



Impact Assessment
Agency of Canada

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Agence d'évaluation
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March 20, 2026

Lucas King
Chief Executive Officer
Grand Council Treaty #3
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Lucas King:

Thank you for your letter of February 24, 2026 concerning the Grand Council Treaty #3's (GCT3) comments on the Nuclear Waste Management Organization's (NWMO) Initial Project Description for their proposed Deep Geological Repository Project (the Project) and the issuance of the Summary of Issues (SOI) by the Impact Assessment Agency of Canada (IAAC).

Following amendments to the *Impact Assessment Act* (IAA) in 2024, the legislation provides greater precision regarding the consideration of effects within areas of federal jurisdiction. As a result, IAAC has been refining key documents, including the SOI, to ensure they clearly identify the key themes of issues that are relevant to federal decision-making while referring the proponent to the full record of submissions from Indigenous Nations, communities, organizations, and the public that is maintained on the Canadian Impact Assessment Registry (the Registry).

These refinements are intended to support a more efficient and transparent assessment process while continuing to meet all obligations under the IAA, including the consideration of Indigenous rights, Indigenous knowledge, and concerns. The approach continues to maintain attention to the issues raised by Indigenous Nations, communities and organizations. To avoid any mischaracterization or misinterpretation of the issues and concerns raised, such as those provided by GCT3, Annex B provides direct links to the full submissions received from Indigenous Nations, communities and organizations for NWMO's consideration when developing their response to the SOI.

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NWMO's response to the SOI will support decision-making by IAAC on whether an impact assessment is required under section 16 of the IAA. IAAC has noted that GCT3 is of the opinion that an impact assessment is required for the Project. Under section 16 of the IAA, IAAC is only allowed to decide if an impact assessment is required after IAAC receives the Initial Project Description, publishes the SOI, and Response to the Summary of Issues. IAAC will make a determination as to whether the project requires an impact assessment shortly after receiving the Response to the Summary of Issues in accordance with the legislation.

If an impact assessment is required, the key issues outlined in the SOI and the NWMO's response will inform the scope of the impact assessment, and the continued development and finalization of the Integrated Tailored Impact Statement Guidelines (Integrated Guidelines) and plans, as appropriate. Information not provided in the Initial Project Description can be obtained by requiring it in the Integrated Guidelines, including the studies and analyses needed to assess the impacts of the project.

Within your letter, you also raised concerns related to site selection. However, site selection is not part of the impact assessment process for any project. Under the IAA, Part A (1) of Schedule 1 of the [Information and Management of Time Limits Regulations](#) requires all proponents to provide the proposed location of the project. The impact assessment will assess the technical, environmental, and social acceptability of the project in the proposed location.

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With regard to the issues GCT3 has raised concerning the implementation of the regulatory process, including the consideration of Manito Aki Inaakonigewin, I understand that some of these have been responded to through recent correspondence with IAAC. IAAC and the Canadian Nuclear Safety Commission remain available to continue meeting with you to understand how members of GCT3 would like to apply Manito Aki Inaakonignewin and explore how to support our respective processes unfolding in a harmonized manner. Please reach out to Kim Noble, Indigenous consultation manager for the project, to continue those discussions.

Sincerely,

<Original signed by>

Terence Hubbard (he/him, il)

c.c.: Ogichidaa Francis Kavanaugh, Grand Chief of the Anishinaabe Nation in Treaty #3
Laurie Swami, President and CEO, Nuclear Waste Management Organization