



2022 March 04

Mr. D. Saumure
Commission Registrar
Canadian Nuclear Safety Commission
280 Slater Street, P.O. Box 1046, Station B
Ottawa, Ontario, K1P 5S9

Dear Mr. Saumure,

ADDENDUM TO THE APPLICATION FOR RENEWAL OF THE PORT HOPE PROJECT WASTE NUCLEAR SUBSTANCE LICENCE WNSL-W1-2310.02/2022

The purpose of this letter is to submit an addendum to the application for licence renewal of the Canadian Nuclear Laboratories (CNL) *Port Hope Project Waste Nuclear Substance Licence WNSL-W1-2310.02/2022* (Port Hope WNSL) [1] that was previously submitted to the Commission Secretariat 2021 September 10 [2].

In the previous submission [2] CNL requested that the Commission, or a person authorized by the Commission, consolidate the Port Hope WNSL [1] and the *Port Granby Project Waste Nuclear Substance Licence WNSL-W1-2311.02/2021*¹ (Port Granby WNSL) [3] into one licence and extend the license period for a period of 10 years.

In addition to the consolidation of these two licences, CNL is also requesting that the following Port Hope project WNSL licences be also be considered for consolidation with both Port Hope and Port Granby WNSL [1] [3].

- WNSL-W1-182.1/2022 Pine Street Extension Temporary Storage Site [5]
- WNSL-W1-344-1.8/ind. Port Hope Radioactive Waste Management Facility [6]

The consolidation of the licences will reduce the administrative burden created by the presence of different licences for similar projects under the Port Hope Area Initiative (PHAI) portfolio, as well as contribute to transparency.

As part of the licence renewal application [2] CNL requested the Commission amend the current Port Hope WNSL clean-up criteria for arsenic and uranium as identified in Appendix C of the PH WNSL [1]. CNL is withdrawing the application to amend the cleanup criteria defined in the Port

¹ Port Granby Waste Nuclear Substance Licence WNSL-W1-2311.02/2021 has been replaced by WNSL-W1-2311.00/2022.[4]



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Hope WNSL, as result of information received from CNSC Staff and Health Canada on 2021 December 3 [7].

A concordance table is provided in Attachment A, providing the necessary updated information for the license amendment application, including requirements in section 24(2) of the *Nuclear Safety and Control Act* (NSCA), and sections 3, 5, 6, 7, 15 of the *General Nuclear Safety and Control Regulations* (GNSCR) and sections 3 and 14 of the *Nuclear Substances and Devices Regulations* (NSRDR). This updated information in Attachment A should be considered as additions to CNL's original concordance Table in Reference [2].

For ease of reference CNL has also included in Attachment B, the Radiation Protection Actions Levels, as defined by the Corporate Radiation Protection Action Levels [8], and the Port Hope Area Initiative Radiation Protection Plan [9].

Canadian Nuclear Laboratories looks forward to hearing from the Commission with respect to this application. In the interim, should you require any further information, please contact Sarah Brewer at 613-633-8271, or myself at 613-584-8811, extension 42408.

Sincerely,

Mark Hughey
General Manager
Historic Waste Program Management Office

Attachment (2)
Enclosures (2)

References

- [1] Canadian Nuclear Safety Commission, *Waste Nuclear Substance Licence - Port Hope Long-Term Low-Level Radioactive Waste Management Project*, WNSL-W1-2310.02/2022, Expiry Date: 2022 December 31.
- [2] Letter – M. Hughey (CNL) to M. Leblanc (CNSC) Application for Renewal of the PH Waste Nuclear Substance Licence WNSL-W1-2310.02/2022, 4501-CNNO-21-0030-L, 2021 September 10.
- [3] Canadian Nuclear Safety Commission, *Waste Nuclear Substance Licence - Port Granby Long-Term Low-Level Radioactive Waste Management Project*, WNSL-W1-2311.02/2021, Expiry Date: 2021 December 31.



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- [4] Canadian Nuclear Safety Commission, *Waste Nuclear Substance Licence - Port Granby Long-Term Low-Level Radioactive Waste Management Project*, WNSL-W1-2311.00/2022, Expiry Date: 2022 December 31
- [5] Canadian Nuclear Safety Commission, *Pine Street Extension Temporary Storage Site Waste Nuclear Substance Licence*, WNSL-W1-182.1/2021. Expiry Date: 2022 December 31.
- [6] Canadian Nuclear Safety Commission, *Port Hope Radioactive Waste Management Facility Waste Nuclear Substance Licence (WNSL-W1-344-1.8/ind.)*. Expiry Date: Indefinite.
- [7] Letter – R. Buhr (CNSC) to S. Morris (CNL) CNSC and HC Joint Assessment of A Review of Arsenic in Soil as Part of the Port Hope Area Initiative, 4501-NOCN-21-0030-L, 2021 December 06.
- [8] *Radiation Protection Action Levels*, 900-508740-LST-002, 2021 April 01.
- [9] *Port Hope Area Initiative Radiation Protection Plan*, 4500-508740-PLA-001, Revision 6, 2021 September 01.

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**Attachment A
Revised Concordance Table for Licence Renewal Application**

Section	Requirement	CNL Response
Nuclear Safety and Control Act		
24(2)	<p>The Commission may issue, renew, suspend in whole or in part, amend, revoke, or replace a licence on receipt of an application</p> <p>(a) in the prescribed form;</p>	<p>This attachment with the letter provides the information required by the NSCA (the Act) and the Regulations made pursuant to the Act and constitute, in part, an application by CNL to consolidate the following licenses :</p> <ul style="list-style-type: none"> • <i>Port Hope Long-Term Low-Level Radioactive Waste Management Project Waste Nuclear Substance Licence WNSL-W1-2310.02/2022 [A1]</i> • <i>Port Granby Project Waste Nuclear Substance Licence WNSL-W1-2311.02/2021 [A2]²</i> • <i>Pine Street Extension Temporary Storage Site WNSL-W1-182.1/2022 [A4]</i> • <i>Port Hope Radioactive Waste Management Facility WNSL-W1-344-1.8/ind. [A5]</i>
General Nuclear Safety and Control Regulations		
3	(b) the activity to be licensed and its purpose;	<p>As described in the existing Port Hope WNSL [A1], the Port Granby WNSL [A2], the Port Hope WNSL License Condition Handbook [A6] and Port Granby WNSL License Conditions Handbook [A7], both projects are divided into 3 phases. The activities to</p>

² Port Granby Waste Nuclear Substance Licence WNSL-W1-2311.02/2021 has been replaced by WNSL-W1-2311.00/2022 [A3].



Section	Requirement	CNL Response
		<p>be licensed are consistent with the existing defined licensed activities, specifically execution of Phase 2 and Phase 3 activities at both sites.</p>
3	<p>(f) any proposed action level for the purpose of Section 6 of the Radiation Protection Regulations;</p>	<p>The table of action levels is provided in the letter with this attachment. The Radiation Protection action levels for the Port Hope Project site are defined under the <i>PHAI RP Plan</i> [A8], inclusive of all licences to be consolidated as part of this application, and are consistent with the corporate documents [A9].</p>
3	<p>(g) the proposed measures to control access to the site of the activity to be licensed and the nuclear substance, prescribed equipment or prescribed information;</p>	<p>All Port Hope Project licences are subject to the <i>General Nuclear Safety and Control Regulations</i>. Security is ensured through implementation of the <i>PHAI Security Plan</i> [A10]. CNL is currently revising the <i>PHAI Security Plan</i> to include all sites identified in the licence application.</p>
3	<p>(1.1) (b) will, in carrying on that activity, make adequate provision for the protection of the environment, the health and safety of persons and the maintenance of national security and measures required to implement international obligations to which Canada has agreed.</p>	<p>In the previous submission, CNL provided the incorrect reference for CNL management system documentation in the area of Safeguards and Non-Proliferation. Provided below are the correct references.</p> <p>Safeguards and Non-Proliferation at the Port Hope Project is ensured through implementation of the Nuclear Materials and Safeguards Management Program [A11] [A12].</p>



Section	Requirement	CNL Response
Nuclear Substances and Devices Regulations		
3	(j) the proposed program to inform persons living in the vicinity of the site of the general nature and characteristics of the anticipated effects on the environment and the health and safety of persons that may result from the activity to be licensed; and	CNL has revised the Port Hope licence Public and Indigenous Engagement Strategies to be reflective of license consolidation and the updated documents included in this revised application [A13] [A14]. These strategies follow the PHAI Public Information and Disclosure Program and meet the requirements of REGDOC 3.2.2, Indigenous Engagement.
5	(b) a statement identifying the changes in the information that was previously submitted.	CNL is requesting consolidation of the following licenses : <ul style="list-style-type: none">• <i>Port Hope Long-Term Low-Level Radioactive Waste Management Project WNSL-W1-2310.02/2022 [A1],</i>• <i>Port Granby Project WNSL-W1-2311.02/2021 [A2]</i>• <i>Pine Street Extension Temporary Storage Site WNSL-W1-182.1/2022 [A3]</i>• <i>Port Hope Radioactive Waste Management Facility WNSL-W1-344-1.8/ind. into a single licence for the Port Hope Project [A4].</i>



**Attachment B
PHAI Action Levels (ALs) for Occupational Radiation Exposures of
Nuclear Energy Workers (NEW)**

Pathway	Dose (mSv)		
	Column 1	Column 2	Column 3
	Per four weeks or Monthly ³	Per thirteen weeks or Quarterly	Per Calendar Year
Effective Dose			
NEW	1	3	6
Pregnant NEW for the balance of pregnancy ⁴	0.3	0.5	1
Skin Dose			
NEW ⁵	1	3	6
Extremity Dose			
NEW	10	30	60
Committed Effective Dose			
NEW (Internal Exposure)	N/A ⁶	N/A	1

³ It is understood that some dosimetry providers provide “monthly” dosimetry instead of 4 weeks. For the purpose of ALs, a one month dosimetry period is considered to have the same AL as “per four week monitoring period”

⁴ ALs referred are effective dose limits to the pregnant worker. The balance of the pregnancy is defined as the time period from the moment the management is informed, in writing, of the pregnancy to the end of the pregnancy.

⁵ When skin is unevenly irradiated, the equivalent dose received by the skin is the average equivalent dose over the 1 cm² area that received the highest equivalent dose. When the contamination is relatively uniform over the skin the averaging area of 100 cm² may be used for operational convenience but not if it significantly lowers the average dose.

⁶ N/A – Not Applicable



Appendix References:

- [A1] Canadian Nuclear Safety Commission, *Waste Nuclear Substance Licence - Port Hope Long-Term Low-Level Radioactive Waste Management Project*, WNSL-W1-2310.02/2022, Expiry Date: 2022 December 31.
- [A2] Canadian Nuclear Safety Commission, *Waste Nuclear Substance Licence - Port Granby Long-Term Low-Level Radioactive Waste Management Project*, WNSL-W1-2311.02/2022, Expiry Date: 2021 December 31.
- [A3] Canadian Nuclear Safety Commission, *Waste Nuclear Substance Licence - Port Granby Long-Term Low-Level Radioactive Waste Management Project*, WNSL-W1-2311.00/2022, Expiry Date: 2022 December 31
- [A4] Canadian Nuclear Safety Commission, *Pine Street Extension Temporary Storage Site Waste Nuclear Substance Licence*, WNSL-W1-182.1/2021. Expiry Date: 2022 December 31.
- [A5] Canadian Nuclear Safety Commission, *Port Hope Radioactive Waste Management Facility Waste Nuclear Substance Licence (WNSL-W1-344-1.8/ind.)*. Expiry Date: Indefinite.
- [A6] Canadian Nuclear Safety Commission, *Port Hope Long-Term Low-Level Radioactive Waste Management - Licence Conditions Handbook*, WNSL-W1.2310.02/2022, Revision 0, 2014 December 04
- [A7] Canadian Nuclear Safety Commission, *Port Granby Long-Term Low-Level Radioactive Waste Management Project Licence Conditions Handbook*, WNSL-W1-LCH-2311, Revision 2, 2019 April 23
- [A8] *Port Hope Area Initiative Radiation Protection Plan*, 4500-508740-PLA-001, Revision 6, 2021 September 01.
- [A9] *Radiation Protection Action Levels*, 900-508740-LST-002, 2021 April 01.
- [A10] *Port Hope Area Initiative Security Plan*, 4500-508710-PLA-001, Revision 3, 2021 September 20.
- [A11] *Nuclear Materials and Safeguards Management Program Requirements Document*, 900-50510-PRD-001, Revision 3, 2021 June 10.
- [A12] *Nuclear Materials and Safeguards Management Program Description Document*, 900-508510-PDD-001, Revision 3, 2021 June 11.
- [A13] Port hope Licence Renewal Public Engagement Strategy – Application for Renewal of Port Hope Project Waste nuclear Substance Licence WNSL-W1-2310.02/2022, 236-10330-PLA-002, 2021 December 07.



[A14] Port Hope Licence Renewal Indigenous Engagement Strategy - Application for Renewal of Port Hope Project Waste nuclear Substance Licence WNSL-W1-2310.02/2022, 236-10330-PLA-002, 2021 December 07.

APPLICATION FOR RENEWAL OF PORT HOPE PROJECT WASTE NUCLEAR SUBSTANCE LICENCE WNSL-W1-2310.02/2022

PUBLIC ENGAGEMENT STRATEGY

The Port Hope Area Initiative sites and the Canadian Nuclear Laboratories Historic Waste Program Management Office are situated on the traditional land of Indigenous Peoples dating back countless generations. This land remains the home of the Métis and Anishinabek people, and is the Williams Treaties territory of the Mississauga of this region.

CNL is grateful to have the opportunity to work on these lands and near traditionally and culturally significant waterways, and offers respect to the First Peoples of the area.

1. PURPOSE

Canadian Nuclear Laboratories (CNL) has submitted a letter of intent to the Canadian Nuclear Safety Commission (CNSC) to apply for the renewal of the *Port Hope Project Waste Nuclear Substance Licence WNSL-W1-2310.02/2022* (Port Hope WNSL) for a term of 10 years. The current licence expires on 2022 December 31. In addition to the renewal of the Port Hope Licence, CNL is requesting a consolidation of the Port Hope WNSL and the *Port Granby Project Waste Nuclear Substance Licence WNSL-W1-2311.02/2021* (Port Granby WNSL) into one licence. The consolidation of the licences is proposed to reduce the administrative burden created by the presence of different licences for similar projects under the Port Hope Area Initiative (PHAI) portfolio. This application will also be amended to include the previously submitted application to change the levels of arsenic and uranium in the PHAI Cleanup Criteria.

As part of the licence renewal process, it is anticipated that the CNSC will hold a public hearing in fall 2022 to consider CNL's application for the renewal of the Port Hope WNSL and the consolidation of the Port Hope and Port Granby licences. It is yet to be determined if the CNSC will include the application to change the PHAI Cleanup Criteria on the agenda for this meeting.

The purpose of this document is to describe how CNL will share the details of its licence application with stakeholders and the public, and provide opportunities for feedback on that information. This engagement plan will be implemented in alignment with the PHAI Public Information Program (PIP) and CNL's corporate-wide Public Information Program, and follows the guidance provided in *CNSC REGDOC 3.2.1 Public Information and Disclosure*.

CNL recognizes Indigenous engagement as a critical component of the Port Hope Area Initiative and acknowledges the continued need for open, honest and transparent communication with rights holders and Indigenous interest holders. Historically, the PHAI Public Information Program (PIP) has included Indigenous communities and organizations as a target audience. In support of CNL's objective to advance Reconciliation through meaningful actions and a continuing move to increased inclusion and

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participation, CNL is, through a separate process, developing a PHAI Indigenous Communications & Engagement Program (ICEP) to be implemented in tandem with the PHAI PIP. The PHAI ICEP will reflect CNL's commitment to recognizing Indigenous rights and interests as we continue to build relationships with First Nations and Métis communities through ongoing learning about their values and interests.

Engagement with Indigenous communities and organizations on the licence renewal application is covered in a separate strategy; engagement plans specific to the proposed changes to the PHAI Cleanup Criteria have been submitted previously to the CNSC.

2. INDIGENOUS HISTORY OF THE PORT HOPE AREA*

This Indigenous history has been generously provided by Curve Lake First Nation. Publication reference: Gitiga Migizi and Julie Kapyrka, 2015 *Before, During, and After: Mississauga Presence in the Kawarthas*. In *Peterborough Archaeology*, Dirk Verhulst, editor, pp. 127-136. Peterborough, Ontario: Peterborough Chapter of the Ontario Archaeological Society

The traditional homelands of the Michi Saagiig (Mississauga Anishinaabeg) encompass a vast area of what is now known as southern Ontario. The Michi Saagiig are known as “the people of the big river mouths.” and were also known as the “Salmon People” who occupied and fished the north shore of Lake Ontario where the various tributaries emptied into the lake. Their territories extended north into and beyond the Kawarthas as winter hunting grounds on which they would break off into smaller social groups for the season, hunting and trapping on these lands, then returning to the lakeshore in spring for the summer months.

The Michi Saagiig were a highly mobile people, travelling vast distances to procure subsistence for their people. They were also known as the “Peacekeepers” among Indigenous nations. The Michi Saagiig homelands were located directly between two very powerful Confederacies: The Three Fires Confederacy to the north and the Haudenosaunee Confederacy to the south. The Michi Saagiig were the negotiators, the messengers, the diplomats, and they successfully mediated peace throughout this area of Ontario for countless generations.

Michi Saagiig oral histories speak to their people being in this area of Ontario for thousands of years. These stories recount the “Old Ones” who spoke an ancient Algonquian dialect. The histories explain that the current Ojibwa phonology is the 5th transformation of this language, demonstrating a linguistic connection that spans back into deep time. The Michi Saagiig of today are the descendants of the ancient peoples who lived in Ontario during the Archaic and Paleo-Indian periods. They are the original inhabitants of southern Ontario, and they are still here today.

The traditional territories of the Michi Saagiig span from Gananoque in the east, all along the north shore of Lake Ontario, west to the north shore of Lake Erie at Long Point. The



territory spreads as far north as the tributaries that flow into these lakes, from Bancroft and north of the Haliburton highlands. This also includes all the tributaries that flow from the height of land north of Toronto like the Oak Ridges Moraine, and all of the rivers that flow into Lake Ontario (the Rideau, the Salmon, the Ganaraska, the Moira, the Trent, the Don, the Rouge, the Etobicoke, the Humber, and the Credit, as well as Wilmot and 16 Mile Creeks) through Burlington Bay and the Niagara region including the Welland and Niagara Rivers, and beyond. The western side of the Michi Saagiig Nation was located around the Grand River which was used as a portage route, as the Niagara portage was too dangerous. The Michi Saagiig would portage from present-day Burlington to the Grand River and travel south to the open water on Lake Erie.

Michi Saagiig oral histories also speak to the occurrence of people coming into their territories sometime between 500-1000 A.D. seeking to establish villages and a corn growing economy – these newcomers included peoples that would later be known as the Huron-Wendat, Neutral, Petun/Tobacco Nations. The Michi Saagiig made treaties with these newcomers and granted them permission to stay with the understanding that they were visitors in these lands. Wampum was made to record these contracts, ceremonies would have bound each nation to their respective responsibilities within the political relationship, and these contracts would have been renewed annually (see Gitiga Migizi and Kapyrka 2015). These visitors were extremely successful as their corn economy grew as well as their populations. However, it was understood by all nations involved that this area of Ontario were the homeland territories of the Michi Saagiig.

The Odawa Nation worked with the Michi Saagiig to meet with the Huron-Wendat, the Petun, and Neutral Nations to continue the amicable political and economic relationship that existed – a symbiotic relationship that was mainly policed and enforced by the Odawa people. Problems arose for the Michi Saagiig in the 1600s when the European way of life was introduced into southern Ontario. Also, around the same time, the Haudenosaunee were given firearms by the colonial governments in New York and Albany which ultimately made an expansion possible for them into Michi Saagiig territories. There began skirmishes with the various nations living in Ontario at the time. The Haudenosaunee engaged in fighting with the Huron-Wendat, and between that and the onslaught of European diseases, the Iroquoian speaking peoples in Ontario were decimated. The onset of colonial settlement and missionary involvement severely disrupted the original relationships between these Indigenous nations. Disease and warfare had a devastating impact upon the Indigenous peoples of Ontario, especially the large sedentary villages, which mostly included Iroquoian speaking peoples. The Michi Saagiig were largely able to avoid the devastation caused by these processes by retreating to their wintering grounds to the north, essentially waiting for the smoke to clear.

Michi Saagiig Elder Gitiga Migizi (2017) recounts:

“We weren’t affected as much as the larger villages because we learned to paddle away for several years until everything settled down. And we came back and tried to bury the bones of the Huron but it was overwhelming, it was all over, there were bones all over – that is our story.

There is a misnomer here, that this area of Ontario is not our traditional territory and that we came in here after the Huron-Wendat left or were defeated, but that is not true. That is a big misconception of our history that needs to be corrected. We are the traditional people, we are the ones that signed treaties with the Crown. We are recognized as the ones who signed these treaties and we are the ones to be dealt with officially in any matters concerning territory in southern Ontario.

We had peacemakers go to the Haudenosaunee and live amongst them in order to change their ways. We had also diplomatically dealt with some of the strong chiefs to the north and tried to make peace as much as possible. So we are very important in terms of keeping the balance of relationships in harmony.

Some of the old leaders recognized that it became increasingly difficult to keep the peace after the Europeans introduced guns. But we still continued to meet, and we still continued to have some wampum, which doesn’t mean we negated our territory or gave up our territory – we did not do that. We still consider ourselves a sovereign nation despite legal challenges against that. We still view ourselves as a nation and the government must negotiate from that basis.”

Often times, southern Ontario is described as being “vacant” after the dispersal of the Huron-Wendat peoples in 1649 (who fled east to Quebec and south to the United States). This is misleading as these territories remained the homelands of the Michi Saagiig Nation.

The Michi Saagiig participated in eighteen treaties from 1781 to 1923 to allow the growing number of European settlers to establish in Ontario. Pressures from increased settlement forced the Michi Saagiig to slowly move into small family groups around the present day communities: Curve Lake First Nation, Hiawatha First Nation, Alderville First Nation, Scugog Island First Nation, New Credit First Nation, and Mississauga First Nation.

The Michi Saagiig have been in Ontario for thousands of years, and they remain here to this day.

*This historical context was prepared by Gitiga Migizi, a respected Elder and Knowledge Keeper of the Michi Saagiig Nation.

3. BACKGROUND

The PHAI represents the Government of Canada’s commitment to respond to a community-requested solution for the cleanup and local, safe, long-term management of historic low-level radioactive waste in the municipalities of Port Hope and Clarington in southern Ontario. The waste is the result of the

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refining practices of the former Crown Corporation, Eldorado Nuclear Ltd., and its private sector predecessors. The original Eldorado refining operation and plant were established in the 1930s without consultation with Indigenous Peoples of the area.

A legal agreement, finalized in March 2001, between the Government of Canada and the municipalities of Port Hope and Clarington, launched the PHAI by defining the framework and setting out the responsibilities for the Port Hope Project and the Port Granby Project. CNL is implementing these projects on behalf of Atomic Energy of Canada Limited, a federal Crown corporation.

The PHAI is being undertaken in three Phases. Phase 1 was completed in 2011 and involved preparing designs; an extensive environmental assessment and community consultation which included First Nations in southeastern Ontario; and securing licensing approvals from the CNSC. Phase 2 of the Port Hope Project, currently underway, involves the cleanup of approximately 1.2 million cubic metres of historic low-level radioactive waste from various sites in Port Hope, the construction of an engineered aboveground mound at the Port Hope Long-Term Waste Management Facility, where the waste is being safely contained. Phase 3 will involve the long-term maintenance and monitoring of the facility.

The cleanup of the waste through the Port Granby Project was completed in 2020, with the project expected to move into Phase 3, long-term maintenance and monitoring of the facility, in 2022. Approximately 1.3 million tonnes of historic low-level radioactive waste was excavated from a former waste management facility on the shoreline of Lake Ontario in the Municipality of Clarington. The waste was transported to a newly constructed engineered aboveground mound approximately 700 metres north of the lake for safe containment. Phase 3 involves the long-term maintenance and monitoring of the facility. CNL publicly announced the completion of the cap and closure of the engineered aboveground mound at the Port Granby Project Long-Term Waste Management Facility in October 2021. Demobilization of internal infrastructure and remaining construction activity will conclude by summer of 2022.

4. PUBLIC ENGAGEMENT STRATEGY

4.1 Objectives of the PHAI Public Information Program (PIP)

The objectives of the PHAI PIP are to:

1. Provide the public, stakeholders and residents with effective access to timely information in order to prepare them for upcoming work and help them understand project changes (such as the licencing renewal), project activities, programs, timing, environmental protection and mitigation measures, long-term benefits and economic opportunities.
2. Build and maintain active support for and confidence in the PHAI with the public, stakeholders and residents at all levels of political leadership in the host communities by ensuring target audiences are fully briefed on the background, goals and current developments of the projects.
3. Position CNL as the primary source for accurate project information to reduce the potential for externally generated project delays that may result from misinformation and misconceptions.

4. Provide open and transparent public disclosure about unplanned project activities and events, proportionate with the public’s perception of risk and the level of public interest in PHAI activities.

4.2 Objectives of the Public Engagement Plan for PHAI Licence Renewal

The specific objectives of this engagement strategy are to:

1. Proactively and transparently share information with stakeholders and the public on CNL’s application to renew the Port Hope WNSL and consolidate Port Hope and Port Granby WNSLs, the effect the renewal for a 10-year term will have on the PHAI timeline, schedule and budget, and on how to participate in the licence renewal process.
2. Provide opportunities for stakeholders and the public to discuss with CNL and give feedback on the licence renewal, amendment application and other related topics.

CNL will use feedback received to further refine project planning and project messaging. An open two-way dialogue loop will be maintained throughout the engagement process.

A final report on the methods and outcomes of this engagement plan will be produced and submitted to the CNSC. A separate report, also to be submitted to the CNSC, will summarize the outcomes of engagement with Indigenous Nations and communities.

4.3 Target Audiences

The target audiences for the PHAI Public Information Program and this engagement plan include, but are not limited to, those described in Table 3-1.

**Table 4-1
PHAI Target Audiences – Public and Stakeholders**

Categories	Target Audiences
Public	
Affected property owners and neighbouring residents	<ul style="list-style-type: none"> • Owners/tenants of properties to be surveyed/remediated • Residents and businesses near long-term waste management facilities, small-scale sites and major sites, and along designated transportation routes
Host community populations	<ul style="list-style-type: none"> • In particular, households and businesses within Port Hope and the southeastern portion of Ward 4, Clarington, in the vicinity of Port Granby
Business and community groups	<ul style="list-style-type: none"> • Port Hope and District Chamber of Commerce • Clarington Board of Trade and Office of Economic Development • Port Hope Heritage Business Improvement Area • Port Hope for Future • Phorests 4R Phuture • Northumberland Hills Association of Realtors • Durham Region Association of Realtors

	<ul style="list-style-type: none"> • Toronto Real Estate Board • Local service clubs
Project-related citizen groups	<ul style="list-style-type: none"> • Port Granby Project Citizen Liaison Group • Port Granby Discussion Group
Canadian population	<ul style="list-style-type: none"> • Members of the public across Canada
Government	
Municipal governments	<ul style="list-style-type: none"> • Municipality of Port Hope • Municipality of Clarington
Regional governments and related agencies	<ul style="list-style-type: none"> • MP, Northumberland – Peterborough South • MPP, Northumberland – Peterborough South • Northumberland County • Region of Durham • Ganaraska Region Conservation Authority • Durham Nuclear Health Committee
Regulatory authority	<ul style="list-style-type: none"> • Canadian Nuclear Safety Commission
Education and Science & Technology Communities	
Local elementary, senior public and high school community	<ul style="list-style-type: none"> • Ganaraska Trail Public School • Beatrice Strong Public School • St. Anthony Catholic Elementary School • Dr. Hawkins Senior Public School • Port Hope High School • Trinity College School • St. Mary Catholic Secondary School • Kawartha Pine Ridge District School Board • Peterborough, Victoria, Northumberland and Clarington Catholic District School Board • Peterborough, Victoria, Northumberland and Clarington French Language Catholic School Board • Local school councils • Student Transportation Services of Southern Ontario
Post-secondary institutions with PHAI-related interests	<ul style="list-style-type: none"> • Ontario Tech University • Fleming College • Trent University • Ryerson University • Loyalist College
Public Interest Groups	
Non-governmental organizations and interest groups	<ul style="list-style-type: none"> • Port Hope Community Health Concerns Committee • Families Against Radiation Exposure • South East Clarington Ratepayers Association • Lake Ontario Waterkeeper • Friends of the Port Hope West Beach • Willow Beach Field Naturalists
Media	
News outlets and trade publications	<ul style="list-style-type: none"> • Local • Provincial • National
Health and Emergency Services	

Physicians and health agencies	<ul style="list-style-type: none"> • Haliburton Kawartha Pine Ridge District Health Unit • Durham Nuclear Health Committee
Emergency services and First Responders	<ul style="list-style-type: none"> • Northumberland Hills Hospital • Lakeridge Health Bowmanville • Local emergency medical services • Local police services • Local emergency preparedness and fire services
Industry	
Business and trade	<ul style="list-style-type: none"> • Contractors • Potential bidders • International nuclear industry
Corporate	<ul style="list-style-type: none"> • Cameco Corporation (adjacent to major sites)
National and international organizations	<ul style="list-style-type: none"> • Canadian Nuclear Association • Canadian Nuclear Society • International Atomic Energy Agency • International nuclear associations
Internal	
Employees	<ul style="list-style-type: none"> • CNL employees

4.4 Tactical Approach

The objectives of the PHAI Public Information Program and this engagement plan are supported by the tactics, products and activities in Table 4-2.

Activities typically conducted in person may be held virtually to protect the safety of employees and external participants during the COVID-19 pandemic.

Table 4-2
Tactics, Products and Activities

Tactics	Products/Activities	Target Audiences
Online Communications <ul style="list-style-type: none"> • Provide information on the Port Hope and Port Granby projects including descriptions of current and upcoming work, environmental monitoring reports, and information on CNSC licences and the CRP and PVP programs • Provide public disclosure of unplanned project events Availability <ul style="list-style-type: none"> • 24-hour-a-day access 	<ul style="list-style-type: none"> • Website – PHAI.ca • PHAI Facebook • PHAI Twitter • PHAI LinkedIn • PHAI Instagram 	<ul style="list-style-type: none"> • Residents • General Public • Media • Schools • Public interest groups • National/international education, industry and professional groups

Tactics	Products/Activities	Target Audiences
<p>Project Information Office 25 Henderson Street, Port Hope, Ontario</p> <ul style="list-style-type: none"> • Provide information on planning, design, implementation, environmental assessment, monitoring and mitigation of the Port Hope and Port Granby projects and the CRP and PVP programs <p>Availability</p> <ul style="list-style-type: none"> • By appointment during pandemic 	<ul style="list-style-type: none"> • Variety of printed material such as: <ul style="list-style-type: none"> ○ Fact sheets ○ Brochures ○ Project newsletters ○ Environmental assessments and related screening reports ○ Health and safety information including Canadian Nuclear Safety Commission Health Synthesis Report ○ Public attitude survey results ○ Canadian Nuclear Safety Commission licence conditions documents ○ Other reports of interest • 3-D models of: <ul style="list-style-type: none"> ○ PHAI long-term waste management facilities ○ PHAI engineered aboveground mounds • Aerial photographs and maps 	<ul style="list-style-type: none"> • Residents • Public • Stakeholders • Media • Schools • Public interest groups • National/international education, industry and professional groups
<p>Project newsletters/bulletins</p> <ul style="list-style-type: none"> • Provide updates on current project work and status, descriptions of upcoming work and information about PHAI-related public programs • Shorter news bulletins may be distributed to provide updates when a full-length newsletter is not required 	<ul style="list-style-type: none"> • Port Hope Project Newsletter • Port Granby Project Newsletter 	<ul style="list-style-type: none"> • Every household in Municipality of Port Hope and southeast Clarington • Municipal, federal and provincial stakeholders
<p>Presentations/Demonstrations</p> <ul style="list-style-type: none"> • Provide information on current and planned project activities • Ensure all community sectors have the opportunity to receive information and updates on the PHAI • Strengthen connections with education and industry community • Promote and support science, technology, engineering and math (STEM) education • Share information with other groups/communities undertaking similar initiatives <p>Occurrence</p> <ul style="list-style-type: none"> • Regularly scheduled for key stakeholders on request for others 	<ul style="list-style-type: none"> • PowerPoint slide shows, related handouts • Information panels • Fact sheets • Brochures • Pop-up displays • 3-D models 	<ul style="list-style-type: none"> • Residents • Public • Stakeholders • Media • Local elementary, secondary and post-secondary schools • Public interest groups • Business community groups • Government (municipal councils/staff, local MP/MPP) • Health and emergency services • Industry • National/international education, industry and professional groups



Tactics	Products/Activities	Target Audiences
<p>Site Tours</p> <ul style="list-style-type: none"> • Illustrate the scope of project planning and implementation including environmental protection, compliance with occupational health and safety requirements and conformance with environmental assessment and licensing obligations practices • Facilitate understanding and appreciation for complexity and importance of projects <p>Occurrence</p> <ul style="list-style-type: none"> • On request 	<ul style="list-style-type: none"> • Led by expert CNL staff 	<ul style="list-style-type: none"> • Stakeholders • Media • Public interest groups • Government (Municipal councils/staff, local MP/ MPP) • Health and emergency services • STEM Industry • National/international education, industry and professional groups
<p>Information Sessions</p> <ul style="list-style-type: none"> • Inform community about upcoming PHAI work and related monitoring, mitigation and health and safety measures in place that protect people and the environment • Provide updates on planned or changed project activity and programs • Receive feedback and discuss issues specific to neighbourhoods in proximity to PHAI work • Provide disclosure of unplanned project events <p>Occurrence</p> <ul style="list-style-type: none"> • In advance of PHAI work, as required; increased frequency during construction and remediation; as required for disclosure 	<ul style="list-style-type: none"> • Presentation slide shows • Information handouts • Information panels • Fact sheets • Brochures • Displays and exhibits • 3-D models • Two-way dialogue through question-and-answer opportunities with CNL and contractors subject matter experts • Event evaluation/comment sheets 	<ul style="list-style-type: none"> • Public • Stakeholders • School populations in close proximity to PHAI work • Media
<p>Media Relations</p> <ul style="list-style-type: none"> • Brief the media and inform the community and broader audiences about: <ul style="list-style-type: none"> ○ Imminent project activities ○ Project achievements ○ Changes to schedule, nature of work or PHAI programs • Reinforce CNL as primary source of accurate, timely information by: <ul style="list-style-type: none"> ○ Building and maintaining relationships with media ○ Providing media with access to CNL technical experts • Demonstrate transparency by disclosing unplanned project events <p>Occurrence</p> <ul style="list-style-type: none"> • In advance of PHAI work, as required; increased frequency during construction and remediation; as required for disclosure 	<ul style="list-style-type: none"> • Media conferences and events • Media releases • Media interviews with CNL subject matter experts • Project newsletters/bulletins • FAQs 	<ul style="list-style-type: none"> • Media • Public

Tactics	Products/Activities	Target Audiences
<p>Key Stakeholder Relations</p> <ul style="list-style-type: none"> Through presentations and representation on working groups and committees: <ul style="list-style-type: none"> Fully brief key stakeholders and project partners on the background, goals and current developments of the projects Build and maintain active support for and confidence in the PHAI to complete the projects safely <p>Occurrence</p> <ul style="list-style-type: none"> According to meeting schedules; with increased frequency, as necessary, during construction and remediation 	<ul style="list-style-type: none"> Quarterly project updates to Municipality of Port Hope council Annual project updates to Municipality of Clarington council CNL/Municipality of Port Hope Communications Working Group CNL/Cameco Communications Working Group CNL/Haliburton, Kawartha, Pine Ridge District Health Unit – Ontario Ministry of the Environment, Conservation & Parks – Municipality of Port Hope Liaison Committee CNL/Northumberland Hills Association of Realtors Working Group Updates and educational sessions for Northumberland Hills Association of Realtors, Durham Region Association of Realtors, Toronto Real Estate Board Annual update to Durham Nuclear Health Committee 	<ul style="list-style-type: none"> Host community municipal governments Public Business groups Health and Emergency Services Cameco Corporation Public interest groups
<p>Port Granby Project-Related Citizen Groups</p> <p>Port Granby Citizen Liaison Group</p> <ul style="list-style-type: none"> Provides a regular forum for volunteer citizens and CNL staff to exchange information and provide input about the PHAI Public Information Program Brings together broad cross-section of local residents and organizations in key sectors such as business, health, the environment, conservation and community life <p>Port Granby Discussion Group</p> <ul style="list-style-type: none"> Provides a unique opportunity for CNL to continue to build on and maintain its relationship with members of the Port Granby community most affected by construction activities of the Port Granby Project 	<ul style="list-style-type: none"> Port Granby Project Citizen Liaison Group meetings Port Granby Discussion Group meetings 	<ul style="list-style-type: none"> Public Residents Business and community groups Health sector

Tactics	Products/Activities	Target Audiences
<p>Internal Communications</p> <ul style="list-style-type: none"> • Ensure CNL employees are fully apprised of CNL business and PHAI project activities on an ongoing basis • Enable CNL employees to share timely public information with relatives, friends and neighbours <p>Occurrence</p> <ul style="list-style-type: none"> • Weekly, monthly, quarterly and as required with increased frequency, as necessary during remediation 	<ul style="list-style-type: none"> • Information updates via General Manager, President, CEO and Executive Committee • Ongoing management meetings and Site Safety and Health Committee meetings • Employee All-Staff meetings (corporate, division and project-specific) and myCNL TV engagements • Employee updates via intranet and staff email • Weekly project updates via intranet • Lunch & Learn opportunities on wide variety of topics • Regulatory meetings/hearings updates via the intranet site myCNL • Surveys to gauge employee awareness and measure messaging effectiveness <p>New Employee Orientation - presentation and tour for new employees</p>	<ul style="list-style-type: none"> • CNL employees



5. TACTICAL APPROACH

5.1 June 2021 to 2022

Tactic	Supporting Activities	Timing	Target Audiences
Quarterly PHAI Updates to Municipality of Port Hope (MPH) Council	Products <ul style="list-style-type: none"> • PowerPoint presentation 	June, November, December 2021; Quarterly in 2022	<ul style="list-style-type: none"> • MPH Council and staff • Media • Port Hope public • Business and community groups
Newsletter	Products <ul style="list-style-type: none"> • Newsletter 	October 2021 May 2022	<ul style="list-style-type: none"> • General Port Hope public • Residents/businesses in area • Circulated to Indigenous communities and organizations
Information Session	Products <ul style="list-style-type: none"> • Fact Sheets • Presentation 	October 2021	<ul style="list-style-type: none"> • Residents and key stakeholders
Stakeholder Meetings/Presentations	<ul style="list-style-type: none"> • Presentation • One-on-one discussions 	Ongoing Fall 2021/Spring 2022	<ul style="list-style-type: none"> • Residents/property owners • Real estate boards • Special interest groups • Local community groups • MP, MPP • Committees of MPH Council • Schools • Project-related groups • CNL staff • General public
PHAI.ca Website	Products <ul style="list-style-type: none"> • Updated information 	Ongoing	<ul style="list-style-type: none"> • Port Hope public • Residents/businesses in area • Property owners • Interest groups • General public
Media Announcement Announcement of hearing date when set	Products <ul style="list-style-type: none"> • Media release 	2022	<ul style="list-style-type: none"> • Port Hope public • Business and community groups
Social Media and Website	Products <ul style="list-style-type: none"> • Posts/feature stories 	Ongoing during work	<ul style="list-style-type: none"> • Port Hope public • Residents/businesses in area • Property Owners • Interest Groups • General Public

6. MONITORING OPINION AND APPLICATION OF FEEDBACK

During execution of this plan, CNL will continue to monitor and analyze public opinion about PHAI activities, including social media and media coverage, to:

- Record questions, concerns and input about the PHAI and project-related impacts, and disposition how this valuable feedback will be considered in project planning and activities
- Gauge awareness of and support for the PHAI
- Be aware of trends in opinion, social media and/or media coverage and how they may affect perception of the PHAI
- Respond promptly and effectively to media coverage and social media posts when necessary

7. PROGRAM EVALUATION AND IMPROVEMENT

CNL evaluates its Public Information Program on an ongoing basis to:

- Ensure messages and supporting information reach target audiences in a timely fashion and through effective channels
- Make adjustments to tactics, strategies and products as required to more successfully provide access to PHAI information and maintain support and confidence in PHAI activities

8. DOCUMENTATION AND RECORDS

To measure the effectiveness of the Public Information Program and this engagement plan, all written, telephone and electronic communications, as well as follow-up actions or requests for information, are tracked and recorded.

Comments and questions at meetings are recorded for follow up where required and responses are made available to all interested parties.

APPLICATION FOR RENEWAL OF PORT HOPE PROJECT WASTE NUCLEAR SUBSTANCE LICENCE WNSL-W1-2310.02/2022

INDIGENOUS ENGAGEMENT STRATEGY

The Port Hope Area Initiative sites and the Canadian Nuclear Laboratories Historic Waste Program Management Office are situated on the traditional land of Indigenous Peoples dating back countless generations. This land remains the home of the Métis and Anishinabek people, and is the Williams Treaties territory of the Mississauga of this region.

CNL is grateful to have the opportunity to work on these lands and near traditionally and culturally significant waterways, and offers respect to the First Peoples of the area.

1. PURPOSE

Canadian Nuclear Laboratories (CNL) has submitted a letter of intent to the Canadian Nuclear Safety Commission (CNSC) to apply for the renewal of the *Port Hope Project Waste Nuclear Substance Licence WNSL-W1-2310.02/2022* (Port Hope WNSL) for a term of 10 years. The current licence expires on 2022 December 31. In addition to the renewal of the Port Hope Licence, CNL is requesting a consolidation of the Port Hope WNSL and the *Port Granby Project Waste Nuclear Substance Licence WNSL-W1-2311.02/2021* (Port Granby WNSL) into one licence. The consolidation of the licences is proposed to reduce the administrative burden created by the presence of different licences for similar projects under the Port Hope Area Initiative (PHAI) portfolio. This application will also be amended to include the previously submitted application to change the levels of arsenic and uranium in the PHAI Cleanup Criteria.

As part of the licence renewal process, it is anticipated that the CNSC will hold a public hearing in fall 2022 to consider CNL's application for the renewal of the Port Hope WNSL and the consolidation of the Port Hope and Port Granby licences. It is yet to be determined if the CNSC will include the application to change the PHAI Cleanup Criteria on the agenda for this meeting.

The purpose of this document is to describe how CNL will share the details of its licence application and discuss the details with representatives of First Nations, Métis communities, and Indigenous organizations, and how opportunities for feedback on that information will be provided. This engagement plan will be implemented in alignment with the guidance provided in *CNSC REGDOC 3.2.2 Indigenous Engagement*.

Engagement with the public and stakeholders on the licence renewal application is covered in a separate strategy; engagement plans specific to the proposed changes to the PHAI Cleanup Criteria have been submitted previously to the CNSC.

CNL recognizes Indigenous engagement as a critical component of the Port Hope Area Initiative and acknowledges the continued need for open, honest and transparent communication with rights holders and Indigenous interest holders. Historically, the PHAI Public Information Program (PIP) has included Indigenous communities and organizations as a target audience. In support of CNL's objective to advance Reconciliation through meaningful actions and a continuing move to increased inclusion and participation, CNL is, through a separate process, developing a PHAI Indigenous Communications & Engagement Program (ICEP) to be implemented in tandem with the PHAI PIP. The PHAI ICEP will reflect CNL's commitment to recognizing Indigenous rights and interests as we continue to build relationships with First Nations and Métis communities through ongoing learning about their values and interests.

2. INDIGENOUS HISTORY OF THE PORT HOPE AREA

This Indigenous history has been generously provided by Curve Lake First Nation. Publication reference: Gitiga Migizi and Julie Kapyrka, 2015 *Before, During, and After: Mississauga Presence in the Kawarthas*. In *Peterborough Archaeology*, Dirk Verhulst, editor, pp. 127-136. Peterborough, Ontario: Peterborough Chapter of the Ontario Archaeological Society

The traditional homelands of the Michi Saagiig (Mississauga Anishinaabeg) encompass a vast area of what is now known as southern Ontario. The Michi Saagiig are known as “the people of the big river mouths.” and were also known as the “Salmon People” who occupied and fished the north shore of Lake Ontario where the various tributaries emptied into the lake. Their territories extended north into and beyond the Kawarthas as winter hunting grounds on which they would break off into smaller social groups for the season, hunting and trapping on these lands, then returning to the lakeshore in spring for the summer months.

The Michi Saagiig were a highly mobile people, travelling vast distances to procure subsistence for their people. They were also known as the “Peacekeepers” among Indigenous nations. The Michi Saagiig homelands were located directly between two very powerful Confederacies: The Three Fires Confederacy to the north and the Haudenosaunee Confederacy to the south. The Michi Saagiig were the negotiators, the messengers, the diplomats, and they successfully mediated peace throughout this area of Ontario for countless generations.

Michi Saagiig oral histories speak to their people being in this area of Ontario for thousands of years. These stories recount the “Old Ones” who spoke an ancient Algonquian dialect. The histories explain that the current Ojibwa phonology is the 5th transformation of this language, demonstrating a linguistic connection that spans back into deep time. The Michi Saagiig of today are the descendants of the ancient peoples who lived in Ontario during the Archaic and Paleo-Indian periods. They are the original inhabitants of southern Ontario, and they are still here today.

The traditional territories of the Michi Saagiig span from Gananoque in the east, all along the north shore of Lake Ontario, west to the north shore of Lake Erie at Long Point. The territory spreads as far north as the tributaries that flow into these lakes, from Bancroft and north of the Haliburton highlands. This also includes all the tributaries that flow from the height of land north of Toronto like the Oak Ridges Moraine, and all of the rivers that flow into Lake Ontario (the Rideau, the Salmon, the Ganaraska, the Moira, the Trent, the Don, the Rouge, the Etobicoke, the Humber, and the Credit, as well as Wilmot and 16 Mile Creeks) through Burlington Bay and the Niagara region including the Welland and Niagara Rivers, and beyond. The western side of the Michi Saagiig Nation was located around the Grand River which was used as a portage route, as the Niagara portage was too dangerous. The Michi Saagiig would portage from present-day Burlington to the Grand River and travel south to the open water on Lake Erie.

Michi Saagiig oral histories also speak to the occurrence of people coming into their territories sometime between 500-1000 A.D. seeking to establish villages and a corn growing economy – these newcomers included peoples that would later be known as the Huron-Wendat, Neutral, Petun/Tobacco Nations. The Michi Saagiig made treaties with these newcomers and granted them permission to stay with the understanding that they were visitors in these lands. Wampum was made to record these contracts, ceremonies would have bound each nation to their respective responsibilities within the political relationship, and these contracts would have been renewed annually (see Gitiga Migizi and Kapyrka 2015). These visitors were extremely successful as their corn economy grew as well as their populations. However, it was understood by all nations involved that this area of Ontario were the homeland territories of the Michi Saagiig.

The Odawa Nation worked with the Michi Saagiig to meet with the Huron-Wendat, the Petun, and Neutral Nations to continue the amicable political and economic relationship that existed – a symbiotic relationship that was mainly policed and enforced by the Odawa people. Problems arose for the Michi Saagiig in the 1600s when the European way of life was introduced into southern Ontario. Also, around the same time, the Haudenosaunee were given firearms by the colonial governments in New York and Albany which ultimately made an expansion possible for them into Michi Saagiig territories. There began skirmishes with the various nations living in Ontario at the time. The Haudenosaunee engaged in fighting with the Huron-Wendat, and between that and the onslaught of European diseases, the Iroquoian speaking peoples in Ontario were decimated. The onset of colonial settlement and missionary involvement severely disrupted the original relationships between these Indigenous nations. Disease and warfare had a devastating impact upon the Indigenous peoples of Ontario, especially the large sedentary villages, which mostly included Iroquoian speaking peoples. The Michi Saagiig were largely able to avoid the devastation caused by these processes by retreating to their wintering grounds to the north, essentially waiting for the smoke to clear.

Michi Saagiig Elder Gitiga Migizi (2017) recounts*:

“We weren’t affected as much as the larger villages because we learned to paddle away for several years until everything settled down. And we came back and tried to bury the bones of the Huron but it was overwhelming, it was all over, there were bones all over – that is our story.

There is a misnomer here, that this area of Ontario is not our traditional territory and that we came in here after the Huron-Wendat left or were defeated, but that is not true. That is a big misconception of our history that needs to be corrected. We are the traditional people, we are the ones that signed treaties with the Crown. We are recognized as the ones who signed these treaties and we are the ones to be dealt with officially in any matters concerning territory in southern Ontario.

We had peacemakers go to the Haudenosaunee and live amongst them in order to change their ways. We had also diplomatically dealt with some of the strong chiefs to the north and tried to make peace as much as possible. So we are very important in terms of keeping the balance of relationships in harmony.

Some of the old leaders recognized that it became increasingly difficult to keep the peace after the Europeans introduced guns. But we still continued to meet, and we still continued to have some wampum, which doesn’t mean we negated our territory or gave up our territory – we did not do that. We still consider ourselves a sovereign nation despite legal challenges against that. We still view ourselves as a nation and the government must negotiate from that basis.”

*This historical context was prepared by Gitiga Migizi, a respected Elder and Knowledge Keeper of the Michi Saagiig Nation.

Often times, southern Ontario is described as being “vacant” after the dispersal of the Huron-Wendat peoples in 1649 (who fled east to Quebec and south to the United States). This is misleading as these territories remained the homelands of the Michi Saagiig Nation.

The Michi Saagiig participated in eighteen treaties from 1781 to 1923 to allow the growing number of European settlers to establish in Ontario. Pressures from increased settlement forced the Michi Saagiig to slowly move into small family groups around the present day communities: Curve Lake First Nation, Hiawatha First Nation, Alderville First Nation, Scugog Island First Nation, New Credit First Nation, and Mississauga First Nation.

The Michi Saagiig have been in Ontario for thousands of years, and they remain here to this day.

3. BACKGROUND

The PHAI represents the Government of Canada’s commitment to respond to a community-requested solution for the cleanup and local, safe, long-term management of historic low-level radioactive waste in

the municipalities of Port Hope and Clarington in southern Ontario. The waste is the result of the refining practices of the former Crown Corporation, Eldorado Nuclear Ltd., and its private sector predecessors. The original Eldorado refining operation and plant were established in the 1930s without consultation with Indigenous Peoples of the area.

A legal agreement, finalized in March 2001, between the Government of Canada and the municipalities of Port Hope and Clarington, launched the PHAI by defining the framework and setting out the responsibilities for the Port Hope Project and the Port Granby Project. CNL is implementing these projects on behalf of Atomic Energy of Canada Limited, a federal Crown corporation.

The PHAI is being undertaken in three Phases. Phase 1 was completed in 2011 and involved preparing designs; an extensive environmental assessment and community consultation which included First Nations in southeastern Ontario; and securing licensing approvals from the CNSC. Phase 2 of the Port Hope Project, currently underway, involves the cleanup of approximately 1.2 million cubic metres of historic low-level radioactive waste from various sites in Port Hope, the construction of an engineered aboveground mound at the Port Hope Long-Term Waste Management Facility, where the waste is being safely contained. Phase 3 will involve the long-term maintenance and monitoring of the facility.

The cleanup of the waste through the Port Granby Project was completed in 2020, with the project expected to move into Phase 3, long-term maintenance and monitoring of the facility, in 2022. Approximately 1.3 million tonnes of historic low-level radioactive waste was excavated from a former waste management facility on the shoreline of Lake Ontario in the Municipality of Clarington. The waste was transported to a newly constructed engineered aboveground mound approximately 700 metres north of the lake for safe containment. Phase 3 involves the long-term maintenance and monitoring of the facility. CNL publicly announced the completion of the cap and closure of the engineered aboveground mound at the Port Granby Project Long-Term Waste Management Facility in October 2021. Demobilization of internal infrastructure and remaining construction activity will conclude by summer of 2022.

4. INDIGENOUS ENGAGEMENT STRATEGY

4.1. Objectives of the Indigenous Engagement Plan for PHAI Licence Renewal

The specific objectives of this engagement strategy are to:

1. Proactively and transparently share information with Indigenous communities and organizations on CNL's application to renew the Port Hope WNSL and consolidate Port Hope and Port Granby WNSLs, the effect the renewal for a 10-year term will have on the PHAI timeline, schedule and budget, and on how to participate in the licence renewal process.
2. Provide opportunities for Indigenous communities and organizations to discuss with CNL and give feedback on the licence renewal, amendment application and other related topics.

December 7, 2021

CNL will use feedback received to further refine project planning and project messaging. An open two-way dialogue loop between CNL and Indigenous communities and organizations will be maintained throughout the engagement process.

A final report on the methods and outcomes of this engagement plan will be produced and submitted to the CNSC. A separate report, also to be submitted to the CNSC, will summarize the outcomes of engagement with the general public and stakeholders.

4.2. Indigenous Communities and Organizations

This plan applies to engagement with, but not limited to, the Mississaugas of the Williams Treaties First Nations - Hiawatha First Nation, Curve Lake First Nation, Mississaugas of Scugog Island First Nation and Alderville First Nation.

Both the Anishinabek Nation and Métis Nation of Ontario, representatives of which have expressed interest in and received presentations and updates on PHAI activities and updates in recent years, are included in this engagement plan as well as other Indigenous communities including the Chippewa communities of Beausoleil First Nation, Georgina Island First Nation and Rama First Nation, and the Mohawks of the Bay of Quinte and local Métis Councils.

4.3. Tactical Approach

Through discussion with Indigenous communities and organizations over the course of the PHAI, CNL has noted their preferences for communications and engagement, and remains open to continual refinement of approaches based on the interest and needs of the communities. The objectives of this engagement plan reflect the preferences and are supported by the tactics, products and activities in Table 4-1.

Activities typically conducted in person may be held virtually to protect the safety of employees and external participants during the COVID-19 pandemic.

**Table 4-1.
Tactics, Products and Activities**

Tactics	Products/Activities	Timing
<p>Presentations/Meetings</p> <ul style="list-style-type: none"> • Provide information on current and planned project activities • Ensure all interested Indigenous communities and organizations have the opportunity to receive information and updates on the PHAI • Provide opportunity to receive updates and information from Indigenous communities and organizations • Provide opportunity to strengthen relationships with Indigenous communities and opportunities <p>Occurrence</p> <ul style="list-style-type: none"> • At the request of Indigenous communities and organizations 	<ul style="list-style-type: none"> • PowerPoint slide shows, related handouts • Information panels • Fact sheets • Brochures • Pop-up displays • 3-D models • Share invitation to public info session events 	<ul style="list-style-type: none"> • Ongoing Fall 2021-Summer 2022
<p>Chief/Council Meetings</p>	<ul style="list-style-type: none"> • PowerPoint presentation • Discussion • Q & A 	<p>On request</p>
<p>Williams Treaties First Nations monthly meetings</p> <ul style="list-style-type: none"> • Provide information on CNL environmental remediation projects • Provide opportunity to receive updates and information from Mississauga and Chippewa First Nations • Provide opportunity to strengthen relationships with Indigenous communities and organizations 	<ul style="list-style-type: none"> • PowerPoint presentation • Discussion • Q & A 	<ul style="list-style-type: none"> • Ongoing Fall 2021-Summer 2022
<p>Contribution Agreements and/or Relationship Agreements</p> <ul style="list-style-type: none"> • Develop memorandum of understanding or principles document for how CNL will interact with communities on PHAI-related activities and mutual information sharing • Provide financial support to First Nations, Indigenous communities and/or organizations to assist with incremental costs re: engagement on the PHAI, including support for third-party review of technical documents 	<ul style="list-style-type: none"> • Agreement developed in collaboration with individual Nations 	<ul style="list-style-type: none"> • As needed or requested by Indigenous community or organization
<p>Direct Notifications</p> <ul style="list-style-type: none"> • Timely information and updates on key PHAI matters, including project milestones and disclosures of unplanned events 	<ul style="list-style-type: none"> • Emails • Phone calls 	<ul style="list-style-type: none"> • Ongoing as applicable, e.g. notice of CNSC hearing date, etc.

Tactics	Products/Activities	Timing
<p>Technical reports</p> <ul style="list-style-type: none"> Includes existing and newly generated reports on technical aspects of the projects Summaries posted on PHAI.ca, full reports available on request 	<ul style="list-style-type: none"> Technical reports 	<ul style="list-style-type: none"> Ongoing as applicable
<p>Project newsletters/bulletins</p> <ul style="list-style-type: none"> Provide updates on current project work and status, descriptions of upcoming work Shorter news bulletins may be distributed to provide updates when a full-length newsletter is not required 	<ul style="list-style-type: none"> Port Hope Project Newsletter Port Granby Project Newsletter 	<ul style="list-style-type: none"> October 2021 May 2022
<p>Online Communications</p> <ul style="list-style-type: none"> Provide information on the Port Hope and Port Granby projects including descriptions of current and upcoming work, environmental monitoring reports, and information on CNSC licences and the Complaints Resolution Program Property Value Protection program Provide disclosure of unplanned project events <p>Availability</p> <ul style="list-style-type: none"> 24-hour-a-day access 	<ul style="list-style-type: none"> Website – PHAI.ca PHAI Facebook PHAI Twitter PHAI LinkedIn PHAI Instagram 	<ul style="list-style-type: none"> Ongoing

5. MONITORING OPINION AND APPLICATION OF FEEDBACK

During execution of this plan, CNL will continue to monitor and gather opinions, concerns and input from Indigenous communities and organizations about PHAI activities to:

- Record questions, concerns and input about the PHAI and project-related impacts, and disposition how this valuable feedback will be considered in project planning and activities
- Garner an understanding of Indigenous perspectives, and relationship to the land and incorporate this knowledge into the dissemination of information, project reporting, planning and execution
- Gauge level of understanding and awareness of the PHAI, offer opportunities for in-depth community-specific discussion if desired
- Be aware of trends in opinion about the PHAI and discuss/explore how it can be proactively addressed

6. PROGRAM EVALUATION AND IMPROVEMENT

CNL evaluates its Public Information Program, and will do the same for the Indigenous Communications & Engagement Plan, on an ongoing basis to:

- Ensure messages and supporting information reach Indigenous communities and organizations in a timely fashion and through effective channels
- Make adjustments to tactics, strategies and products as required to more successfully provide access to PHAI information and maintain awareness, support and confidence in PHAI activities
- Maintain an open two-way dialogue loop between CNL and Indigenous communities and organizations throughout the engagement process and apply feedback accordingly

7. DOCUMENTATION AND RECORDS

To measure the effectiveness of this engagement plan, all written, telephone and electronic communications, as well as follow-up actions or requests for information, are tracked and recorded.

Comments and questions at meetings are recorded for follow up where required and responses are made available to all interested parties.