i> . CNL understands this concern and continues to want to offer opportunities and benefits to Indigenous individuals and communities that will enhance their economic well-being. CNL clarified that the inclusion of socio-economic information was in response to comments on the 2017 draft EIS from Indigenous Nations, communities and organizations.	<u>Where is this topic discussed in the EIS?</u> Sections 8.10 and 9.10 of the EIS focus on Indigenous socio-economic conditions, including economy and employment. Section 8.10 summarizes current economic and employment conditions, and Section 9.10 assesses potential effects and discusses CNL's plan to fully realize the potential for economic and employment benefits to Indigenous Nations, communities and organizations. <u>What changes have been made (and where)?</u> No changes have been made to the EIS.	<u>Status:</u> Resolved CNL considers this interest resolved via clarification of the basis for inclusion of Indigenous socio-economic content within the EIS. It is noted that this topic extends beyond the scope of CEAA (2012) and the EA for the NPD Closure Project.
Chippewas of Rama First Nation				
1. Alternatives	a) Range of alternatives considered and overall suitability of the In-Situ Disposal concept. Rama First Nation was concerned that CNL evaluate a range of options and that the design allows for reversibility if improved waste disposal options become available in the future. Rama wants to ensure that changes can be made in the future to ensure the environment remains protected. This is a project-specific concern.	CNL provided an overview of the alternatives and indicated that ISD is meant to be a permanent solution and that there is no intention to retrieve waste in the future. This response was provided verbally to Rama during a project update in April 2023. <u>CNL Response:</u> The waste at NPD has been there for over 55 years. CNL is reducing the waste liability by converting the waste into a form that provides safe, permanent waste disposal. CNL has assessed the suitability of ISD for NPD, and the EIS demonstrates that such disposal is safe for human health and the environment in the short term and long term. CNL has considered national and international standards and guidelines and continues to believe that the NPD facility has characteristics that support ISD.	<u>Where is this topic discussed in the EIS?</u> The in-situ disposal approach is described in Section 3.2 of the EIS. Alternative means are discussed in the Alternative Means Assessment TSD (64-509200-ASD-002 Revision 1) and Section 4.2 of the EIS. <u>What changes have been made (and where)?</u> No changes have been made to the EIS.	<u>Status:</u> Resolved CNL considers this concern has been addressed with the information shared to Rama First Nation. CNL remains committed to ongoing engagement with Rama First Nation through the William's Treaty First Nations monthly update.
1. Alternatives	b) Is In-Situ Disposal a Proven Technology	CNL shared its report summarizing worldwide examples of In-situ disposal as a follow-up to the 2023 April project update meeting. <u>CNL Response:</u> CNL has written a report that summarizes facilities worldwide that use In-situ Disposal. The report is not limited to nuclear reactors or processing facilities but	<u>Where is this topic discussed in the EIS?</u> Section 11.2 of the EIS confirms that in-situ disposal is a proven technology in use for over 50 years. <u>What changes have been made (and where)?</u> No changes have been made to the EIS.	<u>Status:</u> Resolved CNL considers this concern has been addressed with the information shared to Rama First Nation. CNL remains committed to ongoing engagement with Rama First Nation

	Rama First Nation was interested in seeing examples of ISD used elsewhere and the performance of the technology. Rama wants confidence that this technology will protect humans and the environment. This is a project-specific concern.	includes mines and hazardous waste sites. The report also describes what each of the facilities have in common, why in-situ disposal is the preferred approach and how it applies to NPD. 16 projects are described, the majority of the examples are reactors and all are permanent disposal solutions. CNL has assessed the suitability of ISD for NPD, and the EIS demonstrates that such disposal is safe for human health and the environment in the short term and long term. CNL has considered national and international standards and guidelines and continues to believe that the NPD facility has characteristics that support ISD.		through the William's Treaty First Nations monthly update.
2. End State, Site Restoration and Future Use of the Land	a) Long-term liability of the site beyond decommissioning. Rama is interested to know when the site will be safe for reuse. It is important to Rama that the end state of the NPD site is safe for future land users. This is a project-specific interest.	CNL summarized the range of scenarios considered and that the results that the site is safe for a variety of uses following the Institutional Control period. This response was provided verbally to Rama during a project update in April 2023. <u>CNL Response:</u> CNL acknowledges Rama's interest in being able to reuse the site in the future. The PostSA TSD demonstrates that the impact beyond the Institutional Controls period on the public, Indigenous and the environment is negligible under all scenarios. CNL notes that the final end state is the only time when changes to access will occur; the final end state of the NPD site will be an improvement from current conditions. To instill confidence in the EIS findings and the effectiveness of the follow-up monitoring, CNL will involve Indigenous Nations, communities and organizations in the monitoring program, which aims to confirm the predictions of the EIS.	<u>Where is this topic discussed in the EIS?</u> Sections 9.8 and 9.10 of the EIS include a summary of the results of the PostSA TSD and the potential impacts of the project on human and more specifically Indigenous health. <u>What changes have been made (and where)?</u> No changes have been made to the EIS.	<u>Status:</u> Resolved CNL considers this concern has been addressed with the information shared to Rama First Nation. CNL remains committed to ongoing engagement with Rama First Nation through the William's Treaty First Nations monthly update.
3. Long-term Safety	a) Long-term integrity of the concrete cap and engineered barrier As long-term stewards and users of the land and waters, it is important to Rama First Nation that the design life of the protective layers for the proposed NPD Disposal Facility are sufficient over time to provide confidence that the environment is protected. This is a project-specific interest.	CNL and Rama First Nation had initial discussions on this topic during the April 2023 project update meeting. CNL is happy to share the Institutional Control Surveillance Plan and additional high-level information about the concrete cap and engineered barrier with Rama First Nation if needed during the WTFN monthly meetings. <u>CNL Response:</u> The proposed NPD Disposal Facility is designed to hold the radionuclides within the facility as long as possible so that they have time to decay away. This is achieved by the use of multiple barriers and defense in depth. The main features containing the radionuclides, are the thick concrete walls of the facility and the fact that the majority of the radioactivity is present within the matrix of steels and zircaloy that will corrode very slowly in the chemical environment of the decommissioned facility. For example, steels in the reactor are predicted to take 30,000 years to corrode due to the alkaline conditions in the facility. The grout backfill is also a contributor to safety. The grout and concrete constrain water flow and also limits the mobility of the waste as the waste will sorb to the grout. Even once the concrete and grout has degraded such that its	<u>Where is this topic discussed in the EIS?</u> Section 4.1 of the EIS highlights the in-design mitigation measures that act to isolate and contain the waste inventory within the proposed NPD Disposal Facility to ensure protection of the surrounding environment. Section 4.3.1 of the EIS describes the Concrete Cap and Engineered Cover and Long Term Care and Maintenance. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback (received May 2023).	<u>Status:</u> Resolved CNL considers this concern has been addressed with the information shared to Rama First Nation. CNL remains committed to ongoing engagement with Rama First Nation through the William's Treaty First Nations monthly update.

		structural properties are no longer effective, the alkaline environment provided by the cement will remain in place for thousands of years. A reinforced concrete cap will be placed over the Nuclear Area of the facility as a barrier following the completion of grouting. The concrete cap is designed to support the loads of the Engineered Barrier and its construction. The cap has a thickness of 0.40 m (1'-4") at the edge, and rises to a thickness of 0.71 m (2'-4") at the center. The area of the cap is approximately 600 m² (6430 ft²), and it is dowelled to the foundation walls of the existing structure for anchorage. A multi-layered engineered cover will be placed over the grouted facility, following placement of the concrete cap. The engineered cover consists of a compacted layer of select fill at the bottom a minimum of 1.2 m thick. This bottom layer is overlain by a very low permeability membrane called a geosynthetic clay liner (GCL) and a geogrid, and covered by a 0.15 m thick sand cushion supporting a 0.15 m thick layer of clear stone. The GCL is designed to intercept water percolating through the top of the engineered cover and direct the water to the outside of the engineered cover where it can drain away. The clear stone serves as a drainage layer while the sand cushion also provides some drainage capability and acts as a protective layer to the GCL. Over the clear stone, a geotextile will be placed and covered by a 0.3 m thick layer of select fill, upon which 0.15 m of topsoil is placed and seeded, to form a shallow-rooted vegetative cover at the top of the engineered cover. The design life of the cap and cover system is 100 years. The Institutional Control Surveillance Plan has been developed to verify the integrity of accessible passive barriers and support structures, and to enable the prompt identification of conditions that may lead to a migration or release of radionuclides or other contaminants to the environment. The plan outlines the maintenance program to be executed to ensure accessible features of the new disposal facility are maintained (e.g. periodic inspection of the cover and maintenance when required) over the Institutional Control period. The only mechanism that would require the replacement of the cover would be a catastrophic failure of both the GCL and the geotextile membrane in conjunction with levels of tritium released in excess of acceptance criteria. Disruptive events beyond 100 years were not dismissed. The PostSA TSD examines scenarios and calculations developed systematically using FEPs (Features, Events and Processes) where 200 FEPs were compiled and categorized by potential consequences and probabilities. The PostSA shows that the decommissioned facility can be expected to contain the dominant radionuclides effectively. Even after 50,000 years, more than 96% of the remaining radioactivity is still contained within the proposed NPD Disposal Facility. CNL's technical assessment shows that there are no long-term effects resulting from the NPD Closure Project as shown through the use of multiple barriers and defense in depth. Continued engagement with Rama First Nation may result in additional commitments that will enhance confidence and trust in CNL's assessment. CNL remains committed to ongoing engagement with Rama First Nation within CNL's role as the project proponent.		
4. Monitoring	a) Impacts from site operation Rama is interested to understand CNL's past environmental performance at the NPD site. Rama	CNL shared a link to the annual summary or environmental performance as a follow-up to the 2023 April project update meeting. CNL would be pleased to share any other historic monitoring data as requested by Rama.	<u>Where is this topic discussed in the EIS?</u> Historic environmental monitoring is summarized in the description of the existing environment (Section 8) of the EIS. Specifically, EIS Sections 8.2 – Atmospheric Environment, 8.3	<u>Status:</u> Resolved CNL considers this concern has been addressed with the information shared to Rama First Nation.

	wishes to ensure the environment has not been impacted by past operations. This is a project-specific concern.	<u>CNL Response:</u> CNL conducts a rigorous monitoring program and is committed to ensuring that the environment around the NPD site, including the Ottawa River, is protected. Monitoring of the environment (a) Ottawa River water: Radioactivity measured in the Ottawa River upstream and downstream of the NPD site are very low (<0.01% of the derived release limit). (b) Surface soil and Vegetation: Tritium in soil and vegetation on the NPD site is very low (< 0.01% of the derived release limit). The results demonstrate that the public and the environment around the NPD site continues to be protected. In addition to the CNL monitoring program, the CNSC leads an Independent Environmental Monitoring Program (IEMP) designed to verify that the public and the environment around licensed nuclear facilities are protected. As part of its IEMP, the CNSC samples and analyzes surface water upstream and downstream of the NPD site (including sampling for non-radiological parameters). The CNSC IEMP results confirm that the public and the environment around the NPD site are protected and that there are no expected health impacts.	– Surface Water Environment, 8.5.6 – Groundwater Quality and 8.7 – Ambient Radioactivity. <u>What changes have been made (and where)?</u> No changes have been made to the EIS.	CNL remains committed to ongoing engagement with Rama First Nation through the William’s Treaty First Nations monthly update.
4. Monitoring	b) Design of follow-up monitoring It is important that Rama has an opportunity to review the monitoring plans to ensure transparency and promote confidence in these activities. This is project –specific interest.	CNL shared the draft monitoring plans with Rama First Nation as a follow-up to the 2023 April project update meeting. <u>CNL Response:</u> The follow up monitoring program is described at a high level in Section 12 of the EIS with significant details developed compared to the 2017 draft EIS. These details come through the development of the 3 draft follow-up monitoring plans for effluent, environment and groundwater. CNL is seeking to work together with Indigenous Nations, communities and organizations, the public and stakeholders regarding their feedback before finalizing the EA Follow-up Program (Section 12 of the EIS). CNL has indicated that it is willing to involve all Indigenous Nations, communities and organizations in its monitoring programs.	<u>Where is this topic discussed in the EIS?</u> The follow-up monitoring program is described at a high level in Section 12 of the EIS, details of which derive from the development of the effluent, environment and groundwater draft follow-up monitoring plans. <u>What changes have been made (and where)?</u> No changes have been made to the EIS.	<u>Status:</u> Resolved CNL considers this concern has been addressed with the information shared to Rama First Nation. CNL remains committed to ongoing engagement with Rama First Nation through the William’s Treaty First Nations monthly update.

Appendix Q Alderville First Nation Record of Engagement

Q.1 Record of Engagement-Alderville First Nation -2016 June to 2024 March

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
July 15, 2016 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the Alderville First Nation (FN) Chief introduced the project and requested community input on any potential adverse impacts from project activities. To demonstrate requirements of CEAA, 2012 Section 5(1)(c), the letter requested meaningful feedback on the following: Whether the project may have environmental effect on any lands and/or resources currently used by Aboriginal peoples for traditional purposes; Whether the project may have any perceived impacts on Aboriginal and Treaty Rights; Whether local and traditional knowledge can assist in describing the existing environment; and, The view of Aboriginal communities on proposed valued ecosystems components (environmental attributes) that have been identified for the assessment.				√	√				√	
November 10, 2016 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the Alderville First Nation Chief inquired about asserted rights and traditional activities in the region around CRL. To demonstrate requirements of CEAA 2012 Section 5(1)(c), the letter requested a better understanding of Alderville First Nation’s historic and/or modern day use of lands in and/or near both of the projects and asked the following questions: Does Alderville First Nation have traditional territory or reserve lands near the NSDF and/or NPD Closure Project? What is the history of Alderville First Nation using the areas around the two projects? Do you have any members of Alderville First Nation that currently live in close or reasonable proximity to either of the projects? Does Alderville First Nation have any members that currently practice traditional activities such as, trapping, hunting, fishing and/or gathering, near the two projects? Does Alderville First Nation, or any members, have sites of ceremonial significance in close proximity to either of the two sites, or more generally, any cultural activities near either of the two sites? CNL also indicated interested in learning more about the FN and any asserted rights, interests or activities members might undertake in the local or regional areas in proximity to the project.				√	√				√	
November 15, 2017 Outgoing email	This email from a CNL communications officer to the Alderville First Nation Chief enclosed links to the full draft EIS, an interactive “public-friendly” executive summary of the draft EIS, the CNSC’s public notice, a short overview of the project and environmental assessment, as well as detailed information on the timing of the EA process and how to participate in the public comment period.	√	√	√	√	√	√	√	√	√	
November 17, 2017 Outgoing email	This email from a CNL communications officer to the Alderville First Nation Chief enclosed the draft Aboriginal Engagement Report for the NPD Closure Project and stated, per CEAA, 2012 requirements: “CNL would be pleased to update information in this current draft with input from your community.”	√	√	√	√	√	√	√	√	√	
In March 2020, the COVID-19 pandemic impacted in-person engagement activities. CNL adapted to the restrictions providing online platforms for virtual meetings, workshops, webinars, Project updates and open houses.											

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
April 09, 2020 Outgoing email	This email from a communications officer to representatives of the different WTFN communities (including the Lands and Resources Communications Officer with Alderville First Nation) was to propose a virtual webinar meeting on the NPD Closure Project and the NSDF Project.										√
May 04, 2020 Outgoing email	This email from CNL staff to representatives of the WTFN communities (including representative of Alderville First Nation) enclosed an action list.										√
May 06, 2020 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the Alderville First Nation Chief enclosed a preliminary version of the 2020 revised draft EIS and an updated IER. This letter also asked for feedback in the following seven areas: Does Alderville First Nation have additional information that they would like to provide in the context of traditional territory near the NPD site? Does Alderville First Nation have any members who currently live close or in reasonable proximity to the NPD site? Does Alderville First Nation have historical and/or current traditional practices near the NPD site, specifically we are interested in members’ traditional uses such as trapping (traditional or commercial), hunting, fishing (traditional or commercial), gathering and practicing cultural ceremonies? Does Alderville First Nation have sites of ceremonial significance in close proximity or more generally any cultural activities near the NPD site? Tell us about any important resources, uses, activities, values and interests to Alderville First Nation near the NPD site. If there is use in close proximity to the NPD site, is current community use different than historic use and can a description of those difference be provided? Let us know of any potential concerns you have with respect to effects and any potential impacts on rights. This letter also indicated an interest in meeting with Alderville First Nation to discuss any interests or concerns.	√	√	√	√	√	√	√	√	√	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
May 19, 2020 Virtual meeting	This meeting between four representatives of different WTFN communities (specifically, Hiawatha FN's Land and Resources consultation workers, Alderville First Nation's lands and community engagement officer, Curve Lake First Nation's lands and resources consultation officer and Georgina Island FN's consultation coordinator attended) and six CNL representatives (including the Manager of Stakeholder Relations, the Manager of Regulatory Approvals for the NPD Closure Project and communications officers with CNL) included an interactive webinar overview presentation on the project with the opportunity for questions. Specific topics discussed included the following: Project overview and components; Timeline; Waste inventory; Monitoring; VCs; Species at risk; traditional land and resource use; Effects on the environment. The Alderville First Nation representative had interests and questions with respect to the Chimney Swifts and the height of the ventilation stack in relation to its long-term maintenance.	√		√	√		√	√	√	√	
May 26, 2020 Outgoing email	This email from CNL communications officer to representatives of the WTFN communities (including Lands and Resources Communications Officer with Alderville First Nation) enclosed the follow-up information responding to all questions from the meeting on May 19, including the Alderville First Nation representative's questions on the Chimney Swift (a species at risk) and ventilation stack at the NPD site.	√			√					√	
May 27, 2020 Incoming email	This email from Alderville First Nation's Lands and Resources Communications Officer to a CNL communications officer was to inquire if any issues had not been closed off in the previous virtual meeting.										√
May 27, 2020 Outgoing email	This email from a CNL communications officer to Alderville First Nation Lands and Resources Communications Officer confirmed and enclosed the follow-up information from the previous virtual meeting.										√
July 27, 2020 Outgoing email	This email from a CNL communications officer to representatives of the WTFN communities (including Alderville First Nation's Lands and Resources Communications Officer) enclosing the presentation from the previous meeting in May.	√		√	√		√	√	√	√	
February 12, 2021 Outgoing email	This email from a CNL communications officer to WTFN communities (including Alderville First Nation's Lands and Resources Communications Officer) was an invitation to join Curve Lake First Nation's request of a monthly update on Canadian Nuclear Laboratories (CNL) environmental remediation projects, such as the NSDF Project and NPD Closure Project, as well as Port Hope Area Initiative (PHAI) activities in Port Hope and Port Granby. The monthly meeting takes place the last Wednesday of each month starting March 2021.									√	
April 4, 2021 Outgoing email	This email from a CNL Communications Officer to all the representatives of the William Treaties First Nations communities enclosing the agenda and presentation from the most recent monthly meeting.										√
April 12, 2021 Outgoing letter	This letter from CNL's Manager of Stakeholder Relations to the Alderville First Nation Chief enclosed a preliminary list of commitments and indicated interest in meeting to discuss.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
April 28, 2021 Virtual meeting	This was the second of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer, the Manager of Stakeholder and Indigenous Relations with PHAI and the Manager of Regulatory Approvals for the NPD Closure Project) Curve Lake First Nation (including the Lands and Resources Consultation Officer, a consultant and the Lands and Resource Administrative Support Worker), Hiawatha FN (including two community consultation coordinators), Alderville First Nation (including the Lands and Resources Communications Officer), Rama FN (including the community consultation worker) and AECL (including the Director of Communications and Government Reporting) were in attendance. The focus was an overview on the NPD Closure Project, the NSDF Project and the PHAI.			√	√						√
June 15, 2021 Outgoing email	This email from a communications officer with CNL to Alderville First Nation’s Lands and Resources Communications Officer was to follow-up on the April letter.										√
June 21, 2021 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the Alderville First Nation Chief enclosed a draft summary of Alderville First Nation’s interests and concerns for the NPD Closure Project for the Alderville First Nation’s review and verification.									√	√
July 5, 2021 Outgoing email	This email from a communications officer with CNL to Alderville First Nation’s Lands and Resources Officer was to follow up seeking a response on the June 21, 2021 email enclosing the summary of interests and concerns.										√
July 6, 2021 Outgoing email	This email from a CNL Communications Officer to all the representatives of the William Treaties First Nations communities enclosing the agenda and presentation from the most recent monthly meeting.										√
August 17, 2021 Outgoing email	This email from a communications officer with CNL to Alderville First Nation’s Lands and Resources Officer was to follow up on the June 21, 2021 letter. CNL requested feedback by August 31, 2021.									√	
August 26, 2021 Outgoing email	This email from a CNL Communications Officer to all the representatives of the William Treaties First Nations communities enclosing the agenda and presentation from the most recent monthly meeting.										√
October 21, 2021 Outgoing email	This email from a senior communications officer with CNL to Alderville First Nation’s Lands and Resources Communications Officer was to follow up on the letter that CNL sent on June 21, 2021 regarding the Table of Interests and Concerns for the NPD Closure Project. CNL wanted to ensure that this table was up to date with Alderville First Nation and stated that feedback on the table was required by November 15, 2021 in order to have any feedback incorporated into the revised draft EIS submission in 2021.									√	√
November 1, 2021 Outgoing email	This email from a CNL Senior Communications Officer to all the representatives of the William Treaties First Nations communities enclosing the agenda and presentation from the most recent monthly meeting.										√
April 09, 2022 Outgoing email	This email from a communications officer to representatives of the different WTFN communities (including the Lands and Resources Communications Officer with Alderville First Nation) was to propose a virtual webinar meeting on the NPD Closure Project and the NSDF Project.										√
April 25, 2022 Outgoing email	Email invitation to the April 27, 2022 Williams Treaties First Nations monthly meeting. The agenda items included the following on the NPD project: NPD Project Updates; NPD Draft EAFMP.								√		

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
April 27, 2022 Virtual Meeting	This was the ninth of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer and ERM Stakeholder Relations Manager) Curve Lake First Nation (including the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a community consultation coordinator), Scugog Island (including a consultant), Chippewas of Georgina Island First Nation (Invasive Species coordinator) and AECL (including the Manager of Engagement and Communications) were in attendance. The focus was a discussion on the NSDF Project. CNL also shared an update on the NPD Closure Project.								✓		✓
April 28, 2022 Outgoing email	This email from a CNL Senior Advisor of Indigenous Relations to the WTFN communities attached the presentation from the April 27, 2022 monthly meeting. CNL invited WTFN communities to the Industry Day at the Chalk River Laboratories on Thursday, June, 2, 2022 to promote the broader engagement between CNL’s nuclear industry partners and our local supply chain.								✓		
May 13, 2022 Outgoing email	This email from ERM Stakeholder Relations to the WTFN communities provided a response to technical questions asked at the April 27, 2022 monthly meeting. Q1: Please provide a breakdown of how much tritium in the Ottawa River is naturally occurring versus anthropogenic (e.g. from weapons testing in the 1960s), including a graph showing the peak of tritium from weapons testing. Q2: Please provide further information on stack contamination and the remedial actions planned at the base of the stack, with respect to potential impacts on Chimney Swifts.								✓		
May 17, 2022 Incoming email	This email from the Curve Lake First Nation Consultation to a CNL Senior Communications Officer coordinating combined repose from Curve Lake, Hiawatha, Alderville to CNL’s March 8, 2022 request for feedback on the repackaged Table of Interests and Concerns. The consultant asked the CNL update with information provided and note the new information. CNL acknowledged.										✓
June 06, 2022 Outgoing email	This email from a Senior Advisor of Indigenous Relations at CNL to the WTFN communities sent a proposed agenda for the tenth monthly meeting planned for June 29, 2022. The meeting is planning to be held in-person at the Port Hope Area Initiative office. On the proposed agenda the NPD Project staff will provide an update on the project.										✓
June 06, 2022 Outgoing email	This email from a Senior Advisor of Indigenous Relations at CNL to the WTFN communities sent a proposed agenda for the tenth monthly meeting planned for June 29, 2022. The meeting is planning to be held in-person at the Port Hope Area Initiative office. On the proposed agenda the NPD Project staff will provide an update on the project.										✓
June 22, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the WTFN communities provided an updated agenda for the June 29, 2022 monthly meeting. A NPD Project update was included as an agenda item.										✓
June 29, 2022 Meeting	This was the tenth of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer and ERM Stakeholder Relations Manager) Curve Lake First Nation (including the Chief, the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a community consultation coordinator), Alderville First Nation (Chief) and AECL (including the Manager of Engagement and Communications) were in attendance. The focus was a tour of the PHAI location. CNL also shared an update on the NPD Closure Project.										✓
June 29, 2022 Outgoing email	This email from the Manager of Regulatory Approvals for the NPD Project to Curve Lake First Nation’s Consultant requesting feedback on the summary tables of interests and concerns for Curve Lake First Nation, Hiawatha First Nation and Alderville First Nation.									✓	
June 29, 2022 Incoming email	This email from Curve Lake First Nation’s Consultant to the Manager of Regulatory Approvals for the NPD Project noting no feedback on the Alderville First Nation tables of interests and concerns.									✓	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
July 14, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Curve Lake First Nation’s Consultant sent the new row for the Hiawatha First Nation interest and concern table. CNL requested to know if the communities would like to see further additions to any of the three tables for Curve Lake, Hiawatha or Alderville.										✓
July 14, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Curve Lake First Nation’s Consultant sent the updated summary tables of interests and concerns for Curve Lake First Nation, Hiawatha First Nation and Alderville First Nation for review.									✓	
July 14, 2022 Incoming email	This email from Curve Lake First Nation’s Consultant to a CNL Senior Communications Officer confirming receipt of the updated summary tables of interests and concerns for Curve Lake First Nation, Hiawatha First Nation and Alderville First Nation and noted that there are no further updates needed at this point.									✓	
July 14, 2022 Outgoing email	Email from a CNL Senior Communications Officer to Curve Lake First Nation’s Consultant proposed dates for a tour of the NSDF and NPD Facility. CNL proposed an online poll and asked for any additional dates needed. Curve Lake First Nation’s Consultant replied and will provide alternative dates.										✓
July 25, 2022 Outgoing email	Email from a CNL Senior Communications Officer to WTFN Communities sharing the agenda for the 11th monthly meeting on July 27, 2022. The agenda included a NPD project update.										✓
July 27, 2022 Virtual meeting	This was the 11th of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer and ERM Stakeholder Relations Manager) Curve Lake First Nation (including the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a community consultation coordinator), Scugog Island (including a consultant) and Rama First Nation (including a consultation workers) were in attendance. CNL shared an update on the NPD Closure Project.										✓
August 22, 2022 Outgoing/Incoming emails	Emails from a CNL Senior Communications Officer to WTFN consultation representatives coordinating dates for the tour of the NSDF and NPD Facility.										✓
September 16, 2022 Outgoing email	Email from a CNL Senior Communications Officer to WTFN consultation representatives to save the date for the WTFN tour of Chalk River Laboratories on October 25 and 26, 2022 (including the proposed NSDF site and NPD site).										✓
September 21, 2022 Outgoing email	Email from a CNL Senior Communications Officer to Curve Lake First Nation’s Consultant sharing for review the proposed agenda or the 12th monthly meeting on September 28, 2022. The agenda included a NPD project update. Curve Lake First Nation accepted the agenda.										✓
September 26, 2022 Outgoing email	Email from a CNL Senior Communications Officer to WTFN communities sharing the agenda for the September 28 working group meeting. The agenda included an update on the NPD project.										✓
September 28, 2022 Virtual meeting	This was the 12th of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer and ERM Stakeholder Relations Manager) Curve Lake First Nation (including the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including an Elder and community consultation coordinator), Scugog Island (including a consultant) and AECL (including the Manager of Engagement and Communications) were in attendance. The focus was a presentation and discussion on CNL’s Integrated Waste Strategy. CNL also shared an update on the NPD Closure Project.										✓
October 01, 2022 Outgoing email	Email from a CNL Senior Communications Officer to WTFN communities sharing the agenda and presentation from the September 28, 2022 monthly meeting. Related to the presentation content, CNL have also attached a CNSC infographic that provides a description of the classes of radioactive waste.										✓

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
October 03, 2022 Outgoing email	Email from a CNL Senior Communications Officer to WTFN communities sharing the agenda for the October 25 and 26, 2022 tour of Chalk River Laboratories (including the proposed NSDF site and NPD site). CNL also sent information about required PPE and the link to register for the tour.										✓
October 03, 2022 Outgoing email	This letter addressed to Alderville First Nation’s Chief from CNL’s Director of Indigenous Relations provided a project update and the engagement status with Alderville First Nation. CNL stated it is committed to incorporating Alderville’s interests and concerns into the EIS. CNL provided an engagement status and next steps, including a site visit and establishing commitments to ensure that all interests and concerns are addressed and tracked to resolution. CNL sent an updated draft set of commitments for Alderville First Nation’s review. CNL offered to discuss capacity and establish commitments before December 2022. CNL requested that Alderville First Nation respond confirming their agreement to proceed with the engagement activities, or modified engagement activities.									✓	✓
October 04, 2022 Incoming email	This email from Alderville First Nation’s Lands and Resources Communications Officer to a CNL Senior Communications Officer requested a meeting to discuss the October 3, 2022 letter. CNL coordinated a meeting.									✓	✓
October 07, 2022 Virtual Meeting	This meeting between Alderville First Nation’s Lands and Resources Communications Officer and CNL representatives (including a CNL Senior Communications Officer and the Manager of Regulatory Approvals for the ND Project) provide an update on the NPD Closure Project and the upcoming WTFN tour of the NPF facility.										✓
October 07, 2022 Outgoing email	Email from a CNL Senior Communications Officer to Alderville First Nation’s Lands and Resources Communications Officer provided the details of the WTFN tour of the NPD facility.										✓
October 26, 2022 Tour	WTFN communities were invite to tour the NPD facility as part of a two day visit to the Chalk River Laboratories site and area. Representatives from CNL (in particular, NPD Project staff, communications officers, ERM Stakeholder Relations Manager, Director of Indigenous Relations) Curve Lake First Nation (including the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including Lands and Resource consultation coordinator), Scugog Island (including a consultation coordinator) and AECL (including the Director of Decommissioning and Waste Management Programme) took part in a reactor tour and site walk. The day include a smudging ceremony by the Ottawa River and relationship building.										✓
November 01, 2022 Outgoing email	This email from a CNL Senior Communications Officer to WTFN communities thanked the participants of the October 25 and 26, 2022 tour. As requested over the days CNL sent the archaeological assessments for the NPD site and photos from the tour.										✓
November 15, 2022 Outgoing email	This email from a CNL Senior Communications Officer to WTFN communities cancelled the December monthly meeting.										✓
November 28, 2022 Outgoing email	This email from a CNL Senior Communications Officer to WTFN communities sent the agenda for the November 30th, 2022 monthly meeting. The agenda included a NPD Project update, a discussion on 2023 engagement plans and a discussion on a year in review.										✓
November 30, 2022 Virtual meeting	This was the 13th of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer and ERM Stakeholder Relations Manager) Curve Lake First Nation (including and Elder, Councillors, the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a community consultation coordinator) and Scugog Island (including consultants) were in attendance. CNL shared an update on the NPD Closure Project.										✓

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
January 20, 2023 Outgoing email	Email from a CNL Communications Officer to Alderville First Nation’s Consultation Officer to inform of the decision to postpone the submission of the NPD Closure Project’s draft Environmental Impact Statement (EIS) until May 2023 to allow for additional Indigenous input. CNL acknowledged that as of October 7, 2022, that Alderville First Nation AFN has no further concerns at this time.										✓
January 23, 2023 Incoming email	This email from Alderville First Nation’s Consultation Officer to a CNL Communications Officer acknowledging receipt of the 2023 January 23 email. CNL responded to thank Alderville First Nation for the acknowledgement.										✓
March 14, 2023 Outgoing email	This email from CNL Senior Communications Officer to WTFN with CNL’s Indigenous Relations Procurement Strategy.										✓
May 31, 2023 Meeting	This was the 17th of the monthly meetings between CNL (Including, CNL Communications Officer, Indigenous Engagement Coordinator, Manager, ERM Licensing Support, Administrative Assistant, Manager NPD Regulatory Approvals, and Senior Advisor Indigenous Relations) and the WTFN communities (including Consultant, CLFN and HFN, Rama FN, Community Consultation, Alderville Consultation Coordinator, Mississaugas of Scugog Island First Nation Community Consultation, Curve Lake First Nation, Acting Consultation lead, Hiawatha lands and resource consultation, coordinated between Curve Lake First Nation and CNL and open to all. CNL reminded communities it was seeking validation of the I&C tables, extended the invitation to attending the Swift Count night and provided an update on the restoration plan timing for feedback.						✓			✓	✓
June 09, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to WTFN is to provide WTFN with an updated actions list from the 2023 May 31 Monthly Meeting.										✓
June 19, 2023 Emails	These emails between CNL and Alderville First Nations is to confirm the receipt of the 2023-2024 meeting schedule.										✓
June 28, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to WTFN is to provide WTFN with an updated actions list from the 2023 June 28 Monthly Meeting										✓
June 28, 2023 Incoming Email	This email from Alderville Consultation Coordinator to CNL Indigenous Engagement Coordinator, and CNL Senior Indigenous Relations Advisor is to request additional information on the tobacco offering action noted in the actions from the 2023 June 28 monthly meeting.										✓
July 11, 2023 Outgoing Email	This email from CNL Communications Officer to all WTFN communities is to request confirmation of attendance at the 2023 July monthly meeting being held in person in Hiawatha. Communities confirmed their attendance.										✓
July 19, 2023 Outgoing Email	This email from CNL Communications Officer to Alderville First Nation is to request confirmation of attendance at the 2023 July monthly meeting being held in person in Hiawatha.										✓
July 25, 2023 Incoming Email	This email from Alderville to CNL Communications Officer is to inform CNL that Alderville will not be attending the 2023 July WTFN working group being held in person in Hiawatha.										✓
July 25, 2023 Incoming Email	This email from Alderville to CNL Communications Officer is to confirm if there is a WTFN monthly meeting in 2023 August.										✓
July 27, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to WTFN is to provide WTFN with the action list from the 2023 July 26 in person meeting.										✓

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
October 25, 2023 Meeting	This was the 20th of the monthly meetings between CNL (Including, Director and Manager of Communications and Engagement, Indigenous Engagement Coordinator, Communications Officers, HWP Manager of Indigenous Relations Communications, Environmental and decommissioning specialist), AECL (including the Director of AECL GO-CO Procurement Process) and the WTFN communities (including, Acting Consultation lead from CLFN, Consultant, Consultation Liaison for Beausoleil First Nation, Consultation Coordinator for Alderville First Nation, Hiawatha First Nations Lands and Conservation Officer, and Consultation Advisor for Scugog First Nation) coordinated between Curve Lake First Nation and CNL and open to all. This meeting was to discuss CNL Updates, WTFN updates, the Indigenous Relations Procurement Strategy, the GO-CO Procurement process and the format of WTFN monthly meetings.										✓
October 26, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to WTFN is to provide WTFN with the action list from the 2023 October 26 WTFN Monthly meeting.										✓
November 01, 2023 Outgoing Email	This email from CNL Manager, Communications and Engagement to all WTFN is to follow-up from the 2023 October monthly meeting. CNL noted for those who were unable to attend the meeting, an agenda item was tabled for discussion to move our monthly information sharing meeting to a quarterly meeting instead. The discussion result was an agreement (with those in attendance) to change to a quarterly meeting update if WTFN communities still received project updates/ milestones and/ or news in between meetings. I encourage you to provide feedback on this change. CNL also shared the GO-CO model presentation.										✓
November 23, 2023 Outgoing Email	This email from CNL Manager, Communications and Engagement to all WTFN is to follow-up from the 2023 November 01 email to all WTFN communities to confirm that the 2023 November 30 WTFN monthly meeting has been cancelled, and that the monthly meeting has been changed to a quarterly meeting series. The monthly meeting series has been cancelled. A quarterly meeting series has been setup, and the next meeting is on Wednesday, January 31, 2024.										✓
January 31, 2024 Meeting	This meeting between CNL (including, Manager of Communications and Engagement, Communications Officers, HWP Manager of Indigenous Relations Communications, NPD Closure Project Director and Environmental and Decommissioning Specialist, Manager, HWP Environmental Management and Director, Indigenous Engagement) and WTFN (including, Alderville First Nation, Lands and Resources Consultation Officer, Curve Lake First Nation, Acting Consultation lead , Hiawatha First Nations Lands and Conservation Officer and Consultants) was to discuss CNL Updates and hear community updates. The NSDF and NPD project shared updates including the recent CNSC Decision on the NSDF and the NPD Revised Draft EIS submission date.										✓

Appendix R Beausoleil First Nation Record of Engagement

R.1 Record of Engagement-Beausoleil First Nation-2016 June to 2024 March

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
July 15, 2016 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the Beausoleil First Nation (FN) Chief introduced the project and requested community input on any potential adverse impacts from project activities. To demonstrate requirements of CEAA, 2012 Section 5(1)(c), the letter requested meaningful feedback on the following: <i>Whether the project may have environmental effect on any lands and/or resources currently used by Aboriginal peoples for traditional purposes;</i> <i>Whether the project may have any perceived impacts on Aboriginal and Treaty Rights;</i> <i>Whether local and traditional knowledge can assist in describing the existing environment; and,</i> <i>The view of Aboriginal communities on proposed valued ecosystems components (environmental attributes) that have been identified for the assessment.</i>				√	√				√	
November 10, 2016 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the Beausoleil First Nation Chief inquired about asserted rights and traditional activities in the region around CRL. To demonstrate requirements of CEAA 2012 Section 5(1)(c), the letter requested a better understanding of Beausoleil First Nation’s historic and/or modern day use of lands in and/or near both of the projects and asked the following questions: <i>Do the Beausoleil First Nation have traditional territory or reserve lands near the NSDF and/or NPD Closure Project?</i> <i>What is the history of the Beausoleil First Nation using the areas around the two projects?</i> <i>Do you have any members of the Beausoleil First Nation that currently live in close or reasonable proximity to either of the projects?</i> <i>Do the Beausoleil First Nation have any members that currently practice traditional activities such as, trapping, hunting, fishing and/or gathering, near the two projects?</i> <i>Do the Beausoleil First Nation, or any members, have sites of ceremonial significance in close proximity to either of the two sites, or more generally, any cultural activities near either of the two sites?</i> CNL also indicated interested in learning more about the FN and any asserted rights, interests or activities members might undertake in the local or regional areas in proximity to the project.				√	√				√	
November 15, 2017 Outgoing email	This email from a CNL communications officer to the Beausoleil First Nation Chief enclosed links to the full draft EIS, an interactive “public-friendly” executive summary of the draft EIS, the CNSC’s public notice, a short overview of the project and environmental assessment, as well as detailed information on the timing of the EA process and how to participate in the public comment period.	√	√	√	√	√	√	√	√	√	
November 17, 2017 Outgoing email	This email from a CNL communications officer to the Beausoleil First Nation Chief enclosed the draft Aboriginal Engagement Report for the NPD Closure Project and stated, per CEAA, 2012 requirements: <i>“CNL would be pleased to update information in this current draft with input from your community.”</i>	√	√	√	√	√	√	√	√	√	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
In March 2020, the COVID-19 pandemic impacted in-person engagement activities. CNL adapted to the restrictions providing online platforms for virtual meetings, workshops, webinars, Project updates and open houses.											
April 09, 2020 Outgoing email	This email from a CNL communications officer to representatives of the different WTFN communities (including the consultation coordinator for the Beausoleil First Nation) was to propose a virtual webinar meeting on the NPD Closure Project and the NSDF project.										√
April 17, 2020 Outgoing email	This email from a communications officer with CNL to the Consultation Coordinator for the Beausoleil First Nation was to follow-up on the previous invitations to the webinar meeting with CNL.										√
April 21, 2020 Incoming email	This email from the Beausoleil First Nation Consultation Coordinator to a communications officer with CNL was to confirm they would not be in attendance for the April webinar.										√
May 05, 2020 Outgoing email	This email from a CNL communications officer to the Beausoleil First Nation Consultation Coordinator was to inquire whether there was interest from Beausoleil First Nation in attending the WTFN virtual webinar meetings hosted by CNL for the NSDF and NPD Closure Project.										√
May 06, 2020 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the Beausoleil First Nation Chief enclosed a preliminary version of the 2020 revised draft EIS and an updated IER. This letter also asked for feedback in the following seven areas: - Does Beausoleil First Nation have additional information that they would like to provide in the context of traditional territory near the NPD site? - Does Beausoleil First Nation have any members who currently live close or in reasonable proximity to the NPD site? - Does Beausoleil First Nation have historical and/or current traditional practices near the NPD site, specifically we are interested in members’ traditional uses such as trapping (traditional or commercial), hunting, fishing (traditional or commercial), gathering and practicing cultural ceremonies? - Does Beausoleil First Nation have sites of ceremonial significance in close proximity or more generally any cultural activities near the NPD site? - Tell us about any important resources, uses, activities, values and interests to Beausoleil First Nation near the NPD site. - If there is use in close proximity to the NPD site, is current community use different than historic use and can a description of those difference be provided? - Let us know of any potential concerns you have with respect to effects and any potential impacts on rights. This letter also indicated an interest in meeting with Beausoleil First Nation to discuss any interests or concerns.	√	√	√	√	√	√	√	√	√	
May 12, 2020 Outgoing email	This email from a communications officer with CNL to the Beausoleil First Nation Chief and Consultation Coordinator was to inquire whether there was any interest in Beausoleil First Nation attending the WTFN webinar meetings hosted by CNL on the NPD Closure Project and NSDF Project.									√	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
May 26, 2020 Outgoing email	This email from a CNL communications officer to the Beausoleil First Nation Chief was to follow-up on the registered letter sent on May 06.									√	
May 26, 2020 Outgoing email	This email from a CNL communications officer to representatives of the WTFN communities (including the Beausoleil First Nation Consultation Coordinator) enclosed the follow-up information responding to all questions from the meeting on May 19.	√			√					√	
July 27, 2020 Outgoing email	This email from a CNL communications officer to representatives of the WTFN communities (including the Beausoleil First Nation Consultation Coordinator) enclosed the presentation from the previous meeting in May.	√		√	√		√	√	√	√	
February 12, 2021 Outgoing email	This email from a CNL communications officer to representatives of the WTFN communities (including the Beausoleil First Nation Consultation Coordinator) was an invitation to join Curve Lake First Nation’s request of a monthly update on Canadian Nuclear Laboratories (CNL) environmental remediation projects, such as the NSDF Project and NPD Closure Project, as well as Port Hope Area Initiative (PHAI) activities in Port Hope and Port Granby. The monthly meeting will take place the last Wednesday of each month starting March 2021.									√	
April 4, 2021 Outgoing email	This email from a CNL Communications Officer to all the representatives of the William Treaties First Nations communities enclosing the agenda and presentation from the most recent monthly meeting.										√
April 12, 2021 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the Beausoleil First Nation Chief enclosed a preliminary list of commitments and indicated interest in meeting to discuss.										√
June 15, 2021 Outgoing email	This email from a communications officer with CNL to Beausoleil Consultation Coordinator was to follow-up on the April letter.										√
July 6, 2021 Outgoing email	This email from a CNL Communications Officer to all the representatives of the William Treaties First Nations communities enclosing the agenda and presentation from the most recent monthly meeting.										√
August 25, 2021 Virtual Meeting	This was the six of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer, the Manager of Stakeholder and Indigenous Relations with PHAI and the Manager of Regulatory Approvals for the NPD Closure Project) Curve Lake First Nation (including the Lands and Resources Consultation Officer, a consultant and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a community consultation coordinator), Beausoleil First Nation (including a consultation coordinator) and AECL (including the Director of Communications and Government Reporting) were in attendance. The focus was on Port Granby and a Project update was shared about the NPD Closure Project.										√
August 26, 2021 Incoming Email	This email from a Beausoleil First Nation consultant to a senior communications officer from CNL was to thank CNL for the latest virtual meeting and to inform CNL of new contact information for Beausoleil First Nation consultation moving forward, including the Chief of Beausoleil First Nation.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
August 26, 2021 Outgoing email	This email from a CNL Communications Officer to all the representatives of the William Treaties First Nations communities enclosing the agenda and presentation from the most recent monthly meeting.										√
November 1, 2021 Outgoing email	This email from a CNL Senior Communications Officer to all the representatives of the William Treaties First Nations communities enclosing the agenda and presentation from the most recent monthly meeting.										√
April 25, 2022 Outgoing email	Email invitation to the April 27, 2022 Williams Treaties First Nations monthly meeting. The agenda items included the following on the NPD project: - NPD Project Updates - NPD Draft EAFMP								√		
April 28, 2022 Outgoing email	This email from a CNL Senior Advisor of Indigenous Relations to the WTFN communities attached the presentation from the April 27, 2022 monthly meeting. CNL invited WTFN communities to the Industry Day at the Chalk River Laboratories on Thursday, June, 2, 2022 to promote the broader engagement between CNL’s nuclear industry partners and our local supply chain.								√		
May 13, 2022 Outgoing email	This email from ERM Stakeholder Relations to the WTFN communities provided a response to technical questions asked at the April 27, 2022 monthly meeting. Q1: Please provide a breakdown of how much tritium in the Ottawa River is naturally occurring versus anthropogenic (e.g. from weapons testing in the 1960s), including a graph showing the peak of tritium from weapons testing. Q2: Please provide further information on stack contamination and the remedial actions planned at the base of the stack, with respect to potential impacts on Chimney Swifts.								√		
June 06, 2022 Outgoing email	This email from a Senior Advisor of Indigenous Relations at CNL to the WTFN communities sent a proposed agenda for the tenth monthly meeting planned for June 29, 2022. The meeting is planning to be held in-person at the Port Hope Area Initiative office. On the proposed agenda the NPD Project staff will provide an update on the project.										√
June 22, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the WTFN communities provided an updated agenda for the June 29, 2022 monthly meeting. A NPD Project update was included as an agenda item.										√
July 14, 2022 Outgoing email	Email from a CNL Senior Communications Officer to Curve Lake First Nation’s Consultant proposed dates for a tour of the NSDF and NPD Facility. CNL proposed an online poll and asked for any additional dates needed. Curve Lake First Nation’s Consultant replied and will provide alternative dates.										√
July 25, 2022 Outgoing email	Email from a CNL Senior Communications Officer to WTFN Communities sharing the agenda for the 11th monthly meeting on July 27, 2022. The agenda included a NPD project update.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
August 22, 2022 Outgoing/Incoming emails	Emails from a CNL Senior Communications Officer to WTFN consultation representatives coordinating dates for the tour of the NSDF and NPD Facility.										√
September 26, 2022 Outgoing email	Email from a Senior Communications Officer to WTFN communities sharing the agenda for the September 28 working group meeting. The agenda included an update on the NPD project.										√
October 04, 2022 Outgoing Letter	This letter addressed to Beausoleil First Nation’s Chief from CNL’s Director of Indigenous Relations provided a project update and the engagement status with BFN. CNL stated it is committed to incorporating Beausoleil’s interests and concerns into the EIS. CNL provided an engagement status and next steps, including a site visit and establishing commitments to ensure that all interests and concerns are addressed and tracked to resolution. CNL sent an updated draft set of commitments for Beausoleil First Nation’s review. CNL offered to discuss capacity and establish commitments before December 2022. CNL requested that Beausoleil First Nation respond confirming their agreement to proceed with the engagement activities, or modified engagement activities.									√	
October 26, 2022 Outgoing email	Email from a Senior Communications Officer to Beausoleil First Nation’s Chief to follow-up on the October 4, 2022 letter.									√	
November 15, 2022 Outgoing email	This email from a CNL Senior Communications Officer to WTFN communities cancelled the December monthly meeting.										√
November 26, 2022 Outgoing email	Email from a Senior Communications Officer to the Beausoleil First Nation Consultation Coordinator to follow-up on the October 4, 2022 letter.									√	
November 26, 2022 Outgoing telephone call	Telephone call from a Senior Communications Officer to the Beausoleil First Nation Consultation Coordinator to discussed the October 4, 2022 letter. The Coordinator had not received the letter. CNL offer capacity for the review.									√	
November 28, 2022 Outgoing email	This email from a CNL Senior Communications Officer to WTFN communities sent the agenda for the November 30th, 2022 monthly meeting. The agenda included a NPD Project update, a discussion on 2023 engagement plans and a discussion on a year in review.										√
January 20, 2023 Outgoing email	This email a CNL Communications Officer to Beausoleil First Nation’s Chief to inform of the decision to postpone the submission of the NPD Closure Project’s draft Environmental Impact Statement (EIS) until 2023 May to allow for additional Indigenous input. CNL proposed the next steps would be to discuss the Beausoleil First Nation’s interest and desired involvement in the NPD project to ensure that Beausoleil First Nation's interest and concerns are reflected in the EIS.									√	√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
January 30, 2023 Outgoing email	This email CNL to Beausoleil First Nation to inform of the decision to postpone the submission of the NPD Closure Project’s draft Environmental Impact Statement (EIS) until May 2023 to allow for additional Indigenous input.										√
April 11, 2023 Outgoing email	This email from CNL Senior Communications Officer to WTFN with the agenda and presentation from the monthly meeting held on 2023 March 29. CNL also looked to confirm the dates of the 2023 April 26 monthly meeting.										√
June 09, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to WTFN is to provide WTFN with an updated actions list from the 2023 May 31 Monthly Meeting.										√
June 28, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to WTFN is to provide WTFN with an updated actions list from the 2023 June 28 Monthly Meeting										√
July 11, 2023 Outgoing Email	This email from CNL Communications Officer to all WTFN communities is to request confirmation of attendance at the 2023 July monthly meeting being held in person in Hiawatha. Communities confirmed their attendance.										√
July 27, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to WTFN is to provide WTFN with the action list from the 2023 July 26 in person meeting.										√
October 25, 2023 Meeting	This was the 20th of the monthly meetings between CNL (Including, Director and Manager of Communications and Engagement, Indigenous Engagement Coordinator, Communications Officers, HWP Manager of Indigenous Relations Communications, Environmental and decommissioning specialist), AECL (including the Director of AECL GO-CO Procurement Process) and the WTFN communities (including, Acting Consultation lead from CLFN, Consultant, Consultation Liaison for Beausoleil First Nation, Consultation Coordinator for Alderville First Nation, Hiawatha First Nations Lands and Conservation Officer, and Consultation Advisor for Scugog First Nation) coordinated between Curve Lake First Nation and CNL and open to all. This meeting was to discuss CNL Updates, WTFN updates, the Indigenous Relations Procurement Strategy, the GO-CO Procurement process and the format of WTFN monthly meetings.										√
October 26, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to WTFN is to provide WTFN with the action list from the 2023 October 26 WTFN Monthly meeting.										√
November 01, 2023 Outgoing Email	This email from CNL Manager, Communications and Engagement to all WTFN is to follow-up from the 2023 October monthly meeting. CNL noted for those who were unable to attend the meeting, an agenda item was tabled for discussion to move our monthly information sharing meeting to a quarterly meeting instead. The discussion result was an agreement (with those in attendance) to change to a quarterly meeting update if WTFN communities still received project updates/ milestones and/ or news in between meetings. I encourage you to provide feedback on this change. CNL also shared the GO-CO model presentation.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
November 23, 2023 Outgoing Email	This email from CNL Manager, Communications and Engagement to all WTFN is to follow-up from the 2023 November 01 email to all WTFN communities to confirm that the 2023 November 30 WTFN monthly meeting has been cancelled, and that the monthly meeting has been changed to a quarterly meeting series. The monthly meeting series has been cancelled. A quarterly meeting series has been setup, and the next meeting is on Wednesday, January 31, 2024.										v

Appendix S Chippewas of Georgina Island First Nation Record of Engagement

S.1 Record of Engagement-Chippewas of Georgina Island First Nation- 2016 June to 2024 March

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
July 15, 2016 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the Georgina Island First Nation (FN) Chief introduced the project and requested community input on any potential adverse impacts from project activities. To demonstrate requirements of CEEA, 2012 Section 5(1)(c), the letter requested meaningful feedback on the following: - Whether the project may have environmental effect on any lands and/or resources currently used by Aboriginal peoples for traditional purposes; - Whether the project may have any perceived impacts on Aboriginal and Treaty Rights; - Whether local and traditional knowledge can assist in describing the existing environment; and, - The view of Aboriginal communities on proposed valued ecosystems components (environmental attributes) that have been identified for the assessment.				✓	✓				✓	
October 24, 2016 Outgoing telephone call	A CNL communications officer called Georgina Island FN to follow-up on the July letter.										✓
November 10, 2016 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the Georgina Island FN Chief inquired about asserted rights and traditional activities in the region around CRL. To demonstrate requirements of CEEA 2012 Section 5(1)(c), the letter requested a better understanding of Georgina Island FN’s historic and/or modern day use of lands in and/or near both of the projects and asked the following questions: - Does Georgina Island First Nation have traditional territory or reserve lands near the NSDF and/or NPD Closure Project? - What is the history of Georgina Island First Nation using the areas around the two projects? - Do you have any members of Georgina Island First Nation that currently live in close or reasonable proximity to either of the projects? - Does Georgina Island First Nation have any members that currently practice traditional activities such as, trapping, hunting, fishing and/or gathering, near the two projects? - Does Georgina Island First Nation, or any members, have sites of ceremonial significance in close proximity to either of the two sites, or more generally, any cultural activities near either of the two sites? CNL also indicated interested in learning more about the FN and any asserted rights, interests or activities members might undertake in the local or regional areas in proximity to the project.				✓	✓				✓	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
November 15, 2017 Outgoing email	This email from a communications officer with CNL to the Georgina Island FN Chief enclosed links to the full draft EIS, an interactive “public-friendly” executive summary of the draft EIS, the CNSC’s public notice, a short overview of the project and environmental assessment, as well as detailed information on the timing of the EA process and how to participate in the public comment period.	√	√	√	√	√	√	√	√	√	
November 17, 2017 Outgoing email	This email from a communications officer with CNL to the Georgina Island FN Chief enclosed the draft Aboriginal Engagement Report for the NPD Closure Project and stated, per CEAA, 2012 requirements: “CNL would be pleased to update information in this current draft with input from your community.”	√	√	√	√	√	√	√	√	√	
In March 2020, the COVID-19 pandemic impacted in-person engagement activities. CNL adapted to the restrictions providing online platforms for virtual meetings, workshops, webinars, Project updates and open houses.											
April 09, 2020 Outgoing email	This email from a communications officer with CNL to representatives of the WTFN (including the Consultation Coordinator with Georgina Island FN) was to propose a virtual webinar meeting on the NPD Closure Project and the NSDF Project.										√
April 09, 2020 Incoming email	This email from Georgina Island FN’s Consultation Coordinator to a communications officer with CNL was to confirm attendance and date preference for the webinar.										√
May 04, 2020 Outgoing email	This email from a communications officer with CNL to representatives of the WTFN (including the Consultation Coordinator with Georgina Island FN) enclosed an action list.										√
May 05, 2020 Outgoing email	This email from a CNL communications officer to the Georgina Island FN’s Community Consultation Coordinator was to follow-up on previous correspondence and propose a virtual meeting in May, focused on the NPD Closure Project.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
May 06, 2020 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the Georgina Island FN Chief enclosed a preliminary version of the 2020 revised draft EIS and an updated IER. This letter also asked for feedback in the following seven areas: - Does Georgina Island First Nation have additional information that they would like to provide in the context of traditional territory near the NPD site? - Does Georgina Island First Nation have any members who currently live close or in reasonable proximity to the NPD site? - Does Georgina Island First Nation have historical and/or current traditional practices near the NPD site, specifically we are interested in members’ traditional uses such as trapping (traditional or commercial), hunting, fishing (traditional or commercial), gathering and practicing cultural ceremonies? - Does Georgina Island First Nation have sites of ceremonial significance in close proximity or more generally any cultural activities near the NPD site? - Tell us about any important resources, uses, activities, values and interests to Georgina Island First Nation near the NPD site. - If there is use in close proximity to the NPD site, is current community use different than historic use and can a description of those difference be provided? - Let us know of any potential concerns you have with respect to effects and any potential impacts on rights. This letter also indicated an interest in meeting with Georgina Island FN to discuss any interests or concerns.	√	√	√	√	√	√	√	√	√	
May 19, 2020 Virtual meeting	This meeting between four representatives of different WTFN communities (specifically, Hiawatha FN’s Land and Resources consultation workers, Alderville First Nation’s lands and community engagement officer, Curve Lake First Nation’s lands and resources consultation officer and Georgina Island FN’s consultation coordinator attended) and six CNL representatives (including the Manager of Stakeholder Relations, the Manager of Regulatory Approvals for the NPD Closure Project and communications officers with CNL) included an interactive webinar overview presentation on the project with the opportunity for questions. Specific topics discussed included the following: - Project overview and components; - Timeline; - Waste inventory; - Monitoring; - VCs; - Species at risk; - Traditional land and resource use; - Effects on the environment.	√		√	√		√	√	√	√	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
May 26, 2020 Outgoing email	This email from a communications officer with CNL to representatives of the WTFN (including the Consultation Coordinator with Georgina Island FN) enclosed the follow-up information responding to all questions from the meeting on May 19, including the Georgina Island FN representative’s questions (topics listed above). Three ACMRs and the archaeological assessment were enclosed to support CNL’s response.	√			√					√	
February 12, 2021 Outgoing email	This email from CNL staff to WTFN communities (including Georgina Island FN representatives) was an invitation to join Curve Lake First Nation’s request of a monthly update on Canadian Nuclear Laboratories (CNL) environmental remediation projects, such as the NSDF Project and NPD Closure Project, as well as Port Hope Area Initiative (PHAI) activities in Port Hope and Port Granby. The monthly meeting will take place the last Wednesday of each month starting March 2021.									√	
April 4, 2021 Outgoing email	This email from a CNL Communications Officer to all the representatives of the William Treaties First Nations communities enclosing the agenda and presentation from the most recent monthly meeting.										√
April 12, 2021 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the Georgina Island FN Chief enclosed a preliminary list of commitments and indicated interest in meeting to discuss.										√
June 15, 2021 Outgoing email	This email from a communications officer with CNL to Georgina Island FN Consultation Coordinator was to follow-up on the April letter.										√
July 6, 2021 Outgoing email	This email from a CNL Communications Officer to all the representatives of the William Treaties First Nations communities enclosing the agenda and presentation from the most recent monthly meeting.										√
August 26, 2021 Outgoing email	This email from a CNL Communications Officer to all the representatives of the William Treaties First Nations communities enclosing the agenda and presentation from the most recent monthly meeting.										√
November 1, 2021 Outgoing email	This email from a CNL Senior Communications Officer to all the representatives of the William Treaties First Nations communities enclosing the agenda and presentation from the most recent monthly meeting.										√
April 18, 2022 Outgoing email	Email invitation to Georgina Island First Nation to the CNL Industry Day at the Chalk River Laboratories on Thursday, June, 2, 2022 to promote the broader engagement between CNL’s nuclear industry partners and our local supply chain.										√
April 25, 2022 Outgoing email	Email invitation to the April 27, 2022 Williams Treaties First Nations monthly meeting. The agenda items included the following on the NPD project: - NPD Project Updates - NPD Draft EAFMP								√		

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
April 27 , 2022 Virtual Meeting	This was the ninth of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer and ERM Stakeholder Relations Manager) Curve Lake First Nation (including the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a community consultation coordinator), Scugog Island (including a consultant), Chippewas of Georgina Island First Nation (Invasive Species coordinator) and AECL (including the Manager of Engagement and Communications) were in attendance. The focus was a discussion on the NSDF Project. CNL also shared an update on the NPD Closure Project.								√		√
April 28, 2022 Outgoing email	This email from a CNL Senior Advisor of Indigenous Relations to the WTFN communities attached the presentation from the April 27, 2022 monthly meeting. CNL invited WTFN communities to the Industry Day at the Chalk River Laboratories on Thursday, June, 2, 2022 to promote the broader engagement between CNL’s nuclear industry partners and our local supply chain.								√		
May 06, 2022 Outgoing email	Email invitation to Georgina Island First Nation to the CNL Industry Day at the Chalk River Laboratories on Thursday, June, 2, 2022 to promote the broader engagement between CNL’s nuclear industry partners and our local supply chain.										√
May 13, 2022 Outgoing email	This email from ERM Stakeholder Relations to the WTFN communities provided a response to technical questions asked at the April 27, 2022 monthly meeting. Q1: Please provide a breakdown of how much tritium in the Ottawa River is naturally occurring versus anthropogenic (e.g. from weapons testing in the 1960s), including a graph showing the peak of tritium from weapons testing. Q2: Please provide further information on stack contamination and the remedial actions planned at the base of the stack, with respect to potential impacts on Chimney Swifts.								√		
June 06, 2022 Outgoing email	This email from a Senior Advisor of Indigenous Relations at CNL to the WTFN communities sent a proposed agenda for the tenth monthly meeting planned for June 29, 2022. The meeting is planning to be held in-person at the Port Hope Area Initiative office. On the proposed agenda the NPD Project staff will provide an update on the project.										√
June 22, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the WTFN communities provided an updated agenda for the June 29, 2022 monthly meeting. A NPD Project update was included as an agenda item.										√
July 14, 2022 Outgoing email	Email from a CNL Senior Communications Officer to Curve Lake First Nation’s Consultant proposed dates for a tour of the NSDF and NPD Facility. CNL proposed an online poll and asked for any additional dates needed. Curve Lake First Nation’s Consultant replied and will provide alternative dates.										√
July 25, 2022 Outgoing email	Email from a CNL Senior Communications Officer to WTFN Communities sharing the agenda for the 11 th monthly meeting on July 27, 2022. The agenda included a NPD project update.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
August 22, 2022 Outgoing/Incoming emails	Emails from a CNL Senior Communications Officer to WTFN consultation representatives coordinating dates for the tour of the NSDF and NPD Facility.										✓
September 16, 2022 Outgoing email	Email from a CNL Senior Communications Officer to WTFN consultation representatives to save the date for the WTFN tour of Chalk River Laboratories on October 25 and 26, 2022 (including the proposed NSDF site and NPD site).										✓
September 21, 2022 Outgoing email	Email from a CNL Senior Communications Officer to Curve Lake First Nation’s Consultant sharing for review the proposed agenda or the 12 th monthly meeting on September 28, 2022. The agenda included a NPD project update. Curve Lake First Nation accepted the agenda.										✓
September 26, 2022 Outgoing email	Email from a Senior Communications Officer to WTFN communities sharing the agenda for the September 28 working group meeting. The agenda included an update on the NPD project.										✓
October 01, 2022 Outgoing email	Email from a Senior Communications Officer to WTFN communities sharing the agenda and presentation from the September 28, 2022 monthly meeting. Related to the presentation content, CNL have also attached a CNSC infographic that provides a description of the classes of radioactive waste.										✓
October 05, 2022 Outgoing Letter	This letter addressed to Georgina Island First Nation’s Chief from CNL’s Director of Indigenous Relations provided a project update and the engagement status with GIFN. CNL stated it is committed to incorporating Georgina Island’s interests and concerns into the EIS. CNL provided an engagement status and next steps, including a site visit and establishing commitments to ensure that all interests and concerns are addressed and tracked to resolution. CNL sent an updated draft set of commitments for GIFN’s review. CNL offered to discuss capacity and establish commitments before December 2022. CNL requested that GIFN respond confirming their agreement to proceed with the engagement activities, or modified engagement activities.									✓	✓
October 03, 2022 Outgoing email	Email from a Senior Communications Officer to WTFN communities sharing the agenda for the October 25 and 26, 2022 tour of Chalk River Laboratories (including the proposed NSDF site and NPD site). CNL also sent information about required PPE and the link to register for the tour.										✓
October 26, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Georgina Island First Nation’s Chief following up on the October 03, 2022 letter.									✓	
November 15, 2022 Outgoing email	This email from a CNL Senior Communications Officer to WTFN communities cancelled the December monthly meeting.										✓

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
November 26, 2022 Telephone call	This call from a CNL Senior Communications Officer to Georgina Island First Nation’s Invasive Species Coordinator discussed the October 02, 2022 letter. CNL offered capacity for the review or a meeting and re-sent the invitation for the WTFN monthly meeting.									✓	
November 26, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Georgina Island First Nation’s Invasive Species Coordinator shared the October 03, 2022 letter and follow-up email.									✓	
November 26, 2022 Incoming email	This email from Georgina Island First Nation’s Invasive Species Coordinator to a CNL Senior Communications Officer requested that CNL keep GIFN update about the project and declined to meet.									✓	
November 28, 2022 Outgoing email	This email from a CNL Senior Communications Officer to WTFN communities sent the agenda for the November 30 th , 2022 monthly meeting. The agenda included a NPD Project update, a discussion on 2023 engagement plans and a discussion on a year in review.										✓
January 20, 2023 Outgoing email	Email from a CNL Communications Officer to Georgina Island First Nation’s Invasive Species Coordinator to inform of the decision to postpone the submission of the NPD Closure Project’s draft Environmental Impact Statement (EIS) until May 2023 to allow for additional Indigenous input. CNL proposed the next step would be to coordinate a meeting to discuss the NPD project.										✓
January 30, 2023 Incoming email	This email from Georgina Island First Nation’s Invasive Species Coordinator to a CNL Communications Officer questioning what concerns were raised to invoke the postponement of the submission date to May 2023.									✓	✓
January 30, 2023 Outgoing email	This email from a CNL Communications Officer to Georgina Island First Nation’s Invasive Species Coordinator with more information on the postponement of the submission date to May 2023 with links to additional resources.										✓
March 01, 2023 Virtual Meeting	This was the 15th of the monthly meetings between CNL and the Williams Treaties First Nations communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a Communications Officer, Indigenous Engagement Coordinator, and ERM Stakeholder Relations, the Manager of ERM Licensing Support, the Manager of ERM Stakeholder Relations, NPD Regulatory Approvals, the Senior Advisor Indigenous Relations, and the Manager of Stakeholder and Indigenous Engagement) AECL (including the Manager of Engagement and Communications) and WTFN communities, (including, Mississaugas of Scugog Island First Nation Consultation Specialist, Georgina Island Invasive Species Coordinator, Hiawatha and Curve Lake First Nation Consultant, Curve Lake First Nation Elder, Three Fires Consulting, Hiawatha Lands and Resource Coordinator). CNL and WTFN discussed NPD project update, May 2023 in-person meeting, CNL Public disclosures, and the program for Engagement with Indigenous Nations, communities and organizations.										✓
March 14, 2023 Outgoing email	This email from CNL Senior Communications Officer to WTFN with CNL’s Indigenous Relations Procurement Strategy.										✓

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
March 29, 2023 Virtual Meeting	This was the 16th of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. This meeting was between CNL representatives (including Communications Officers, the Indigenous engagement coordinator, the Manager of Supply Chain, the Manager of ERM Licensing Support, Man the Manager of ERM Stakeholder Relations, the Manager of NPD Regulatory Approvals, the Senior Advisor Indigenous Relations) AECL (including the Manager of Engagement and Communications) and WTFN communities, (including Georgina Island First Nation’s Invasive Species Coordinator, Mississaugas of Scugog Island First Nation Consultation Specialist, Hiawatha and Curve Lake First Nation Consultant, and Curve Lake Elder. CNL and the WTFN discussed CNL’s Indigenous Procurement Strategy.										✓
April 06, 2023 Outgoing email	This email from a CNL Communications Officer to Georgina Island First Nation’s Invasive Species Coordinator with suggested next steps to finalize the commitments between CNL and the Mississauga’s of Mississaugas of Scugog Island First Nation to ensure that all interests and concerns are addressed and tracked to resolution.										✓
April 11, 2023 Outgoing email	This email from CNL Senior Communications Officer to WTFN with the agenda and presentation from the monthly meeting held on 2023 March 29. CNL also looked to confirm the dates of the 2023 April 26 monthly meeting.										✓
June 09, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to WTFN is to provide WTFN with an updated actions list from the 2023 May 31 Monthly Meeting.										✓
June 28, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to WTFN is to provide WTFN with an updated actions list from the 2023 June 28 Monthly Meeting.										✓
July 11, 2023 Outgoing Email	This email from CNL Communications Officer to all WTFN communities is to request confirmation of attendance at the 2023 July monthly meeting being held in person in Hiawatha. Communities confirmed their attendance.										✓
July 21, 2023 Outgoing Email	This email from CNL Communications Officer to all WTFN communities is to request confirmation of attendance at the 2023 July monthly meeting being held in person in Hiawatha. Communities confirmed their attendance.										✓
July 27, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to WTFN is to provide WTFN with the action list from the 2023 July 26 in person meeting.										✓
October 26, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to WTFN is to provide WTFN with the action list from the 2023 October 26 WTFN Monthly meeting.										✓
November 01, 2023 Outgoing Email	This email from CNL Manager, Communications and Engagement to all WTFN is to follow-up from the 2023 October monthly meeting. CNL noted for those who were unable to attend the meeting, an agenda item was tabled for discussion to move our monthly information sharing meeting to a quarterly meeting instead. The discussion result was an agreement (with those in attendance) to change to a quarterly meeting update if WTFN communities still received project updates/ milestones and/ or news in between meetings. I encourage you to provide feedback on this change. CNL also shared the GO-CO model presentation.										✓

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
November 23, 2023 Outgoing Email	This email from CNL Manager, Communications and Engagement to all WTFN is to follow-up from the 2023 November 01 email to all WTFN communities to confirm that the 2023 November 30 WTFN monthly meeting has been cancelled, and that the monthly meeting has been changed to a quarterly meeting series. The monthly meeting series has been cancelled. A quarterly meeting series has been setup, and the next meeting is on Wednesday, January 31, 2024.										v

Appendix T Chippewas of Rama First Nation Record of Engagement

T.1 Record of Engagement-Chippewas of Rama First Nation-2016 June to 2024 March

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
July 15, 2016 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the Chippewas of Rama First Nation (FN) Chief introduced the project and requested community input on any potential adverse impacts from project activities. To demonstrate requirements of CEAA, 2012 Section 5(1)(c), the letter requested meaningful feedback on the following: Whether the project may have environmental effect on any lands and/or resources currently used by Aboriginal peoples for traditional purposes; Whether the project may have any perceived impacts on Aboriginal and Treaty Rights; Whether local and traditional knowledge can assist in describing the existing environment; and, The view of Aboriginal communities on proposed valued ecosystems components (environmental attributes) that have been identified for the assessment.				√	√				√	
October 24, 2016 Outgoing telephone call	This telephone call from a communications officer with CNL to representatives of the Chippewas of Rama FN was to follow up on the July letter.				√	√				√	
November 10, 2016 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the Chippewas of Rama FN Chief inquired about asserted rights and traditional activities in the region around CRL. To demonstrate requirements of CEAA 2012 Section 5(1)(c), the letter requested a better understanding of Rama FN’s historic and/or modern day use of lands in and/or near both of the projects and asked the following questions: Do the Chippewas of Rama First Nation have traditional territory or reserve lands near the NSDF and/or NPD Closure Project? What is the history of the Chippewas of Rama First Nation using the areas around the two projects? Do you have any members of the Chippewas of Rama First Nation that currently live in close or reasonable proximity to either of the projects? Do the Chippewas of Rama First Nation have any members that currently practice traditional activities such as, trapping, hunting, fishing and/or gathering, near the two projects? Do the Chippewas of Rama First Nation, or any members, have sites of ceremonial significance in close proximity to either of the two sites, or more generally, any cultural activities near either of the two sites? CNL also indicated interested in learning more about the FN and any asserted rights, interests or activities members might undertake in the local or regional areas in proximity to the project.				√	√				√	
November 16, 2016 Incoming email	This email from the Chippewas of Rama FN community consultation coordinator to a communications officer with CNL acknowledged the previous letters and stated that the information had been sent to the Williams Treaties First Nations (WTFN) Process Coordinator. This email included contact details for the WTFN Process Coordinator.										√
November 15, 2017 Outgoing email	This email from a communications officer with CNL to the Chippewas of Rama FN Chief enclosed links to the full draft EIS, an interactive “public-friendly” executive summary of the draft EIS, the CNSC’s public notice, a short overview of the project and environmental assessment, as well as detailed information on the timing of the EA process and how to participate in the public comment period.	√	√	√	√	√	√	√	√	√	
November 17, 2017 Outgoing email	This email from a communications officer with CNL to the Chippewas of Rama FN Chief enclosed the draft Aboriginal Engagement Report for the NPD Closure Project and stated, per CEAA, 2012 requirements: “CNL would be pleased to update information in this current draft with input from your community.”	√	√	√	√	√	√	√	√	√	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
In March 2020, the COVID-19 pandemic impacted in-person engagement activities. CNL adapted to the restrictions providing online platforms for virtual meetings, workshops, webinars, Project updates and open houses.											
April 09, 2020 Outgoing email	This email from CNL communications officer to representatives of the different WTFN communities (including the Chippewas of Rama FN community consultation coordinator) was to propose a virtual webinar meeting on the NPD Closure Project and the NSDF Project.										✓
April 17, 2020 Outgoing email	This email from CNL communications officer to representatives of the different WTFN communities (including the Chippewas of Rama FN community consultation coordinator) was to confirm the webinar, as well as offer to test the virtual meeting platform.										✓
April 29, 2020 Outgoing email	This email from CNL communications officer to representatives of the different WTFN communities (including the Chippewas of Rama FN community consultation coordinator) enclosed a copy of the overview presentations for the webinars.										✓
May 04, 2020 Outgoing email	This email from CNL communications officer to representatives of the different WTFN communities (including the Chippewas of Rama FN community consultation coordinator) enclosed an action list.										✓
May 05, 2020 Outgoing email	This email from a CNL communications officer to the Chippewas of Rama Community Consultation Worker was to inquire whether there was interest from Chippewas of Rama FN in attending the WTFN virtual webinar meetings hosted by CNL for the NSDF and NPD Closure Project.										✓
May 06, 2020 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the Chippewas of Rama FN Chief enclosed a preliminary version of the 2020 revised draft EIS and an updated IER. This letter also asked for feedback in the following seven areas: Does Chippewas of Rama First Nation have additional information that they would like to provide in the context of traditional territory near the NPD site? Does Chippewas of Rama First Nation have any members who currently live close or in reasonable proximity to the NPD site? Does Chippewas of Rama First Nation have historical and/or current traditional practices near the NPD site, specifically we are interested in members’ traditional uses such as trapping (traditional or commercial), hunting, fishing (traditional or commercial), gathering and practicing cultural ceremonies? Does Chippewas of Rama First Nation have sites of ceremonial significance in close proximity or more generally any cultural activities near the NPD site? Tell us about any important resources, uses, activities, values and interests to Chippewas of Rama First Nation near the NPD site. If there is use in close proximity to the NPD site, is current community use different than historic use and can a description of those difference be provided? Let us know of any potential concerns you have with respect to effects and any potential impacts on rights. This letter also indicated an interest in meeting with Chippewas of Rama to discuss any interests or concerns.	✓	✓	✓	✓	✓	✓	✓	✓	✓	
May 12, 2020 Outgoing email	This email a CNL communications officer to the Chippewas of Rama Community Consultation Worker was to inquire whether there was any interest in Chippewas of Rama FN attending the WTFN webinar meetings hosted by CNL on the NPD Closure Project and NSDF Project.										✓
May 14, 2020 Outgoing email	This email from CNL communications officer to representatives of the different WTFN communities (including the Chippewas of Rama FN community consultation coordinator) was to confirm the virtual webinar meeting date of May 19.										✓
May 26, 2020 Outgoing email	This email from CNL communications staff to the Chippewas of Rama FN Chief was to follow-up on the registered letter sent on May 06.										✓
May 26, 2020 Outgoing email	This email from CNL communications officer to representatives of the different WTFN communities (including the Chippewas of Rama FN community consultation coordinator) enclosed the follow-up information responding to all questions from the meeting on May 19.	✓			✓					✓	
July 27, 2020 Outgoing email	This email from CNL communications officer to representatives of the different WTFN communities (including the Chippewas of Rama FN community consultation coordinator) enclosed the presentation from the May meeting.	✓		✓	✓		✓	✓	✓	✓	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
October 08, 2020 Incoming email	This email from the Community Consultation Worker for Chippewas of Rama FN to a CNL communications officer provided information on the new Chief for the Chippewas of Rama FN and inquired whether there was ongoing engagement with the WTFN and confirmed they were consulting the CNSC. This email also indicated an interest in continuing to receive project updates.										✓
October 08, 2020 Outgoing email	This email from a communications officer with CNL to the Community Consultation Worker for Rama FN confirmed that CNL also was in communication with, and provided updates, to the CNSC.										✓
October 26, 2020 Outgoing letter	This letter from CNL’s Manager of ERM Stakeholder Relations to the Chippewas of Rama FN Chief was to congratulate the newly elected Chief and express appreciation for the representatives of the Chippewas of Rama FN participation in recent engagements related to other CNL projects.										✓
February 12, 2021 Outgoing email	This email from CNL communications officer to representatives of the different WTFN communities (including the Chippewas of Rama FN community consultation coordinator) was an invitation to join Curve Lake First Nation’s request of a monthly update on Canadian Nuclear Laboratories (CNL) environmental remediation projects, such as the NSDF Project and NPD Closure Project, as well as Port Hope Area Initiative (PHAI) activities in Port Hope and Port Granby. The monthly meeting will take place the last Wednesday of each month starting March 2021.									✓	
April 4, 2021 Outgoing email	This email from a CNL Communications Officer to all the representatives of the William Treaties First Nations communities enclosing the agenda and presentation from the most recent monthly meeting.										✓
April 12, 2021 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the Chippewas of Rama FN Chief enclosed a preliminary list of commitments and indicated interest in meeting to discuss.										✓
April 28, 2021 Virtual meeting	This was the second of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer, the Manager of Stakeholder and Indigenous Relations with PHAI and the Manager of Regulatory Approvals for the NPD Closure Project) Curve Lake First Nation (including the Lands and Resources Consultation Officer, a consultant and the Lands and Resource Administrative Support Worker), Hiawatha FN (including two community consultation coordinators), Alderville First Nation (including the Lands and Resources Communications Officer), Rama FN (including the community consultation coordinator) and AECL (including the Director of Communications and Government Reporting) were in attendance. The focus was an overview on the NPD Closure Project, the NSDF Project and the PHAI.			✓	✓						✓
May 26, 2021 Virtual meeting	This was the third of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer, the Manager of Stakeholder and Indigenous Relations with PHAI, an environmental specialist with the NPD Closure Project and the Manager of Regulatory Approvals for the NPD Closure Project) Curve Lake First Nation (including the Lands and Resources Consultation Officer, a consultant and the Lands and Resource Administrative Support Worker), Hiawatha FN (including two community consultation coordinators), Rama FN (including the community consultation coordinator) and AECL (including the Director of Communications and Government Reporting) were in attendance. The focus was an overview of biodiversity at CNL and included an update on the EA process for NPD.										✓
June 15, 2021 Outgoing email	This email from a communications officer with CNL to Chippewas of Rama First FN’s Lands and Resources Communications Officer was to follow-up on the April letter.										✓
July 6, 2021 Outgoing email	This email from a CNL Communications Officer to all the representatives of the William Treaties First Nations communities enclosing the agenda and presentation from the most recent monthly meeting.										✓
August 26, 2021 Outgoing email	This email from a CNL Communications Officer to all the representatives of the William Treaties First Nations communities enclosing the agenda and presentation from the most recent monthly meeting.										✓
November 1, 2021 Outgoing email	This email from a CNL Senior Communications Officer to all the representatives of the William Treaties First Nations communities enclosing the agenda and presentation from the most recent monthly meeting.										✓

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
February 21, 2022 Meeting invitation	Meeting invitation sent from a CNL Senior Communications Officer to WTFN for the monthly update and information sharing with WTFN.										✓
April 18, 2022 Outgoing email	Email invitation to Chippewas of Rama FN to the CNL Industry Day at the Chalk River Laboratories on Thursday, June, 2, 2022 to promote the broader engagement between CNL’s nuclear industry partners and our local supply chain.										✓
April 25, 2022 Outgoing email	Email invitation to the April 27, 2022 Williams Treaties First Nations monthly meeting. The agenda items included the following on the NPD project: NPD Project Updates; NPD Draft EAFMP.								✓		
May 06, 2022 Outgoing email	Email invitation to Chippewas of Rama FN to the CNL Industry Day at the Chalk River Laboratories on Thursday, June, 2, 2022 to promote the broader engagement between CNL’s nuclear industry partners and our local supply chain.										✓
June 06, 2022 Outgoing email	This email from a Senior Advisor of Indigenous Relations at CNL to the WTFN communities sent a proposed agenda for the tenth monthly meeting planned for June 29, 2022. The meeting is planning to be held in-person at the Port Hope Area Initiative office. On the proposed agenda the NPD Project staff will provide an update on the project.										✓
June 22, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the WTFN communities provided an updated agenda for the June 29, 2022 monthly meeting. A NPD Project update was included as an agenda item.										✓
July 14, 2022 Outgoing email	Email from a CNL Senior Communications Officer to Curve Lake First Nation’s Consultant proposed dates for a tour of the NSDF and NPD Facility. CNL proposed an online poll and asked for any additional dates needed. Curve Lake First Nation’s Consultant replied and will provide alternative dates.										✓
July 25, 2022 Outgoing email	Email from a CNL Senior Communications Officer to WTFN Communities sharing the agenda for the 11th monthly meeting on July 27, 2022. The agenda included a NPD project update.										✓
July 27, 2022 Virtual meeting	This was the 11th of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer and ERM Stakeholder Relations Manager) Curve Lake First Nation (including the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a community consultation coordinator), Scugog Island (including a consultant) and Rama First Nation (including a consultation workers) were in attendance. CNL shared an update on the NPD Closure Project.										✓
August 22, 2022 Outgoing/Incoming emails	Emails from a CNL Senior Communications Officer to WTFN consultation representatives coordinating dates for the tour of the NSDF and NPD Facility.										✓
September 16, 2022 Outgoing email	Email from a CNL Senior Communications Officer to WTFN consultation representatives to save the date for the WTFN tour of Chalk River Laboratories on October 25 and 26, 2022 (including the proposed NSDF site and NPD site).										✓
September 21, 2022 Outgoing email	Email from a CNL Senior Communications Officer to Curve Lake First Nation’s Consultant sharing for review the proposed agenda or the 12th monthly meeting on September 28, 2022. The agenda included a NPD project update. Curve Lake First Nation accepted the agenda.										✓
October 03, 2022 Outgoing email	Email from a CNL Senior Communications Officer to WTFN communities sharing the agenda for the October 25 and 26, 2022 tour of Chalk River Laboratories (including the proposed NSDF site and NPD site). CNL also sent information about required PPE and the link to register for the tour.										✓

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
October 03, 2022 Outgoing Letter	This letter addressed to Chippewas of Rama First Nation Chief from CNL’s Director of Indigenous Relations provided a project update and the engagement status with Chippewas of Rama First Nation. CNL stated it is committed to incorporating Chippewas of Rama’s interests and concerns into the EIS. CNL provided an engagement status and next steps, including a site visit and establishing commitments to ensure that all interests and concerns are addressed and tracked to resolution. CNL sent an updated draft set of commitments for Chippewas of Rama First Nation’s review. CNL offered to discuss capacity and establish commitments before December 2022. CNL requested that Chippewas of Rama First Nation respond confirming their agreement to proceed with the engagement activities, or modified engagement activities.									✓	
October 07, 2022 Incoming email	This email from Chippewas of Rama First Nation legal counsel to a CNL Senior Communications Officer confirmed receipt of the October 03, 2022 letter and commitment to continuing with engagement. Chippewas of Rama FN request a meeting to discuss the letter. Chippewas of Rama FN also noted the change in point of contact for CNL. CNL coordinated a meeting date.									✓	✓
October 07, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the Chippewas of Rama First Nation legal counsel shared the invitation to the October 26, 2022 WTFN tour of the NPD site.										✓
October 12, 2022 Incoming email	This email from Chippewas of Rama First Nation Councillor to a CNL Senior Communications Officer requested to attend the October 26, 2022 WTFN tour of the NPD site.										✓
October 12, 2022 Outgoing email	This email from a CNL Senior Communications Officer to a Chippewas of Rama First Nation Councillor provided logistical support to attend the October 26, 2022 WTFN tour of the NPD site.										✓
October 26, 2022 Tour	WTFN communities were invite to tour the NPD facility as part of a two day visit to the Chalk River Laboratories site and area. Representatives from CNL (in particular, NPD Project staff, communications officers, ERM Stakeholder Relations Manager, Director of Indigenous Relations) Curve Lake First Nation (including the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including Lands and Resource consultation coordinator), Scugog Island (including a consultation coordinator), Chippewas of Rama First Nation (including a councillor) and AECL (including the Director of Decommissioning and Waste Management Programme) took part in a reactor tour and site walk. The day include a smudging by the Ottawa River and relationship building.										✓
November 01, 2022 Outgoing email	This email from a CNL Senior Communications Officer to WTFN communities thanked the participants of the October 25 and 26, 2022 tour. As requested over the days CNL sent the archaeological assessments for the NPD site and photos from the tour.										✓
November 02, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the Chippewas of Rama First Nation legal counsel proposed an agenda for the upcoming meeting to introduce CNL’s different projects.										✓
November 09, 2022 Virtual Meeting	Meeting between Representatives from CNL (in particular, NPD Project staff, communications officers, ERM Stakeholder Relations Manager, Director of Indigenous Relations) and Chippewas of Rama First Nation (including legal counsel) to discuss CNL projects.										✓
November 15, 2022 Outgoing email	This email from a CNL Senior Communications Officer to WTFN communities cancelled the December monthly meeting.										✓
January 20, 2023 Outgoing email	This email from a CNL Communications Officer to Rama First Nation’s Legal Counsel to inform of the decision to postpone the submission of the NPD Closure Project’s draft Environmental Impact Statement (EIS) until May 2023 to allow for additional Indigenous input. CNL proposed the next step would be to continue working together to finalize the commitments between Rama First Nation and CNL to ensure that the Chippewas of Rama First Nation’s interests and concerns are reflected in the EIS.										✓
March 14, 2023 Outgoing email	This email from a CNL Senior Communications Officer to WTFN with CNL’s Indigenous Relations Procurement Strategy.										✓

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
March 29, 2023 Virtual Meeting	This was the 16th of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. This meeting was between CNL representatives (including Communications Officers, the Indigenous engagement coordinator, the Manager of Supply Chain, the Manager of ERM Licensing Support, Man the Manager of ERM Stakeholder Relations, the Manager of NPD Regulatory Approvals, the Senior Advisor Indigenous Relations) AECL (including the Manager of Engagement and Communications) and WTFN communities, (including, Georgina Island First Nation Invasive Species Coordinator, Mississaugas of Scugog Island First Nation Consultant Specialist, Hiawatha and Curve Lake First Nation Consultant, and Curve Lake Elder. CNL and the WTFN discussed CNL’s Indigenous Procurement Strategy.										✓
April 06, 2023 Outgoing email	This email from CNL Communications Officer to Rama First Nation’s Consultation Worker with suggested next steps to finalize the commitments between CNL and the Mississauga’s of Scugog Island FN to ensure that all interests and concerns are addressed and tracked to resolution.										✓
April 11, 2023 Outgoing email	This email from CNL Senior Communications Officer to WTFN with the agenda and presentation from the monthly meeting held on 2023 March 29. CNL also looked to confirm the dates of the 2023 April 26 monthly meeting.										✓
April 19, 2023 Emails	This email from Communications Officer and Rama First Nation Legal Counsel and Rama First Nation Community Consultation Worker to confirm a date for CNL to present on the NPD closure project. CNL and Rama FN agreed to meet for an initial NPD update meeting on 2023 April 25.										✓
April 25, 2023 Virtual Meeting	This meeting was between CNL (including Communications Officers and the Manager of Regulatory Approvals for the NPD Project) and Rama First Nation (including Legal Counsel and Consultation Worker). CNL gave an introduction presentation to Rama First Nation, followed by a question-and-answer session. CNL and Rama First Nation reviewed the Commitments list.										✓
May 02, 2023 Outgoing email	This email from a Communications Officer to the Rama First Nation Legal Counsel and Rama First Nation Community Consultation Worker shared action items from the NPD meeting held between CNL and Rama FN on 2023 April.										✓
May 16, 2023 Outgoing email	This email from CNL Communications Officer to RFN provided the update Table of Interests and Concerns. CNL is seeking validation. CNL respectfully requested RFN's response by 2023 June 20.									✓	
May 25, 2023 Incoming	This email from RFN to a CNL Communications Officer requested updates to the Table of Interest and Concerns related to long term safety									✓	
May 29, 2023 Outgoing email	This email from CNL Communications Officer to RFN provided the updated Table of Interest and Concerns. CNL added a new topic Long-term Safety to address the concern about the long-term integrity of the concrete cap and engineered barrier. CNL requested feedback on the edit.									✓	
May 31, 2023 Meeting	This was the 17th of the monthly meetings between CNL (Including, CNL Communications Officer, Indigenous Engagement Coordinator, Manager, ERM Licensing Support, Administrative Assistant, Manager NPD Regulatory Approvals, and Senior Advisor Indigenous Relations) and the WTFN communities (including Consultant, CLFN and HFN, Rama FN, Community Consultation, Alderville Consultation Coordinator, Mississaugas Scugog Island First Nation Community Consultation, Curve Lake First Nation, Acting Consultation lead, Hiawatha lands and resource consultation, coordinated between Curve Lake First Nation and CNL and open to all. CNL reminded communities it was seeking validation of the I&C tables, extended the invitation to attending the Swift Count night and provided an update on the restoration plan timing for feedback.						✓			✓	✓
June 07, 2023 Incoming email	This email from RFN to a CNL Communications Officer provided validation of the updated Table of Interest and Concerns.									✓	
June 09, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to WTFN is to provide WTFN with an updated actions list from the 2023 May 31 Monthly Meeting.										✓

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
June 28, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to WTFN is to provide WTFN with an updated actions list from the 2023 June 28 Monthly Meeting										✓
June 28, 2023 Meeting	This was the 18th of the monthly meetings between CNL (Including, CNL Communications Officer, Indigenous Engagement Coordinator, Manager, ERM Licensing Support, Administrative Assistant, Manager NPD Regulatory Approvals, and Senior Advisor Indigenous Relations, Manager, Environmental Management, Decommissioning and Environmental Specialist, and Project Manager) AECL (Directory of Communications and Government Relations) and the WTFN communities (including Consultant, CLFN and HFN, Rama FN, Community Consultation, Mississauga Scugog Island First Nation Community Consultation, Curve Lake First Nation, Acting Consultation lead) coordinated between Curve Lake First Nation and CNL and open to all. The focus of this meeting was to discuss NPD, PHAI, NSDF updates.										✓
July 11, 2023 Outgoing Email	This email from CNL Communications Officer to all WTFN communities is to request confirmation of attendance at the 2023 July monthly meeting being held in person in Hiawatha. Communities confirmed their attendance.										✓
July 26, 2023 Meeting	This was the 19th of the monthly meetings held in person in Hiawatha between CNL (Including, Director of Engagement and Communications, Manager NPD Regulatory Approvals, Manager of Stakeholder and Indigenous Communications, Communications Officers, Indigenous Engagement Coordinator, Project Manager, and Project Coordinator) and the WTFN communities (including, CLFN Consultant, CLFN and Hiawatha FN, Rama FN, Community Consultation, Rama Acting Consultation lead, CLFN, Elder, CNLFN Consultant, Consultant, CLFN and HFN, Executive Director, MSIFN Staff, MSIFN Student, MSIFN Consultation Department), coordinated between Curve Lake First Nation and CNL and open to all. The meeting included a tour of Serpent Mounds, a working lunch and a monthly meeting. Topics of discussion included Project updates- NSDF, NPD, and PHAI.										✓
July 27, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to WTFN is to provide WTFN with the action list from the 2023 July 26 in person meeting.										✓
October 26, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to WTFN is to provide WTFN with the action list from the 2023 October 26 WTFN Monthly meeting.										✓
November 01, 2023 Outgoing Email	This email from CNL Manager, Communications and Engagement to all WTFN is to follow-up from the 2023 October monthly meeting. CNL noted for those who were unable to attend the meeting, an agenda item was tabled for discussion to move our monthly information sharing meeting to a quarterly meeting instead. The discussion result was an agreement (with those in attendance) to change to a quarterly meeting update if WTFN communities still received project updates/ milestones and/ or news in between meetings. I encourage you to provide feedback on this change. CNL also shared the GO-CO model presentation.										✓
November 23, 2023 Outgoing Email	This email from CNL Manager, Communications and Engagement to all WTFN is to follow-up from the 2023 November 01 email to all WTFN communities to confirm that the 2023 November 30 WTFN monthly meeting has been cancelled, and that the monthly meeting has been changed to a quarterly meeting series. The monthly meeting series has been cancelled. A quarterly meeting series has been setup, and the next meeting is on Wednesday, January 31, 2024.										✓

Appendix U Curve Lake First Nation Record of Engagement

U.1 Record of Engagement-Curve Lake First Nation-2016 June to 2024 March

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
July 05, 2016 Letter to the CNSC	This letter from the Curve Lake First Nation (FN) Chief to an environmental specialist with the CNSC was related to the Project Description for the NPD Closure Project and raised the following interests and concerns: Indigenous rights; Protection of the environment; Archaeological resources.									√	
July 15, 2016 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the Curve Lake First Nation FN Chief introduced the project and requested community input on any potential adverse impacts from project activities. To demonstrate requirements of CEAA, 2012 Section 5(1)(c), the letter requested meaningful feedback on the following: Whether the project may have environmental effect on any lands and/or resources currently used by Aboriginal peoples for traditional purposes; Whether the project may have any perceived impacts on Aboriginal and Treaty Rights; Whether local and traditional knowledge can assist in describing the existing environment; and, The view of Aboriginal communities on proposed valued ecosystems components (environmental attributes) that have been identified for the assessment.				√	√				√	
October 24, 2016 Outgoing telephone call	This telephone call from CNL communications staff to Curve Lake First Nation staff was to follow-up on the July letter.										√
November 10, 2016 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the Curve Lake First Nation Chief inquired about asserted rights and traditional activities in the region around CRL. To demonstrate requirements of CEAA 2012 Section 5(1)(c), the letter requested a better understanding of the Curve Lake First Nation’s historic and/or modern day use of lands in and/or near both of the projects and asked the following questions: Does Curve Lake First Nation have traditional territory or reserve lands near the NSDF and/or NPD Closure Project? What is the history of Curve Lake First Nation using the areas around the two projects? Do you have any members of Curve Lake First Nation that currently live in close or reasonable proximity to either of the projects? Does Curve Lake First Nation have any members that currently practice traditional activities such as, trapping, hunting, fishing and/or gathering, near the two projects? Does Curve Lake First Nation, or any members, have sites of ceremonial significance in close proximity to either of the two sites, or more generally, any cultural activities near either of the two sites? CNL also indicated interested in learning more about the FN and any asserted rights, interests or activities members might undertake in the local or regional areas in proximity to the project.				√	√				√	
December 05, 2016 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the Lands and Resources Consultation Liaison for Curve Lake First Nation acknowledged Curve Lake First Nation’s interest in archaeological resources at CRL site and confirmed that NPD archaeological information would also be shared in the future.									√	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
February 09, 2017 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the Lands and Resources Consultation Liaison for Curve Lake First Nation enclosed the Archaeological Assessment for the NPD Closure Project, based on Curve Lake First Nation’s previous interest in archaeological resources for the NSDF project.									√	
November 15, 2017 Outgoing email	This email from a CNL communications officer to the Curve Lake First Nation Chief enclosed links to the full draft EIS, an interactive “public-friendly” executive summary of the draft EIS, the CNSC’s public notice, a short overview of the project and environmental assessment, as well as detailed information on the timing of the EA process and how to participate in the public comment period.	√	√	√	√	√	√	√	√	√	
November 17, 2017 Outgoing email	This email from a CNL communications officer to the Curve Lake First Nation Chief enclosed the draft Aboriginal Engagement Report for the NPD Closure Project and stated, per CEAA, 2012 requirements: “CNL would be pleased to update information in this current draft with input from your community.”	√	√	√	√	√	√	√	√	√	
In March 2020, the COVID-19 pandemic impacted in-person engagement activities. CNL adapted to the restrictions providing online platforms for virtual meetings, workshops, webinars, Project updates and open houses.											
April 09, 2020 Outgoing email	This email from a CNL communications officer to representatives of the different WTFN communities (including the Lands Resource Consultation Liaison with Curve Lake First Nation) was to propose a virtual webinar meeting on the NPD Closure Project and the NSDF project.										√
April 09, 2020 Incoming email	This email from Curve Lake First Nation’s Lands Resource Consultation Liaison to a CNL communications officer was to confirm attendance and date preference for the webinars.										√
April 17, 2020 Outgoing email	This email from a CNL communications officer to representatives of the different WTFN communities (including the Lands Resource Consultation Liaison with Curve Lake First Nation) was to confirm the webinar and to offer to test the virtual meeting platform.										√
April 29, 2020 Outgoing email	This email from a CNL communications officer to representatives of the different WTFN communities (including the Lands Resource Consultation Liaison with Curve Lake First Nation) enclosed a copy of the overview presentations for the webinars.										√
May 04, 2020 Outgoing email	This email from a CNL communications officer to representatives of the different WTFN communities (including the Lands Resource Consultation Liaison with Curve Lake First Nation) enclosed an action list.										√
May 06, 2020 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the Curve Lake First Nation Chief enclosed a preliminary version of the 2020 revised draft EIS and an updated IER. This letter also asked for feedback in the following seven areas: Does Curve Lake First Nation have additional information that they would like to provide in the context of traditional territory near the NPD site? Does Curve Lake First Nation have any members who currently live close or in reasonable proximity to the NPD site? Does Curve Lake First Nation have historical and/or current traditional practices near the NPD site, specifically we are interested in members’ traditional uses such as trapping (traditional or commercial), hunting, fishing (traditional or commercial), gathering and practicing cultural ceremonies? Does Curve Lake First Nation have sites of ceremonial significance in close proximity or more generally any cultural activities near the NPD site? Tell us about any important resources, uses, activities, values and interests to Curve Lake First Nation near the NPD site. If there is use in close proximity to the NPD site, is current community use different than historic use and can a description of those difference be provided? Let us know of any potential concerns you have with respect to effects and any potential impacts on rights. This letter also indicated an interest in meeting with Curve Lake First Nation to discuss any interests or concerns.	√	√	√	√	√	√	√	√	√	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
May 19, 2020 Virtual meeting	This meeting between four representatives of different WTFN communities (specifically, Hiawatha FN's Land and Resources consultation workers, Alderville First Nation's lands and community engagement officer, Curve Lake First Nation's Lands Resource Consultation Liaison and Georgina Island FN's consultation coordinator attended) and six CNL representatives (including the Manager of Stakeholder Relations, the Manager of Regulatory Approvals for the NPD Closure Project and communications officers with CNL) included an interactive webinar overview presentation on the project with the opportunity for questions. Specific topics discussed included the following: Project overview and components; Timeline; Waste inventory; Monitoring; VCs; Species at risk; Traditional land and resource use; Effects on the environment.	✓		✓	✓		✓	✓	✓	✓	
May 19, 2020 Incoming email	This email from Curve Lake First Nation's Lands Resource Consultation Liaison to a CNL communications officer was in follow-up to the meeting of the same day with a number of questions on the following topics: Chimney Swifts (species at risk); Indigenous consultation and engagement; The size of the NPD site; Plans for the nuclear disposal facility resulting from decommissioning.	✓			✓					✓	
May 26, 2020 Outgoing email	This email from a CNL communications officer to representatives of the different WTFN communities (including the Lands Resource Consultation Liaison with Curve Lake First Nation) enclosed the follow-up information responding to all questions from the meeting on May 19 and all of the questions sent from the Curve Lake First Nation Lands and Resources Consultation Liaison.	✓			✓					✓	
July 27, 2020 Outgoing email	This email from a CNL communications officer to representatives of the different WTFN communities (including the Lands Resource Consultation Liaison with Curve Lake First Nation) enclosed the presentation from the previous meeting in May.	✓		✓	✓		✓	✓	✓	✓	
November 6, 2020 Virtual meeting	This meeting between two Curve Lake First Nation representatives (consultants) and four CNL representatives (including the Manager of Regulatory Approvals for the NPD Closure Project, the Manager of Regulatory Approvals for the NSDF Project, the Manager of Stakeholder Relations and two communications officers) was to discuss Curve Lake's request for capacity to support meaningful consultation, engagement, and participation in the environmental assessments. Curve Lake First Nation and CNL discussed a contribution agreement for the NSDF project and NPD Closure Project and an action list was created.									✓	
November 11, 2020 Outgoing email	This email from a CNL communications officer to the Lands Resource Consultation Liaison with Curve Lake First Nation and consultants enclosed an action list that was initiated at the 2020 November 06 meeting.										✓
December 14, 2020 Virtual meeting	This meeting between the Curve Lake First Nation consultant and CNL representatives, including the Manager of Stakeholder Relations and two communications officers, was to discuss proposed budget and schedule for 2020/2021 activities and how it would fit into a contribution agreement. A second meeting was planned to continue discussions in early January 2021.									✓	

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		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
December 22, 2020 Outgoing email	This email from a communications officer with CNL to the Curve Lake First Nation representatives (consultants and Lands Resource Consultation Liaison) was to follow-up and share the link to the NPD Closure Project’s virtual open house for Curve Lake First Nation’s consultant and staff to review the information on the project components, the EA process and all other information contained on the virtual open house website.										✓
January 15, 2021 Virtual meeting	This meeting between two Curve Lake First Nation representatives (consultant) and CNL communications staff, including the Manager of Stakeholder Relations and two communications officers, was a continuation of the December 2020 discussion on establishing a contribution agreement, which included how to formalize engagement and how Curve Lake wished to be involved with CNL.									✓	
February 01, 2021 Outgoing email	This email from a communications officer with CNL to the Curve Lake First Nation representatives (consultants and Lands Resource Consultation Liaison) representatives enclosed a list of CNL environmental remediation projects (such as the NSDF project and NPD Closure Project) as well as Port Hope Area Initiative (PHAI) activities for 2021, per an earlier request from Curve Lake First Nation.										✓
February 11, 2021 Outgoing email	This email from a communications officer with CNL to the Curve Lake First Nation representatives (consultants and Lands Resource Consultation Liaison) was to follow up on the CNL list of 2021 activities and to inquire when Curve Lake First Nation would like the monthly update meetings to start, per an earlier request.										✓
February 11, 2021 Incoming email	This email from the Curve Lake First Nation consultant to a CNL communications officer acknowledged receiving the list of activities and confirmed monthly meetings could start in March 2021.										✓
February 12, 2021 Outgoing email	This email from a CNL communications officer to WTFN communities (including the Curve Lake First Nation Lands Resource Consultation Officer) was an invitation to join Curve Lake First Nation’s request of a monthly update on Canadian Nuclear Laboratories (CNL) environmental remediation projects, such as the NSDF Project and NPD Closure Project, as well as Port Hope Area Initiative (PHAI) activities in Port Hope and Port Granby. The monthly meeting takes place the last Wednesday of each month starting March 2021.									✓	
February 16, 2021 Outgoing email	This email from a CNL communications officer to the Curve Lake First Nation representatives (including consultants and Lands Resource Consultation Liaison) confirmed that the monthly meetings had been set up. CNL also informed Curve Lake First Nation that the draft contribution agreement was being drawn up and that upon completion a meeting would follow to further discuss.									✓	
February 26, 2021 Outgoing email	This email from a communications officer with CNL to the consultant and the Lands and Resources Consultation Coordinator with Curve Lake First Nation enclosed a number of suggested documents of interest related to the NPD Closure Project, including the following: draft follow-up monitoring plans, 2020 draft EIS, IER, Postclosure Safety Assessment and the Ecological Risk Assessment.	✓	✓	✓	✓		✓	✓	✓	✓	✓
March 26, 2021 Virtual meeting	This meeting between two Curve Lake First Nation representatives (consultant and Lands and Resource Administrative Support Worker) and CNL communications staff, including the Manager of Stakeholder Relations and two communications officers, was a discussion on the contribution agreement and associated budget and schedule.									✓	
March 31, 2021 Virtual meeting	This was the first of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer, the Manager of Stakeholder and Indigenous Relations with PHAI and the Manager of Regulatory Approvals for the NPD Closure Project) Curve Lake First Nation (including the Lands Resource Consultation Liaison, a consultant and the Lands and Resource Administrative Support Worker), Hiawatha FN (including two community consultation coordinators), Alderville First Nation (including the Lands and Resources Communications Officer), Rama FN (including the community consultation worker) and AECL (including the Director of Communications and Government Reporting) were in attendance. The focus was an overview on AECL and CNL as a corporation. A follow-up email with the presentation, was sent to all WTFN representatives.			✓	✓						✓

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		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
April 4, 2021 Outgoing email	This email from a CNL Communications Officer to all the representatives of the William Treaties First Nations communities enclosing the agenda and presentation from the most recent monthly meeting.										✓
April 12, 2021 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the Curve Lake First Nation Chief enclosed a preliminary list of commitments and indicated interest in meeting to discuss.										✓
April 28, 2021 Virtual meeting	This was the second of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer, the Manager of Stakeholder and Indigenous Relations with PHAI and the Manager of Regulatory Approvals for the NPD Closure Project) Curve Lake First Nation including the Lands Resource Consultation Officer, consultants, a community member on a consultation committee and the Lands and Resource Administrative Support Worker), Hiawatha FN (including two community consultation coordinators), Alderville First Nation (including the Lands and Resources Communications Officer), Rama FN (including the community consultation worker) and AECL (including the Director of Communications and Government Reporting) were in attendance. The focus was an overview on the NPD Closure Project, the NSDF Project and the PHAI.			✓	✓						✓
May 26, 2021 Virtual meeting	This was the third of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer, the Manager of Stakeholder and Indigenous Relations with PHAI, an environmental specialist with the NPD Closure Project and the Manager of Regulatory Approvals for the NPD Closure Project) Curve Lake First Nation (including the Lands Resource Consultation Officer, consultants, a community member on a consultation committee and the Lands and Resource Administrative Support Worker), Hiawatha FN (including two community consultation coordinators), Rama FN (including the community consultation coordinator) and AECL (including the Director of Communications and Government Reporting) were in attendance. The focus was an overview of biodiversity at CNL and included an update on the EA process for NPD.										✓
June 15, 2021 Outgoing email	This email from a communications officer with CNL to Curve Lake First Nation’s Lands Resource Consultation Liaison was to follow-up on the April letter.										✓
June 21, 2021 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the Curve Lake First Nation Chief enclosed a draft summary of the Curve Lake First Nation’s interests and concerns for the NPD Closure Project for Curve Lake’s review and verification.									✓	✓
June 23, 2021 Incoming email	This email from the Curve Lake First Nation consultant to a communications officer with CNL was to confirm the most recent draft of the draft EIS for the project.										✓
June 23, 2021 Outgoing email	This email from a Communications Officer with CNL to a Curve Lake First Nation consultant enclosed drafts of Sections 8.9 and 9.9 to assist in the EIS review.	✓			✓						✓
June 30, 2021 Virtual meeting	This was the fourth of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer, the Manager of Stakeholder and Indigenous Relations with PHAI, an environmental specialist with the NPD Closure Project and the Manager of Regulatory Approvals for the NPD Closure Project) Curve Lake First Nation (including the Lands Resource Consultation Officer, consultants, a community member on a consultation committee and the Lands and Resource Administrative Support Worker), Hiawatha FN (including two community consultation coordinators), Rama FN (including the community consultation coordinator) and AECL (including the Director of Communications and Government Reporting) were in attendance. The focus was an overview of biodiversity at CNL and included an update on the EA process for NPD.								✓	✓	✓
July 6, 2021 Outgoing email	This email from a CNL Communications Officer to all the representatives of the William Treaties First Nations communities enclosing the agenda and presentation from the most recent monthly meeting.										✓

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		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
July 16, 2021 Incoming email	This email from a consultant for Curve Lake to the ERM Stakeholder Relations Manager enclosed a letter enclosing Curve Lake First Nation’s Review of the NPD Closure Project’s 2020 revised draft EIS.	✓		✓	✓		✓	✓	✓	✓	✓
July 24, 2021 Outgoing email	This email from a communications officer with CNL to the consultant with Curve Lake First Nation summarized a phone call from the same day to confirm topics of discussion and that the revise of the EIS was the only formal review CNL would receive for now on the NPD Closure Project.									✓	✓
July 28, 2021 Virtual meeting	This was the fifth of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer, the Manager of Regulatory Approvals for the NPD Closure Project) Curve Lake First Nation (including the Lands and Resources Consultation Officer, a consultant and the Lands and Resource Administrative Support Worker), Hiawatha FN (including two community consultation coordinators), and AECL (including the Director of Communications and Government Reporting) were in attendance. The focus was an overview of the WTFN’s interests and concerns with respect to the NPD Closure Project.			✓						✓	✓
July 30, 2021 Outgoing email	This email from a communications officer with CNL to the consultant with Curve Lake First Nation enclosed a draft of the contribution agreement between Curve Lake First Nation and CNL for review.									✓	✓
August 11, 2021 Virtual Meeting	This was a meeting between Curve Lake First Nation representatives (consultant and Lands and Resource Administrative Support Worker) and CNL representatives (communications staff, including the Manager of Stakeholder Relations and two communications officers, Manager of Regulatory Approvals for the NPD Closure Project and Manager, ERM Licensing Support,) to discuss the draft contribution agreement.										✓
August 16, 2021 Outgoing email	This email from a communications officer with CNL to the consultant with Curve Lake First Nation enclosed an updated contribution agreement between Curve Lake First Nation and CNL for review based on Curve Lake First Nation feedback received at the August 11, 2021 meeting.										✓
August 25, 2021 Virtual Meeting	This was the six of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer, the Manager of Stakeholder and Indigenous Relations with PHAI and the Manager of Regulatory Approvals for the NPD Closure Project) Curve Lake First Nation (including the Lands and Resources Consultation Officer, a consultant and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a community consultation coordinator), Beausoleil First Nation (including a consultation coordinator) and AECL (including the Director of Communications and Government Reporting) were in attendance. The focus was on Port Granby and a Project update was shared about the NPD Closure Project.										✓
August 26, 2021 Outgoing email	This email from a communications officer with CNL to the consultant with Curve Lake First Nation and Hiawatha FN community consultation coordinator enclosed updated Table of Interests and Concerns. Updates to the tables to reflect the additional interests that were noted in the discussion at the July 28, 2021 meeting.									✓	
August 26, 2021 Outgoing email	This email from a CNL Communications Officer to all the representatives of the Williams Treaties First Nations communities enclosing the agenda and presentation from the most recent monthly meeting.										✓
August 31, 2021 Outgoing email	This email from a communications officer with CNL to the consultant with Curve Lake First Nation enclosed CNL’s responses to Curve Lake First Nation’s review of the 2020 NPD Closure Project’s revised draft EIS.	✓		✓	✓	✓		✓	✓	✓	✓
September 1, 2021 Incoming email	This email from a Curve Lake First Nation consultant to a communications officer with CNL enclosed an updated contribution agreement between Curve Lake First Nation and CNL for review based on a review from the Curve Lake First Nation legal team.										✓

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September 13, 2021 Outgoing Email	This email from a CNL Communications Officer to a Curve Lake First Nation consultant was in follow-up to the email shared on August 26, 2021, looking for verification that CNL had accurately made the changes to the Table of Interests and Concerns, which had been discussed at the July 28, 2021 meeting.									√	
September 29, 2021 Virtual meeting	This was the seventh of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer, ERM Stakeholder Relations Manager and the Manager of Regulatory Approvals for the NPD Closure Project) Curve Lake First Nation (including the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a community consultation coordinator), Scugog Island (including a consultant) and AECL (including the Manager of Engagement and Communications) were in attendance. The focus was a discussion on CNL’s responses to Curve Lake First Nation’s review of the 2020 revised draft EIS.	√		√	√	√				√	√
October 05, 2021 Outgoing Email	This email from a CNL Senior Communications Officer to the Lands and Resources Consultation Liaison for Curve Lake First Nation was to consult Curve Lake on their preferred topic of discussion for the October meeting.									√	√
October 05, 2021 Incoming Email	This email from Curve Lake First Nation Consultation to CNL ERM Stakeholder Relations is an invoice that covers August 2021 to the end of September 2021.										√
October 07, 2021 Incoming Email	This email from the Land & Resources Consultation Liaison for Curve Lake First Nation to a Senior Communications Officer was to confirm that the topics of interest for the October meeting outlined in an email from October 05, 2021 were appropriate for the upcoming meeting. The Administrative Support Worker with Curve Lake First Nation was copied on the email and confirmed that she also had no items to add.										√
October 21, 2021 Outgoing Email	This email from a CNL Senior Communications Officer to a Curve Lake First Nation Consultant included the ‘Final’ Contribution/Engagement Agreement that incorporated all comments previously discussed as well as both CLFN and CNL legal review.									√	
October 21, 2021 Incoming Email	This email from a Curve Lake First Nation Consultant confirmed receipt of the updated ‘Final’ Contribution Agreement and thanked CNL for their work on this.										√
October 25, 2021 Incoming Email	This email from a Curve Lake First Nation Consultant to a Senior Communications Officer was to inform CNL of the inclusion of an individual to sit on the next meeting as an observer to visually render the discussion in real-time.										√
October 27, 2021 Virtual meeting	This was the eight of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer and ERM Stakeholder Relations Manager) Curve Lake First Nation (including the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a community consultation coordinator), Scugog Island (including a consultant) and AECL (including the Manager of Engagement and Communications) were in attendance. The focus was a discussion on small modular reactor research and technology at Chalk River Laboratories. CNL also shared an update on the NPD Closure Project.										√
October 29, 2021 Outgoing email	This email from a CNL Communications Officer to a Curve Lake First Nation Consultant and Lands and Resources Consultation Coordinator provided an update on the decision to submit the revised draft EIS in December 2021 and indicated that any input that Curve Lake would like to see reflected in the 2021 revised draft EIS would need to be received by November 26, 2021.										√
November 1, 2021 Outgoing email	This email from a CNL Senior Communications Officer to all the representatives of the William Treaties First Nations communities enclosing the agenda and presentation from the most recent monthly meeting.										√

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November 2, 2021 Emails	This correspondence between a senior communications officer and a consultant for Curve Lake First Nation was to confirm receipt of emails.										✓
November 4, 2021 Contribution Agreement Signed	CNL and Curve Lake First Nation signed a contribution agreement to cover engagement activities for the NPD Closure Project, the NSDF Project and the Port Hope Area Initiative.									✓	
November 15, 2021 Emails	This correspondence between a senior communications officer and a consultant for Curve Lake First Nation was to follow-up on an administrative item from a previous monthly meeting.										✓
November 15, 2021 Incoming email	This email from a Curve Lake First Nation Consultant to a Senior Communications Officer was to share the signed contribution agreement supporting Curve Lake First Nation’s engagement on the NPD Closure Project, the NSDF Project and the PHAI.									✓	✓
November 18, 2021 Outgoing email	This email from a CNL Communications Officer to a Curve Lake First Nation Consultant was to confirm that the signed contribution agreement had been sent to be stamped.									✓	✓
November 19, 2021 Outgoing email	This email from a CNL Communications Officer to a Curve Lake First Nation Consultant enclosed the signed contribution agreement.									✓	✓
November 22, 2021 Emails	These emails between a CNL Communications Officer to a Curve Lake First Nation Consultant was about the format of the monthly meeting agenda.										✓
November 24, 2021 Virtual meeting	This was the eight of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer and ERM Stakeholder Relations Manager) Curve Lake First Nation (including the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a community consultation coordinator), Scugog Island (including a consultant) and AECL (including the Manager of Engagement and Communications) were in attendance. The focus was a discussion on the NSDF Project. CNL also shared an update on the NPD Closure Project.										✓
January 4, 2022 Incoming email	This email from Curve Lake First Nation to CNL enclosed attached the final 2021 invoice from Curve Lake First Nation that I am sending to CNL on CLFN's behalf.										✓
January 5, 2022 Outgoing email	This email from CNL to Curve Lake First Nation acknowledged confirmation of the invoice and its delivery for processing.										✓
January 17, 2022 Outgoing Email	This email from a CNL Senior Communications Officer to Curve Lake First Nation was to propose CNL’s Cleanup Mission as the topic for the next monthly meeting. CNL noted that they will send a list of key dates for the Projects over by the end of the following week and look forward to discussing if there were any further milestones that Curve Lake First Nation would like on that list of key dates for engagement activities.										✓
January 21, 2022 Outgoing Email	This email from a CNL Senior Communications Officer to Curve Lake First Nation attached a list of key dates for engagement activities.										✓
February 15, 2022 Outgoing Email	This email from a CNL Senior Communications Officer to Curve Lake First Nation proposed an agenda for the February 23, 2022 meeting.										✓
February 16, 2022 Outgoing Email	This email from a CNL Senior Communications Officer to Curve Lake First Nation was to thank Curve Lake First Nation for agreeing to submit a written intervention for NSDF.										✓

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March 8, 2022 Outgoing Email	This email from CNL to Curve Lake First Nation was to inform CLFN that CNL is revising how they present the summary table of interests and concerns to address a request from the Canadian Nuclear Safety Commission (CNSC). CNL requested that CLFN confirm whether they would like to verify that the revised table still reflects their interests and concerns, focusing on the new column that ties their interest/concern to the project or Aboriginal and treaty right, and identify why it is of concern to your community.										✓
March 8, 2022 Incoming Email	This email from Curve Lake First Nation to a CNL Senior Communications Officer was to inform CNL that they would like to review the updated interest and concerns table before submission.										✓
March 11, 2022 Incoming Email	This email from Curve Lake First Nation to CNL was to inform CNL about a new member of the Curve Lake First Nation support team.										✓
April 18, 2022 Outgoing email	Email invitation to Curve Lake First Nation to the CNL Industry Day at the Chalk River Laboratories on Thursday, June, 2, 2022 to promote the broader engagement between CNL’s nuclear industry partners and our local supply chain.										✓
April 20, 2022 Outgoing email	This email from CNL to Curve Lake First Nation was a cancellation of the May monthly meeting as discussed at the previous meeting.										✓
April 25, 2022 Outgoing email	Email invitation to the April 27, 2022 Williams Treaties First Nations monthly meeting. The agenda items included the following on the NPD project: NPD Project Updates; NPD Draft EAFMP.								✓		
April 27, 2022 Virtual Meeting	This was the ninth of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a Communications Officer and ERM Stakeholder Relations Manager) Curve Lake First Nation (including the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a community consultation coordinator), Scugog Island (including a consultant), Chippewas of Georgina Island First Nation (Invasive Species coordinator) and AECL (including the Manager of Engagement and Communications) were in attendance. The focus was a discussion on the NSDF Project. CNL also shared an update on the NPD Closure Project.								✓		✓
April 28, 2022 Outgoing email	This email from a CNL Senior Advisor of Indigenous Relations to the WTFN communities attached the presentation from the April 27, 2022 monthly meeting. CNL invited WTFN communities to the Industry Day at the Chalk River Laboratories on Thursday, June, 2, 2022 to promote the broader engagement between CNL’s nuclear industry partners and our local supply chain.								✓		
May 05, 2022 Outgoing email	Email invitation to Curve Lake First Nation to the CNL Industry Day at the Chalk River Laboratories on Thursday, June, 2, 2022 to promote the broader engagement between CNL’s nuclear industry partners and our local supply chain.										✓
May 13, 2022 Outgoing email	This email from ERM Stakeholder Relations to the WTFN communities provided a response to technical questions asked at the April 27, 2022 monthly meeting. Q1: Please provide a breakdown of how much tritium in the Ottawa River is naturally occurring versus anthropogenic (e.g. from weapons testing in the 1960s), including a graph showing the peak of tritium from weapons testing. Q2: Please provide further information on stack contamination and the remedial actions planned at the base of the stack, with respect to potential impacts on Chimney Swifts.								✓		
May 17, 2022 Incoming email	This email from the Curve Lake First Nation Consultation to a CNL Senior Communications Officer coordinating combined repos from Curve Lake, Hiawatha, Alderville to CNL’s March 8, 2022 request for feedback on the repackaged Table of Interests and Concerns. The consultant asked the CNL update with information provided and note the new information. CNL acknowledged.										✓

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June 06, 2022 Outgoing email	This email from a Senior Advisor of Indigenous Relations at CNL to the WTFN communities sent a proposed agenda for the tenth monthly meeting planned for June 29, 2022. The meeting is planning to be held in-person at the Port Hope Area Initiative office. On the proposed agenda the NPD Project staff will provide an update on the project.										✓
June 15, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Curve Lake First Nation’s Lands Resource Consultation Liaison and Consultant sent the Williams Treaties First Nations Interest and Concerns table and the list of questions and responses form the May 29, 2020 webinar.									✓	✓
June 22, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the WTFN communities provided an updated agenda for the June 29, 2022 monthly meeting. A NPD Project update was included as an agenda item.										✓
June 16, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Curve Lake First Nation’s Lands Resource Consultation Liaison and Consultant asked for a timeline for Cure Lake FN’s edits to the Interest and Concerns table. CLFN replied and would send edits to the table June 17, 2022.									✓	
June 27, 2022 Outgoing email	This email from the Manager of Regulatory Approval for the NPD Project at CNL to Curve Lake First Nation’s Consultant followed-up about Cure Lake FN’s edits to the Interest and Concerns table.									✓	
June 29, 2022 Incoming email	This email from Curve Lake First Nation’s Consultant to a CNL Senior Communications Officer sent the Williams Treaties First Nations Interest and Concerns table.									✓	
June 29, 2022 Virtual Meeting	This was the tenth of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a Communications Officer and ERM Stakeholder Relations Manager) Curve Lake First Nation (including the Chief, the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a community consultation coordinator), Alderville First Nation (Chief) and AECL (including the Manager of Engagement and Communications) were in attendance. The focus was a tour of the PHAI location. CNL also shared an update on the NPD Closure Project.										✓
June 29, 2022 Outgoing email	This email from the Manager of Regulatory Approval for the NPD Project at CNL to Curve Lake First Nation’s Consultant shared that CNL will be with incorporating the edits to the CLFN and Alderville First Nation tables while resolving a question about the Hiawatha table.									✓	
June 29, 2022 Incoming email	This email from Manager of Regulatory Approval for the NPD Project at CNL to Curve Lake First Nation’s Consultant indicated that CNL will incorporate the suggested next steps into the Curve Lake rows of the table.									✓	
July 11, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Curve Lake First Nation’s Consultant provided the new row for the Hiawatha First Nation Interest and Concerns table. CNL asked CLFN to confirm if they would like the same row added to the CLFN Interest and Concern table.									✓	
July 14, 2022 Outgoing email	Email from a CNL Senior Communications Officer to Curve Lake First Nation’s Consultant sent the updated summary tables of interests and concerns for Curve Lake First Nation, Hiawatha First Nation and Alderville First Nation for review.									✓	
July 14, 2022 Incoming email	This email from Curve Lake First Nation’s Consultant to a CNL Senior Communications Officer confirming receipt of the updated summary tables of interests and concerns for Curve Lake First Nation, Hiawatha First Nation and Alderville First Nation and noted that there are no further updates needed at this point.									✓	
July 14, 2022 Outgoing email	Email from a CNL Senior Communications Officer to Curve Lake First Nation’s Consultant proposed dates for a tour of the NSDF and NPD Facility. CNL proposed an online poll and asked for any additional dates needed. Curve Lake First Nation’s Consultant replied and will provide alternative dates.										✓

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
July 25, 2022 Outgoing email	Email from a CNL Senior Communications Officer to WTFN Communities sharing the agenda for the 11th monthly meeting on July 27, 2022. The agenda included a NPD project update.										√
July 27, 2022 Virtual meeting	This was the 11th of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a Communications Officer and ERM Stakeholder Relations Manager) Curve Lake First Nation (including the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a community consultation coordinator), Scugog Island (including a consultant) and Rama First Nation (including a consultation workers) were in attendance. CNL shared an update on the NPD Closure Project.										√
August 22, 2022 Outgoing/Incoming emails	Emails from a CNL Senior Communications Officer to WTFN consultation representatives coordinating dates for the tour of the NSDF and NPD Facility.										√
September 16, 2022 Outgoing email	Email from a CNL Senior Communications Officer to WTFN consultation representatives to save the date for the WTFN tour of Chalk River Laboratories on October 25 and 26, 2022 (including the proposed NSDF site and NPD site).										√
September 21, 2022 Outgoing email	Email from a CNL Senior Communications Officer to Curve Lake First Nation’s Consultant sharing for review the proposed agenda or the 12th monthly meeting on September 28, 2022. The agenda included a NPD project update. Curve Lake First Nation accepted the agenda.										√
September 21, 2022 Outgoing email	Email from a CNL Senior Communications Officer to Curve Lake First Nation’s Consultant providing the names of the participants for the Curve Lake First Nation visit on October 20, 2022.										√
September 21, 2022 Incoming email	Email from Curve Lake First Nation’s Consultant to a CNL Senior Communications Officer providing an agenda for the October 20, 2022 visit to CLFN. NPD Project staff will be in attendance.										√
September 26, 2022 Outgoing email	Email from a Senior Communications Officer to WTFN communities sharing the agenda for the September 28 working group meeting. The agenda included an update on the NPD project.										√
September 28, 2022 Virtual meeting	This was the 12th of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a Communications Officer and ERM Stakeholder Relations Manager) Curve Lake First Nation (including the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including an Elder and community consultation coordinator), Scugog Island (including a consultant) and AECL (including the Manager of Engagement and Communications) were in attendance. The focus was a presentation and discussion on CNL’s Integrated Waste Strategy. CNL also shared an update on the NPD Closure Project.										√
September 29, 2022 Outgoing/Incoming emails	Emails from a CNL Senior Communications Officer to Curve Lake First Nation’s Consultant drafting the agenda for the WTFN tour of the CRL site (including NPD).										√
October 01, 2022 Outgoing email	Email from a Senior Communications Officer to WTFN communities sharing the agenda and presentation from the September 28, 2022 monthly meeting. Related to the presentation content, CNL have also attached a CNSC infographic that provides a description of the classes of radioactive waste.										√
October 03, 2022 Outgoing email	Email from a Senior Communications Officer to WTFN communities sharing the agenda for the October 25 and 26, 2022 tour of Chalk River Laboratories (including the proposed NSDF site and NPD site). CNL also sent information about required PPE and the link to register for the tour.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
October 04, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Curve Lake First Nation’s Consultant asked about logistics for the October 20th 2022 meeting in the community.										√
October 05, 2022 Outgoing Letter	This letter addressed to Curve Lake First Nation’s Chief from CNL’s Director of Indigenous Relations provided a project update and the engagement status with CLFN. CNL stated it is committed to incorporating Curve Lake’s interests and concerns into the EIS. CNL provided an engagement status and next steps, including a site visit and establishing commitments to ensure that all interests and concerns are addressed and tracked to resolution. CNL sent an updated draft set of commitments for CLFN’s review. CNL offered to discuss capacity and establish commitments before December 2022. CNL requested that CLFN respond confirming their agreement to proceed with the engagement activities, or modified engagement activities.									√	
October 13, 2022 Outgoing/Incoming emails	The emails from a CNL Senior Communications Officer to Curve Lake First Nation’s Consultant coordinated logistics for the October 20, 2022 community visit.										√
October 20, 2022 Meeting	CNL (NPD representatives and others) were invited to visit Curve Lake First Nation. CNL’s visit to the community was a day of listening and experiencing the cultural values of the community; CNL visited and observed the historic and sacred Petroglyphs site, shared in a smudging ceremony, and heard from Elders within the community. The group congregated at the Curve Lake Community Centre and met with the Chief and council, and also heard from Elders within the community. The afternoon followed with informal conversations and perspective-sharing. We ended the day congregating near the water, and walking along the boardwalk.										√
October 26, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Curve Lake First Nation’s Chief followed up the letter sent on October 5, 2055.										√
October 26, 2022 Tour	WTFN communities were invite to tour the NPD facility as part of a two day visit to the Chalk River Laboratories site and area. Representatives from CNL (in particular, NPD Project staff, Communications Officers, ERM Stakeholder Relations Manager, Director of Indigenous Relations) Curve Lake First Nation (including the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including Lands and Resource consultation coordinator), Scugog Island (including a consultation coordinator), Chippewas of Rama First Nation (including a councillor) and AECL (including the Director of Decommissioning and Waste Management Programme) took part in a reactor tour and site walk. The day include a smudging by the Ottawa River and relationship building.										√
October 31, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Curve Lake First Nation’s Consultant sending the December 2021 draft EIS via FTP link.										√
November 01, 2022 Outgoing email	This email from a CNL Senior Communications Officer to WTFN communities thanked the participants of the October 25 and 26, 2022 tour. As requested over the days CNL sent the archaeological assessments for the NPD site and photos from the tour.										√
November 15, 2022 Outgoing email	This email from a CNL Senior Communications Officer to WTFN communities cancelled the December monthly meeting.										√
November 15, 2022 Phone call	This call from a CNL Senior Communications Officer to Curve Lake First Nation’s Consultant discussed the Curve Lake First Nation contribution agreement that is in effect until 2022 December 31. Curve Lake First Nation is interested in renewing the current contribution agreement for another two years. CLFN will be forwarding an updated budget to accompany the renewal. CLFN noted that Hiawatha First Nation and is proposing that CNL and Hiawatha First Nation establish a contribution agreement as well. Noting that some of the activities in the agreements would overlap but the funding would not. He will clearly articulate that in both budgets that the Curve Lake First Nation’s Consultant will be sending to CNL for review.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
November 23, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Curve Lake First Nation’s Consultant requested a phone call to discuss the letter CNL sent on October 5, 2022.									√	
November 28, 2022 Outgoing email	This email from a CNL Senior Communications Officer to WTFN communities sent the agenda for the November 30th, 2022 monthly meeting. The agenda included a NPD Project update, a discussion on 2023 engagement plans and a discussion on a year in review.										√
November 30, 2022 Virtual meeting	This was the 13th of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a Communications Officer and ERM Stakeholder Relations Manager) Curve Lake First Nation (including and Elder, Councillors, the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a community consultation coordinator) and Scugog Island (including consultants) were in attendance. CNL shared an update on the NPD Closure Project.										√
December 02, 2022 Virtual Meeting	Meeting between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a Communications Officer, the Manager of NPD Regulatory Approvals) and WTFN communities, (including Hiawatha and Curve Lake First Nation’s Consultant). CNL and the WTFNs discussed the November 5, 2022, letter and the next steps for Cure Lake and Hiawatha First Nation.										√
December 02, 2022 Outgoing email	This email from CNL Communications Officer Curve Lake First Nation’s Consultant included the updated WTFN Interest and Concerns table and identified the next steps from the December 2, 2022 meeting. Curve Lake First Nation acknowledged.										√
December 05, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Curve Lake First Nation’s Consultant concerning attendance at the UN Biodiversity Conference (COP 15).										√
December 14, 2022 Incoming email	This email from Curve Lake First Nation’s Consultant to a CNL Senior Communications Officer with information on the Ontario Phragmites Working Group Meeting on 2023 January 25.										√
January 03, 2023 Incoming email	This email from Curve Lake First Nation’s Consultant to a CNL Senior Communications Officer with Curve Lake First Nation registration form for Alternative Routes fair (Career Fair).										√
January 17, 2023 Outgoing email	This email from a CNL Senior Communications Officer to Curve Lake First Nation’s Consultant following up with the Draft Environmental Assessment to confirm when the review will be completed. Curve Lake First Nation confirmed the assessment will be reviewed by the end of February 2023.										√
January 20, 2023 Outgoing email	This email a CNL Communications Officer to Curve Lake First Nation’s Consultant to inform of the decision to postpone the submission of the NPD Closure Project’s draft Environmental Impact Statement (EIS) until May 2023 to allow for additional Indigenous input. CNL proposed the next steps would be to continue working together to ensure the CLFN’s interests and concerns are reflected in the EIS by CLFN providing CNL with comments on the new Interests and Concerns table and on the proposed commitments. A follow-up meeting will be coordinated as necessary to ensure CNL accurately incorporates any feedback.									√	√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
January 25, 2023 Virtual Meeting	This was the 14th of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a Communications Officer and ERM Stakeholder Relations Manager, Communications Officers, the Manager of ERM Licensing Support, Man the Manager of ERM Stakeholder Relations, the Manager of NPD Regulatory Approvals, the Senior Advisor Indigenous Relations, the Director of Indigenous Relations, and the Manager of Stakeholder and Indigenous Engagement) AECL (including the Manager of Engagement and Communications) and WTFN communities, (including, Mississaugas of Scugog Island First Nation Consultant Department, Hiawatha and Curve Lake First Nation Consultant). CNL and WTFN discussed the NPD Closure Project and NSDF Project. CNL and the WTFNs discussed 2023 engagement activities including visits to Hiawatha and Scugog Island communities. CNL also introduced the RAP and Procurement Strategy; restoration was a topic for interest for 2023.										√
January 25, 2023 Incoming email	This email from Curve Lake First Nation’s Consultant to CNL with Part 1 of the Review of the I&C Table. CNL confirmed receipt.										√
February 16, 2023 Email between CNL and Curve Lake First Nation (3 Emails)	This email from Curve Lake First Nation’s Consultant to a CNL Senior Communications Officer with an invitation to reception during the CNA Conference on 2023 February 23. Curve Lake First Nation responded with their confirmation of interest in attending.										√
February 16, 2023 Outgoing email	This email from a CNL Senior Communications Officer to Curve Lake First Nation’s Consultant to confirm the proper contact for one of the staff members. Curve Lake First Nation confirmed the proper email address was being used.										√
February 20, 2023 Emails between CNL and Curve Lake First Nation (6 emails)	Email between a CNL Senior Communications Officer to Curve Lake First Nation’s Consultant discussing setting up a meeting to discuss the Curve Lake First Nation and CNL 2023 Budget.										√
March 01, 2023 Virtual Meeting	This was the 15th of the monthly meetings between CNL and the Williams Treaties First Nations communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a Communications Officer, Indigenous Engagement Coordinator, and ERM Stakeholder Relations, the Manager of ERM Licensing Support, the Manager of ERM Stakeholder Relations, NPD Regulatory Approvals, the Senior Advisor Indigenous Relations, and the Manager of Stakeholder and Indigenous Engagement) AECL (including the Manager of Engagement and Communications) and WTFN communities, (including, Mississaugas of Scugog Island First Nation Consultant Department, Georgina Island Invasive Species Coordinator, Hiawatha and Curve Lake First Nation Consultant, Curve Lake First Nation Elder, Three Fires Consulting, Hiawatha Lands and Resource Coordinator). CNL and WTFN discussed NPD project update, May 2023 in-person meeting, CNL Public disclosures, and the program for Engagement with Indigenous Nations, communities and organizations.										√
March 14, 2023 Outgoing email	This email from CNL Senior Communications Officer to WTFN with CNL's Indigenous Relations Procurement Strategy.										√
March 16, 2023 Outgoing email	This email from CNL Communications Officer to Curve Lake First Nation’s Consultant with the edited proposed CLFN and HFN NPD commitments table from the feedback in the 4 Directions memo to assign dates and timelines to the commitments and the added column to the table, “Proposed Timeline”.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
March 29, 2023 Virtual Meeting	This was the 16th of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. This meeting was between CNL representatives (including Communications Officers, the Indigenous engagement coordinator, the Manager of Supply Chain, the Manager of ERM Licensing Support, Man the Manager of ERM Stakeholder Relations, the Manager of NPD Regulatory Approvals, the Senior Advisor Indigenous Relations) AECL (including the Manager of Engagement and Communications) and WTFN communities, (including, Georgina Island First Nation Invasive Species Coordinator, Mississaugas of Scugog Island First Nation Consultant Department , Hiawatha and Curve Lake First Nation Consultant, and Curve Lake Elder. CNL and the WTFN discussed CNL’s Indigenous Procurement Strategy.										✓
May 01, 2023 Outgoing email	Email from a CNL Senior Communications Officer to Curve Lake First Nation with an attached copy of the DRAFT Hiawatha First Nation contribution agreement for their review. CNL requested that any changes be noted for CNL to address them.										✓
May 16, 2023 Outgoing email	This email from a CNL Communications Officer to CLFN provided the updated Interests and Concerns Table. CNL is seeking verification from CLFN that the interests and concerns of CLFN have been recorded. CNL respectfully requested a response by 2023 June 20.									✓	
May 31, 2023 Meeting	This was the 17th of the monthly meetings between CNL (Including, CNL Communications Officer, Indigenous Engagement Coordinator, Manager, ERM Licensing Support, Administrative Assistant, Manager NPD Regulatory Approvals, and Senior Advisor Indigenous Relations) and the WTFN communities (including Consultant, CLFN and HFN, Rama FN, Community Consultation, Alderville Consultation Coordinator, Mississaugas Scugog Island First Nation Community Consultation, Curve Lake First Nation, Acting Consultation lead, Hiawatha lands and resource consultation, coordinated between Curve Lake First Nation and CNL and open to all. CNL reminded communities it was seeking validation of the I&C tables, extended the invitation to attending the Swift Count night and provided an update on the restoration plan timing for feedback.						✓			✓	✓
June 01, 2023 Outgoing email	This email from CNL Communications Officer to CLFN following up to the 2023 March 16 email. CNL offered to coordinate a meeting to discuss further should it be desired.									✓	✓
June 22, 2023 Outgoing email	This email from a CNL Communications Officer to CLFN following up to the 2023 March 16 email. CNL offered to coordinate a meeting to discuss further should it be desired.									✓	✓
June 22, 2023 Incoming email	This email from CLFN to a CNL Communications Officer requesting an edit to the Interest and Concerns Table.									✓	
June 27, 2023 Incoming email	This email from a CNL Communications Officer to CLFN confirming the edit to the table had been made and asked if CLFN would like further review.									✓	
June 27, 2023 Incoming email	This email from CLFN to a CNL Communications Officer validated the Table of Interest and Concerns.									✓	
June 27, 2023 Incoming email	This email from CLFN to a CNL Senior Communications Officer requested the removal of the term Draft on the Agreement and then for it to be sent to leadership for signature.										✓
June 28, 2023 Meeting	This was the 18th of the monthly meetings between CNL (Including, CNL Communications Officer, Indigenous Engagement Coordinator, Manager, ERM Licensing Support, Administrative Assistant, Manager NPD Regulatory Approvals, and Senior Advisor Indigenous Relations) and the WTFN communities (including Consultant, CLFN and HFN, Rama FN, Community Consultation, Alderville Consultation Coordinator, Mississauga's Scugog Island First Nation Community Consultation, Curve Lake First Nation, Acting Consultation lead, Hiawatha lands and resource consultation, coordinated between Curve Lake First Nation and CNL and open to all. The focus of this meeting was NSDF, PHAI, and NPD Project updates.										✓

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
July 11, 2023 Outgoing Email	This email from CNL Communications Officer to all WTFN communities is to request confirmation of attendance at the 2023 July monthly meeting being held in person in Hiawatha. Communities confirmed their attendance.										√
July 17, 2023 Emails	These emails between Curve Lake consultation and CNL Manager, Communications and Engagement are to discuss a CNL visit to Curve Lake in fall 2023 to view the petroglyphs. CNL confirmed the invitation and noted they will confirm availability. CNL followed up to note that a leadership meeting might be more appropriate for this, and that CNL will reach out at a later date.										√
July 21, 2023 Outgoing Email	This email from CNL Communications Officer to Curve Lake Consultant is to confirm last minute logistics of the in person meeting being held in Hiawatha on 2023 July.										√
July 21, 2023 Outgoing Email	This email from CNL Communications Officer to Curve Lake Consultant is to let the curve lake consultant know that CNL is considering attending the workshop in curve lake with CNL leadership. Curve lake suggested the Sept 18, 19, Oct 2 (and maybe Oct 3).										√
July 26, 2023 Meeting	This was the 19th of the monthly meetings held in person in Hiawatha between CNL (including, Director of Engagement and Communications, Manager NPD Regulatory Approvals, Manager of Stakeholder and Indigenous Communications, Communications Officers, Indigenous Engagement Coordinator, Project Manager, and Project Coordinator) and the WTFN communities (including, CLFN Consultant, CLFN and Hiawatha FN, Rama FN, Community Consultation, Rama Acting Consultation lead, CLFN, Elder, CNL FN Consultant, Consultant, CLFN and HFN, Executive Director, MSIFN Staff, MSIFN Student, MSIFN Consultation Department), coordinated between Curve Lake First Nation and CNL and open to all. The meeting included a tour of Serpent Mounds, a working lunch and a monthly meeting. Topics of discussion included Project updates- NSDF, NPD, and PHAI.										√
July 27, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to WTFN is to provide WTFN with the action list from the 2023 July 26 in person meeting.										√
August 09, 2023 Outgoing Email	This email from CNL Communications Officer to Curve Lake Consultant is to confirm numbers for the CLFN Leadership/ Proponents visit to CLFN.										√
September 05, 2023 Incoming Email	This email from CLRFN Consultant to CNL Manager, Communications and Engagement is to provide CNL with a copy of the signed CLFN- CNL amended agreement.										√
September 06, 2023 Incoming Email	This email from CLRFN Consultant to CNL Communications officer is to provide CNL with an update to the draft agenda for the CNL Leadership visit to Curve Lake First Nation in 2023 September.										√
September 18, 2023 Meeting	CNL staff (including ERM Stakeholder Relations, the Director of the NPD Closure Project, and leadership) attended Curve Lake First Nation for a Cultural sharing day hosted by the community itself for CNL specifically. The day included a visit to the Petroglyphs, and lunch.										√
October 03, 2023 Emails	This email from CNL Manager, Communications and Engagement to CLFN Consultant is to request a meeting to discuss the continuation of monthly meetings with the WTFN. CLFN confirmed 2023 October 06 for a meeting. CNL sent the meeting invite.										√
October 25, 2023 Meeting	This was the 20th of the monthly meetings between CNL (including, Director and Manager of Communications and Engagement, Indigenous Engagement Coordinator, Communications Officers, HWP Manager of Indigenous Relations Communications, Environmental and decommissioning specialist) AECL (including the Director of AECL GO-CO Procurement Process) and the WTFN communities (including, Acting Consultation lead from CLFN, Consultant, Consultation Liaison for Beausoleil First Nation, Consultation Coordinator for Alderville First Nation, Hiawatha First Nations Lands and Conservation Officer, and Consultation Advisor for Scugog First Nation) coordinated between Curve Lake First Nation and CNL and open to all. This meeting was to discuss CNL Updates, WTFN updates, the Indigenous Relations Procurement Strategy, the GO-CO Procurement process and the format of WTFN monthly meetings.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
October 26, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to WTFN is to provide WTFN with the action list from the 2023 October 26 WTFN Monthly meeting.										✓
November 01, 2023 Outgoing Email	This email from CNL Manager, Communications and Engagement to all WTFN is to follow-up from the 2023 October monthly meeting. CNL noted for those who were unable to attend the meeting, an agenda item was tabled for discussion to move our monthly information sharing meeting to a quarterly meeting instead. The discussion result was an agreement (with those in attendance) to change to a quarterly meeting update if WTFN communities still received project updates/ milestones and/ or news in between meetings. I encourage you to provide feedback on this change. CNL also shared the GO-CO model presentation.										✓
November 23, 2023 Outgoing Email	This email from CNL Manager, Communications and Engagement to all WTFN is to follow-up from the 2023 November 01 email to all WTFN communities to confirm that the 2023 November 30 WTFN monthly meeting has been cancelled, and that the monthly meeting has been changed to a quarterly meeting series. The monthly meeting series has been cancelled. A quarterly meeting series has been setup, and the next meeting is on Wednesday, January 31, 2024.										✓
January 31, 2024 Meeting	This meeting between CNL (including, Manager of Communications and Engagement, Communications Officers, HWP Manager of Indigenous Relations Communications, NPD Closure Project Director and Environmental and Decommissioning Specialist, Manager, HWP Environmental Management and Director, Indigenous Engagement) and WTFN (including, Alderville First Nation, Lands and Resources Consultation Officer, Curve Lake First Nation, Acting Consultation lead , Hiawatha First Nations Lands and Conservation Officer and Consultants) was to discuss CNL Updates and hear community updates. The NSDF and NPD project shared updates including the recent CNSC Decision on the NSDF and the NPD Revised Draft EIS submission date.										✓

Appendix V Hiawatha First Nation Record of Engagement and

V.1 Record of Engagement-Hiawatha First Nation-2016 June to 2024 March

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
July 15, 2016 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the Hiawatha First Nation (FN) Chief introduced the project and requested community input on any potential adverse impacts from project activities. To demonstrate requirements of CEAA, 2012 Section 5(1)(c), the letter requested meaningful feedback on the following: Whether the project may have environmental effect on any lands and/or resources currently used by Aboriginal peoples for traditional purposes; Whether the project may have any perceived impacts on Aboriginal and Treaty Rights; Whether local and traditional knowledge can assist in describing the existing environment; and, The view of Aboriginal communities on proposed valued ecosystems components (environmental attributes) that have been identified for the assessment.				√	√				√	
October 24, 2016 Outgoing telephone call	This telephone call from a CNL communications officer to the Hiawatha FN Chief’s office was to follow-up on the July letter.										√
November 10, 2016 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the Hiawatha FN Chief inquired about asserted rights and traditional activities in the region around CRL. To demonstrate requirements of CEAA 2012 Section 5(1)(c), the letter requested a better understanding of Hiawatha’s historic and/or modern day use of lands in and/or near both of the projects and asked the following questions: Does Hiawatha First Nation have traditional territory or reserve lands near the NSDF and/or NPD Closure Project? What is the history of Hiawatha First Nation using the areas around the two projects? Do you have any members of Hiawatha First Nation that currently live in close or reasonable proximity to either of the projects? Does Hiawatha First Nation have any members that currently practice traditional activities such as, trapping, hunting, fishing and/or gathering, near the two projects? Does Hiawatha First Nation, or any members, have sites of ceremonial significance in close proximity to either of the two sites, or more generally, any cultural activities near either of the two sites? CNL also indicated interested in learning more about the FN and any asserted rights, interests or activities members might undertake in the local or regional areas in proximity to the project.				√	√				√	
November 15, 2017 Outgoing email	This email from a communications officer with CNL to the Hiawatha FN Chief enclosed links to the full draft EIS, an interactive “public-friendly” executive summary of the draft EIS, the CNSC’s public notice, a short overview of the project and environmental assessment, as well as detailed information on the timing of the EA process and how to participate in the public comment period.	√	√	√	√	√	√	√	√	√	
November 17, 2017 Outgoing email	This email from a communications officer with CNL to the Hiawatha FN Chief enclosed the draft Aboriginal Engagement Report for the NPD Closure Project and stated, per CEAA, 2012 requirements: “CNL would be pleased to update information in this current draft with input from your community.”	√	√	√	√	√	√	√	√	√	
In March 2020, the COVID-19 pandemic impacted in-person engagement activities. CNL adapted to the restrictions providing online platforms for virtual meetings, workshops, webinars, Project updates and open houses.											

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
April 09, 2020 Outgoing email	This email from a communications officer with CNL to representatives of WTFN communities (including the Lands and Resources Consultation coordinator with Hiawatha FN) was to propose a virtual webinar meeting on the NPD Closure Project and the NSDF Project.										√
April 14, 2020 Incoming email	This email from Hiawatha First Nation’s Lands and Resources Consultation Coordinator to a CNL communications officer was to confirm attendance and date preference for the webinars.										√
April 17, 2020 Outgoing email	This email from a communications officer with CNL to representatives of WTFN communities (including the Lands and Resources Consultation coordinator with Hiawatha FN) was to confirm the webinar, and offer to test the virtual meeting platform.										√
April 29, 2020 Outgoing email	This email from a communications officer with CNL to representatives of WTFN communities (including the Lands and Resources Consultation coordinator with Hiawatha FN) enclosed a copy of the overview presentations for the webinars.										√
May 04, 2020 Outgoing email	This email from a communications officer with CNL to representatives of WTFN communities (including the Lands and Resources Consultation coordinator with Hiawatha FN) enclosed an action list.										√
May 06, 2020 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the Hiawatha FN Chief enclosed a preliminary version of the 2020 revised draft EIS and an updated IER. This letter also asked for feedback in the following seven areas: Does Hiawatha First Nation have additional information that they would like to provide in the context of traditional territory near the NPD site? Does Hiawatha First Nation have any members who currently live close or in reasonable proximity to the NPD site? Does Hiawatha First Nation have historical and/or current traditional practices near the NPD site, specifically we are interested in members’ traditional uses such as trapping (traditional or commercial), hunting, fishing (traditional or commercial), gathering and practicing cultural ceremonies? Does Hiawatha First Nation have sites of ceremonial significance in close proximity or more generally any cultural activities near the NPD site? Tell us about any important resources, uses, activities, values and interests to Hiawatha First Nation near the NPD site. If there is use in close proximity to the NPD site, is current community use different than historic use and can a description of those difference be provided? Let us know of any potential concerns you have with respect to effects and any potential impacts on rights. This letter also indicated an interest in meeting with Hiawatha FN to discuss any interests or concerns.	√	√	√	√	√	√	√	√	√	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
May 19, 2020 Virtual meeting	This meeting between four representatives of different WTFN communities (specifically, Hiawatha FN’s Land and Resources consultation workers, Alderville First Nation’s lands and community engagement officer, Curve Lake First Nation’s lands and resources consultation officer and Georgina Island FN’s consultation coordinator attended) and six CNL representatives (including the Manager of Stakeholder Relations, the Manager of Regulatory Approvals for the NPD Closure Project and communications officers with CNL) included an interactive webinar overview presentation on the project with the opportunity for questions. Specific topics discussed included the following: Project overview and components; Timeline; Waste inventory; Monitoring; VCs; Species at risk; Traditional land and resource use; Effects on the environment. The Alderville First Nation representative had interests and questions with respect to the Chimney Swifts and the height of the ventilation stack in relation to its long-term maintenance.	✓		✓	✓		✓	✓	✓	✓	
May 26, 2020 Outgoing email	This email from a communications officer with CNL to representatives of WTFN communities (including the Lands and Resources Consultation coordinator with Hiawatha FN) enclosed the follow-up information responding to all questions from the meeting on May 19, including the Hiawatha FN representative’s questions (topics listed above). Three ACMRs and the archaeological assessment were enclosed.	✓			✓					✓	
February 12, 2021 Outgoing email	This email from a communications officer with CNL to representatives of WTFN communities (including the Lands and Resources Consultation coordinator with Hiawatha FN) was an invitation to join Curve Lake First Nation’s request of a monthly update on Canadian Nuclear Laboratories (CNL) environmental remediation projects, such as the NSDF Project and NPD Closure Project, as well as Port Hope Area Initiative (PHAI) activities in Port Hope and Port Granby. The monthly meeting will take place the last Wednesday of each month starting March 2021.									✓	
March 31, 2021 Virtual meeting	This was the first of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer, the Manager of Stakeholder and Indigenous Relations with PHAI and the Manager of Regulatory Approvals for the NPD Closure Project) Curve Lake First Nation (including the Lands Resource Consultation Liaison, a consultant and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a Lands and Resources Consultation Coordinator), Alderville First Nation (including the Lands and Resources Communications Officer), Rama FN (including the community consultation worker) and AECL (including the Director of Communications and Government Reporting) were in attendance. The focus was an overview on AECL and CNL as a corporation.			✓	✓						✓
April 4, 2021 Outgoing email	This email from a CNL Communications Officer to all the representatives of the William Treaties First Nations communities enclosing the agenda and presentation from the most recent monthly meeting.										✓
April 12, 2021 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the Hiawatha FN Chief enclosed a preliminary list of commitments and indicated interest in meeting to discuss.										✓

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
April 28, 2021 Virtual meeting	This was the second of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer, the Manager of Stakeholder and Indigenous Relations with PHAI and the Manager of Regulatory Approvals for the NPD Closure Project) Curve Lake First Nation (including the Lands Resource Consultation Officer, a consultant and the Lands and Resource Administrative Support Worker), Hiawatha FN (including two Lands and Resources Consultation Coordinators), Alderville First Nation (including the Lands and Resources Communications Officer), Rama FN (including the community consultation worker) and AECL (including the Director of Communications and Government Reporting) were in attendance. The focus was an overview on the NPD Closure Project, the NSDF Project and the PHAI.			√	√						√
May 26, 2021 Virtual meeting	This was the third of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer, the Manager of Stakeholder and Indigenous Relations with PHAI, an environmental specialist with the NPD Closure Project and the Manager of Regulatory Approvals for the NPD Closure Project) Curve Lake First Nation (including the Lands Resource Consultation Officer, a consultant and the Lands and Resource Administrative Support Worker), Hiawatha FN (including two Lands and Resources Consultation Coordinators), Rama FN (including the community consultation coordinator) and AECL (including the Director of Communications and Government Reporting) were in attendance. The focus was an overview of biodiversity at CNL and included an update on the EA process for NPD.										√
June 15, 2021 Outgoing email	This email from a communications officer with CNL to Hiawatha FN’s Lands Resource Consultation Coordinator was to follow-up on the April letter.										√
June 21, 2021 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the Hiawatha FN Chief enclosed a draft summary of the Hiawatha’s interests and concerns for the NPD Closure Project for Hiawath’s review and verification.									√	√
July 6, 2021 Outgoing email	This email from a CNL Communications Officer to all the representatives of the William Treaties First Nations communities enclosing the agenda and presentation from the most recent monthly meeting.										√
July 28, 2021 Virtual meeting	This was the fifth of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer, the Manager of Regulatory Approvals for the NPD Closure Project) Curve Lake First Nation (including the Lands and Resources Consultation Officer, a consultant and the Lands and Resource Administrative Support Worker), Hiawatha FN (including two community consultation coordinators) and AECL (including the Director of Communications and Government Reporting) were in attendance. The focus was an overview of the WTFN’s interests and concerns with respect to the NPD Closure Project.			√						√	√
August 25, 2021 Virtual Meeting	This was the six of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer, the Manager of Stakeholder and Indigenous Relations with PHAI and the Manager of Regulatory Approvals for the NPD Closure Project) Curve Lake First Nation (including the Lands and Resources Consultation Officer, a consultant and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a community consultation coordinator), Beausoleil First Nation (including a consultation coordinator) and AECL (including the Director of Communications and Government Reporting) were in attendance. The focus was on Port Granby and a Project update was shared about the NPD Closure Project.										√

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August 26, 2021 Outgoing email	This email from a CNL Communications Officer to all the representatives of the William Treaties First Nations communities enclosing the agenda and presentation from the most recent monthly meeting.										√
August 26, 2021 Outgoing email	This email from a Senior Communications Officer with CNL to the consultant with Curve Lake First Nation and Hiawatha FN community consultation coordinator enclosed updated summary of interest and concerns tables. Updates to the tables to reflect the additional interests that were noted in the discussion at our July 28, 2021 meeting.									√	√
September 13, 2021 Outgoing Email	This email from a Senior Communications Officer with CNL to the consultant with Curve Lake First Nation and Hiawatha FN Lands/Resources Consultation was to inquire whether Hiawatha FN had the chance to look at the updated table of interests and concerns and whether it accurately reflects the concerns raised to date. This email also shared (via an attachment) CNL's responses to and the review of the revised Environmental Impact Statement for the NPD Closure Project (with permission from Curve Lake First Nation).			√						√	
September 29, 2021 Virtual meeting	This was the seventh of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer, ERM Stakeholder Relations Manager and the Manager of Regulatory Approvals for the NPD Closure Project) Curve Lake First Nation (including the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a community consultation coordinator), Scugog Island (including a consultant) and AECL (including the Manager of Engagement and Communications) were in attendance. The focus was a discussion on CNL's responses to Curve Lake First Nation's review of the 2020 revised draft EIS.	√		√	√	√				√	√
October 27, 2021 Virtual meeting	This was the eight of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer and ERM Stakeholder Relations Manager) Curve Lake First Nation (including the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a community consultation coordinator), Scugog Island (including a consultant) and AECL (including the Manager of Engagement and Communications) were in attendance. The focus was a discussion on small modular reactor research and technology at Chalk River Laboratories. CNL also shared an update on the NPD Closure Project.										√
October 29, 2021 Outgoing email	This email from a CNL Communications Officer to the Hiawatha Consultation Coordinators provided an update on the decision to submit the revised draft EIS in December 2021 and indicated that any input that Hiawatha FN would like to see reflected in the revised draft EIS would need to be received by November 26, 2021.										√
November 1, 2021 Outgoing email	This email from a CNL Senior Communications Officer to all the representatives of the William Treaties First Nations communities enclosing the agenda and presentation from the most recent monthly meeting.										√
November 24, 2021 Virtual meeting	This was the eighth of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer and ERM Stakeholder Relations Manager) Curve Lake First Nation (including the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a community consultation coordinator), Scugog Island (including a consultant) and AECL (including the Manager of Engagement and Communications) were in attendance. The focus was a discussion on the NSDF Project. CNL also shared an update on the NPD Closure Project.										√

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April 01, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Hiawatha FN's Consultation worker was to inform HFN that CNL is revising how they present the summary table of interests and concerns to address a request from the Canadian Nuclear Safety Commission (CNSC). CNL requested that HFN confirm whether they would like to verify that the revised table still reflects their interests and concerns, focusing on the new column that ties their interest/concern to the project or Aboriginal and treaty right, and identify why it is of concern to their community.									✓	
April 18, 2022 Outgoing email	Email invitation to Hiawatha FN's to the CNL Industry Day at the Chalk River Laboratories on Thursday, June, 2, 2022 to promote the broader engagement between CNL's nuclear industry partners and our local supply chain.										✓
April 25, 2022 Outgoing email	Email invitation to the April 27, 2022 Williams Treaties First Nations monthly meeting. The agenda items included the following on the NPD project: NPD Project Updates; NPD Draft EAFMP.								✓		
April 26, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Hiawatha FN's Consultation worker and Lands and Resources Consultation Coordinator to follow-up on CNL's email from April 01, 2022. CNL request HFN confirm if they are interested in reviewing the new table of Interests and Concerns.									✓	
April 27, 2022 Virtual Meeting	This was the ninth of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer and ERM Stakeholder Relations Manager) Curve Lake First Nation (including the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a community consultation coordinator), Scugog Island (including a consultant), Chippewas of Georgina Island First Nation (Invasive Species coordinator) and AECL (including the Manager of Engagement and Communications) were in attendance. The focus was a discussion on the NSDF Project. CNL also shared an update on the NPD Closure Project.								✓		✓
April 28, 2022 Outgoing email	This email from a CNL Senior Advisor of Indigenous Relations to the WTFN communities attached the presentation from the April 27, 2022 monthly meeting. CNL invited WTFN communities to the Industry Day at the Chalk River Laboratories on Thursday, June, 2, 2022 to promote the broader engagement between CNL's nuclear industry partners and our local supply chain.								✓		
May 13, 2022 Outgoing email	This email from ERM Stakeholder Relations to the WTFN communities provided a response to technical questions asked at the April 27, 2022 monthly meeting. Q1: Please provide a breakdown of how much tritium in the Ottawa River is naturally occurring versus anthropogenic (e.g. from weapons testing in the 1960s), including a graph showing the peak of tritium from weapons testing. Q2: Please provide further information on stack contamination and the remedial actions planned at the base of the stack, with respect to potential impacts on Chimney Swifts.								✓		
May 17, 2022 Incoming email	This email from the Curve Lake First Nation Consultation to a CNL Senior Communications Officer coordinating combined repos from Curve Lake, Hiawatha, Alderville to CNL's March 8, 2022 request for feedback on the repackaged Table of Interests and Concerns. The consultant asked the CNL update with information provided and note the new information. CNL acknowledged.										✓

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June 06, 2022 Outgoing email	This email from a Senior Advisor of Indigenous Relations at CNL to the WTFN communities sent a proposed agenda for the tenth monthly meeting planned for June 29, 2022. The meeting is planning to be held in-person at the Port Hope Area Initiative office. On the proposed agenda the NPD Project staff will provide an update on the project.										√
June 22, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the WTFN communities provided an updated agenda for the June 29, 2022 monthly meeting. A NPD Project update was included as an agenda item.										√
June 29, 2022 Incoming email	This email from Curve Lake First Nation’s Consultant to a CNL Senior Communications Officer provided comments on the interest and concern table. HFN asked that any notes made at a recent monthly meeting about deer and hunting be incorporated.									√	
June 29, 2022 Outgoing email	This email from the Manager of Regulatory Approvals for the NPD Closure Project to Curve Lake First Nation’s Consultant confirming receipt of the comments on the interest and concerns table. CNL asked for clarification regarding the request to incorporate information about hunting and deer.									√	
June 29, 2022 Incoming email	This email from Curve Lake First Nation’s Consultant to the Manager of Regulatory Approvals for the NPD Closure Project clarified that the comment being discussed was about what wildlife would consume on site and the impact of that on future consumption.									√	
June 29, 2022 Meeting	This was the tenth of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer and ERM Stakeholder Relations Manager) Curve Lake First Nation (including the Chief, the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a community consultation coordinator), Alderville First Nation (Chief) and AECL (including the Manager of Engagement and Communications) were in attendance. The focus was a tour of the PHAI location. CNL also shared an update on the NPD Closure Project.										√
July 11, 2022 Outgoing email	This email from a Senior Advisor of Indigenous Relations at CNL to Curve Lake First Nation’s Consultant sent the interest and concerns table with a new row “Status of this Concern” for review.									√	
July 14, 2022 Outgoing email Hiawatha First Nation and Alderville First Nation	Email from a CNL Senior Communications Officer to Curve Lake First Nation’s Consultant sent the updated summary tables of interests and concerns for Curve Lake First Nation, Hiawatha First Nation and Alderville First Nation for review.									√	
July 14, 2022 Incoming email	This email from Curve Lake First Nation’s Consultant to a CNL Senior Communications Officer confirming receipt of the updated summary tables of interests and concerns for Curve Lake First Nation, Hiawatha First Nation and Alderville First Nation and noted that there are no further updates needed at this point.									√	
July 14, 2022 Outgoing email	Email from a CNL Senior Communications Officer to Curve Lake First Nation’s Consultant proposed dates for a tour of the NSDF and NPD Facility. CNL proposed an online poll and asked for any additional dates needed. Curve Lake First Nation’s Consultant replied and will provide alternative dates.										√
July 25, 2022 Outgoing email	Email from a CNL Senior Communications Officer to WTFN Communities sharing the agenda for the 11th monthly meeting on July 27, 2022. The agenda included a NPD project update.										√

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July 27, 2022 Virtual meeting	This was the 11th of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer and ERM Stakeholder Relations Manager) Curve Lake First Nation (including the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a community consultation coordinator), Scugog Island (including a consultant) and Rama First Nation (including a consultation workers) were in attendance. CNL shared an update on the NPD Closure Project.										√
August 22, 2022 Outgoing/Incoming emails	Emails from a CNL Senior Communications Officer to WTFN consultation representatives coordinating dates for the tour of the NSDF and NPD Facility.										√
September 16, 2022 Outgoing email	Email from a CNL Senior Communications Officer to WTFN consultation representatives to save the date for the WTFN tour of Chalk River Laboratories on October 25 and 26, 2022 (including the proposed NSDF site and NPD site).										√
September 21, 2022 Outgoing email	Email from a CNL Senior Communications Officer to Curve Lake First Nation’s Consultant sharing for review the proposed agenda or the 12th monthly meeting on September 28, 2022. The agenda included a NPD project update. Curve Lake First Nation accepted the agenda.										√
September 26, 2022 Outgoing email	Email from a Senior Communications Officer to WTFN communities sharing the agenda for the September 28 working group meeting. The agenda included an update on the NPD project.										√
September 28, 2022 Virtual meeting	This was the 12th of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer and ERM Stakeholder Relations Manager) Curve Lake First Nation (including the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including an Elder and community consultation coordinator), Scugog Island (including a consultant) and AECL (including the Manager of Engagement and Communications) were in attendance. The focus was a presentation and discussion on CNL’s Integrated Waste Strategy. CNL also shared an update on the NPD Closure Project.										√
October 01, 2022 Outgoing email	Email from a Senior Communications Officer to WTFN communities sharing the agenda and presentation from the September 28, 2022 monthly meeting. Related to the presentation content, CNL have also attached a CNSC infographic that provides a description of the classes of radioactive waste.										√
October 03, 2022 Outgoing email	Email from a Senior Communications Officer to WTFN communities sharing the agenda for the October 25 and 26, 2022 tour of Chalk River Laboratories (including the proposed NSDF site and NPD site). CNL also sent information about required PPE and the link to register for the tour.										√
October 05, 2022 Outgoing Letter	This letter addressed to Hiawatha First Nation’s Chief from CNL’s Director of Indigenous Relations provided a project update and the engagement status with HFN. CNL stated it is committed to incorporating Hiawatha’s interests and concerns into the EIS. CNL provided an engagement status and next steps, including a site visit and establishing commitments to ensure that all interests and concerns are addressed and tracked to resolution. CNL sent an updated draft set of commitments for HFN’s review. CNL offered to discuss capacity and establish commitments before December 2022. CNL requested that HFN respond confirming their agreement to proceed with the engagement activities, or modified engagement activities.									√	
October 03, 2022 Outgoing email	Email from a CNL Senior Communications Officer to Hiawatha First Nation’s Chief following up on the October 5, 2022 letter.									√	

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October 26, 2022 Tour	WTFN communities were invited to tour the NPD facility as part of a two day visit to the Chalk River Laboratories site and area. Representatives from CNL (in particular, NPD Project staff, communications officers, ERM Stakeholder Relations Manager, Director of Indigenous Relations) Curve Lake First Nation (including the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including Lands and Resource consultation coordinator), Scugog Island (including a consultation coordinator), Chippewas of Rama First Nation (including a councillor) and AECL (including the Director of Decommissioning and Waste Management Programme) took part in a reactor tour and site walk. The day include a smudging by the Ottawa River and relationship building.										√
November 01, 2022 Outgoing email	This email from a CNL Senior Communications Officer to WTFN communities thanked the participants of the October 25 and 26, 2022 tour. As requested over the days CNL sent the archaeological assessments for the NPD site and photos from the tour.										√
November 15, 2022 Outgoing email	This email from a CNL Senior Communications Officer to WTFN communities cancelled the December monthly meeting.										√
November 15, 2022 Phone call	This call from a CNL Senior Communications Officer to Curve Lake First Nation’s Consultant discussed the Curve Lake First Nation contribution agreement that is in effect until 2022 December 31. Curve Lake First Nation is interested in renewing the current contribution agreement for another two years. CLFN will be forwarding an updated budget to accompany the renewal. CLFN noted that Hiawatha First Nation and is proposing that CNL and Hiawatha First Nation establish a contribution agreement as well. Noting that some of the activities in the agreements would overlap but the funding would not. He will clearly articulate that in both budgets that the Curve Lake First Nation’s Consultant will be sending to CNL for review.										√
November 28, 2022 Outgoing email	This email from a CNL Senior Communications Officer to WTFN communities sent the agenda for the November 30th, 2022 monthly meeting. The agenda included a NPD Project update, a discussion on 2023 engagement plans and a discussion on a year in review.										√
November 30, 2022 Virtual meeting	This was the 13th of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer and ERM Stakeholder Relations Manager) Curve Lake First Nation (including and Elder, Councillors, the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a community consultation coordinator) and Scugog Island (including consultants) were in attendance. CNL shared an update on the NPD Closure Project.										√
December 02, 2022 Virtual Meeting	Meeting between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a Communications Officer, the Manager of NPD Regulatory Approvals) and WTFN communities, (including Hiawatha and Curve Lake First Nation Consultant). CNL and the WTFNs discussed the November 5, 2022, letter and the next steps for Cure Lake and Hiawatha First Nation.										√
December 02, 2022 Outgoing email	This email from a CNL Senior Communications Officer to Hiawatha First Nation’s Consultant sharing the updated Interest and Concerns table and summarized notes from the December 02, 2022, meeting.										√

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January 17, 2023 Outgoing email	This email from a CNL Senior Communications Officer to Hiawatha First Nation’s Consultant following up with the Draft Environmental Assessment to confirm when the review will be completed. Curve Lake First Nation confirmed the assessment will be reviewed by the end of February 2023.										√
January 20, 2023 Outgoing email	This email from a CNL Communications Officer to Hiawatha First Nation’s Consultant to inform of the decision to postpone the submission of the NPD Closure Project’s draft EIS until May 2023 to allow for additional Indigenous input. CNL proposed the next steps would be to have Hiawatha to provide CNL comments on the new Interests and Concerns table and on the proposed commitments. A follow-up meeting will be coordinated as necessary to ensure CNL accurately incorporates any feedback.										√
January 25, 2023 Incoming email	This email from to Hiawatha First Nation’s Consultant to CNL with Part 1 of the review of the I&C table, NPD closure. CNL confirmed receipt.										√
January 25, 2023 Virtual Meeting	This was the 14th of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a Communications Officer and ERM Stakeholder Relations Manager, Communications Officers, the Manager of ERM Licensing Support, Man the Manager of ERM Stakeholder Relations, the Manager of NPD Regulatory Approvals, the Senior Advisor Indigenous Relations, the Director of Indigenous Relations, and the Manager of Stakeholder and Indigenous Engagement) AECL (including the Manager of Engagement and Communications) and WTFN communities, (including, Mississaugas of Scugog Island First Nation Consultant Specialist, Hiawatha and Curve Lake First Nation Consultant). CNL and WTFN discussed the NPD Closure Project and NSDF Project. CNL and the WTFNs discussed 2023 engagement activities including visits to Hiawatha and Scugog Island communities. CNL also introduced the RAP and Procurement Strategy; restoration was a topic for interest for 2023.										√
March 01, 2023 Virtual Meeting	This was the 15th of the monthly meetings between CNL and the Williams Treaties First Nations communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a Communications Officer, Indigenous Engagement Coordinator, and ERM Stakeholder Relations, the Manager of ERM Licensing Support, the Manager of ERM Stakeholder Relations, NPD Regulatory Approvals, the Senior Advisor Indigenous Relations, and the Manager of Stakeholder and Indigenous Engagement) AECL (including the Manager of Engagement and Communications) and WTFN communities, (including, Mississaugas of Scugog Island First Nation Consultant Specialist, Georgina Island Invasive Species Coordinator, Hiawatha and Curve Lake First Nation Consultant, Curve Lake First Nation Elder, Three Fires Consulting, Hiawatha Lands and Resource Coordinator). CNL and WTFN discussed NPD project update, May 2023 in-person meeting, CNL Public disclosures, and the program for Engagement with Indigenous Nations, communities and organizations.										√
March 09, 2023 Outgoing email	This email from a CNL Senior Communications Officer to Hiawatha First Nation Consultation to confirm the interest in hosting the 2023 May 31 meeting in the community. Mississaugas of Scugog Island First Nation consultant confirmed receipt of the email and will get back to CNL after an internal discussion.										√
March 14, 2023 Outgoing email	This email from CNL Senior Communications Officer to Hiawatha First Nation with CNL's Indigenous Relations Procurement Strategy.										√
March 16, 2023 Outgoing email	This email from a CNL Communications Officer to HFN’s Consultant with the edited proposed CLFN and HFN NPD commitments table from the feedback in the 4 Directions memo to assign dates and timelines to the commitments and the added column to the table, “Proposed Timeline”.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
March 29, 2023 Virtual Meeting	This was the 16th of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. This meeting was between CNL representatives (including Communications Officers, the Indigenous engagement coordinator, the Manager of Supply Chain, the Manager of ERM Licensing Support, Man the Manager of ERM Stakeholder Relations, the Manager of NPD Regulatory Approvals, the Senior Advisor Indigenous Relations) AECL (including the Manager of Engagement and Communications) and WTFN communities, (, Georgina Island First Nation Invasive Species Coordinator, Mississaugas of Scugog Island First Nation Consultant Department, Hiawatha and Curve Lake First Nation Consultant, and Curve Lake Elder. CNL and the WTFN discussed CNL’s Indigenous Procurement Strategy.										√
April 11, 2023 Outgoing email	This email from CNL Senior Communications Officer to WTFN with the agenda and presentation from the monthly meeting held on 2023 March 29. CNL also looked to confirm the dates of the 2023 April 26 monthly meeting.										√
May 01, 2023 Outgoing email	Email from CNL Senior Communications Officer to Hiawatha First Nation with an attached copy of the DRAFT Hiawatha First Nation contribution agreement for their review. CNL requested that any changes be noted for CNL to address them.										√
May 16, 2023 Outgoing email	This email from a CNL Communications Officer to HFN provided the updated Interests and Concerns Table. CNL is seeking verification from HFN that the interests and concerns of HFN have been recorded. CNL respectfully requested a response by 2023 June 20.									√	
May 31, 2023 Meeting	This was the 17th of the monthly meetings between CNL (Including, CNL Communications Officer, Indigenous Engagement Coordinator, Manager, ERM Licensing Support, Administrative Assistant, Manager NPD Regulatory Approvals, and Senior Advisor Indigenous Relations) and the WTFN communities (including Consultant, CLFN and HFN, Rama FN, Community Consultation, Alderville Consultation Coordinator, Mississaugas Scugog Island First Nation Community Consultation, Curve Lake First Nation, Acting Consultation lead, Hiawatha lands and resource consultation, coordinated between Curve Lake First Nation and CNL and open to all. CNL reminded communities it was seeking validation of the I&C tables, extended the invitation to attending the Swift Count night and provided an update on the restoration plan timing for feedback.						√			√	√
June 01, 2023 Outgoing email	This email from CNL Communications Officer to HFN following up to the 2023 March 16 email. CNL offered to coordinate a meeting to discuss further should it be desired.									√	√
June 22, 2023 Outgoing email	This email from a CNL Communications Officer to HFN following up to the 2023 March 16 email. CNL offered to coordinate a meeting to discuss further should it be desired.									√	√
June 22, 2023 Incoming email	This email from HFN to a CNL Communications Officer requesting an edit to the Interest and Concerns Table.									√	
June 27, 2023 Incoming email	This email from a CNL Communications Officer to HFN confirming the edit to the table had been made and asked if HFN would like further review.									√	
June 27, 2023 Incoming email	This email from HFN to a CNL Communications Officer validated the Table of Interest and Concerns.									√	
June 27, 2023 Incoming email	This email from HFN to a CNL Senior Communications Officer requested the removal of the term Draft on the Agreement and then for it to be sent to Hiawatha leadership for signature.										√
July 11, 2023 Outgoing Email	This email from CNL Communications Officer to all WTFN communities is to request confirmation of attendance at the 2023 July monthly meeting being held in person in Hiawatha. Communities confirmed their attendance.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
July 12, 2023 Outgoing Email	This email from CNL Manager, Communications and Engagement Hiawatha Consultant to provide them with a copy of the final Hiawatha First Nation contribution agreement for signature.										√
July 19, 2023 Outgoing Email	This email from CNL Communications officer to Hiawatha is to confirm logistics for the 2023 July 24 in person meeting being held in Hiawatha FN. CNL also requested information on IT supplied at the cultural centre and names of chief, councillors and elders who will be attending.										√
July 26, 2023 Meeting	This was the 19th of the monthly meetings held in person in Hiawatha between CNL (Including, Director of Engagement and Communications, Manager NPD Regulatory Approvals, Manager of Stakeholder and Indigenous Communications, Communications Officers, Indigenous Engagement Coordinator, Project Manager, and Project Coordinator) and the WTFN communities (including, CLFN Consultant, CLFN and Hiawatha FN, Rama FN, Community Consultation, Rama Acting Consultation lead, CLFN, Elder, CNLFN Consultant, Consultant, CLFN and HFN, Executive Director, MSIFN Staff, MSIFN Student, MSIFN Consultation Department), coordinated between Curve Lake First Nation and CNL and open to all. The meeting included a tour of Serpent Mounds, a working lunch and a monthly meeting. Topics of discussion included Project updates- NSDF, NPD, and PHAI.										√
July 27, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to WTFN is to provide WTFN with the action list from the 2023 July 26 in person meeting.										√
August 21, 2023 Outgoing Email	This email from Hiawatha FN to CNL Manager, Communication and Engagement is to provide CNL with the signed Contribution agreement.										√
September 27, 2023 Outgoing Email	This email from Hiawatha FN to CNL Manager of Communications and Engagement is to confirm in the 2023 September WTFN monthly meeting is cancelled or not. CNL replied and confirmed it was cancelled.										√
October 05, 2023 Outgoing Email	This email from CNL Manager, Communications and Engagement to CLFN Consultant is to provide a copy of the Hiawatha First Nation DRAFT Contribution Agreement for review - up to 2024 December.										√
October 25, 2023 Meeting	This was the 20th of the monthly meetings between CNL (Including, Director and Manager of Communications and Engagement, Indigenous Engagement Coordinator, Communications Officers, HWP Manager of Indigenous Relations Communications, Environmental and decommissioning specialist), AECL (including the Director of AECL GO-CO Procurement Process) and the WTFN communities (including, Acting Consultation lead from CLFN, Consultant, Consultation Liaison for Beausoleil First Nation, Consultation Coordinator for Alderville First Nation, Hiawatha First Nations Lands and Conservation Officer, and Consultation Advisor for Scugog First Nation) coordinated between Curve Lake First Nation and CNL and open to all. This meeting was to discuss CNL Updates, WTFN updates, the Indigenous Relations Procurement Strategy, the GO-CO Procurement process and the format of WTFN monthly meetings.										√
October 26, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to WTFN is to provide WTFN with the action list from the 2023 October 26 WTFN Monthly meeting.										√
November 01, 2023 Outgoing Email	This email from CNL Manager, Communications and Engagement to all WTFN is to follow-up from the 2023 October monthly meeting. CNL noted for those who were unable to attend the meeting, an agenda item was tabled for discussion to move our monthly information sharing meeting to a quarterly meeting instead. The discussion result was an agreement (with those in attendance) to change to a quarterly meeting update if WTFN communities still received project updates/ milestones and/ or news in between meetings. I encourage you to provide feedback on this change. CNL also shared the GO-CO model presentation.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
November 23, 2023 Outgoing Email	This email from CNL Manager, Communications and Engagement to all WTFN is to follow-up from the 2023 November 01 email to all WTFN communities to confirm that the 2023 November 30 WTFN monthly meeting has been cancelled, and that the monthly meeting has been changed to a quarterly meeting series. The monthly meeting series has been cancelled. A quarterly meeting series has been setup, and the next meeting is on Wednesday, January 31, 2024.										√
January 31, 2024 Meeting	This meeting between CNL (including, Manager of Communications and Engagement, Communications Officers, HWP Manager of Indigenous Relations Communications, NPD Closure Project Director and Environmental and Decommissioning Specialist, Manager, HWP Environmental Management and Director, Indigenous Engagement) and WTFN (including, Alderville First Nation, Lands and Resources Consultation Officer, Curve Lake First Nation, Acting Consultation lead , Hiawatha First Nations Lands and Conservation Officer and Consultants) was to discuss CNL Updates and hear community updates. The NSDF and NPD project shared updates including the recent CNSC Decision on the NSDF and the NPD Revised Draft EIS submission date.										√

Appendix W Scugog Island First Nation Record of Engagement

W.1 Record of Engagement-Scugog Island First Nation -2016 June to 2024 March

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
July 15, 2016 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the Mississaugas of Scugog Island First Nation (FN) Chief introduced the project and requested community input on any potential adverse impacts from project activities. To demonstrate requirements of CEAA, 2012 Section 5.1(c), the letter requested meaningful feedback on the following: Whether the project may have environmental effect on any lands and/or resources currently used by Aboriginal peoples for traditional purposes; Whether the project may have any perceived impacts on Aboriginal and Treaty Rights; Whether local and traditional knowledge can assist in describing the existing environment; and, The view of Aboriginal communities on proposed valued ecosystems components (environmental attributes) that have been identified for the assessment.				√	√				√	
October 24, 2016 Outgoing telephone call	This telephone call from a communications officer with CNL to the Scugog Island FN contact was to follow up on the July letter.										√
November 10, 2016 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the Scugog Island FN Chief inquired about asserted rights and traditional activities in the region around CRL. To demonstrate requirements of CEAA 2012 Section 5(1)(c), the letter requested a better understanding of Scugog Island FN’s historic and/or modern day use of lands in and/or near both of the projects and asked the following questions: Do the Mississaugas of Scugog Island First Nation have traditional territory or reserve lands near the NSDF and/or NPD Closure Project? What is the history of the Mississaugas of Scugog Island First Nation using the areas around the two projects? Do you have any members of the Mississaugas of Scugog Island First Nation that currently live in close or reasonable proximity to either of the projects? Do the Mississaugas of Scugog Island First Nation have any members that currently practice traditional activities such as, trapping, hunting, fishing and/or gathering, near the two projects? Do the Mississaugas of Scugog Island First Nation, or any members, have sites of ceremonial significance in close proximity to either of the two sites, or more generally, any cultural activities near either of the two sites? CNL also indicated interested in learning more about the FN and any asserted rights, interests or activities members might undertake in the local or regional areas in proximity to the project.				√	√				√	
November 15, 2017 Outgoing email	This email from a communications officer with CNL to the Mississaugas of Scugog Island FN Chief enclosed links to the full draft EIS, an interactive “public-friendly” executive summary of the draft EIS, the CNSC’s public notice, a short overview of the project and environmental assessment, as well as detailed information on the timing of the EA process and how to participate in the public comment period.	√	√	√	√	√	√	√	√	√	
November 17, 2017 Outgoing email	This email from a communications officer with CNL to the Mississaugas of Scugog Island FN Chief enclosed the draft Aboriginal Engagement Report for the NPD Closure Project and stated, per CEAA, 2012 requirements: “CNL would be pleased to update information in this current draft with input from your community.”	√	√	√	√	√	√	√	√	√	
In March 2020, the COVID-19 pandemic impacted in-person engagement activities. CNL adapted to the restrictions providing online platforms for virtual meetings, workshops, webinars, Project updates and open houses.											

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
April 09, 2020 Outgoing email	This email from a communications officer with CNL to Williams Treaties First Nations (including the Scugog Island FN consultation coordinator) was to propose a virtual webinar meeting on the NPD Closure Project and the NSDF.										✓
April 17, 2020 Outgoing email	This email a CNL communications officer to the Scugog Island First Nation’s Consultation Coordinator was to confirm the receipt of previous emails.										✓
April 17, 2020 Outgoing email	This email from a communications officer with CNL to Williams Treaties First Nations (including the Scugog Island FN consultation coordinator) was to confirm the webinar, as well as offer to test the virtual meeting platform.										✓
April 29, 2020 Outgoing email	This email from a communications officer with CNL to Williams Treaties First Nations (including the Scugog Island FN consultation coordinator) enclosed a copy of the overview presentations for the webinars.										✓
May 04, 2020 Outgoing email	This email from a communications officer with CNL to Williams Treaties First Nations (including the Scugog Island FN consultation coordinator) enclosed an action list.										✓
May 06, 2020 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the Scugog Island FN Chief enclosed a preliminary version of the 2020 revised draft EIS and an updated IER. This letter also asked for feedback in the following seven areas: Does Scugog Island First Nation have additional information that they would like to provide in the context of traditional territory near the NPD site? Does Scugog Island First Nation have any members who currently live close or in reasonable proximity to the NPD site? Does Scugog Island First Nation have historical and/or current traditional practices near the NPD site, specifically we are interested in members’ traditional uses such as trapping (traditional or commercial), hunting, fishing (traditional or commercial), gathering and practicing cultural ceremonies? Does Scugog Island First Nation have sites of ceremonial significance in close proximity or more generally any cultural activities near the NPD site? Tell us about any important resources, uses, activities, values and interests to Scugog Island First Nation near the NPD site. If there is use in close proximity to the NPD site, is current community use different than historic use and can a description of those difference be provided? Let us know of any potential concerns you have with respect to effects and any potential impacts on rights. This letter also indicated an interest in meeting with Scugog Island FN to discuss any interests or concerns.	✓	✓	✓	✓	✓	✓	✓	✓	✓	
May 12, 2020 Outgoing email	This email from a CNL communications officer to the Scugog Island FN Chief and Consultation Coordinator was to inquire whether there was any interest in Scugog Island FN attending the WTFN webinar meetings hosted by CNL on the NPD Closure Project and NSDF Project.										✓
May 14, 2020 Outgoing email	This email from a communications officer with CNL to Williams Treaties First Nations (including the Scugog Island FN consultation coordinator) was to confirm the virtual webinar meeting date of May 19.										✓
May 26, 2020 Outgoing email	This email from a communications officer with CNL to the Scugog Island FN Chief was to follow-up on the registered letter sent on May 06.										✓
May 26, 2020 Outgoing email	This email from a communications officer with CNL to Williams Treaties First Nations (including the Scugog Island FN consultation coordinator) enclosed the follow-up information responding to all questions from the meeting on May 19.	✓			✓					✓	
July 27, 2020 Outgoing email	This email from a communications officer with CNL to Williams Treaties First Nations (including the Scugog Island FN consultation coordinator) enclosing the presentation from the previous meeting in May.	✓		✓	✓		✓	✓	✓	✓	
August 11, 2020 Incoming email	This email from Scugog Island FN consultation coordinator to a communications officer with CNL was to introduce the new Community Consultation Specialist.										✓

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
August 14, 2020 Outgoing email	This email from a CNL communications officer to the Scugog Island Community Consultation Specialist was to inquire on whether they would like to meet with CNL to discuss the projects.										✓
August 20, 2020 Virtual meeting	This virtual meeting between a communications officer with CNL and the Scugog Island FN Community Consultation Specialist was to discuss CNL projects, including the NPD Closure Project.			✓							
February 12, 2021 Outgoing email	This email from a communications officer with CNL to WTFN communities (including the Scugog Island Community Consultation Specialist) was an invitation to join Curve Lake First Nation's request of a monthly update on Canadian Nuclear Laboratories (CNL) environmental remediation projects, such as the NSDF Project and NPD Closure Project, as well as Port Hope Area Initiative (PHAI) activities in Port Hope and Port Granby. The monthly meeting will take place the last Wednesday of each month starting March 2021.									✓	
April 4, 2021 Outgoing email	This email from a CNL Communications Officer to all the representatives of the William Treaties First Nations communities enclosing the agenda and presentation from the most recent monthly meeting.										✓
April 12, 2021 Outgoing letter	This letter from CNL's Manager of Stakeholder Relations to the Scugog Island FN Chief enclosed a preliminary list of commitments and indicated interest in meeting to discuss.										✓
June 15, 2021 Outgoing email	This email from a communications officer with CNL to Scugog Island FN Chief was to follow-up on the April letter.										✓
July 6, 2021 Outgoing email	This email from a CNL Communications Officer to all the representatives of the William Treaties First Nations communities enclosing the agenda and presentation from the most recent monthly meeting.										✓
August 26, 2021 Outgoing email	This email from a CNL Communications Officer to all the representatives of the William Treaties First Nations communities enclosing the agenda and presentation from the most recent monthly meeting.										✓
September 29, 2021 Incoming Email	This email from a Scugog Island FN consultant to Senior Communications Officer at CNL was to ask CNL to add their email to the mailing list to arrange the WTFN/CNL monthly meeting.										✓
September 29, 2021 Outgoing Email	This email from a CNL Communications officer to a Scugog Island FN consultant was to follow up on the previous email to confirm the inclusion of their email to the mailing list to arrange CNL/WTFN monthly meetings. CNL also asked the Scugog FN consultant if they would like to participate in a meeting to discuss environmental assessment projects and to discuss ongoing engagement between CNL and WTFN so far. The Scugog Island FN consultant confirmed interest										✓
September 29, 2021 Virtual meeting	This was the seventh of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer, ERM Stakeholder Relations Manager and the Manager of Regulatory Approvals for the NPD Closure Project) Curve Lake First Nation (including the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a community consultation coordinator), Scugog Island (including a consultant) and AECL (including the Manager of Engagement and Communications) were in attendance. The focus was a discussion on CNL's responses to Curve Lake First Nation's review of the 2020 revised draft EIS.	✓		✓	✓	✓				✓	✓
October 05, 2021 Outgoing Email	This email from a CNL Communications officer to a Scugog Island FN consultant was to confirm the date of this proposed meeting (October 20). CNL also inquired whether Scugog Island FN would be interested in arranging a second meeting to discuss the Chalk River Projects (NPD Closure Project included). If time did not permit, CNL offered to briefly overview the Chalk River projects in the October 20th meeting.										✓
October 07, 2021 Incoming Email	This email from a Scugog Island FN consultant suggested that the October 20, 2021 meeting focused on the Port Hope Area Initiative and that a future meeting for Chalk River projects, including the NPD Closure Project, be arranged in the near future.										✓

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		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
October 27, 2021 Virtual meeting	This was the eight of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer and ERM Stakeholder Relations Manager) Curve Lake First Nation (including the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a community consultation coordinator), Scugog Island (including a consultant) and AECL (including the Manager of Engagement and Communications) were in attendance. The focus was a discussion on small modular reactor research and technology at Chalk River Laboratories. CNL also shared an update on the NPD Closure Project.										✓
November 1, 2021 Outgoing email	This email from a CNL Senior Communications Officer to all the representatives of the William Treaties First Nations communities enclosing the agenda and presentation from the most recent monthly meeting.										✓
November 24, 2021 Virtual meeting	This was the eight of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a communications officer and ERM Stakeholder Relations Manager) Curve Lake First Nation (including the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a community consultation coordinator), Scugog Island (including a consultant) and AECL (including the Manager of Engagement and Communications) were in attendance. The focus was a discussion on the NSDF Project. CNL also shared an update on the NPD Closure Project.										✓
January 17, 2022 Outgoing email	This email from a CNL Communications Officer to Curve Lake First Nation was to propose the next discussion topic on CNL’s Cleanup Mission. This topic would look at CNL’s company-wide approach to environmental remediation and specifically how it relates to Chalk River’s future and the NSDF. As discussed at the November 2021 monthly meeting, CNL noted that they will send a list of key dates for the Projects over by the end of the week. CNL acknowledged that they may need to discuss if there are any further milestones that Curve Lake First Nation would like on that list of key dates.										✓
January 21, 2022 Outgoing email	This email from a CNL Communications Officer to Curve Lake First Nation representatives enclosed some proposed key dates for PHAI, NPD and NSDF.										✓
February 15, 2022 Outgoing email	This email from a CNL Communications Officer to Curve Lake First Nation representatives proposed a more open agenda for the meeting on February 23rd. CNL proposed discussing the three usual projects (NSDF, NPD and PHAI) but also a discussion around the NSDF Part 1 hearing.										✓
March 8, 2022 Outgoing email	This email from Curve Lake First Nation to a CNL Communications Officer noted that Curve Lake First Nation would like to review the updated interest and concerns table before submission.									✓	✓
March 11, 2022 Incoming email	This email from Curve Lake First Nation to a CNL Communications Officer informed CNL that the meeting invitation for the next working group meeting was forwarded to a new member of the support team.										✓
April 18, 2022 Outgoing email	Email invitation to Scugog FN to the CNL Industry Day at the Chalk River Laboratories on Thursday, June, 2, 2022 to promote the broader engagement between CNL’s nuclear industry partners and our local supply chain.										✓
April 25, 2022 Outgoing email	Email invitation to the April 27, 2022 Williams Treaties First Nations monthly meeting. The agenda items included the following on the NPD project: NPD Project Updates NPD Draft EAFMP								✓		

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
April 27, 2022 Virtual Meeting	This was the ninth of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a Communications Officer and ERM Stakeholder Relations Manager) Curve Lake First Nation (including the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a community consultation coordinator), Scugog Island (including a consultant), Chippewas of Georgina Island First Nation (Invasive Species coordinator) and AECL (including the Manager of Engagement and Communications) were in attendance. The focus was a discussion on the NSDF Project. CNL also shared an update on the NPD Closure Project.								✓		✓
April 28, 2022 Outgoing email	This email from a CNL Senior Advisor of Indigenous Relations to the WTFN communities attached the presentation from the April 27, 2022 monthly meeting. CNL invited WTFN communities to the Industry Day at the Chalk River Laboratories on Thursday, June, 2, 2022 to promote the broader engagement between CNL’s nuclear industry partners and our local supply chain.								✓		
May 06, 2022 Outgoing email	Email invitation to Scugog FN to the CNL Industry Day at the Chalk River Laboratories on Thursday, June, 2, 2022 to promote the broader engagement between CNL’s nuclear industry partners and our local supply chain. Scugog FN replied that the invitation had been shared internally.										✓
May 13, 2022 Outgoing email	This email from ERM Stakeholder Relations to the WTFN communities provided a response to technical questions asked at the April 27, 2022 monthly meeting. Q1: Please provide a breakdown of how much tritium in the Ottawa River is naturally occurring versus anthropogenic (e.g. from weapons testing in the 1960s), including a graph showing the peak of tritium from weapons testing. Q2: Please provide further information on stack contamination and the remedial actions planned at the base of the stack, with respect to potential impacts on Chimney Swifts.								✓		
June 06, 2022 Outgoing email	This email from a CNL Senior Advisor of Indigenous Relations to the WTFN communities sent a proposed agenda for the tenth monthly meeting planned for June 29, 2022. The meeting is planning to be held in-person at the Port Hope Area Initiative office. On the proposed agenda the NPD Project staff will provide an update on the project.										✓
June 22, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the WTFN communities provided an updated agenda for the June 29, 2022 monthly meeting. A NPD Project update was included as an agenda item.										✓
June 29, 2022 Meeting	This was the tenth of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a Communications Officer and ERM Stakeholder Relations Manager) Curve Lake First Nation (including the Chief, the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a community consultation coordinator), Alderville First Nation (Chief) and AECL (including the Manager of Engagement and Communications) were in attendance. The focus was a tour of the PHAI location. CNL also shared an update on the NPD Closure Project.										✓
July 14, 2022 Outgoing email	Email from a CNL Senior Communications Officer to Curve Lake First Nation’s Consultant proposed dates for a tour of the NSDF and NPD Facility. CNL proposed an online poll and asked for any additional dates needed. Curve Lake First Nation’s Consultant replied and will provide alternative dates.										✓
July 25, 2022 Outgoing email	Email from a CNL Senior Communications Officer to WTFN Communities sharing the agenda for the 11th monthly meeting on July 27, 2022. The agenda included a NPD project update.										✓

Date/Method	Details	Key EA Topics									
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July 27, 2022 Virtual meeting	This was the 11th of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a Communications Officer and ERM Stakeholder Relations Manager) Curve Lake First Nation (including the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a community consultation coordinator), Scugog Island (including a consultant) and Rama First Nation (including a consultation workers) were in attendance. CNL shared an update on the NPD Closure Project.										✓
August 22, 2022 Outgoing/Incoming emails	Emails from a CNL Senior Communications Officer to WTFN consultation representatives coordinating dates for the tour of the NSDF and NPD Facility.										✓
September 16, 2022 Outgoing email	Email from a CNL Senior Communications Officer to WTFN consultation representatives to save the date for the WTFN tour of Chalk River Laboratories on October 25 and 26, 2022 (including the proposed NSDF site and NPD site).										✓
September 21, 2022 Outgoing email	Email from a CNL Senior Communications Officer to Curve Lake First Nation’s Consultant sharing for review the proposed agenda or the 12th monthly meeting on September 28, 2022. The agenda included a NPD project update. Curve Lake First Nation accepted the agenda.										✓
September 26, 2022 Outgoing email	Email from a Senior Communications Officer to WTFN communities sharing the agenda for the September 28 working group meeting. The agenda included an update on the NPD project.										✓
September 28, 2022 Virtual meeting	This was the 12th of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a Communications Officer and ERM Stakeholder Relations Manager) Curve Lake First Nation (including the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including an Elder and community consultation coordinator), Scugog Island (including a consultant) and AECL (including the Manager of Engagement and Communications) were in attendance. The focus was a presentation and discussion on CNL’s Integrated Waste Strategy. CNL also shared an update on the NPD Closure Project.										✓
October 01, 2022 Outgoing email	Email from a Senior Communications Officer to WTFN communities sharing the agenda and presentation from the September 28, 2022 monthly meeting. Related to the presentation content, CNL have also attached a CNSC infographic that provides a description of the classes of radioactive waste.										✓
October 03, 2022 Outgoing email	Email from a Senior Communications Officer to WTFN communities sharing the agenda for the October 25 and 26, 2022 tour of Chalk River Laboratories (including the proposed NSDF site and NPD site). CNL also sent information about required PPE and the link to register for the tour.										✓
October 03, 2022 Outgoing Letter	This letter addressed to Scugog First Nation’s Chief from CNL’s Director of Indigenous Relations provided a project update and the engagement status with Scugog First Nation. CNL stated it is committed to incorporating Scugog’s interests and concerns into the EIS. CNL provided an engagement status and next steps, including a site visit and establishing commitments to ensure that all interests and concerns are addressed and tracked to resolution. CNL sent an updated draft set of commitments for Scugog First Nation’s review. CNL offered to discuss capacity and establish commitments before December 2022. CNL requested that Scugog First Nation respond confirming their agreement to proceed with the engagement activities, or modified engagement activities.									✓	
October 19, 2022 Outgoing email	This email from a Senior Communications Officer to Scugog Island First Nation’s consultation coordinator confirmed registration for the October 26, 2022 tour of the NPD facility.										✓

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
October 19, 2022 Outgoing email	This email from a Senior Communications Officer to Scugog Island First Nation’s chief followed up on the October 3, 2022 letter.									✓	
October 26, 2022 Tour	WTFN communities were invite to tour the NPD facility as part of a two day visit to the Chalk River Laboratories site and area. Representatives from CNL (in particular, NPD Project staff, Communications Officers, ERM Stakeholder Relations Manager, Director of Indigenous Relations) Curve Lake First Nation (including the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including Lands and Resource consultation coordinator), Scugog Island (including a consultation coordinator), Chippewas of Rama First Nation (including a councillor) and AECL (including the Director of Decommissioning and Waste Management Programme) took part in a reactor tour and site walk. The day include a smudging by the Ottawa River and relationship building.										✓
October 27, 2022 Incoming email	This email from Scugog Island First Nation’s consultation to a Senior Communications Officer provided updated contacts, including the Consultation Specialist. CNL acknowledged.										✓
November 01, 2022 Outgoing email	This email from a CNL Senior Communications Officer to WTFN communities thanked the participants of the October 25 and 26, 2022 tour. As requested over the days CNL sent the archaeological assessments for the NPD site and photos from the tour.										✓
November 15, 2022 Outgoing email	This email from a CNL Senior Communications Officer to WTFN communities cancelled the December monthly meeting.										✓
November 28, 2022 Outgoing email	This email from a CNL Senior Communications Officer to WTFN communities sent the agenda for the November 30th, 2022 monthly meeting. The agenda included a NPD Project update, a discussion on 2023 engagement plans and a discussion on a year in review.										✓
November 30, 2022 Virtual meeting	This was the 13th of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a Communications Officer and ERM Stakeholder Relations Manager) Curve Lake First Nation (including and Elder, Councillors, the Lands and Resources Consultation Officer, consultants and the Lands and Resource Administrative Support Worker), Hiawatha FN (including a community consultation coordinator) and Scugog Island (including consultants) were in attendance. CNL shared an update on the NPD Closure Project.										✓
January 12, 2023 Emails	Emails between MSIFN’s Consultation Specialist and CNL coordinating a meeting.										✓
January 20, 2023 Outgoing email	This email from a CNL Communications Officer to MSIFN’s Consultation Specialist to inform of the decision to postpone the submission of the NPD Closure Project’s draft Environmental Impact Statement (EIS) until May 2023 to allow for additional Indigenous input. CNL proposed the next steps would be to continue working together to ensure the MSIFN’s interests and concerns are reflected in the EIS by meeting to discuss the MSIFN's interest and desired involvement in the NPD project.										✓

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
January 25, 2023 Virtual Meeting	This was the 14th of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a Communications Officer and ERM Stakeholder Relations Manager, Communications Officers, the Manager of ERM Licensing Support, Man the Manager of ERM Stakeholder Relations, the Manager of NPD Regulatory Approvals, the Senior Advisor Indigenous Relations, the Director of Indigenous Relations, and the Manager of Stakeholder and Indigenous Engagement) AECL (including the Manager of Engagement and Communications) and WTFN communities, (including, Mississaugas of Scugog Island First Nation Consultant Department, Hiawatha and Curve Lake First Nation Consultant). CNL and WTFN discussed the NPD Closure Project and NSDF Project. CNL and the WTFNs discussed 2023 engagement activities including visits to Hiawatha and Scugog Island communities. CNL also introduced the RAP and Procurement Strategy; restoration was a topic for interest for 2023.										✓
March 01, 2023 Virtual Meeting	This was the 15th of the monthly meetings between CNL and the Williams Treaties First Nations communities, coordinated between Curve Lake First Nation and CNL and open to all. Representatives from CNL (in particular, a Communications Officer, Indigenous Engagement Coordinator, and ERM Stakeholder Relations, the Manager of ERM Licensing Support, the Manager of ERM Stakeholder Relations, NPD Regulatory Approvals, the Senior Advisor Indigenous Relations, and the Manager of Stakeholder and Indigenous Engagement) AECL (including the Manager of Engagement and Communications) and WTFN communities, (including, Mississaugas of Scugog Island First Nation Consultation Specialist, Georgina Island Invasive Species Coordinator, Hiawatha and Curve Lake First Nation Consultant, Curve Lake First Nation Elder, Three Fires Consulting, Hiawatha Lands and Resource Coordinator). CNL and WTFN discussed NPD project update, May 2023 in-person meeting, CNL Public disclosures, and the program for Engagement with Indigenous Nations, communities and organizations.										✓
March 09, 2023 Outgoing email	This email from CNL Senior Communications Officer to MSIFN’s Consultation Specialist to confirm the interest in hosting the 2023 May 31 meeting in the community. MSIFN’s Consultation Specialist confirmed receipt of the email and will get back to CNL after an internal discussion.										✓
March 14, 2023 Outgoing email	This email from CNL Senior Communications Officer to MSIFN’s Consultation Specialist with CNL's Indigenous Relations Procurement Strategy.										✓
March 29, 2023 Virtual Meeting	This was the 16th of the monthly meetings between CNL and the WTFN communities, coordinated between Curve Lake First Nation and CNL and open to all. This meeting was between CNL representatives (including Communications Officers, the Indigenous engagement coordinator, the Manager of Supply Chain, the Manager of ERM Licensing Support, Manager of ERM Stakeholder Relations, the Manager of NPD Regulatory Approvals, the Senior Advisor Indigenous Relations) AECL (including the Manager of Engagement and Communications) and WTFN communities, (including, Georgina Island First Nation Invasive Species Coordinator, MSIFN’s Consultation Specialist, Hiawatha and Curve Lake First Nation Consultant, and Curve Lake Elder. CNL and the WTFN discussed CNL’s Indigenous Procurement Strategy.										✓
April 11, 2023 Outgoing email	This email from CNL Senior Communications Officer to MSIFN’s Consultation Specialist with the agenda and presentation from the monthly meeting held on 2023 March 29. CNL also looked to confirm the dates of the 2023 April 26 monthly meeting.										✓
May 04 2023 Outgoing email	Email from a CNL Senior Communications Officer to Scugog Island FN to discuss the logistics of the 2023 June in-person meeting. Scugog confirmed that 2023 June 15 works for an in-person community.										✓

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
May 31, 2023 Incoming email	Email from MSIFN to a CNL Senior Communications Officer is to inform CNL that Scugog Island FN will not be present at the 2023 May 31 CNL/WTFN monthly meeting as they are at a conference in Ottawa.										✓
May 31, 2023 Meeting	This was the 17th of the monthly meetings between CNL (Including, CNL Communications Officer, Indigenous Engagement Coordinator, Manager, ERM Licensing Support, Administrative Assistant, Manager NPD Regulatory Approvals, and Senior Advisor Indigenous Relations) and the WTFN communities (including Consultant, CLFN and HFN, Rama FN, Community Consultation, Alderville Consultation Coordinator, Mississaugas Scugog Island First Nation Community Consultation, Curve Lake First Nation, Acting Consultation lead, Hiawatha lands and resource consultation, coordinated between Curve Lake First Nation and CNL and open to all. CNL reminded communities it was seeking validation of the I&C tables, extended the invitation to attending the Swift Count night and provided an update on the restoration plan timing for feedback.						✓			✓	✓
June 28, 2023 Meeting	This was the 18th of the monthly meetings between CNL (Including, CNL Communications Officer, Indigenous Engagement Coordinator, Manager, ERM Licensing Support, Administrative Assistant, Manager NPD Regulatory Approvals, and Senior Advisor Indigenous Relations) and the WTFN communities (including Consultant, CLFN and HFN, Rama FN, Community Consultation, Alderville Consultation Coordinator, Mississauga's Scugog Island First Nation Community Consultation, Curve Lake First Nation, Acting Consultation lead, Hiawatha lands and resource consultation, coordinated between Curve Lake First Nation and CNL and open to all. The focus of this meeting was NSDF, PHAI, and NPD Project updates										✓
July 11, 2023 Outgoing Email	This email from CNL Communications Officer to all CLFN communities is to request confirmation of attendance at the 2023 July monthly meeting being held in person in Hiawatha. Communities confirmed their attendance.										✓
July 11, 2023 Incoming Email	This email from MSIFN to CNL Manager Communications and Engagement is to request clarification on funding for the 2023 July in-person WTFN monthly meeting being held in Hiawatha. CNL provide a response.										✓
July 17, 2023 Incoming Email	This email from MSIFN to CNL Communications Officer is to provide attendance numbers for the 2023 July in-person WTFN monthly meeting. CNL confirmed receipt of the email.										✓
July 19, 2023 Outgoing Email	This email from CNL Communications officer to Scugog is to confirm logistics and final attendance for the 2023 July 24 in person meeting being held in Hiawatha FN.										✓
July 26, 2023 Meeting	This was the 19th of the monthly meetings held in person in Hiawatha between CNL (Including, Director of Engagement and Communications, Manager NPD Regulatory Approvals, Manager of Stakeholder and Indigenous Communications, Communications Officers, Indigenous Engagement Coordinator, Project Manager, and Project Coordinator) and the WTFN communities (including, CLFN Consultant, CLFN and Hiawatha FN, Rama FN, Community Consultation, Rama Acting Consultation lead, CLFN, Elder, CNLFN Consultant, Consultant, CLFN and HFN, Executive Director, MSIFN Staff, MSIFN Student, MSIFN Consultation Department), coordinated between Curve Lake First Nation and CNL and open to all. The meeting included a tour of Serpent Mounds, a working lunch and a monthly meeting. Topics of discussion included Project updates- NSDF, NPD, and PHAI.										✓
July 27, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to WTFN is to provide WTFN with the action list from the 2023 July 26 in person meeting.										✓

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
October 25, 2023 Outgoing Email	This was the 20th of the monthly meetings between CNL (Including, Director and Manager of Communications and Engagement, Indigenous Engagement Coordinator, Communications Officers, HWP Manager of Indigenous Relations Communications, Environmental and decommissioning specialist), AECL (including the Director of AECL GO-CO Procurement Process) and the WTFN communities (including, Acting Consultation lead from CLFN, Consultant, Consultation Liaison for Beausoleil First Nation, Consultation Coordinator for Alderville First Nation, Hiawatha First Nations Lands and Conservation Officer, and Consultation Advisor for Scugog First Nation) coordinated between Curve Lake First Nation and CNL and open to all. This meeting was to discuss CNL Updates, WTFN updates, the Indigenous Relations Procurement Strategy, the GO-CO Procurement process and the format of WTFN monthly meetings.										✓
October 26, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to WTFN is to provide WTFN with the action list from the 2023 October 26 WTFN Monthly meeting.										✓
November 01, 2023 Outgoing Email	This email from CNL Manager, Communications and Engagement to all WTFN is to follow-up from the 2023 October monthly meeting. CNL noted for those who were unable to attend the meeting, an agenda item was tabled for discussion to move our monthly information sharing meeting to a quarterly meeting instead. The discussion result was an agreement (with those in attendance) to change to a quarterly meeting update if WTFN communities still received project updates/ milestones and/ or news in between meetings. I encourage you to provide feedback on this change. CNL also shared the GO-CO model presentation.										✓
November 27, 2023 Outgoing Email	This email from CNL Manager, Communications and Engagement to all WTFN is to follow-up from the 2023 November 01 email to all WTFN communities to confirm that the 2023 November 30 WTFN monthly meeting has been cancelled, and that the monthly meeting has been changed to a quarterly meeting series. The monthly meeting series has been cancelled. A quarterly meeting series has been setup, and the next meeting is on Wednesday, January 31, 2024.										✓

Appendix X Anishinabek First Nation Record of Engagement and Interests and Concerns

This appendix provides a complete record of all engagement between CNL and the Anishinabek Nation from June 2016 to March 2024 (Table X.1). Table C-35 includes the date and method of the communication / engagement, the topics discussed and participants. The table also highlights engagements where key EA topics were discussed. The key EA topics align with “Generic Guidelines for Preparation of an Environmental Impact Statement Pursuant to the Canadian Environmental Assessment Act, 2012” as well as the requirements of REGDOC 3.2.2 “Indigenous Engagement” and guidance specific to NPD provided by the CNSC in January 2021 (e-doc # 6467843).

Section 4.4.17.1 of the IER summarizes the engagement activities that have taken place to date between CNL and the Anishinabek Nation.

X.1 Record of Engagement-Anishinabek First Nation-2016 June to 2024 March

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
July 15, 2016 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the Grand Chief of the Anishinabek Nation introduced the project and requested community input on any potential adverse impacts from project activities. To demonstrate requirements of CEAA, 2012 Section 5(1)(c), the letter requested meaningful feedback on the following: - Whether the project may have environmental effect on any lands and/or resources currently used by Aboriginal peoples for traditional purposes; - Whether the project may have any perceived impacts on Aboriginal and Treaty Rights; - Whether local and traditional knowledge can assist in describing the existing environment; and, - The view of Aboriginal communities on proposed valued ecosystems components (environmental attributes) that have been identified for the assessment.				√	√				√	
August 02, 2016 Outgoing telephone call	This telephone call was from CNL communications staff to the office of the Grand Chief of the Anishinabek Nation to follow-up on the July letter.										√
November 10, 2016 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the Anishinabek Nation (then known as the Union of Ontario Indians or UOI) Grand Chief inquired about asserted rights and traditional activities in the region around CRL. To demonstrate requirements of CEAA 2012 Section 5(1)(c), the letter requested a better understanding of Anishinabek Nation’s historic and/or modern day use of lands in and/or near both of the projects and asked the following questions: - Does the Union of Ontario Indians have traditional territory or reserve lands near the NSDF and/or NPD Closure Project? - What is the history of the Union of Ontario Indians using the areas around the two projects? - Do you have any members of the Union of Ontario Indians that currently live in close or reasonable proximity to either of the projects? - Does the Union of Ontario Indians have any members that currently practice traditional activities such as, trapping, hunting, fishing and/or gathering, near the two projects? - Does the Union of Ontario Indians, or any members, have sites of ceremonial significance in close proximity to either of the two sites, or more generally, any cultural activities near either of the two sites? CNL also indicated interested in learning more about the community and any asserted rights, interests or activities members might undertake in the local or regional areas in proximity to the project.				√	√				√	

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
November 15, 2017 Outgoing email	This email from a communications officer with CNL to the Anishinabek Nation Grand Chief enclosed links to the full draft EIS, an interactive “public-friendly” executive summary of the draft EIS, the CNSC’s public notice, a short overview of the project and environmental assessment, as well as detailed information on the timing of the EA process and how to participate in the public comment period.	√	√	√	√	√	√	√	√	√	
November 17, 2017 Outgoing email	This email from a communications officer with CNL to the Anishinabek Nation Grand Chief enclosed the draft Aboriginal Engagement Report for the NPD Closure Project and stated, per CEAA, 2012 requirements: “CNL would be pleased to update information in this current draft with input from your community.”	√	√	√	√	√	√	√	√	√	
In March 2020, the COVID-19 pandemic impacted in-person engagement activities. CNL adapted to the restrictions providing online platforms for virtual meetings, workshops, webinars, Project updates and open houses.											
May 06, 2020 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the Anishinabek Nation Grand Council Chief enclosed a preliminary version of the 2020 revised draft EIS and an updated IER. This letter also asked for feedback in the following seven areas: - Does the Anishinabek Nation have additional information that they would like to provide in the context of traditional territory near the NPD site? - Does the Anishinabek Nation have any members who currently live close or in reasonable proximity to the NPD site? - Does the Anishinabek Nation have historical and/or current traditional practices near the NPD site, specifically we are interested in members’ traditional uses such as trapping (traditional or commercial), hunting, fishing (traditional or commercial), gathering and practicing cultural ceremonies? - Does the Anishinabek Nation have sites of ceremonial significance in close proximity or more generally any cultural activities near the NPD site? - Tell us about any important resources, uses, activities, values and interests to the Anishinabek Nation near the NPD site. - If there is use in close proximity to the NPD site, is current community use different than historic use and can a description of those difference be provided? - Let us know of any potential concerns you have with respect to effects and any potential impacts on rights. This letter also indicated an interest in meeting with the Anishinabek Nation to discuss any interests or concerns.	√	√	√	√	√	√	√	√	√	
May 26, 2020 Outgoing email	This email from a communications officer with CNL to the Anishinabek Nation Grand Council Chief was to follow-up on the registered letter sent on May 06.										√
August 27, 2020 Outgoing email	This email from a communications officer with CNL to Anishinabek Nation representatives was to follow-up to the 2020 May letter from CNL to Anishinabek Nation. New contacts for the Anishinabek Nation were obtained from the CNSC and the 2020 May letter was resent, as well as an invitation to meet.										√
April 12, 2021 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the Grand Chief of the Anishinabek Nation enclosed a preliminary list of commitments and indicated interest in meeting to discuss.										√
June 15, 2021 Outgoing email	This email from a communications officer with CNL to the Grand Chief of the Anishinabek Nation (copying the Policy Analyst) was to follow-up on the April letter.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
April 20, 2022 Outgoing email	This email mail invitation to Anishinabek Nation to the CNL Industry Day at the Chalk River Laboratories on June 2, 2022 to promote the broader engagement between CNL’s nuclear industry partners and our local supply chain.										√
July 19, 2022 Outgoing email	This email from a CNL Senior Communications Office to Anishinabek Nation to provide more details about the Environmental Stewardship Council July 28, 2022 meeting.										√
July 28, 2022 Environmental Stewardship Council	Anishinabek Nation, Deputy Grand Council (DGC) Chief attended CNL’s Environmental Stewardship Council meeting held at the Chalk River Laboratories. This included a NPD Project update.										√
October 04, 2022 Outgoing letter	This letter addressed to the Anishinabek Nation’s Grand Chief from CNL’s Director of Indigenous Relations provided a project update and the engagement status with the Anishinabek Nation. CNL stated it is committed to incorporating Anishinabek Nation’s interests and concerns into the EIS. CNL provided an engagement status and next steps, including a site visit and establishing commitments to ensure that all interests and concerns are addressed and tracked to resolution. CNL sent an updated draft set of commitments for Anishinabek Nation’s review. CNL offered to discuss capacity and establish commitments before December 2022. CNL requested that Anishinabek Nation respond confirming their agreement to proceed with the engagement activities, or modified engagement activities.									√	
October 26, 2022 Outgoing email	This email from a CNL Senior Communications Office to the Anishinabek Nation’s Grand Chief was to follow-up on the October 4, 2022 letter.									√	
November 23, 2022 Outgoing telephone call	Telephone call from a CNL Senior Communications Officer to the general inbox for the Anishinabek Nation stating CNL was following up on October 3, 2022 letter for NPD Closure Project. CNL left a message.									√	
January 20, 2023 Outgoing Email	This email from a CNL Communications Officer to the Anishinabek Nation Regional Deputy Grand Council Chief to inform them of the decision to postpone the submission of the NPD Closure Project’s draft Environmental Impact Statement (EIS) until 2023 May to allow for additional Indigenous input. CNL proposed the next step would be to discuss the Anishinabek Nation’s interest and desired involvement in the NPD project.										√
February 14, 2023 Outgoing Email	This email from a CNL Senior Communications Officer to the Anishinabek Nation Regional Deputy Grand Council Chief to follow up with the 2022 November 28 email regarding the tour of Chalk River Laboratories.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
February 15, 2023 Emails between Anishinabek Nation and CNL (2 emails)	This email from the Anishinabek Nation Regional Deputy Grand Council Chief to a CNL Senior Communications Officer to confirm the interest in a tour of Chalk River Laboratories and confirmation of the next ESC Meeting date.										√
March 14, 2023 Outgoing Email	This email from CNL Senior Communications Officer to Anishinabek Nation with CNL's Indigenous Relations Procurement Strategy.										√
April 11, 2023 Outgoing Email	This email from CNL Senior Communications Officer to the Anishinabek Nation Regional Deputy Grand Council Chief following up on previous communications with regard to a site tour in Spring 2023; preferably early May.										√
July 15, 2023 Incoming Email	This email from Anishinabek Nation Administrative Coordinator to CNL Manager, Communications and Engagement is to see if CNL has any sponsorship places for the NWDER conference being held in Niagara Falls, ON. Anishinabek Nation noted that the conference coordinators mentioned CNL might have places. CNL informed Anishinabek Nation that unfortunately CNL doesn't have any places, and that the conference registration is now full.										√
September 20, 2023 Incoming Email	This email from Deputy Grand Council Chief to CNL cc'd is to request staff to publicize the CNL Indigenous Relations Director role.										√
October 17, 2023 Outgoing Email	This email from CNL Manager of Communications and Engagement to Anishinabek Nation is to provide an invite to the 2023 October 20 Career Fair being held In Pembroke.										√

Appendix Y Algonquin Nation Secretariat Record of Engagement

This appendix provides a complete record of all engagement between CNL and Algonquin Nation Secretariat from June 2016 to March 2024 (Table Y.1). Table (Y.1) includes the date and method of the communication / engagement, the topics discussed and participants. The table also highlights engagements where key EA topics were discussed. The key EA topics align with “Generic Guidelines for Preparation of an Environmental Impact Statement Pursuant to the Canadian Environmental Assessment Act, 2012” as well as the requirements of REGDOC 3.2.2 “Indigenous Engagement” and guidance specific to NPD provided by the CNSC in January 2021 (e-doc # 6467843

Section 6.4.15.1 of the IER summarizes the engagement activities that have taken place to date between CNL and the Algonquin Nation Secretariat.

Y.1 Record of Engagement-Algonquin Nation Secretarial-2016 June to 2024 March

Date/Method	Details
July 15, 2016 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the Algonquin Nation Secretariat’s Director General introduced the project and requested community input on any potential adverse impacts from project activities. To demonstrate requirements of CEAA, 2012 Section 5(1)(c), the letter requested meaningful feedback on the following: • <i>Whether the project may have environmental effect on any lands and/or resources currently used by Aboriginal peoples for traditional purposes;</i> • <i>Whether the project may have any perceived impacts on Aboriginal and Treaty Rights;</i> • <i>Whether local and traditional knowledge can assist in describing the existing environment; and,</i> • <i>The view of Aboriginal communities on proposed valued ecosystems components (environmental attributes) that have been identified for the assessment.</i>
October 24, 2016 Outgoing telephone call	This was a telephone call from a communications officer with CNL to the office of the Director General of the Algonquin Nation Secretariat.
November 10, 2016 Outgoing letter	This letter from CNL’s Director of Corporate Communications to the Algonquin Nation Secretariat Director General inquired about asserted rights and traditional activities in the region around CRL. To demonstrate requirements of CEAA 2012 Section 5(1)(c), the letter requested a better understanding of Algonquin Nation Secretariat’s historic and/or modern day use of lands in and/or near both of the projects and asked the following questions: • <i>Does the Algonquin Nation Secretariat have traditional territory or reserve lands near the NSDF and/or NPD Closure Project?</i> • <i>What is the history of Algonquin Nation Secretariat using the areas around the two projects?</i> • <i>Do you have any members of the Algonquin Nation Secretariat that currently live in close or reasonable proximity to either of the projects?</i> • <i>Does the Algonquin Nation Secretariat have any members that currently practice traditional activities such as, trapping, hunting, fishing and/or gathering, near the two projects?</i> • <i>Does the Algonquin Nation Secretariat, or any members, have sites of ceremonial significance in close proximity to either of the two sites, or more generally, any cultural activities near either of the two sites?</i> CNL also indicated interested in learning more about the Algonquin Nation Secretariat and any asserted rights, interests or activities members might undertake in the local or regional areas in proximity to the project.

Date/Method	Details
November 15, 2017 Outgoing email	This email from a communications officer to the Algonquin Nation Secretariat Director General enclosed links to the full draft EIS, an interactive “public-friendly” executive summary of the draft EIS, the CNSC’s public notice, a short overview of the project and environmental assessment, as well as detailed information on the timing of the EA process and how to participate in the public comment period.
November 17, 2017 Outgoing email	This email from a communications officer with CNL to the Algonquin Nation Secretariat Director General enclosed the draft Aboriginal Engagement Report for the NPD Closure Project and stated, per CEAA, 2012 requirements: “CNL would be pleased to update information in this current draft with input from your community.”
In March 2020, the COVID-19 pandemic impacted in-person engagement activities. CNL adapted to the restrictions providing online platforms for virtual meetings, workshops, webinars, Project updates and open houses.	
May 06, 2020 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the Algonquin Nation Secretariat Director General enclosed a preliminary version of the 2020 revised draft EIS and an updated IER. This letter also asked for feedback in the following seven areas: • <i>Does Algonquin Nation Secretariat have additional information that they would like to provide in the context of traditional territory near the NPD site?</i> • <i>Does Algonquin Nation Secretariat have any members who currently live close or in reasonable proximity to the NPD site?</i> • <i>Does Algonquin Nation Secretariat have historical and/or current traditional practices near the NPD site, specifically we are interested in members’ traditional uses such as trapping (traditional or commercial), hunting, fishing (traditional or commercial), gathering and practicing cultural ceremonies?</i> • <i>Does Algonquin Nation Secretariat have sites of ceremonial significance in close proximity or more generally any cultural activities near the NPD site?</i> • <i>Tell us about any important resources, uses, activities, values and interests to Algonquin Nation Secretariat near the NPD site.</i> • <i>If there is use in close proximity to the NPD site, is current community use different than historic use and can a description of those difference be provided?</i> • <i>Let us know of any potential concerns you have with respect to effects and any potential impacts on rights.</i> This letter also indicated an interest in meeting with Algonquin Nation Secretariat to discuss any interests or concerns.
May 26, 2020 Outgoing email	This email from a communications officer with CNL to the Algonquin Nation Secretariat Director General was to follow-up on the registered letter sent on May 06.
May 26, 2020 Incoming email	This email from the former Algonquin Nation Secretariat Director General to a communications officer with CNL was to advise of the new Algonquin Nation Secretariat Director General and share their contact information.
May 26, 2020 Outgoing email	This email from a communications officer with CNL to the new Algonquin Nation Secretariat Director General enclosed the letter from May 06, 2020 and offered a meeting.
April 12, 2021 Outgoing letter	This letter from CNL’s Manager of Stakeholder Relations to the Director General of the Algonquin Nation Secretariat enclosed a preliminary list of commitments and indicated interest in meeting to discuss.

Date/Method	Details
June 15, 2021 Outgoing email	This email from a communications officer with CNL to the Director General of the Algonquin Nation Secretariat was to follow-up on the April letter.
April 18, 2022 Outgoing email	This email from a Communications officer at CNL to Algonquin Nation Secretariat consultation was to inform Algonquin Nation Secretariat about Industry Day on June 2, 2022 at CRL.

Appendix Z Algonquins of Barriere Lake Record of Engagement

This appendix provides a complete record of all engagement between CNL and the Algonquins of Barriere Lake (a member nation of Algonquin Nation Secretariat) from June 2022 to March 2024 (Table Z.1). Communications with Algonquins of Barriere Lake between June 2016 and June 2022 were via the Algonquin Nation Secretariat (Table Y.1). At the NSDF Hearing in 2022 June, CNL heard that the individual rights bearing communities needed to be engaged independently from the Algonquin Nation Secretariat, regarding CNL related projects and activities.

Table Z.1 includes the date and method of the communication / engagement, the topics discussed and participants. This table also highlights engagements where key EA topics were discussed. The key EA topics align with “Generic Guidelines for Preparation of an Environmental Impact Statement Pursuant to the Canadian Environmental Assessment Act, 2012” as well as the requirements of REGDOC 3.2.2 “Indigenous Engagement” and guidance specific to NPD provided by the CNSC in January 2021 (e-doc # 6467843).

Z.1 RECORD OF ENGAGEMENT – ALGONQUINS of Barriere Lake – 2023 January to 2024 March

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
April 08, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the ABL Chief was to inquire if ABL would be interested in meeting CNL to discuss CNL projects, include the NPD project.										✓
May 24, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the ABL Chief followed up on the April 8, 2022 offer to meet.										✓
May 24, 2022 Outgoing telephone call	A CNL Senior Communications Officer telephoned the number on the ABL letterhead and left a message with a contact number and offered a meeting with CNL if ABL was interested.										✓
June 15, 2022 Outgoing email	This email from a CNL Senior Communications Officer to ABL’s Legal Counsel was to follow-up on the previous email requesting contact information for ABL.										✓
June 15, 2022 Incoming email	This email from the ABL Consultant to a CNL Senior Communications Officer stated that the ABL Chief had asked the consultant to follow-up on CNL’s outreach with ABL’s Legal Counsel.										✓
June 15, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the ABL Consultant stated that CNL was interested in meeting with ABL to discuss interest in CNL’s projects, including the NPD project.										✓

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
June 23, 2022 Outgoing email	This email from CNL’s Director of Indigenous Relations to the Chiefs of Algonquins of Barriere Lake, Timiskaming First Nation and Wolf Lake First Nation was to indicate CNL’s interest in meeting with each community either collectively or together and to share information on CNL’s activities and projects including the NPD project.										✓
June 24, 2022 Outgoing email	This email from CNL’s Director of Indigenous Relations to an Algonquins of Barriere Lake consultant was to coordinate meetings with Algonquins of Barriere Lake, Timiskaming First Nation and Wolf Lake First Nation.										✓
June 30, 2022 Incoming email	This email from an ABL Consultant to CNL’s Director of Indigenous Relations confirmed ABL would coordinate a meeting with CNL after July 12, 2022.										✓
June 30, 2022 Outgoing email	This email from CNL’s Director of Indigenous Relations to an ABL Consultant was to thank the consultant and affirm CNL’s interest in the consultant coordinating a meeting between ABL and CNL.										✓
August 04, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the ABL Consultant asked if ABL were still interested in meeting with CNL to discuss project, including the NPD project.										✓
October 03, 2022 Outgoing email	This letter addressed to the ABL’s Chief from CNL’s Director of Indigenous Relations provided a project update and the engagement status with the ABL, CNL noted that the next step is a meeting to discuss enabling capacity funding for ABL’s involvement in the NPD and NSDF projects.										✓
October 26, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the ABL Chief followed-up on the October 3, 2022 letter.										✓
November 23, 2022 Outgoing telephone call	A CNL senior communications officer called the general telephone number and left a message with a contact number stating CNL was following up with a letter sent on October 3, 2022 for NPD Closure Project.										✓
January 10, 2023 Outgoing email	This email from a communications officer with CNL to Chiefs of ABL providing an update on the NPD Closure Project and inquiring if SBL would like to meet and discuss their ABL’s interest and desired involvement in the NPD Project.										✓

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
January 20, 2023 Outgoing Email	This email from CNL Communications Officer to Algonquin’s of Barriere Lake inform of the decision to postpone the submission of the NPD Closure Project’s draft Environmental Impact Statement (EIS) until 2023 May to allow for additional Indigenous input. CNL proposed the next step would be to discuss the Algonquin’s of Barriere Lake’s interest and desired involvement in the NPD project.										√
March 14, 2023 Emails between CNL and Algonquin’s of Barriere Lake	This email from CNL Senior Communications Officer to Algonquin’s of Barriere Lake with CNL's Indigenous Relations Procurement Strategy.										√
October 17, 2023 Outgoing Email	This email from CNL Manager of Communications and Engagement to ABL is to provide an invite to the 2023 October 20 Career Fair being held In Pembroke.										√
January 10, 2023 Outgoing email	This email from a communications officer with CNL to Chiefs of ABL providing an update on the NPD Closure Project and inquiring if SBL would like to meet and discuss their ABL’s interest and desired involvement in the NPD Project.										√
January 20, 2023 Outgoing Email	This email from CNL Communications Officer to Algonquin’s of Barriere Lake inform of the decision to postpone the submission of the NPD Closure Project’s draft Environmental Impact Statement (EIS) until 2023 May to allow for additional Indigenous input. CNL proposed the next step would be to discuss the Algonquin’s of Barriere Lake’s interest and desired involvement in the NPD project.										√
March 14, 2023 Emails between CNL and Algonquin’s of Barriere Lake	This email from CNL Senior Communications Officer to Algonquin’s of Barriere Lake with CNL's Indigenous Relations Procurement Strategy.										√
October 17, 2023 Outgoing Email	This email from CNL Manager of Communications and Engagement to ABL is to provide an invite to the 2023 October 20 Career Fair being held In Pembroke.										√

Appendix AA Wolf Lake First Nation Record of Engagement

This appendix provides a complete record of all engagement between CNL and Wolf Lake First Nation (a member nation of Algonquin Nation Secretariat) from June 2022 to March 2024 (Table AA.1). Communications with Wolf Lake First Nation between June 2016 and June 2022 were via the Algonquin Nation Secretariat (Table Y.1). At the NSDF Hearing in 2022 June, CNL heard that the individual rights bearing communities needed to be engaged independently from the Algonquin Nation Secretariat, regarding CNL related projects and activities.

Table AA.1 includes the date and method of the communication / engagement, the topics discussed and participants. This table also highlights engagements where key EA topics were discussed. The key EA topics align with “Generic Guidelines for Preparation of an Environmental Impact Statement Pursuant to the Canadian Environmental Assessment Act, 2012” as well as the requirements of REGDOC 3.2.2 “Indigenous Engagement” and guidance specific to NPD provided by the CNSC in January 2021 (e doc # 6467843). Following the record of engagement is a mapping of how the summary of interests and concerns were compiled (Table AA.2), as well as a summary of interests and concerns raised by Wolf Lake First Nation (Table AA.3). Section 4.4.16.1 of the IER summarizes the engagement activities that have taken place to date between CNL and Wolf Lake First Nation.

AA.1 Record of Engagement-Wolf Lake First Nation (WLFN)-2022 June to 2024 March

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
May 12, 2022 Outgoing email	This email from a CNL Communications Officer to the WLFN’s Chief was to inquire if WLFN would be interested in meeting CNL and acknowledging WLFN’s intervention for the NSDF licensing hearing. CNL asked WLFN to confirm the appropriate contact for engagement and asked how WLFN would like to engage CNL moving forward.										
May 24, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the WLFN’s Chief was follow-up on the previous email and to inquire whether there was interest in meeting CNL.										√
June 22, 2022 Outgoing email	This email from CNL’s Indigenous Relations Director to the WLFN Chief stated an interest in engagement and meeting with WLFN.										√
June 22, 2022 Outgoing email	This email from CNL’s Indigenous Relations Director to the WLFN’s Legal Counsel stated an interest in engagement (including the NPD project) and meeting with WLFN to discuss WLFN’s interest in the NSDF project.										√
June 22, 2022 Outgoing Telephone call	CNL’s Indigenous Relations Director called the WLFN Chief and left a voicemail asking the Chief to get in touch by email for phone to set up a meeting.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
June 23, 2022 Outgoing email	This email from CNL’s Director of Indigenous Relations to the Chiefs of ABL, TFN and WLFN was to indicate CNL’s interest in meeting with each community either collectively or together and to share information on CNL’s activities and projects including the NPD project.										√
June 24, 2022 Incoming letter	This letter from WLFN’s Legal Counsel to CNL’s Director of Indigenous Relations. The letter requests that CNL assess the strength of WLFN’s Aboriginal rights and title assertion in proximity to the NSDF project. Of importance to the NPD project, the letter discussed CNL’s lack of engagement and consultation with WLFN and the duty to consult. The letter references previous correspondence with the federal government.										√
June 24, 2022 Incoming email	This email from WLFN’s Chief to CNL’s Director of Indigenous Relations offered a meeting to discuss the relationship.										√
June 24, 2022 Outgoing email	This email from CNL’s Director of Indigenous Relations to the WLFN Chief thanked WLFN for the letter and indicated interest in an initial meeting in August.										√
July 07, 2022 Outgoing email	This email from CNL’s Director of Indigenous Relations to the WLFN Chief indicated CNL was reviewing and would be responding to the letter of June 24, 2022 and indicated an interest in setting a meeting date for August in the meantime.										√
July 20, 2022 Outgoing email	This email from CNL’s Director of Indigenous Relations to the WLFN Legal Counsel requested assistance in setting up a meeting between CNL and WLFN.										√
July 25, 2022 Incoming email	This email from the WLFN Legal Counsel to CNL’s Director of Indigenous Relations stated they would be reaching out to the WLFN to coordinate. CNL confirmed receipt.										√
July 28, 2022 Outgoing letter	This letter from CNL’s Director of Indigenous Relations to the WLFN Legal Counsel responded to WLFN’s letter of June 24. This letter articulated that CNL was not the Crown and did not have the duty to consult in the case of the NSDF project. This letter also stated an interest in engagement, working together and meeting in the near term to discuss interests. This letter speaks to the relationship between CNL and WLFN and is important for engagement related to the NPD project.										√
August 05, 2022 Incoming email	This email from the WLFN Legal Counsel to CNL’s Director Indigenous Relations confirmed that WLFN would meet with CNL on August 10 to discuss WLFN’s assertions. The email also requested CNL correspond directly with WLFN and not the Algonquin Nation Secretariat.										√
August 05, 2022 Incoming email	This email from the WLFN Legal Counsel to CNL’s Director Indigenous Relations gave a final specific meeting place in Ottawa.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
August 05, 2022 Outgoing email	This email from CNL's Director of Indigenous Relations to the WLFN Legal Counsel confirmed CNL's attendance for the August 10 meeting. CNL also confirmed that all future correspondence will be sent the Chief at WLFN, and not Algonquin Nation Secretariat.										✓
August 09, 2022 Outgoing email	This email from CNL's Director of Indigenous Relations to the WLFN's Chief provided details about the August 10, 2022 meeting logistics.										✓
August 10, 2022 Meeting	This meeting between WLFN (including the WLFN Chief and Legal Counsel), CNL (including the Director of Indigenous Relations, Manager of ERM Stakeholder Relations and the NSDF project staff), and AECL (including the Vice-President, Decommissioning and Waste Management Oversight) was to discuss the CNL and WLFN relationship and the NPSD project. CNL provided information on the NPD project.										✓
August 17, 2022 Outgoing email	This email from CNL's Director of Indigenous Relations to the WLFN's Chief thanked WLFN for the opportunity to meet and share information on the NSDF and NPD projects. CNL enclosed information in follow-up to the meeting.										✓
October 03, 2022 Outgoing letter	This letter addressed to the WLFN's Chief from CNL's Director of Indigenous Relations provided a project update and the engagement status with the WFLF, CNL noted that the next step is a meeting to discuss enabling capacity funding for WLFN's involvement in the NPD and NSDF projects. CNL also sent a draft Contribution Agreement template.									✓	✓
October 26, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the WLFN's Chief was to follow-up on the October 3, 2022 letter.									✓	✓
November 13, 2022 Incoming email	This email from the WLFN Legal Counsel is in response to a CNL Senior Communications Officer to schedule a zoom call to discuss options for capacity funding to address CNL's outstanding projects. WLFN requested capacity funding to specifically hire a third party to review both the technical requirements of the project(s) and a review of the environmental assessment report. Once those reviews have been completed WLFN will be able to provide its comments and request any accommodation that may be required to ensure its asserted Aboriginal and title rights are not impacted									✓	✓
November 18, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the WLFN Legal Counsel requesting a few dates and times that would work for WLFN for a virtual meeting to discuss CNL project(s)									✓	✓

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
November 30, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the WLFN Legal Counsel following up on email sent November 18 requesting a few dates and times that would work for WLFN for a virtual meeting to discuss CNL project(s), including the NPD project.									✓	✓
November 30, 2022 Incoming email	This email from the WLFN Legal Counsel is in response to a CNL Senior Communications Officer confirmed receipt of meeting request and will confirm the meeting soon.									✓	✓
December 07, 2022 Incoming Email	This email from WLFN legal counsel to CNL Senior Communications Officer requesting the most recent version of the Environmental Impact Statement for the NPD Closure Project.										✓
December 07, 2022 Incoming Email	This email from WLFN legal counsel to CNL Senior Communications Officer with suggested dates for a virtual meeting to discuss the next steps in finalizing a Capacity Funding Agreement, timelines and deliverables.										✓
December 07, 2022 Outgoing Email	This email from a CNL Senior Communications Officer to WLFN's legal counsel providing dates to meet and confirming the request for the Nuclear Power Demonstration Environmental Impact Statement (EIS).										✓
December 07, 2022 Incoming Email	This email from WLFN legal counsel to the CNL Senior Communications Officer with CNL confirming a meeting date of 2022 December 12.										✓
December 07, 2022 Outgoing Email	This email from CNL Senior Communications Officer to WLFN Legal Counsel sharing names of whom to send the invitations of the 2022 December 12 meeting.										✓
December 07, 2022 Incoming Email	This email from WLFN legal counsel to ERM Stakeholder Relations containing a meeting invitation and link for a virtual meeting to be held on 2022 December 12.										✓
December 07, 2022 Outgoing Email	This email from CNL Senior Communications Officer to WLFN Legal Counsel confirming if they received the link to download the NPD Environmental Impact Statement.										✓

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
December 07, 2022 Incoming Email	This email from the WLFN Legal Counsel in response to CNL Senior Communications Officer to confirm that they did not receive a link for the Environmental Impact Statement (EIS).										✓
December 09, 2022 Outgoing Email	This email from a CNL Senior Communications Officer to WLFN Legal Counsel resending the NPD Environmental Impact Statement (EIS).										✓
December 09, 2022 Incoming Email	This email from the WLFN Legal Counsel in response to CNL Senior Communications Officer to confirm that WLFN Legal Counsel has successfully downloaded the Environmental Impact Statement (EIS) document.										✓
December 12, 2022 Virtual Meeting	This meeting between representative of Wolfe Lake FN (including the chief and legal counsel) and CNL (NPD project staff, NSDF project staff, ERM Stakeholder Relations, CNL legal counsel and Director of Indigenous Relations) to discuss Federal Environmental Assessments for NSDF and NPD. CNL and WLFN also discussed a Contribution Agreement.										✓
December 13, 2022 Incoming Email	This email from the WLFN Legal Counsel to a CNL Senior Communications Officer requesting CNL provides WLFN with the other third-party environmental reviews.										✓
December 15, 2022 Outgoing Email	This email from a CNL Senior Communications Officer to WLFN Legal Counsel containing links to third-party environmental reviews.										✓
December 16, 2022 Incoming Email	This email from the WLFN Legal Counsel to CNL containing quotes for the draft budget in the Capacity Funding Agreement.										✓
December 16, 2022 Outgoing Email	This email from CNL Legal Counsel to WLFN Legal Counsel containing comments for consideration on the draft Capacity Funding Agreement.										✓
December 20, 2022 Incoming Email	This email from WLFN Legal Counsel to CNL Legal Counsel confirming there are no further comments on the draft Capacity Funding Agreement so CNL can proceed with signatures and finalization of the document before office holiday closure.										✓

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
December 20, 2022 Outgoing Email	This email from CNL Legal Counsel to WLFN Legal Counsel confirming there will be no further comments at this time for the draft Capacity Funding Agreement.										√
December 20, 2022 Incoming Email	This email from the WLFN Legal Counsel to CNL Legal Counsel containing a copy of the Capacity Funding Agreement signed by the Wolf Lake First Nation Chief.										√
December 20, 2022 Outgoing Email	This email from CNL Legal Counsel to WLFN Legal Counsel requesting the documents used to create the execution version of the Capacity Funding Agreement.										√
December 20, 2022 Incoming Email	This email from the WLFN Legal Counsel to CNL containing the documents requested by CNL in an earlier email on 2022 December 20.										√
December 21, 2022 Outgoing Email	This email from CNL Legal Counsel to WLFN Legal Counsel with an attached copy of the fully executed Capacity Funding Agreement between Wolf Lake First Nation and CNL.										√
December 20, 2022 Incoming Email	This email from WLFN Legal Counsel to CNL legal counsel confirming receipt of the fully executed copy of the Capacity Funding Agreement between Wolf Lake First Nation and CNL.										√
January 17, 2023 Incoming Email	This email from WLFN Legal Counsel to a Communications Officer at CNL and confirming the submission date of 2023 January 20 for comments on the Environmental Impact Statement (EIS) for the NPD Closure Project.										√
January 18, 2023 Outgoing Email	This email from CNL Senior Communications Officer to WLFN Legal Counsel confirming the decision to postpone the NPD Environmental Impact Statement (EIS) submission and provided a new date of 2023 May.										√
January 18, 2023 Incoming Email	This email from the WLFN Legal Counsel to a CNL Senior Communications Officer requesting additional time to further refine its submission of the NPD EIS.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
January 18, 2023 Outgoing Email	This email from a CNL Senior Communications Officer to WLFN Legal Counsel suggesting a feedback submission for the end of February 2023 in the interest of working together for the 2023 May submission.										√
January 18, 2023 Incoming Email	This email from WLFN Legal Counsel to CNL Communications Officer confirming a date of 28 February 2023 to submit any feedback on the Environmental Impact Statement (EIS).										√
January 18, 2023 Outgoing Email	This email from CNL to Senior Communications Officer to WLFN Legal Counsel suggesting a feedback submission for the end of 2023 February in the interest of working together for the 2023 May submission.										√
January 20, 2023 Outgoing Email	This email from CNL Communications Officer to WLFN Legal Counsel to inform of the decision to postpone the submission of the NPD Closure Project’s draft Environmental Impact Statement (EIS) until 2023 May to allow for additional Indigenous input. CNL proposed the next step would be receiving the EIS comments in February 2023.										√
January 28, 2023 Emails between WLFN and CNL (2 emails)	This email from WLFN Legal Counsel to CNL in follow-up and response to the email sent from CNL to WLFN on 2023 January 18. WLFN emailed CNL with a request to extend the submission date of the Wolf Lake First Nation’s submissions on the EIS for the NPD Closure Project to 2023 March 02. CNL confirmed that a submission date of 2023 March 08 is acceptable.										√
March 03, 2023 Incoming Email	This email from WLFN Legal Counsel to a CNL Senior Communications Officer indicating that they will deliver the Wolf Lake FN submission to CNL on 2023 March 08 instead of 2023 March 02.										√
March 08, 2023 Incoming Email	This email from WLFN’s Legal Counsel to a CNL Senior Communications Officer providing Wolf Lake’s final submission on the NPD Closure Project EIS. CNL confirmed receipt.	√	√	√	√	√	√	√	√	√	√
March 14, 2023 Outgoing Email	This email from a CNL Senior Communications Officer to WLFN’s Chief sharing CNL’s Indigenous Relations Procurement Strategy.										√
March 22, 2023 Outgoing Email	Emails between CNL and WLFN concerning WLFN comments on the Near Surface Disposal Facility (NSDF) project and NPD Closure project Environmental Impact Statements (EIS). CNL requested a meeting virtually to discuss the next steps for each of the two projects before the 2023 July Environmental Impact Statement draft submission date.										√
April 13, 2023 Outgoing Email	This email from CNL Senior Communications Officer to WLFN looking to follow up on an email sent on 2023 March 22, to possibly coordinate a time to meet virtually.										√

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
April 13, 2023 Emails between CNL and WLFN (3 Emails)	Emails between CNL Senior Communications Officer and WLFN concerning an upcoming virtual meeting and questions regarding CNL's capacity to cover these types of meetings under the capacity agreement.										√
May 04, 2023 Outgoing Email	These emails between CNL Senior Communication Officer and WLFN concerning an upcoming in-person meeting to be held at Wolf Lake or in Ottawa. CNL confirmed their interest in going to an in-person meeting in the community and wanted to confirm if Wolf Lake was interested in an NSDF and NPD update. Wolf Lake confirmed they would like to hear updates for both NSDF and NPD. CNL proposed possible dates in 2023 May.										√
May 16, 2023 Outgoing Email	This email from a CNL Senior Communication Officer to WLFN is to follow up on a previous email sent on 2023 May 04 concerning an upcoming in-person meeting to be held at Wolf Lake or in Ottawa and possible dates for the meeting.										√
June 07, 2023 Outgoing Email	This email from a CNL Communications Officer to WLFN providing responses to the comments and recommendations from WLFN on the EIS. CNL shared that they are looking to confirm that CNL accurately recorded the interests and concerns of WLFN related to the NPD Closure Project. CNL shared the current version of the WLFN Interests and Concerns Table (WLFN I&C) for WLFN verification. CNL also included a mapping table that indicates where/how the interest was received (WLFN Mapping). CNL requested WLFN verify its completeness and accuracy by 2023 June 20.	√	√	√	√	√	√	√	√	√	
June 29, 2023 Outgoing Email	This email from CNL Communications Officer to WLFN is to follow up on the email from CNL sent on 2023-06-06 to confirm with WLFN that CNL accurately recorded the interests and concerns of WLFN related to the NPD Closure Project.										√
July 20, 2023 Outgoing Email	This email from CNL Communications Officer to WLFN is to follow up on the email from CNL sent on 2023-06-06. CNL noted their continued interest in meeting with WLFN to discuss both the NSDF and NPD Closure projects.										√
October 17, 2023 Outgoing Email	This email from CNL Manager of Communications and Engagement to Wolf Lake FN is to provide an invite to the 2023 October 20 Career Fair being held In Pembroke										√

AA.2 **Wolf Lake First Nation (WLFN)-Mapping of Key Interests and Concerns**

Table AA.2 presents a mapping of how the key interests and concerns relate to detailed feedback and input from Wolf Lake First Nation (WLFN), up to March 2024.

Table AA.2 has 3 columns:

- Column 1 identifies the topic, i.e., the subject area the key interest(s) or concern(s) falls under.
- Column 2 presents a key interest or concern, why it is important to the Indigenous Nation, community or organization, and connects it to a project aspect or an Aboriginal or treaty right wherever possible. This may be a summary of multiple related interests or concerns that have been expressed by the Indigenous Nation, community or organization.
- Column 3 presents details of the key interest or concern that the Indigenous Nation, community or organization has identified formally in writing and/or verbally to CNL.

Topic	Project Aspects of Interest/Concern	Specific feedback provided by WLFN on this interest/concern
1. Aquatic Environment	(a) Importance of wetlands WLFN highlights that wetlands are significant in facilitating organic decay, filtration of water and contaminants and every effort should be made to not disturb them. Wetlands are connected to surface waters that are significant to WLFN, including the Ottawa River. This is a project-specific concern.	In their comments on the draft EIS, received March 2023, WLFN highlighted that the importance of wetlands cannot be overstated. They are significant in facilitating organic decay, filtration of water and contaminants and every effort should be made as to not disturb them. There are surface waters within their traditional territory that are significant to WLFN, including the Ottawa River. The water provides not only life, but the waterways were major transportation routes to visit family, access trade goods and resources.
2. Baseline Characterization	(a) Characterization of aquatic and terrestrial biota. It is important to WLFN that baseline conditions in the Ottawa River are accurate, well understood and protected in order to adequately assess potential impacts to WLFN rights and traditional land and resource uses. This is a project-specific concern.	In their comments on the draft EIS, received March 2023, WLFN requested that CNL include fish tissue sampling within their monitoring programs. WLFN was concerned that proper baseline studies of contaminants in the Ottawa River be completed.
2. Baseline Characterization	(b) Contamination of the aquatic environment WLFN is concerned about radioactivity/bioaccumulation of radionuclides in fish and within the plant communities in the near shore of the Ottawa River. An education and awareness strategy would help achieve greater understanding of baseline values for the NPD site. This is a project-specific concern.	In their comments on the draft EIS, received March 2023, WLFN recommended that CNL and WLFN build on an education and awareness strategy aimed at mutual understating of baseline values for radioactivity/bioaccumulation of radionuclides in fish, and within the plant communities in the near shore of the Ottawa River.
3. Engagement	(a) Long-term relationship building WLFN is concerned that the EIS assumes that Algonquin communities on the Quebec side of the river have a similar perspective to Ontario communities. WLFN is interested in obtaining capacity to support a long-term relationship with CNL. This is a project-specific concern.	In their comments on the draft EIS, received March 2023 WLFN was concerned with CNL’s statement that “the EIS assumes that Algonquin communities on the Quebec side of the river have a similar perspective”. WLFN commits to building a longer-term relationship with CNL provided that capacity resources are available. This is an important matter to WLFN, its citizens and CNL as engagement continues to expand.
3. Engagement	(b) Continued meaningful engagement using best practices. It is important to WLFN that its members be meaningfully engaged on the project, because the project is located within WLFN traditional territory This is a project-specific concern.	In their comments on the draft EIS, received March 2023 WLFN recommended CNL and WLFN continue to work on building a relationship founded on trust that ensures information, data, results, and findings are shared. Any anomalies or concerns will be discussed and remediated to ensure uncertainties are addressed.
4. Environmental Effects and Mitigations	(a) Accommodation and compensation measures WLFN are interested in discussing accommodations and compensatory measures with CNL in the event that WLFN’s valued components are found to be impacted by the proposed project. This is a project-specific concern.	In their comments on the draft EIS, received March 2023 WLFN requested support and funding for WLFN to complete a land use & occupancy study that would include their value components identified and further protect traditional, cultural and heritage sites for future generations. It is understood there will be overlapping values with other First Nations, and this can be key to identifying the significant and true value of the value components in question. WLFN is also interested to understand how First Nations are accommodated if values are impacted.
5. Impacts to Rights	(a) Concerns about assessment of impacts to rights and traditional land and resource use Fish and wildlife represent the expression of WLFN’s rights and their ability to exercise their Aboriginal right to hunt, fish, and trap. The ecosystem as a whole should be considered in making decisions that may potentially impact Aboriginal rights and lead to uncertainties and fear for using staple food sources. This is a project-specific concern.	In their comments on the draft EIS, received March 2023 WLFN expressed concern that Fish and Wildlife do not recognize borders and migrate through the lands and waters owned by CNL, which represent the expression on WLFN’s rights and their ability to exercise their Aboriginal right to hunt, fish, and trap. Traditional land use occurs on what are known by the federal and provincial governments as Crown Lands, or with permission, on privately owned land. The ecosystem as a whole should be considered in making decision that may potentially impact Aboriginal rights. Cumulative effects impact and impede on the exercising of rights by First Nations by affecting their staple food sources, following traditional teachings and leading to uncertainties, feeding fear- resulting in avoidance of the areas. Further, WLFN recommended that CNL and WLFN work together on measures that ensure impacts are not infringing the rights of WLFN; and impacts are minimized and WLFN’s interests accommodated. Measures are also required that consider cumulative impacts and ensure that they will not result in food security issues or concerns.

Topic	Project Aspects of Interest/Concern	Specific feedback provided by WLFN on this interest/concern
		Sufficient and continued resources are required to maintain a healthy way of life. There are concerns about contamination of the land, water, flora and fauna.
6. Long-term Safety	(a) Long-term site integrity WLFN is concerned about the long-term management and monitoring of legacy radioactive contamination sites such as NPD. WLFN is looking to ensure the vault safety and durability, as well as understand how the landscape will respond to external forces present a few thousand years after disposal. This is a project-specific concern.	In their comments on the draft EIS, received March 2023, WLFN expressed concern about long-term vault safety and durability. The facility should have a post closure environmental safety case that includes a detailed analysis and modelling of a geological environment that contemplates significant, ongoing, projected changes. There also needs to be an assessment of the human health and environmental impacts. WLFN is also concerned that there are significant geological processes interacting with the surface environment and the potential waste site. It is critical to understand the disposal system in terms of both short and long-term performance. WLFN suggests that understanding landscape responses to external forces and further research is needed to have a detailed model of the first few thousand years after disposal. This is significant to the long-term management of legacy radioactive contamination sites.
7. Monitoring	(a) Involvement in additional monitoring and information sharing WLFN are interested in being involved in follow up monitoring and sharing of reported results for the NPD Closure Project in order to minimize fear and uncertainty for those who may resume using the site for a range of uses in the future This is a project-specific concern.	In their comments on the draft EIS, received March 2023, WLFN highlighted that follow-up monitoring and sharing of reported results will be a key element in changing public perceptions. Uncertainties bring fear to people who are not aware or educated on this proposed project.
7. Monitoring	(b) Comprehensive baseline monitoring WLFN is interested in beginning an enhanced information sharing protocol to better understand the landscape from both world perspectives: "Western Science & Traditional Knowledge" to allow a more comprehensive baseline monitoring to take place for the NPD Closure Project. This is a project-specific concern.	In their comments on the draft EIS, received March 2023, WLFN recommended that CNL and WLFN develop an enhanced information sharing protocol to better understand the landscape from both world perspectives: "Western Science & Traditional Knowledge". This would allow a more comprehensive baseline monitoring to take place for the NPD Closure Project.
7. Monitoring	(c) Periodic review of the proposed NPD Closure Project every 5 years WLFN has requested to be included in a periodic review of the proposed project following the final closure- as part of the long-term relationship building. This will ensure that WLFN traditional territory is not negatively impacted, and that they uphold their sacred responsibility to Mother Earth and her gifts (the land, water, fish, wildlife, plants, trees), thus protecting the health and well-being of citizens and the environment that sustains them. This is a project-specific concern.	In their comments on the draft EIS, received March 2023, WLFN requested to be included in the periodic review, every 5 years, following the final closure- as part of the long-term relationship building. WLFN's primary concern is that their traditional territory is not negatively impacted, and that they uphold their sacred responsibility to Mother Earth and her gifts, (the land, water, fish, wildlife, plants, trees), thus protecting the health and well-being of citizens and the environment that sustains them. The citizens of WLFN have a connection with all the Algonquin Nations in both Ontario and Quebec.
8. National Policy	(a) Modernization of Canada's nuclear waste policy WLFN are of the view that the Auditor General's nuclear waste management audit and NRCAN's policy modernization process should conclude before the NPD facility is decommissioned. This concern is out of scope for the NPD Closure Project	In their comments on the draft EIS, received March 2023, WLFN requested that the Auditor General's nuclear waste management audit and NRCAN's policy modernization process should conclude before the NPD facility is decommissioned. Findings from the audit and hearings may help prevent the proposed project from becoming a financial and environmental disaster that has the potential to impact the Ottawa River and traditional territory of WLFN.

Topic	Project Aspects of Interest/Concern	Specific feedback provided by WLFN on this interest/concern
9. Protection of the Ottawa River	(a) Radioactive waste should not be present near the vicinity of water bodies, like the Ottawa River and St. Lawrence River Basin. WLFN is concerned about perceived contamination due to the project’s proximity to the Ottawa River, which has great importance to WLFN This is a project-specific and a broader concern.	In their comments on the draft EIS, received March 2023, WLFN requested that the principle of no radioactive waste near the vicinity of water bodies, like the Ottawa River and St. Lawrence River Basin be followed.
10. Technical	(a) WLFN is interested in knowing the point source for contamination exceedances in sediment This is a project-specific concern.	In their comments on the draft EIS, received March 2023, WLFN expressed concern with the recorded high concentration levels of several metals found in the sediment samples. The EIS identifies these levels as baseline conditions however WLFN remains concerned that this contamination is occurring from the NPD site. WLFN wishes to better understand where CNL believes this contamination occurred from, as the sediment contamination exceedances must have a point source?
10. Technical	(b) Emissions and discharges. It is important to WLFN that emissions to and contaminants within the atmospheric environment are properly assessed, and are mitigated and monitored as appropriate. This is a project-specific concern.	In their comments on the draft EIS, received March 2023, WLFN requested that reports from the air monitoring stations within the regional study area be shared with WLFN to demonstrate compliance with regulatory requirements and that there is no evidence of cumulative impacts that affects the traditional territory of WLFN.
10. Technical	(c) Transport of contaminants in groundwater WLFN is concerned about groundwater intrusion that will eventually saturate the grout and come in contact with contamination, and the dissolved contaminates will reach the Ottawa River. There are some uncertainties about the impacts to surface water quality. Long-term exposure to contaminants is unacceptable even in small doses that do not exceed the acceptance criteria. This is a project-specific concern.	In their comments on the draft EIS, received March 2023, WLFN expressed concern about the transport of contaminants through groundwater and ultimately to the Ottawa river. WLFN highlighted, that in relation to the vault, there will be groundwater intrusion that will eventually saturate the grout and come in contact with contamination, and the dissolved contaminants will reach the Ottawa River. When the vault is completely saturated with groundwater, the infrastructure will be compromised and will transport contaminated groundwater to the Ottawa River. Further WLFN has identified that long-term exposure to contaminants is unacceptable even in small doses that do not exceed the acceptance criteria.
11. Traditional Land and Resource Use and Cultural Impacts	(a) Safety of harvested and gathered foods WLFN are concerned about the accumulated effects and impacts to First Nations who are using the area for hunting and gathering during the postclosure period. This is a project-specific concern	In their comments on the draft EIS, received March 2023, WLFN recommended that CNL share the results and findings and ensure that citizen uncertainties are addressed through education and awareness that continues from generation to generation for an anticipated 550-year project life span. Further, WLFN recommended that CNL and WLFN work collaboratively to avoid and mitigate impacts to value components identified by WLFN.
11. Traditional Land and Resource Use and Cultural Impacts	(b) Impact of perceived contamination in the Ottawa River and the environment on the inherent and protected rights of WLFN citizens The NPD site is important to WLFN since its citizens use these lands and waters. WLFN traditional territory must be protected from legacy, present and future contamination. Perceived contamination plays a key role in the way First Nations practice harvesting activities that can influence the safety and acceptability of the proposed project. This is a project-specific concern.	In their comments on the draft EIS, received March 2023, WLFN identified that perceived contamination plays a key role in the way First Nations practice harvesting activities that can influence the safety and acceptability of the proposed project. WLFN is not certain that their traditional territory is protected from legacy, present and future contamination, which is impacting the way WLFN citizens are exercising their inherent and protected rights. Language used within the EIS does not make the First Nation confident that their traditional territory, and flora and fauna that is relied upon, is not going to be impacted. WLFN cannot positively support the project when statements like “reasonably achievable measures’ or “prevent or minimize harm to workers, the public and the environment” are being stated in the reports. These statements assume that impact or influence, that will or may occur, is acceptable provided it is in small doses.

Topic	Project Aspects of Interest/Concern	Specific feedback provided by WLFN on this interest/concern
		Further, the NPD Closure project is significant to WLFN. The proposed project is located on federally owned lands situated on the Ottawa River. Directly North and East across the River is Quebec that consists of gently rolling hills interspaced with many small lakes. WLFN citizens in both Ontario and Quebec use these lands and waters, which have the potential to be impacted by the proposed project. This is especially challenging for WLFN, given negotiations for their reserve land base have yet to be resolved. Despite no resolution in the negotiations, Canada continues to decide on projects that have the potential to contaminate the traditional territory of WLFN. Such conduct is not supportive of reconciliation efforts being promoted by both Federal and Provincial governments.
11. Traditional Land and Resource Use and Cultural Impacts	(c) Algonquin traditional knowledge should be collected and incorporated into the EIS WLFN is interested in documenting traditional knowledge, land use, occupancy, and values to demonstrate how the proposed project may impact WLFN’s land use, occupancy, rights, traditional food harvesting, and citizens. This includes collaborating to take an inventory of the areas of significance. This is important to WLFN citizens who historically and currently continue to use the lands and waters around the proposed NPD Closure Project and other CNL sites. This is a project-specific concern.	In their comments on the draft EIS, received March 2023, WLFN recommended that CNL support WLFN in completing a Diet and Harvesting Study that will look at the importance of traditional food harvesting and the way of life from WLFN’s perspective. Further, WLFN recommends using the same research parameters as WLFN’s previous Land Use Study which has specific community data standards that are kept consistent and can be used in future data sharing if required between Nations, and CNL. WLFN looks at potentially keeping the 50 km radius from the site of the proposed NPD Closure Project; including the Kichi-Sibi (Ottawa River) and a good representation for the Quebec region. WLFN does maintain land use, occupancy and values that are in both the provinces of Ontario and Quebec. WLFN has also recommended that CNL support WLFN in establishing a process that will document traditional knowledge, land use, occupancy, and values within a site radius to be determined by WLFN. WLFN citizens historically and currently continue to use the lands and waters around the proposed NPD Closure Project and other CNL sites. WLFN and CNL to collaborate and take an inventory of the areas of significance, use and occupancy, using a proximity of 50km. This study must be in line with data collected. Data sharing with and among First Nations in the future may be significant if rights are impacted by the project.
12. Valued Components	(a) Engagement, input and participation in VC selection WLFN requires the opportunity to provide values identified by the community. A priority concern is any potential changes in local fishery species as they are an important and significant indicator of understanding the potential and cumulative effects on inherent rights for harvesting natural resources, fish and wildlife species, and medicine. This is a project-specific concern.	In their comments on the draft EIS, received March 2023, WLFN highlighted that WLFN needs an opportunity to provide values identified by the community. Some values that are very similar have been identified by other First Nations. A priority concern is any potential changes in local fishery species; as they are an important and significant indicator of understanding the potential effects and cumulative effects on inherent and protected rights from the proposed NPD Closure Project. WLFN has also highlighted that First Nations have traditional harvesting, and intercommunity harvesting protocols that need to be taken into account. Many of the species at risk listed within the valued components have a connection to WLFN where knowledge and stories that reflect the natural operations of various ecosystems, are held.

AA.3 Wolf Lake First Nation (WLFN)-Summary of Interests and Concerns

Table AA.3 below summarizes the key interests and concerns that Wolf Lake First Nation (WLFN) raised on the NPD Closure Project, up to March 2024.

Table AA.3 has five columns:

- Column 1 identifies the topic, i.e., the subject area the key interest(s) or concern(s) falls under.
- Column 2 presents a key interest or concern, why it is important to the Indigenous Nation, community or organization, and connects it to a project aspect or an Aboriginal or treaty right wherever possible. This may be a summary of multiple related interests or concerns that have been expressed by the Indigenous Nation, community or organization.
- Column 3 summarizes CNL’s response or conclusions as well as CNL’s efforts to address this key interest or concern
- Column 4 identifies where in the EIS the key interest or concern is addressed, and whether any changes were made to the EIS in response to the interest/concern. If these changes resulted in a different outcome in the EIS, this is also discussed;

- Column 5 summarizes the “Status” of the key interest or concern and the anticipated Next Steps towards achieving resolution of the key interest or concern. Not all concerns can be quickly or easily resolved, as some concerns go beyond the scope of the EA process, or there may divergent perspectives on certain interests or concerns. Note: this column does not, unless specifically confirmed by the Indigenous Nation, community or organization, mean that they have verified that the interest or concern has been dealt with to their satisfaction.

Topic	Key Interests and Concerns	Response to the interest/concern	Changes to the EIS and/or EA process	Status of the Concern
1. Aquatic Environment	(a) Importance of wetlands WLFN highlights that wetlands are significant in facilitating organic decay, filtration of water and contaminants and every effort should be made to not disturb them. Wetlands are connected to surface waters that are significant to WLFN, including the Ottawa River. This is a project-specific concern.	<u>CNL Response</u> The potential for contamination to reach the Ottawa River is assessed in the EIS and is supported by detailed groundwater modelling and long term performance modelling for the proposed disposal facility. The groundwater source of the wetlands is not affected at all by groundwater from the NPD facility. Groundwater on the NPD site flows towards the Ottawa River, so groundwater that interacts with the NPD facility flows away from the wetlands onsite, towards the Ottawa River. The EIS predicts no effects to surface water (including the Ottawa River). To verify that the engineered barriers are performing as expected/designed, CNL will monitor groundwater. Groundwater wells will be located between the NPD facility and the Ottawa River in order to monitor groundwater quality after it interacts with the facility and before it reaches the Ottawa River. CNL will conduct monitoring for as long as necessary to verify the results of the assessment in the EIS. CNL is interested in engagement with WLFN to gain a greater understanding of their concerns about watershed sustainability related to the NPD Closure Project.	<u>Where is this topic discussed in the EIS?</u> Section 4.1 of the EIS highlights the in-design mitigation measures that act to isolate and contain the waste inventory within the proposed NPD Disposal Facility to ensure protection of the surrounding environment including the Ottawa River. Mitigation measures for the protection of surface water (Section 9.3.3.2) (including the Ottawa River) have been updated and expanded from the 2017 draft EIS. The EIS does not predict any adverse residual effects on the aquatic environment (Section 9.4.3.5) as a result of the NPD Closure Project. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback	<u>Status:</u> CNL received EIS comments and recommendations from WLFN on March 7, 2023. CNL sent responses to WLFN comments and recommendations and sent a draft I&C table (and mapping table) on June 7, 2023. No response has been received from WLFN. CNL has attempted to engage with the WLFN on multiple occasions through a variety of means (i.e., emails, letters, telephone, webinars, meetings). CNL remains committed to engagement with WLFN within CNL’s role as the project proponent to support WLFN’s meaningful participation in the EA process. <u>Next Steps:</u> CNL wishes to continue discussions with WLFN to better understand the community’s perspective, values, or concerns associated with the NPD site. CNL proposes to work together with WLFN to develop a work plan and capacity for future activities related to the NPD Closure Project.
2. Baseline Characterization	(a) Characterization of aquatic and terrestrial biota. It is important to WLFN that baseline conditions in the Ottawa River are accurate, well understood and protected in order to adequately assess potential impacts to WLFN rights and traditional land and resource uses. This is a project-specific concern.	<u>CNL Response</u> Species detected as part of baseline biodiversity surveys within a 200 m area beyond the perimeter of the project footprint have been included as Valued Components for the NPD Closure Project, and mitigation measures, including buffers, have been developed for protection. To supplement baseline data, a study of sediment, benthic invertebrates and fish habitat features was undertaken upstream, adjacent to and downstream of the NPD site in 2020. CNL is happy to provide the report to WLFN. The study determined that the Ottawa River benthic invertebrate community near the NPD site is healthy and typical of what is observed in many large, soft-bottomed, relatively deep river systems. This study can be repeated when decommissioning is complete, to verify if the project has had an impact. CNL is planning to regularly monitor the Ottawa River water quality before the project begins.	<u>Where is this topic discussed in the EIS?</u> Appendix B and Section 8.6 of the EIS indicate which species have been observed on the NPD site. Historic environmental monitoring is summarized in the description of the existing environment (Section 8) of the EIS. Specifically, EIS Sections 8.2 – Atmospheric Environment, 8.3 – Surface Water Environment, 8.5.6 – Groundwater Quality and 8.7 – Ambient Radioactivity. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback	<u>Status:</u> CNL received EIS comments and recommendations from WLFN on March 7, 2023. CNL sent responses to WLFN comments and recommendations and sent a draft I&C table (and mapping table) on June 7, 2023. No response has been received from WLFN. CNL has attempted to engage with the WLFN on multiple occasions through a variety of means (i.e., emails, letters, telephone, webinars, meetings). CNL remains committed to engagement with WLFN within CNL’s role as the project proponent to support WLFN’s meaningful participation in the EA process. <u>Next Steps:</u> CNL wishes to continue discussions with WLFN to better understand the community’s perspective, values, or concerns associated with the NPD site. CNL proposes to work together with WLFN to develop a

		CNL is willing to discuss fish tissue sampling with WLFN and review past studies of fish tissue in the NPD area.		work plan and capacity for future activities related to the NPD Closure Project.
2. Baseline Characterization	(b) Contamination of the aquatic environment WLFN is concerned about radioactivity/bioaccumulation of radionuclides in fish and within the plant communities in the near shore of the Ottawa River. An education and awareness strategy would help achieve greater understanding of baseline values for the NPD site. This is a project-specific concern.	In response to comments from Indigenous Nations, communities and organizations, CNL completed sediment and benthic invertebrate sampling and fish habitat surveys to establish the baseline for follow-up monitoring. CNL is happy to provide the report to WLFN. CNL is open and willing to work together with WLFN to build an education and awareness strategy aimed at mutual understanding of baseline values for the NPD site. <u>CNL Response:</u> To supplement baseline data, a study of sediment, benthic invertebrates and fish habitat features was undertaken upstream, adjacent to and downstream of the NPD site in 2020. The study determined that the Ottawa River benthic invertebrate community near the NPD site is healthy and typical of what is observed in many large, soft-bottomed, relatively deep river systems. This study can be repeated when decommissioning is complete, to verify if the project has had an impact. CNL is planning to regularly monitor the Ottawa River water quality before the project begins. CNL is willing to discuss fish tissue sampling with WLFN and review past studies of fish tissue in the NPD area. Species detected as part of baseline biodiversity surveys within a 200m area beyond the perimeter of the project footprint have been included as Valued Components for the NPD Closure Project, and mitigation measures, including buffers, have been developed for protection. As shown in the EIS, there are no adverse impacts from the project on the Ottawa River shoreline or on any fish, wildlife or plants within the riparian and aquatic ecosystems. CNL is continuing its efforts to address these concerns by involving the Indigenous Nations, communities and organizations in monitoring activities that will confirm the conclusions of the EIS. An Indigenous-driven monitoring program can help build confidence that the decommissioning strategy and mitigation measures are effective. The development of risk communication tools is also important to achieve a greater understanding of the NPD Closure Project.	<u>Where is this topic discussed in the EIS?</u> Appendix B and Section 8.6 of the EIS indicate which species have been observed on the NPD site. Historic environmental monitoring is summarized in the description of the existing environment (Section 8) of the EIS. Specifically, EIS Sections 8.2 – Atmospheric Environment, 8.3 – Surface Water Environment, 8.5.6 – Groundwater Quality and 8.7 – Ambient Radioactivity. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback.	<u>Status:</u> CNL received EIS comments and recommendations from WLFN on March 7, 2023. CNL sent responses to WLFN comments and recommendations and sent a draft I&C table (and mapping table) on June 7, 2023. No response has been received from WLFN. CNL has attempted to engage with the WLFN on multiple occasions through a variety of means (i.e., emails, letters, telephone, webinars, meetings). CNL remains committed to engagement with WLFN within CNL’s role as the project proponent to support WLFN’s meaningful participation in the EA process. <u>Next Steps:</u> CNL wishes to continue discussions with WLFN to better understand the community’s perspective, values, or concerns associated with the NPD site. CNL proposes to work together with WLFN to develop a work plan and capacity for future activities related to the NPD Closure Project.
3. Engagement	(a) Long-term relationship building WLFN is concerned that the EIS assumes that Algonquin communities on the Quebec side of the river have a	<u>Summary of Engagement:</u> In December 2022, WLFN requested to review the NPD EIS. On December 20, 2022, a Capacity Funding Agreement	<u>Where is this topic discussed in the EIS?</u> CNL presents its record of engagement with all Indigenous Nations, communities and organizations in	<u>Status:</u> CNL received EIS comments and recommendations from WLFN on March 7, 2023. CNL sent responses to

	similar perspective to Ontario communities. WLFN is interested in obtaining capacity to support a long-term relationship with CNL. This is a project-specific concern.	was signed by WLFN and CNL to support WLFN’s involvement in the Environmental Assessment (EA) process for the NPD Closure Project. In March 2023, WLFN provided their comments to CNL on the NPD EIS. <u>CNL Response</u> CNL is committed to collaborative, two-way engagement with the WLFN on the NPD Closure Project in the means that WLFN would like to be engaged. CNL has much to learn and hopes to build trust and seek guidance from WLFN. Through meaningful engagement activities, CNL is happy to share information, data, results, and findings, as well as discuss and address issues and concerns with WLFN. CNL has heard WLFN’s request to establish a longer-term relationship. As a starting point, CNL is very interested in working together with WLFN to develop a work plan and capacity for NPD specific activities.	Section 6.2.4 of the EIS. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback.	WLFN comments and recommendations and sent a draft I&C table (and mapping table) on June 7, 2023. No response has been received from WLFN. CNL has attempted to engage with the WLFN on multiple occasions through a variety of means (i.e., emails, letters, telephone, webinars, meetings). CNL remains committed to engagement with WLFN within CNL’s role as the project proponent to support WLFN’s meaningful participation in the EA process. <u>Next Steps:</u> CNL wishes to continue discussions with WLFN to better understand the community’s perspective, values, or concerns associated with the NPD site. CNL proposes to work together with WLFN to develop a work plan and capacity for future activities related to the NPD Closure Project.
3. Engagement	(b) Continued meaningful engagement using best practices. It is important to WLFN that its members be meaningfully engaged on the project, because the project is located within WLFN traditional territory This is a project-specific concern.	<u>Summary of Engagement:</u> In December 2022, WLFN requested to review the NPD EIS. On December 20, 2022, a Capacity Funding Agreement was signed by WLFN and CNL to support WLFN’s involvement in the EA process for the NPD Closure Project. In March 2023, WLFN provided their comments to CNL on the NPD EIS. An in-person discussion of WLFN recommendations is planned in community in 2023 June. <u>CNL Response</u> CNL is committed to collaborative, two-way engagement with the WLFN on the NPD Closure Project in the means that WLFN would like to be engaged. CNL has much to learn and hopes to build trust and seek guidance from WLFN. Through meaningful engagement activities, CNL is happy to share information, data, results, and findings, as well as discuss and address issues and concerns with WLFN.	<u>Where is this topic discussed in the EIS?</u> CNL presents its record of engagement with all Indigenous Nations, communities and organizations in Section 6.2.4 of the EIS. <u>What changes have been made (and where)?</u> Engagement activities with WLFN has been added to Section 6.2.4.17 of the EIS.	<u>Status:</u> CNL received EIS comments and recommendations from WLFN on March 7, 2023. CNL sent responses to WLFN comments and recommendations and sent a draft I&C table (and mapping table) on June 7, 2023. No response has been received from WLFN. CNL has attempted to engage with the WLFN on multiple occasions through a variety of means (i.e., emails, letters, telephone, webinars, meetings). CNL remains committed to engagement with WLFN within CNL’s role as the project proponent to support WLFN’s meaningful participation in the EA process. <u>Next Steps:</u> CNL wishes to continue discussions with WLFN to better understand the community’s perspective, values, or concerns associated with the NPD site. CNL proposes to work together with WLFN to develop a work plan and capacity for future activities related to the NPD Closure Project.
4. Environmental Effects and Mitigations	(a) Accommodation and compensation measures WLFN are interested in discussing accommodations and compensatory measures with CNL in the event that WLFN’s valued components are found to be impacted by the proposed project. This is a project-specific concern.	<u>CNL Response</u> CNL acknowledges WLFN’s concerns about the potential impacts on the rights of the WLFN to practice traditional activities on, and in the vicinity of, the NPD site. CNL recognizes that, while we don’t have the full historical records, we know that the NPD site was very likely established without consulting Indigenous peoples. As the	<u>Where is this topic discussed in the EIS?</u> CNL presents its record of engagement with all Indigenous Nations, communities and organizations in Section 6.2.4 of the EIS. The EIS includes a section on Indigenous engagement related to VC selection (Section 6.3.1.1) <u>What changes have been made (and where)?</u>	<u>Status:</u> CNL received EIS comments and recommendations from WLFN on March 7, 2023. CNL sent responses to WLFN comments and recommendations and sent a draft I&C table (and mapping table) on June 7, 2023. No response has been received from WLFN. CNL has attempted to engage with the WLFN on multiple

		licensee for AECL owned sites, CNL is working to understand all of the considerations around the future of the sites, including considerations for Indigenous consultations through engagements with Indigenous peoples. While we can't change the past, we can look forward and work to establish positive and mutually beneficial relationship with the WLFN. CNL stands by its conclusion that the project will not interfere with traditional activities or have a negative impact on the biological resources on which they are dependent. Ultimately, the decision of impacts to rights rests with the CNSC. If the CNSC finds any potential impacts to WLFN's Indigenous and/or treaty rights, CNL remains committed to understanding these rights and working collaboratively to ensure that they are appropriately mitigated to the greatest extent possible. CNL is very interested in continuing dialogue with the WLFN to foster a greater understanding of concerns on lost use and occupancy of the land. We look forward to continued engagement to enable the development of both project-specific and CNL commitments. CNL is very interested in working together with the WLFN to identify WLFN valued components and develop mitigation measures to address interests and concerns related to VCs.	No changes have been made to the EIS in response to this feedback.	occasions through a variety of means (i.e., emails, letters, telephone, webinars, meetings). CNL remains committed to engagement with WLFN within CNL's role as the project proponent to support WLFN's meaningful participation in the EA process. <u>Next Steps:</u> CNL wishes to continue discussions with WLFN to better understand the community's perspective, values, or concerns associated with the NPD site. CNL proposes to work together with WLFN to develop a work plan and capacity for future activities related to the NPD Closure Project.
5. Impacts to Rights	(a) Concerns about assessment of impacts to rights and traditional land and resource use Fish and wildlife represent the expression of WLFN's rights and their ability to exercise their Aboriginal right to hunt, fish, and trap. The ecosystem as a whole should be considered in making decisions that may potentially impact Aboriginal rights and lead to uncertainties and fear for using staple food sources. This is a project-specific concern.	As part of CNL's engagement activities, we seek to understand the interests and concerns of Indigenous Nations, communities and organizations while building awareness and understanding of NPD Closure Project activities. CNL seeks to develop a mutual understanding of the perceived effects of NPD Closure Project activities on the environment and any potential negative impacts on Aboriginal and/or treaty rights. This includes, but is not limited to, rights to trap, hunt, fish, gather, or harvest as well as the continuation and uninterrupted access to cultural and spiritual activities on the lands and waters. <u>CNL Response:</u> CNL acknowledges WLFN's concerns about assessment of impacts to rights and traditional land and resource use, driven by distrust in the safety of the land and water. CNL is open to increased engagement, education and participatory involvement in monitoring activities at its sites to address these concerns. The proposed NPD Closure Project has the potential to	<u>Where is this topic discussed in the EIS?</u> CNL presents its record of engagement with all Indigenous Nations, communities and organizations in Section 6.2.4 of the EIS. The EIS notes in Table 6.2-2 that the NPD site is located within the vicinity of known traditional territory. The EIS does not predict any adverse residual effects to traditional land and resource use (Section 9.9.3.5). <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback.	<u>Status:</u> CNL received EIS comments and recommendations from WLFN on March 7, 2023. CNL sent responses to WLFN comments and recommendations and sent a draft I&C table (and mapping table) on June 7, 2023. No response has been received from WLFN. CNL has attempted to engage with the WLFN on multiple occasions through a variety of means (i.e., emails, letters, telephone, webinars, meetings). CNL remains committed to engagement with WLFN within CNL's role as the project proponent to support WLFN's meaningful participation in the EA process. <u>Next Steps:</u> CNL wishes to continue discussions with WLFN to better understand the community's perspective, values, or concerns associated with the NPD site. CNL proposes to work together with WLFN to develop a work plan and capacity for future activities related to

		help reduce concerns of alienation and/or fears. The proposed project involves a long-term solution to ensure the waste that currently resides at the NPD site is effectively contained and isolated from the environment, ensuring public safety. This solution has the potential to result in additional lands being freed up for traditional harvest or other uses by Indigenous peoples or the public. CNL stands by its conclusion that the project will not interfere with traditional activities or have a negative impact on the biological resources on which they are dependent. Ultimately, the decision of impacts to rights rests with the CNSC. If the CNSC finds any potential impacts to WLFN’s Indigenous and/or treaty rights, CNL remains committed to understanding these rights and working collaboratively to ensure that they are appropriately mitigated to the greatest extent possible.		the NPD Closure Project.
6. Long-term Safety	(a) Long-term site integrity WLFN is concerned about the long-term management and monitoring of legacy radioactive contamination sites such as NPD. WLFN is looking to ensure the vault safety and durability, as well as understand how the landscape will respond to external forces present a few thousand years after disposal. This is a project-specific concern.	CNL is open and willing to discuss some of the geologic and site investigation undertaken to support the project during a dedicated meeting with WLFN. CNL is also willing to share the Geosynthesis report for the project. <u>CNL Response:</u> CNL acknowledges WLFN’s concerns about the long-term safety of the NPD site. CNL has assessed the probabilities and potential impacts of flooding, seismic activity, above-ground natural hazards and extreme temperature change through all project phases (Decommissioning Execution, Institutional Controls and Post-Institutional Controls), and has concluded that these events will have no undue effects on people or the environment around the site. CNL models several scenarios in its PostSA TSD which take into account how accidents and natural hazards could affect the facility. These scenarios are called disruptive events. One such case models severe erosion (flood) while another models extreme degradation of the facility (the concrete structure and the grout). In both of these cases the predicted doses to receptors are still well below the dose criterion. In 2018/19, CNL undertook a geoscientific fieldwork campaign to sample and characterize the bedrock around the NPD facility. The fieldwork included coring of 10 boreholes to a depth of 50 meters into bedrock and several overburden boreholes, with installation of wells for sampling and hydraulic property determinations. The Geoscientific Characterization Report was used to revise the Geosynthesis report and the various models (i.e.,	<u>Where is this topic discussed in the EIS?</u> Section 8.5 of the EIS presents the geological baseline data. Section 8.12 of the EIS discusses the relevant natural disasters to which NPD may be exposed. Section 9.14 of the EIS discusses the potential effects on the project of climate change, forest fires, floods, earthquakes, severe weather such as tornados, lightning strikes, ice storms, and changes to the Ottawa River. The follow-up monitoring program is described at a high level in Section 12 of the EIS, details of which derive from the development of the effluent, environment and groundwater draft follow-up monitoring plans. Additional details and a range of scenarios that encompass the potential impacts from extreme weather and natural hazards are examined in the DecomSA TSD and the PostSA TSD. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback.	<u>Status:</u> CNL received EIS comments and recommendations from WLFN on March 7, 2023. CNL sent responses to WLFN comments and recommendations and sent a draft I&C table (and mapping table) on June 7, 2023. No response has been received from WLFN. CNL has attempted to engage with the WLFN on multiple occasions through a variety of means (i.e., emails, letters, telephone, webinars, meetings). CNL remains committed to engagement with WLFN within CNL’s role as the project proponent to support WLFN’s meaningful participation in the EA process. <u>Next Steps:</u> CNL wishes to continue discussions with WLFN to better understand the community’s perspective, values, or concerns associated with the NPD site. CNL proposes to work together with WLFN to develop a work plan and capacity for future activities related to the NPD Closure Project.

		Groundwater Model, Resaturation Model). The results of these reports were incorporated into the PostSA TSD, enabling CNL to assess potential effects to valued components (VC) in the aquatic and terrestrial ecosystems. The additional field investigations and updated models support the conclusion that the NPD Closure Project is protective of human health and the environment. CNL acknowledges that, as the licensee, it is responsible for the long-term management of the site during the Institutional Controls period, which will last a minimum of 100 years and will be extended as long as is necessary to ensure protection of people and the environment. The EIS predicts no effects to surface water (including the Ottawa river); CNL will conduct monitoring for as long as necessary to verify the results of the assessment in the EIS.		
7. Monitoring	(a) Involvement in additional monitoring and information sharing WLFN are interested in being involved in follow up monitoring and sharing of reported results for the NPD Closure Project in order to minimize fear and uncertainty for those who may resume using the site for a range of uses in the future. This is a project-specific concern.	CNL is open and willing to have a dedicated discussion with WLFN on their desired level of involvement in monitoring. CNL is happy to share technical reports that are available for the project. <u>CNL Response:</u> CNL acknowledges WLFN’s concerns about the long-term safety of the NPD site and the potential impacts on the rights of the WLFN and other Indigenous Nations, communities and organizations to practice traditional activities around the NPD site. The PostSA TSD demonstrates that the impact beyond the Institutional Controls period on the public, Indigenous and the environment is negligible under all scenarios. The proposed NPD Closure Project has the potential to help reduce concerns of alienation and/or fears. The proposed project involves a long-term solution to ensure the waste that currently resides at the NPD site is effectively contained and isolated from the environment, ensuring public safety. This solution has the potential to result in additional lands being freed up for traditional harvest or other uses by Indigenous peoples or the public. At the project level, follow-up monitoring for the NPD Closure Project will include monitoring of environmental components critical to WLFN such as monitoring of surface water, groundwater and air quality. CNL will conduct monitoring for as long as necessary to verify the results of the assessment in the EIS. CNL is continuing its efforts to address these concerns by:	<u>Where is this topic discussed in the EIS?</u> CNL presents its record of engagement with all Indigenous Nations, communities and organizations in Section 6.2.4 of the EIS. The EIS does not predict any adverse residual effects to traditional land and resource use (Section 9.9.3.5). The follow-up monitoring program is described at a high level in Section 12 of the EIS, details of which derive from the development of the effluent, environment and groundwater draft follow-up monitoring plans. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback.	<u>Status:</u> CNL received EIS comments and recommendations from WLFN on March 07, 2023. CNL sent responses to WLFN comments and recommendations and sent a draft I&C table (and mapping table) on June 7, 2023. No response has been received from WLFN. CNL has attempted to engage with the WLFN on multiple occasions through a variety of means (i.e., emails, letters, telephone, webinars, meetings). CNL remains committed to engagement with WLFN within CNL’s role as the project proponent to support WLFN’s meaningful participation in the EA process. <u>Next Steps:</u> CNL wishes to continue discussions with WLFN to better understand the community’s perspective, values, or concerns associated with the NPD site. CNL proposes to work together with WLFN to develop a work plan and capacity for future activities related to the NPD Closure Project.

		(i) Involving Indigenous Nations, communities and organizations, in monitoring activities that will confirm the conclusions of the EIS. An Indigenous-driven monitoring program can help to reduce fear or anxiety associated with traditional uses occurring adjacent to and near CNL operated sites and build confidence that the decommissioning strategy and mitigation measures are effective. (ii) Developing an Indigenous-driven risk-informed communications program for the NPD Closure Project to promote understanding of the EIS results and to help alleviate the concerns related to negative perceptions and feelings of discomfort and concern.		
7. Monitoring	(b) Comprehensive baseline monitoring WLFN is interested in beginning an enhanced information sharing protocol to better understand the landscape from both world perspectives: "Western Science & Traditional Knowledge" to allow a more comprehensive baseline monitoring to take place for the NPD Closure Project. This is a project-specific concern.	In response to WLFN's EIS comments, CNL will share a link to the annual summary of environmental performance available on CNL's website. CNL would be pleased to share any other historic monitoring data as requested by WLFN. CNL is open and willing to work together with WLFN to incorporate Traditional Knowledge into its Western Science practices. <u>CNL Response:</u> CNL conducts a rigorous monitoring program and is committed to ensuring that the environment around the NPD site, including the Ottawa River, is protected. Monitoring of the environment (a) Ottawa River water: Radioactivity measured in the Ottawa River upstream and downstream of the NPD site are very low (<0.01% of the derived release limit). (b) Surface soil and Vegetation: Tritium in soil and vegetation on the NPD site is very low (< 0.01% of the derived release limit). The results demonstrate that the public and the environment around the NPD site continues to be protected. In addition to the CNL monitoring program, the CNSC leads an Independent Environmental Monitoring Program (IEMP) designed to verify that the public and the environment around licensed nuclear facilities are protected. As part of its IEMP, the CNSC samples and analyzes surface water upstream and downstream of the	<u>Where is this topic discussed in the EIS?</u> The follow-up monitoring program is described at a high level in Section 12 of the EIS, details of which derive from the development of the effluent, environment and groundwater draft follow-up monitoring plans. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback.	<u>Status:</u> CNL received EIS comments and recommendations from WLFN on March 7, 2023. CNL sent responses to WLFN comments and recommendations and sent a draft I&C table (and mapping table) on June 7, 2023. No response has been received from WLFN. CNL has attempted to engage with the WLFN on multiple occasions through a variety of means (i.e., emails, letters, telephone, webinars, meetings). CNL remains committed to engagement with WLFN within CNL's role as the project proponent to support WLFN's meaningful participation in the EA process. <u>Next Steps:</u> CNL wishes to continue discussions with WLFN to better understand the community's perspective, values, or concerns associated with the NPD site. CNL proposes to work together with WLFN to develop a work plan and capacity for future activities related to the NPD Closure Project.

		NPD site (including sampling for non-radiological parameters). The CNSC IEMP results confirm that the public and the environment around the NPD site are protected and that there are no expected health impacts.		
7. Monitoring	(c) Periodic review of the proposed NPD Closure Project every 5 years WLFN has requested to be included in a periodic review of the proposed project following the final closure- as part of the long-term relationship building. This will ensure that WLFN traditional territory is not negatively impacted, and that they uphold their sacred responsibility to Mother Earth and her gifts (the land, water, fish, wildlife, plants, trees), thus protecting the health and well-being of citizens and the environment that sustains them. This is a project-specific concern.	<u>CNL Response</u> CNL is open to working with WLFN to ensure WLFN involvement in reviewing the draft follow-up monitoring plans and recognizes how such a review can support long-term monitoring programs. CNL invites WLFN for further engagement with CNL on this topic. CNL is willing to involve WLFN and other Indigenous Nations, communities and organizations in the monitoring program, which will help ensure transparency and lend confidence to monitoring activities and results. The aim of monitoring activities are to confirm the accuracy of the EIS predictions around potential effects and develop mitigation measures as needed.	<u>Where is this topic discussed in the EIS?</u> The EIS update includes additional detail on the VC-related engagement process and how Indigenous interests have been incorporated into the VCs selected for the NPD Closure Project. Mitigation measures for Indigenous Land and Resource Use are presented in Section 9.9.3.2 and for Indigenous Socio-Economic and Health in Section 9.10.1.3.2. Section 12 of the EIS summarizes the follow-monitoring plans developed for the project. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback.	<u>Status:</u> CNL received EIS comments and recommendations from WLFN on March 7, 2023. CNL sent responses to WLFN comments and recommendations and sent a draft I&C table (and mapping table) on June 7, 2023. No response has been received from WLFN. CNL has attempted to engage with the WLFN on multiple occasions through a variety of means (i.e., emails, letters, telephone, webinars, meetings). CNL remains committed to engagement with WLFN within CNL’s role as the project proponent to support WLFN’s meaningful participation in the EA process. <u>Next Steps:</u> CNL wishes to continue discussions with WLFN to better understand the community’s perspective, values, or concerns associated with the NPD site. CNL proposes to work together with WLFN to develop a work plan and capacity for future activities related to the NPD Closure Project.
8. National Policy	(a) Modernization of Canada’s nuclear waste policy WLFN are of the view that the Auditor General’s nuclear waste management audit and NRCAN’s policy modernization process should conclude before the NPD facility is decommissioned. This concern is out of scope for the NPD Closure Project	<u>CNL Response:</u> This interest is generally beyond the scope of the project. The proposal to create a disposal facility on the NPD reactor site through in-situ decommissioning has been chosen as a safe and immediate decommissioning option for the NPD reactor with respect to the environment, workers and the public. It is important to highlight that this closure will reduce historic nuclear liabilities for Canada and, at the same time, reduce the footprint of the NPD site.	<u>Where is this topic discussed in the EIS?</u> Section 3.5 of the EIS summarizes the regulatory framework for the NPD Closure Project. Section 6.4 outlines CNL’s approach and commitment to reconciliation. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback.	<u>Status:</u> CNL received EIS comments and recommendations from WLFN on March 7, 2023. CNL sent responses to WLFN comments and recommendations and sent a draft I&C table (and mapping table) on June 7, 2023. No response has been received from WLFN. CNL has attempted to engage with the WLFN on multiple occasions through a variety of means (i.e., emails, letters, telephone, webinars, meetings). CNL remains committed to engagement with WLFN within CNL’s role as the project proponent to support WLFN’s meaningful participation in the EA process. <u>Next Steps:</u> CNL wishes to continue discussions with WLFN to better understand the community’s perspective, values, or concerns associated with the NPD site. CNL proposes to work together with WLFN to develop a work plan and capacity for future activities related to the NPD Closure Project.

9. Protection of the Ottawa River	(a) Radioactive waste should not be present near the vicinity of water bodies, like the Ottawa River and St. Lawrence River Basin. WLFN is concerned about perceived contamination due to the project's proximity to the Ottawa River, which has great importance to WLFN This is a project-specific and a broader concern.	<u>CNL Response:</u> The potential for contamination to reach the Ottawa River is assessed in the EIS and is supported by long term modelling and detailed groundwater modelling. The EIS predicts no effects to surface water (including the Ottawa river). CNL is open and willing to have a dedicated discussion with WLFN on its conclusion of no adverse impacts on the Ottawa River. CNL has added information to the EIS about the washout pit and historic water discharges from the wells area sump. Monitoring results capture the effects of historic activities. Groundwater modelling was conducted for the NPD site. The PostSA TSD incorporates the results of groundwater modelling and, where necessary, uses conservative assumptions, (e.g., the tile drains remain functional and serve as a faster pathway to the Ottawa River), and considers the tile drains to have failed (so that the facility resaturates more quickly). The PostSA concludes that no residual effects are expected from potential contaminant migration in groundwater. Follow up monitoring will be implemented to confirm the predictions presented in the EIS. To verify that the engineered barriers as a whole are performing as expected/designed, CNL will monitor groundwater. Groundwater wells will be located between the NPD facility and the Ottawa River in order to monitor groundwater quality after it interacts with the facility and before it reaches the Ottawa River.	<u>Where is this topic discussed in the EIS?</u> Section 8.5 of the EIS presents the geological baseline data. The follow-up monitoring program is described at a high level in Section 12 of the EIS, details of which derive from the development of the effluent, environment and groundwater draft follow-up monitoring plans. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback.	<u>Status:</u> CNL received EIS comments and recommendations from WLFN on March 07, 2023. CNL sent responses to WLFN comments and recommendations and sent a draft I&C table (and mapping table) on June 7, 2023. No response has been received from WLFN. CNL has attempted to engage with the WLFN on multiple occasions through a variety of means (i.e., emails, letters, telephone, webinars, meetings). CNL remains committed to engagement with WLFN within CNL's role as the project proponent to support WLFN's meaningful participation in the EA process. <u>Next Steps:</u> CNL wishes to continue discussions with WLFN to better understand the community's perspective, values, or concerns associated with the NPD site. CNL proposes to work together with WLFN to develop a work plan and capacity for future activities related to the NPD Closure Project.
10. Technical	(a) WLFN is interested in knowing the point source for contamination exceedances in sediment This is a project-specific concern.	In response to WLFN's EIS comments, CNL will share a link to the annual summary of environmental performance available on CNL's website. CNL would be pleased to share any other historic monitoring data as requested by WLFN. However, CNL notes that impacts from past operations are out of scope of this EA. <u>CNL Response:</u> CNL conducts a rigorous monitoring program and is committed to ensuring that the environment around the NPD site, including the Ottawa River, is protected. The results demonstrate that the public and the environment around the NPD site continues to be protected. In addition to the CNL monitoring program, the CNSC leads an Independent Environmental Monitoring Program (IEMP) designed to verify that the public and the	<u>Where is this topic discussed in the EIS?</u> Historic environmental monitoring is summarized in the description of the existing environment (Section 8) of the EIS. Specifically, Sections 8.2 – Atmospheric Environment, 8.3 – Surface Water Environment, 8.5.6 – Groundwater Quality and 8.7 – Ambient Radioactivity. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback.	<u>Status:</u> CNL received EIS comments and recommendations from WLFN on March 7, 2023. CNL sent responses to WLFN comments and recommendations and sent a draft I&C table (and mapping table) on June 7, 2023. No response has been received from WLFN. CNL has attempted to engage with the WLFN on multiple occasions through a variety of means (i.e., emails, letters, telephone, webinars, meetings). CNL remains committed to engagement with WLFN within CNL's role as the project proponent to support WLFN's meaningful participation in the EA process. <u>Next Steps:</u>

		environment around licensed nuclear facilities are protected. As part of its IEMP, the CNSC samples and analyzes surface water upstream and downstream of the NPD site (including sampling for non-radiological parameters). The CNSC IEMP results confirm that the public and the environment around the NPD site are protected and that there are no expected health impacts.		CNL wishes to continue discussions with WLFN to better understand the community's perspective, values, or concerns associated with the NPD site. CNL proposes to work together with WLFN to develop a work plan and capacity for future activities related to the NPD Closure Project.
10. Technical	(b) Emissions and discharges. It is important to WLFN that emissions to and contaminants within the atmospheric environment are properly assessed, and are mitigated and monitored as appropriate. This is a project-specific concern.	In response to WLFN's EIS comments, CNL will share a link to the annual summary of environmental performance available on CNL's website. CNL would be pleased to share any other historic monitoring data as requested by WLFN. <u>CNL Response:</u> CNL conducts a rigorous monitoring program and is committed to ensuring that the environment around the NPD site, including the Ottawa River, is protected. The results demonstrate that the public and the environment around the NPD site continues to be protected. Air releases of substances that will not be removed from the facility prior to decommissioning are assessed in the DecomSA TSD and are below relevant criteria. Monitoring of the environment (a) Ottawa River water: Radioactivity measured in the Ottawa River upstream and downstream of the NPD site are very low (<0.01% of the derived release limit). (b) Surface soil and Vegetation: Tritium in soil and vegetation on the NPD site is very low (< 0.01% of the derived release limit). In addition to the CNL monitoring program, the CNSC leads an Independent Environmental Monitoring Program (IEMP) designed to verify that the public and the environment around licensed nuclear facilities are protected. As part of its IEMP, the CNSC samples and analyzes surface water upstream and downstream of the NPD site (including sampling for non-radiological parameters). The CNSC IEMP results confirm that the public and the environment around the NPD site are protected and that there are no expected health impacts. The EIS does not predict any adverse residual effects on the aquatic or terrestrial environment as a result of potential emissions during the NPD Closure Project.	<u>Where is this topic discussed in the EIS?</u> The follow-up monitoring program is described at a high level in Section 12 of the EIS, details of which derive from the development of the effluent, environment and groundwater draft follow-up monitoring plans. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback.	<u>Status:</u> CNL received EIS comments and recommendations from WLFN on March 7, 2023. CNL sent responses to WLFN comments and recommendations and sent a draft I&C table (and mapping table) on June 7, 2023. No response has been received from WLFN. CNL has attempted to engage with the WLFN on multiple occasions through a variety of means (i.e., emails, letters, telephone, webinars, meetings). CNL remains committed to engagement with WLFN within CNL's role as the project proponent to support WLFN's meaningful participation in the EA process. <u>Next Steps:</u> CNL wishes to continue discussions with WLFN to better understand the community's perspective, values, or concerns associated with the NPD site. CNL proposes to work together with WLFN to develop a work plan and capacity for future activities related to the NPD Closure Project.
10. Technical	(c) Transport of contaminants in groundwater WLFN is concerned about groundwater intrusion that	<u>CNL Response</u> The potential for contamination to reach the Ottawa River	<u>Where is this topic discussed in the EIS?</u> Section 4.1 of the EIS highlights the in-design mitigation	<u>Status:</u> CNL received EIS comments and recommendations

	will eventually saturate the grout and come in contact with contamination, and the dissolved contaminants will reach the Ottawa River. There are some uncertainties about the impacts to surface water quality. Long-term exposure to contaminants is unacceptable even in small doses that do not exceed the acceptance criteria. This is a project-specific concern.	is assessed in the EIS and is supported by long term modelling and detailed groundwater modelling. The EIS predicts no effects to surface water (including the Ottawa river) and follow up monitoring will be implemented to confirm these predictions. Groundwater modelling was conducted for the NPD site. The PostSA TSD incorporates the results of groundwater modelling and, where necessary, uses conservative assumptions, (e.g., the tile drains remain functional and serve as a faster pathway to the Ottawa River), and considers the tile drains to have failed (so that the facility resaturates more quickly). The PostSA concludes that no residual effects are expected from potential contaminant migration in groundwater. The tile drain system is expected to fail at some point during the Institutional Controls phase. To verify that the engineered barriers as a whole are performing as expected/designed, CNL will monitor groundwater. Groundwater wells will be located between the NPD facility and the Ottawa River in order to monitor groundwater quality after it interacts with the facility and before it reaches the Ottawa River.	measures that act to isolate and contain the waste inventory within the NPD Disposal Facility to ensure protection of the surrounding environment, including the Ottawa River. Section 4.3 of the EIS describes the project activities and presents CNL's plans with respect to surface drainage. Section 4.5 of the EIS describes CNL's plans for handling project-related liquid releases. Sections 9.3 and 9.5 of the EIS presents the assessment of potential impacts to surface water and groundwater respectively. Mitigation measures for the protection of surface water and groundwater are provided, including CNL's process for non-routine discharges. No un-assessed liquid effluent releases are permitted. The EIS does not predict any adverse residual effects on the surface water or groundwater environments. Section 12 of the EIS summarizes the Monitoring Plans developed for the project. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback	from WLFN on March 7, 2023. CNL sent responses to WLFN comments and recommendations and sent a draft I&C table (and mapping table) on June 7, 2023. No response has been received from WLFN. CNL has attempted to engage with the WLFN on multiple occasions through a variety of means (i.e., emails, letters, telephone, webinars, meetings). CNL remains committed to engagement with WLFN within CNL's role as the project proponent to support WLFN's meaningful participation in the EA process. <u>Next Steps:</u> CNL wishes to continue discussions with WLFN to better understand the community's perspective, values, or concerns associated with the NPD site. CNL proposes to work together with WLFN to develop a work plan and capacity for future activities related to the NPD Closure Project.
11. Traditional Land and Resource Use and Cultural Impacts	(a) Safety of harvested and gathered foods WLFN are concerned about the accumulated effects and impacts to First Nations who are using the area for hunting and gathering during the postclosure period. This is a project-specific concern	<u>CNL Response</u> CNL acknowledges WLFN's concern about the effects on the Kichi-Sibi and NPD site from various activities in the past, present and future. CNL has assessed potential effects related to the safety of harvesting and consuming local foods, and no significant adverse effects were identified in the assessment. CNL suggests a dedicated conversation to review the Indigenous receptor evaluated as part of the EA for the project.	<u>Where is this topic discussed in the EIS?</u> The EIS presents the PostSA results for the Indigenous receptor group in Section 9.10.2 . Section 9.13 of the EIS describes the process for evaluating cumulative effects and presents CNL's assessment of cumulative effects for the NPD Closure Project. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback.	<u>Status:</u> CNL received EIS comments and recommendations from WLFN on March 7, 2023. CNL sent responses to WLFN comments and recommendations and sent a draft I&C table (and mapping table) on June 7, 2023. No response has been received from WLFN. CNL has attempted to engage with the WLFN on multiple occasions through a variety of means (i.e., emails, letters, telephone, webinars, meetings). CNL remains committed to engagement with WLFN within CNL's role as the project proponent to support WLFN's meaningful participation in the EA process. <u>Next Steps:</u> CNL wishes to continue discussions with WLFN to better understand the community's perspective, values, or concerns associated with the NPD site. CNL proposes to work together with WLFN to develop a work plan and capacity for future activities related to the NPD Closure Project.
11. Traditional Land and Resource Use	(b) Impact of perceived contamination in the Ottawa River and the environment on the inherent and protected rights of WLFN citizens	<u>Summary of Engagement:</u> In December 2022, WLFN requested to review the NPD EIS, and a meeting was held to discuss drafting a	<u>Where is this topic discussed in the EIS?</u> Section 3.5 of the EIS summarizes the regulatory framework for the NPD Closure Project. Section 6.4	<u>Status:</u> CNL received EIS comments and recommendations from WLFN on March 7, 2023. CNL sent responses to

and Cultural Impacts	The NPD site is important to WLFN since its citizens use these lands and waters. WLFN traditional territory must be protected from legacy, present and future contamination. Perceived contamination plays a key role in the way First Nations practice harvesting activities that can influence the safety and acceptability of the proposed project. This is a project-specific concern.	Contribution Agreement for WLFN’s involvement in the EA process for the NPD Closure Project. On December 20, 2022, a Capacity Funding Agreement was signed by WLFN and CNL. In March 2023, WLFN provided their comments to CNL on the NPD EIS. <u>CNL Response</u> CNL acknowledges WLFN’s concerns about perceived effects from the NPD site. CNL has assessed potential nuisance effects related to dust and noise, loss of connection to the land, safety of harvesting and consuming local foods, and changes to access to the land; no significant adverse effects were identified in the assessment. The potential for contamination to reach the Ottawa river is assessed in the EIS and is supported by long term modelling and detailed groundwater modelling. The EIS predicts no effects to surface water (including the Ottawa river) and follow up monitoring will be implemented to confirm these predictions. CNL stands by its conclusion that the project will not interfere with traditional activities nor impact biological resources upon which they are dependent. The EIS and supporting studies have assumed that traditional uses do occur adjacent to the NPD site, whether on the Ottawa River or outside the restricted/fenced area. CNL has also assumed that in the future there is an interest to re-establish traditional use activities on the NPD site. CNL is attempting to address these concerns by: (i) Involving the Indigenous Nations, communities and organizations in monitoring activities that will confirm the conclusions of the EIS and that the decommissioning strategy and mitigation measures are effective; and (ii) Developing an Indigenous-driven risk-informed communications program for the NPD Closure Project, to promote understanding of the EIS results, and to help alleviate the concerns related to negative perceptions and feelings of discomfort and concern. CNL is committed to building positive long-term relationships with Indigenous Nations and communities	outlines CNL’s approach and commitment to reconciliation. Section 4.1 of the EIS highlights the in-design mitigation measures that act to isolate and contain the waste inventory within the NPD Disposal Facility to ensure protection of the surrounding environment, including the Ottawa River. CNL presents its record of engagement with all Indigenous Nations, communities and organizations in Section 6.2.4 of the EIS. Section 8.9 of the EIS presents information about traditional land and resource use. Section 9.9 of the EIS assesses risk to traditional land and resource use VCs. The EIS discusses concerns about potential loss of connection to land and water (e.g., feeling of discomfort or concern), and loss of land and water use in Section 9.9.5. The follow-up monitoring program is described at a high level in Section 12 of the EIS. <u>What changes have been made (and where)?</u> Engagement activities with WLFN has been added to Section 6.2.4 of the EIS.	WLFN comments and recommendations and sent a draft I&C table (and mapping table) on June 7, 2023. No response has been received from WLFN. CNL has attempted to engage with the WLFN on multiple occasions through a variety of means (i.e., emails, letters, telephone, webinars, meetings). CNL remains committed to engagement with WLFN within CNL’s role as the project proponent to support WLFN’s meaningful participation in the EA process. <u>Next Steps:</u> CNL wishes to continue discussions with WLFN to better understand the community’s perspective, values, or concerns associated with the NPD site. CNL proposes to work together with WLFN to develop a work plan and capacity for future activities related to the NPD Closure Project.

		who have treaty and Aboriginal rights on the lands for the proposed NPD disposal facility, as well as working with other interested Indigenous Nations, communities and organizations. It is important to CNL that we continue our efforts to build a relationship with WLFN through meaningful engagement to address any potential issues and concerns on the proposed project.		
11. Traditional Land and Resource Use and Cultural Impacts	(c) Algonquin traditional knowledge should be collected and incorporated into the EIS WLFN is interested in documenting traditional knowledge, land use, occupancy, and values to demonstrate how the proposed project may impact WLFN's land use, occupancy, rights, traditional food harvesting, and citizens. This includes collaborating to take an inventory of the areas of significance. This is important to WLFN citizens who historically and currently continue to use the lands and waters around the proposed NPD Closure Project and other CNL sites. This is a project-specific concern.	<u>CNL Response</u> CNL agrees that traditional knowledge from WLFN and other Indigenous Nations, communities and organizations should be integrated into the EIS. The Near Surface Disposal Facility (NSDF) and NPD Projects have provided capacity to the Algonquin community closest to the NPD site (the AOPFN (AOPFN)). AOPFN also completed a Traditional Knowledge and Land Use Study (AKLUS) and a Culture and Rights Study. CNL is open and willing to discuss this topic further with WLFN to fully understand WLFN-specific interests. The EIS and supporting studies have assumed that traditional uses do occur adjacent to the NPD site, whether on the Ottawa River or outside the restricted/fenced area. CNL has also assumed that there will be future interest in re-establishing traditional use activities on the NPD site. CNL understands the importance of establishing a unique relationship with WLFN to ensure that they may bring forward any concerns or interest they have specific to the rights held collectively by the Nation. CNL is committed to building positive long-term relationships with Indigenous Nations and communities who have treaty and Aboriginal rights on the lands for the proposed NPD disposal facility, as well as working with other interested Indigenous Nations, communities and organizations.	<u>Where is this topic discussed in the EIS?</u> CNL presents its record of engagement with all Indigenous Nations, communities and organizations in Section 6.2.4 of the EIS. Appendix B and Section 8.6 of the EIS indicate which species have been observed on the NPD site. Section 8.9 of the EIS presents information about traditional land and resource use. Section 9.9 of the EIS assesses risk to traditional land and resource use VCs, including new VCs (Sections 6.3 and 9.9 of the EIS). <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback.	<u>Status:</u> CNL received EIS comments and recommendations from WLFN on March 7, 2023. CNL sent responses to WLFN comments and recommendations and sent a draft I&C table (and mapping table) on June 7, 2023. No response has been received from WLFN. CNL has attempted to engage with the WLFN on multiple occasions through a variety of means (i.e., emails, letters, telephone, webinars, meetings). CNL remains committed to engagement with WLFN within CNL's role as the project proponent to support WLFN's meaningful participation in the EA process. <u>Next Steps:</u> CNL wishes to continue discussions with WLFN to better understand the community's perspective, values, or concerns associated with the NPD site. CNL proposes to work together with WLFN to develop a work plan and capacity for future activities related to the NPD Closure Project.
12. Valued Components	(a) Engagement, input and participation in VC selection WLFN requires the opportunity to provide values identified by the community. A priority concern is any potential changes in local fishery species as they are an important and significant indicator of understanding the potential and cumulative effects on inherent rights for harvesting natural resources, fish and wildlife species, and medicine.	<u>CNL Response</u> CNL is open and willing to discuss capacity support and funding with WLFN to seek input on VCs and incorporate WLFN's VCs into the NPD Closure Project. The EIS outlines how Indigenous engagement and input has influenced the VCs used in the assessment. The EIS addressed potential effects to VCs in the aquatic environment. The assessment covered the aquatic VCs of interest to Indigenous Nations, communities and organizations, including the fish species identified during	<u>Where is this topic discussed in the EIS?</u> The EIS now includes a section on Indigenous engagement related to VC selection (Section 6.3.1.1) Section 4.1 of the EIS highlights the in-design mitigation measures that act to isolate and contain the waste inventory within the NPD Disposal Facility to ensure protection of the surrounding environment, including the aquatic environment. Section 9.3.3.2 of the EIS provides a series of mitigation measures focused on protection of surface water and	<u>Status:</u> CNL received EIS comments and recommendations from WLFN on March 7, 2023. CNL sent responses to WLFN comments and recommendations and sent a draft I&C table (and mapping table) on June 7, 2023. No response has been received from WLFN. CNL has attempted to engage with the WLFN on multiple occasions through a variety of means (i.e., emails, letters, telephone, webinars, meetings). CNL remains

	This is a project-specific concern.	Indigenous engagement activities. The assessment concluded that there are no adverse residual effects on the aquatic environment expected from the project. CNL is interested in working together with the WLFN to identify WLFN valued components, address interests and concerns related to VCs, and develop project commitments.	ultimately the aquatic environment. Mitigation measures for the protection of surface water have been updated and expanded from the 2017 draft EIS. The EIS does not predict any adverse residual effects on the aquatic environment (Section 9.4.3.5) as a result of the NPD Closure Project. <u>What changes have been made (and where)?</u> No changes have been made to the EIS in response to this feedback.	committed to engagement with WLFN within CNL’s role as the project proponent to support WLFN’s meaningful participation in the EA process. <u>Next Steps:</u> CNL wishes to continue discussions with WLFN to better understand the community’s perspective, values, or concerns associated with the NPD site. CNL proposes to work together with WLFN to develop a work plan and capacity for future activities related to the NPD Closure Project.

Appendix BB Timiskaming First Nation Record of Engagement

This appendix provides a complete record of all engagement between CNL and Timiskaming First Nation (a member nation of Algonquin Nation Secretariat) from June 2022 to March 2024 (Appendix BBBB.1). Communications with Timiskaming First Nation between June 2016 and June 2022 were via the Algonquin Nation Secretariat (Table Y.1). At the NSDF Project Hearing in 2022 June, CNL heard that the individual rights bearing communities needed to be engaged independently from the Algonquin Nation Secretariat, regarding CNL related projects and activities.

Table BB.1 includes the date and method of the communication / engagement, the topics discussed and participants. This table also highlights engagements where key EA topics were discussed. The key EA topics align with “Generic Guidelines for Preparation of an Environmental Impact Statement Pursuant to the Canadian Environmental Assessment Act, 2012” as well as the requirements of REGDOC 3.2.2 “Indigenous Engagement” and guidance specific to NPD provided by the CNSC in January 2021 (e-doc # 6467843).

BB.1 Record of Engagement-Timiskaming First Nation (TFN)-2023 January to 2024 March

Date/Method	Details	Key EA Topics									
		Baseline Conditions	Alternative Means	Project components and related activities	Effects assessment, incl. VC and spatial and temporal boundaries for the assessment	Impacts to rights	Proposed Mitigation Measures	Residual Effects	Follow-up Monitoring Program	Specific Interests and Concerns of the Community	General Communications
June 09, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the Timiskaming First Nation Chief offered to meet with TFN to discuss any concerns about the NSDF project or CNL’s other projects. This offer was a result of the of interest CNL heard from other communities associated with the Algonquin Nation Secretariat at the Canadian Nuclear Safety Commission for the hearing on Canadian Nuclear Laboratories’ (CNL’s) proposed Near Surface Disposal Facility (NSDF).										√
June 16, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the TFN General Director was to inquire who the appropriate contact was for TFN.										√
June 23, 2022 Outgoing email	This email from CNL’s Director of Indigenous Relations to the TFN Chief was to indicate CNL’s interest in meeting to share information on CNL’s activities and projects including the NPD project.										√
June 24, 2022 Outgoing email	This email from CNL’s Director of Indigenous Relations to an Algonquins of Barriere Lake consultant was to coordinate meetings with Algonquins of Barriere Lake, Timiskaming First Nation and Wolf Lake First Nation.										√
June 30, 2022 Incoming email	This email from an Algonquins of Barriere Lake consultant to CNL’s Director of Indigenous Relations suggested CNL contact the Chief and Council at TFN.										√
August 04, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the TFN Chief was a follow up and email sent to inquire if TFNL would be interested in meeting CNL to discuss CNL activities, including the NPD project.										√
October 03, 2022 Outgoing email	This letter addressed to the TFN’s Chief from CNL’s Director of Indigenous Relations provided a project update and the engagement status with the TFN, CNL noted that the next step is a meeting to discuss enabling capacity funding for TFN’s involvement in the NPD and NSDF projects.										√
October 26, 2022 Outgoing email	This email from a CNL Senior Communications Officer to the TFN Chief was to follow-up on the October 3, 2022 email.										√
January 20, 2023 Outgoing Email	This email from a CNL Communications Officer to TFN’s Chief to inform of the decision to postpone the submission of the NPD Closure Project’s draft EIS until 2023 May to allow for additional Indigenous input. CNL proposed the next step would be to discuss TFN’s interest and desired involvement in the NPD project.										√
March 14, 2023 Outgoing Email	This email from CNL Senior Communications Officer to TFN’s Chief sharing CNL’s Indigenous Relations Procurement Strategy.										√

September 20, 2023 Incoming Email	This email from ATFN Executive Secretary to CNL Indigenous Engagement Coordinator is to provide CNL with the new emails for the Chief and Vice Chief of Timiskaming First Nation Council										√
October 17, 2023 Outgoing Email	This email from CNL Indigenous Engagement Coordinator to ATFN is to provide an invite to the 2023 October 20 Career Fair being held In Pembroke.										√
October 19, 2023 Incoming Email	This email from ATFN Chief to CNL Indigenous Engagement Coordinator is to inform CNL of ATFN change in leadership. CNL thanks ATFN and noted looking forward to receiving ATFN feedback.										√