



Supplementary Information

Written submission from Canadian Nuclear Laboratories Ltd.

In the Matter of the

**Canadian Nuclear Laboratories,
Douglas Point Waste Facility**

Application to amend the waste facility
decommissioning licence for the Douglas
Point Waste Facility

Commission Public Hearing

November 25-26, 2020

Renseignements supplémentaires

Mémoire des Laboratoires Nucléaires Canadiens Ltée

À l'égard de

**Les Laboratoires Nucléaires Canadiens,
installation de gestion des déchets de
Douglas Point**

Demande de modification du permis de
déclassement de l'installation de gestion des
déchets de Douglas Point

Audience publique de la Commission

25 et 26 novembre 2020

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REPORT, GENERAL

INDIGENOUS ENGAGEMENT REPORT

DOUGLAS POINT WASTE FACILITY

22-513130-REPT-001

Revision 2

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1. INTRODUCTION

1.1 Purpose

Canada's prototype CANDU® reactor at Douglas Point produced electricity from 1967 until 1984 when it was permanently shut down having achieved its objectives as a prototype. In 1987, after the fuel was removed and the reactor coolant drained, the facility was put into a safe shutdown state, referred to as the "storage with surveillance" phase of decommissioning.

Since 2015 Canadian Nuclear Laboratories (CNL) has been responsible for the operation of the facility, now known as the Douglas Point Waste Facility (DPWF), which is owned by Atomic Energy of Canada Limited (AECL), a federal Crown corporation. To reduce Canada's nuclear waste footprint, CNL is planning the next phase of decommissioning for Douglas Point, with the health, safety and security of people and the environment the top considerations for the project.

As a prototype nuclear reactor Douglas Point demonstrated that a CANDU® nuclear plant could be scaled up for commercial power generation, the legacy continues to create 60 per cent of Ontario's clean, reliable nuclear power.

Currently, the Douglas Point facility consists of the permanently shut-down, partially-decommissioned prototype CANDU® reactor and its associated structures and ancillaries located within the Bruce Power Site on the east shore of Lake Huron in the Province of Ontario.

In 2019 July 22, CNL submitted an application to the Canadian Nuclear Safety Commission (CNSC) to amend the current licence for the Douglas Point facility. If granted, this licence amendment will permit CNL to transition into the next phase of decommissioning – Phase 3. Eventually, CNL plans to complete decommissioning with the removal of the facility. While the licence amendment is essential to progressing with decommissioning, it is not sufficient. Further regulatory decisions on different sub-phases of the decommissioning project are required prior to complete removal.

It is essential to engage and develop relationships with Indigenous communities early on in the decommissioning project to incorporate Indigenous views and values into the remediation of the facility. This Indigenous Engagement Report (IER) outlines CNL's approach to Indigenous engagement with respect to decommissioning and is prepared in accordance with the CNSC Public and Indigenous Engagement: Indigenous Engagement (2019 August) REGDOC-3.2.2 ("REGDOC") regulatory document. It is an iterative document that will be updated regularly as engagement progresses. This revision captures activities from October 15, 2019 to October 15, 2020.

1.2 Scope

Per the REGDOC, the scope of this IER includes:

- Identification and description of Indigenous communities (identified through consultation with the CNSC).
- Identification and description of lands and resources used by Indigenous communities for Traditional activities that are within the project area.
- Planned Indigenous engagement activities, 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.

Canadian Nuclear Laboratories is responsive to evolving best practices, and guidance including the REGDOC, which guides and informs the content of this report.

1.3 Acronyms

AECL	Atomic Energy of Canada Limited
ATRIS	Aboriginal and Treaty Rights Information System
BNGS	Bruce Nuclear Generating Station
CRL	Chalk River Laboratories
CNL	Canadian Nuclear Laboratories
CNSC	Canadian Nuclear Safety Commission
DDP	Detailed Decommissioning Plan
DPWF	Douglas Point Waste Facility
GBTTC	Georgian Bay Traditional Territory Consultation Committee
Ha	Hectare
HSM	Historic Saugeen Métis
IER	Indigenous Engagement Report
INAC	Indigenous and Northern Affairs Canada
km	Kilometres
MNC	Métis National Council
MNO	Métis Nation of Ontario
MNRF	Ministry of Natural Resources and Forestry
NSCA	Nuclear Safety and Control Act
PCMNO	Provisional Council of the Métis Nation of Ontario
REGDOC	Canadian Nuclear Safety Commission Regulatory Document– Public and Indigenous Engagement: Indigenous Engagement. REGDOC-3.2.2. 2019 August.
SON	Saugeen Ojibway Nation
sq	Square
SSA	Site Study Area

SWS	Storage with Surveillance
TBD	To Be Determined

2. ALIGNMENT WITH REGULATORY REQUIREMENTS

Detailed information on Indigenous engagement is available from the CNSC in the form of REGDOC 3.2.2 Indigenous Engagement. 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. As well, the CNSC encourages licensees to keep the identified Indigenous communities involved by sharing information on the regulated facility’s operation and updates on the follow-up and/or monitoring program. To this end, CNL will continue to use the IER as the key record of engagement activities. Section 4.2.2 of 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 final report.

REGDOC 3.2.2 also states the need for an interim reporting schedule. To this end, the CNSC and CNL have coordinated regular meetings to discuss outreach activities.

REGDOC 3.2.2 does clearly indicate that an impact assessment component should be undertaken. Section 3 “Applicability” of REGDOC 3.2.2 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 Indigenous and/or treaty rights, such as the ability to hunt, trap, fish, gather or conduct ceremonies” (Section 3 Applicability, page 7).

As REGDOC 3.2.2 is specific about the above rights and activities (e.g. hunt, trap, fish, gather or conduct ceremonies) those issues are specifically addressed in this IER.

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 and a column provided that indicates the section of the IER that address the issue.

To fulfill, and demonstrate fulfillment of, these requirements leading up to the hearing on the licence amendment application for the project, CNL will share two drafts of this IER prior to the hearing. For this hearing, CNL will submit a current IER, including the most up to date information and as much feedback as possible.

Table 2-1
Summary of Guideline requirements and concordance

Section of the Guidelines	Summary of Guideline Requirements	IER Section
REGDOC 3.2.2 Section 4.1	<p>Licensees shall conduct research to identify Indigenous communities whose 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 communities to engage include:</p> <ul style="list-style-type: none"> • 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 communities. • Existing relationships between Indigenous communities 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. 	Sections 3 (this IER)
REGDOC 3.2.2 Section 4.2	<p>The IER shall include:</p> <ol style="list-style-type: none"> 1. a list of Indigenous communities identified for engagement; 2. a summary of any Indigenous engagement activities conducted to date; 3. a description of planned Indigenous engagement activities; 4. proposed schedule for interim reporting to the CNSC. <p>The IER shall be submitted:</p> <ol style="list-style-type: none"> 1. as part of a licence application, or 2. as part of a project description required under federal environmental assessment legislation or other relevant statutes 	<p>Sections 2, 3 (Table 3-1), 4.4, 4.6 (this IER)</p> <p>This IER is in support of a licence amendment and in preparation for future potential licensing activities that are anticipated to be generated by future decommissioning activities.</p>
REGDOC 3.2.2 Section 4.2.1	Licensees should provide the methodology and rationale used to develop the list of identified Indigenous communities.	Sections 3 (this IER)

Section of the Guidelines	Summary of Guideline Requirements	IER Section
REGDOC 3.2.2 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)
REGDOC 3.2.2 Section 4.2.3	The Indigenous engagement report shall include a high-level outline of proposed engagement activities.	Chapter 4 (this IER)

Canadian Nuclear Safety Commission (CNSC). 2019. Public and Indigenous Engagement: Indigenous Engagement. REGDOC-3.2.2. August.

3. DESCRIPTION OF INDIGENOUS COMMUNITIES

A proposed list of Indigenous communities 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 and industry members, and through the use of publicly available sources of information including:

- Indigenous community and organization websites;
- the Aboriginal and Treaty Rights Information System (ATRIS) (Government of Canada, 2019); and
- Indigenous and Northern Affairs Canada (INAC) First Nation community profiles.

The proposed list was based on the identified potential or established Indigenous or treaty rights of Indigenous communities in the vicinity of the project and is provided in Table 3-1 along with a brief rationale for inclusion. The inclusion of specific communities considers the nature of the established and/or claimed rights; potential impacts on those rights caused by the proposed project based on a preliminary assessment of existing and available information; and existing relationships with the nuclear industry in the region. As such, the working list is subject to change based on information and dialogue with the identified communities.

Table 3-1
Summary of Identified Indigenous Communities

Indigenous Communities (by representative Organization) and/or Organizations	Identification Rationale	Distance to Douglas Point (measured as a straight line)
<p>Saugeen Ojibway Nation (SON), represents collectively the Joint Council of two distinct communities, and operates the SON Environment Office, which handles consultations and engagements on projects on behalf of the two distinct communities :</p> <ul style="list-style-type: none"> • Chippewas of Saugeen First Nation • Chippewas of Nawash Unceded First Nation 	<ul style="list-style-type: none"> • The project is located within the vicinity of known traditional territory • Agreements with other local industry (Bruce Power, Nuclear Waste Management Organization (NWMO) and Ontario Power Generation (OPG) 	<ul style="list-style-type: none"> • ~34 km from Saugeen First Nation 29 (Reserve No. 06221) • ~76 km from Neyaashiinigiing 27 (Reserve No.06218)
<p>Métis Nation of Ontario (MNO) (community councils representing the project location):</p> <ul style="list-style-type: none"> • MNO: Region 7 • MNO Georgian Bay Traditional Territory Consultation Committee (GBTCC) 	<ul style="list-style-type: none"> • Represents more than 3,000 Métis citizens in the Bruce, Grey and Simcoe counties. (Métis Nation of Ontario, 2009) • Relationships with local nuclear industry • Métis claimed traditional territory 	<ul style="list-style-type: none"> • Community is not in one physically defined location; one council that is represented by the GBTTCC is the Great Lakes Métis Council, located in Owen Sound, Ontario ~58 km from Douglas Point

Indigenous Communities (by representative Organization) and/or Organizations	Identification Rationale	Distance to Douglas Point (measured as a straight line)
Historic Saugeen Métis (HSM)	<ul style="list-style-type: none"> • Identification of Lake Huron Watershed Métis community • Agreements with local nuclear industry (Bruce Power, 2009) 	<ul style="list-style-type: none"> • Community is not in one physically defined location, however their offices are ~26km from the Douglas Point site in Southampton, Ontario

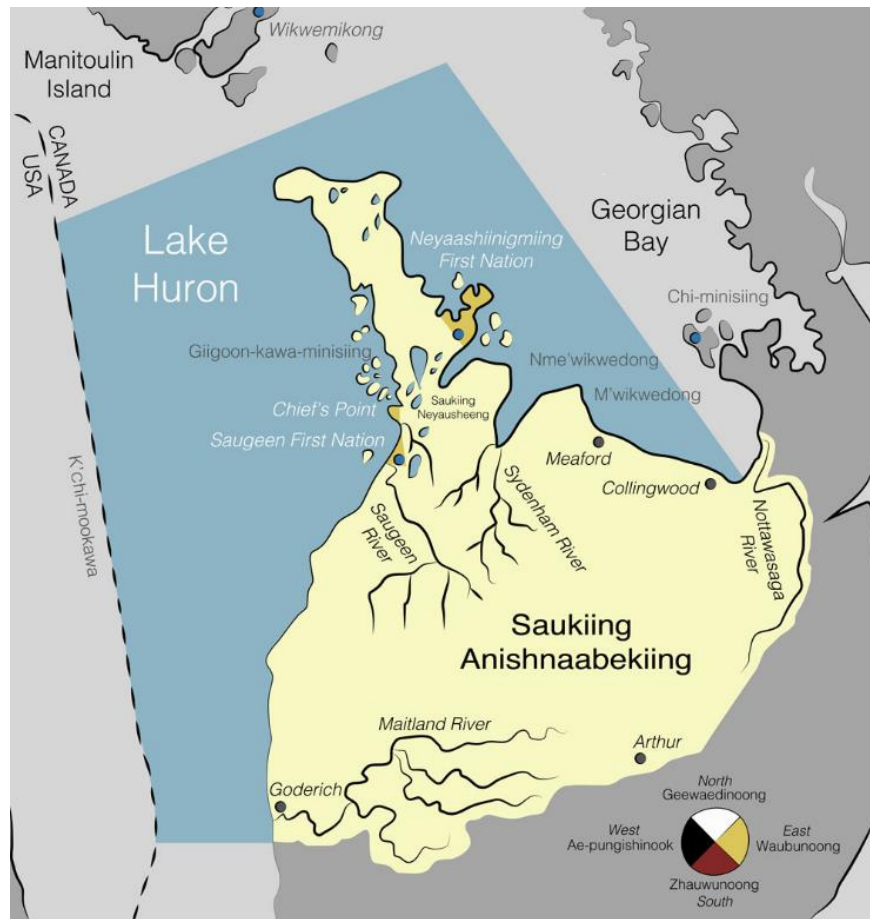
This IER provides background information on these communities and/or representative organizations with a potential interest in the project and includes, where possible, reference to individual community’s elected council, geographic location, population, and associations or memberships. This IER is revised as these communities and organizations provide additional information.

3.1 Saugeen Ojibway Nation

The SON represents the Saugeen Anishnaabek people who have lived on or near the Saugeen (Bruce) Peninsula for, “as long as our history remembers.” (Saugeen Ojibway Nation, 2019a) SON’s Environment Office was created by the Joint Council and serves the Joint Chiefs and Councils (Joint Council) of two distinct First Nations: the Chippewas of Saugeen First Nation and Chippewas of Nawash Unceded First Nation. Joint Council consists of the leadership from both the Chippewas of Nawash Unceded First Nation (Neyaashiinigiimiing; Nawash; Cape Croker) and the Chippewas of Saugeen First Nation (Saugeen) encompassing both chiefs and all councillors. (Saugeen Ojibway Nation, 2019b)

According to the organization’s website the SON Environment Office provides: “the infrastructure and expertise for environmental matters that affect the interests of the Saugeen Ojibway Nation and assist the Chiefs and Councils of the Saugeen Ojibway Nation in asserting First Nation jurisdiction over the environment of the Traditional Territory.”(Saugeen Ojibway Nation, 2019a) In particular, the SON Environment Office’s concerns include nuclear issues, including a mandate to address nuclear legacy issues. The SON Environment Office has worked on behalf of the two communities to achieve nuclear industry commitments with respect to planning for waste projects within the region. The Environment Office reports to the SON Joint Council and regularly updates the communities of Neyaashiinigiimiing and Saugeen with communications, such as webinars and newsletters. (Saugeen Ojibway Nation, 2019b)

The traditional territory of the SON extends around two million acres across the Saugeen (Bruce) Peninsula from Lake Huron in the west to Georgian Bay in the east and south to what is now known as the Town of Arthur and the Town of Goderich. (Saugeen Ojibway Nation, 2019a) Douglas Point is located within their traditional territory.



Source: SON press release, 2019 (Saugeen Ojibway Nation, 2019c)

Figure 1 - Saugeen Ojibway Nation Traditional Territory - Anishnaabekiing

There were two main treaties that were negotiated in the mid-1800s that involved the Saugeen Anishnaabek. In 1836 representatives of the Crown and from some Anishnaabe peoples signed the Saugeen Tract Purchase (Treaty 45 ½), involving 1.5 million acres of land: “European encroachment and promise of land on Manitoulin Island convinced the Saugeen Anishnaabek to surrender all land south of Owen Sound.” (Government of Ontario, 2018)

In 1854 Treaty 72, the Saugeen Peninsula Treaty was signed by representatives of the Crown and representatives of the First Nations. This was negotiated between Laurence Oliphant, Superintendent General for Indian Affairs and the Saugeen Anishnaabek. (Saugeen Ojibway Nation, 2019a)



Source: Government of Ontario Map of Treaties and Reserves (Government of Ontario, 2018)

Figure 2 – Map of Treaty 45 ½ and Treaty 72 and Locations of the Reserve Lands of the Chippewas of the Saugeen First Nation and the Chippewas of Nawash Unceded First Nation

Currently, there is a multi-year trial underway for two claims involving the SON. (Humphries, 2019) One is a first of its kind title claim asking the Crown to recognize the SON's "Aboriginal title" to the water's surrounding the land of their traditional territory, as these waters were never surrendered by treaty. The second claim asserts that in signing Treaty 45 ½ the Crown promised to protect the Saugeen (Bruce) Peninsula from further settler encroachment for the SON. However, in 1854, representatives for the Crown claimed they could no longer protect the peninsula for the SON from further settlement, which the SON disputes. (Saugeen Ojibway Nation, 2019c)

The table below provides an overview of the land base size and registered population both on and off reserve lands for the SON's two federally registered First Nations, the Chippewas of Saugeen First Nation and the Chippewas of Nawash Unceded First Nation.

Table 3-2
Saugeen Ojibway Nation Land Base and Population

First Nation	Land Base Description	Total Land Base Size (ha)	Registered Aboriginal Population		Total Registered Population
			On Reserve Lands	Off Reserve Lands	
Chippewas of Saugeen First Nation	Saugeen (No. 123)	5,071.6	855	1,053	1,908
Chippewas of Nawash Unceded First Nation	Chippewas of Nawash Unceded First Nation (No.122)	8,083.7	758	1,982	2,740

Source: INAC, 2019 & INAC, 2019a

3.1.1 Chippewas of Saugeen First Nation

The Chippewas of Saugeen First Nation have four areas of reserve lands: Chief's Point 28 No. 06220, Saugeen & Cape Croker Fishing Island 1 No. 06143, Saugeen 29 No. 06221 and Saugeen Hunting Grounds 60A No. 06222. The biggest reserve land, Saugeen 29, occupies 3,815 ha of land, 24 km west of Owen Sound on the east shore of Lake Huron and at the south end of the Bruce Peninsula. Saugeen has a total registered population of 1,908 (as of 2019 September). Roughly 55 per cent of the registered population reside off reserve lands (1,053).

The governing body of Saugeen First Nation is composed of one chief and nine 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 an Indian Act Election System and council election occurs every two years through voting members of the First Nation.

22 per cent of the registered population of Saugeen have Indigenous language knowledge, with 15.9 per cent having an Indigenous language as their first language. (INAC, 2019)

The Saugeen First Nation is represented by the SON Environment Office on projects where the Crown has the duty to consult, such as commercial fisheries and most relevant to the Douglas Point Waste Facility, nuclear projects. Note that proponents such as CNL are required to support the Crown (in the case of nuclear projects the Crown is the CNSC) with the Crown's duty to consult through CNL's engagement activities with Indigenous communities. (SON, 2019a)

3.1.2 Chippewas of Nawash Unceded First Nation

The Chippewas of Nawash Unceded First Nation have three areas of reserve lands: Cape Croker Hunting Ground 60B No. 06219, Neyaashiinigiing 27 No. 06218 and Saugeen & Cape Croker Fishing Island 1 No. 06143. The biggest reserve land, occupies 7183.3 ha of land on the West shore of Georgian Bay on the Bruce Peninsula. The name of "Nawash" comes from chief Nawash, who fought alongside Tecumseh in the war of 1812. The community is approximately 26 km from Wiarton, 64 km from Owen Sound, and 250 km from Toronto.

The Chippewas of Nawash Unceded First Nation has a total population of 2,740 as of September 2019. Roughly 72 per cent of the community's registered population live in off-reserve lands.

The governing body of Saugeen First Nation is composed of one chief and nine 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 an Indian Act Election System and council election occurs every two years through voting members of the First Nation. (INAC, 2019a)

13.8 per cent of the registered population of Nawash have knowledge of an Indigenous language with 7.3 per cent having an Indigenous language as their first language.

The Chippewas of Nawash Unceded First Nation is represented by the SON Environment Office on projects where the Crown has a duty to consult, such as commercial fisheries and most relevant to the Douglas Point Waste Facility, nuclear projects. Note that proponents such as CNL are required to support the Crown (in the case of nuclear projects this is the CNSC) with the Crown's duty to consult through CNL's engagement activities with Indigenous communities. (SON, 2019a)

One Land Claim Settlement that is particular to the Chippewas of Nawash Unceded First Nation and did not involve the Saugeen First Nation is the Coldwater-Narrows Land Claim Settlement. In 2012 the Chippewa Tri-Council (representing the Chippewas of Rama First Nation, the Chippewas of Georgina Island First Nation and Beausoleil First Nation) and the Chippewas of Nawash Unceded First Nation signed a Settlement Agreement on the claim with the Government of Canada. The Coldwater-Narrows claim dates back to 1836 and is related to the alleged surrender of the Coldwater-Narrows reserve and the sale of those lands. The Coldwater-Narrows reserve land was a narrow strip of land that was originally a portage route in Ontario between what is now Orillia and Matchedash Bay on Lake Huron. The claim was based on the determination that the surrender of the reserve was not conducted properly and that the land had been sold below value. (Chippewas of Nawash First Nation, 2019)

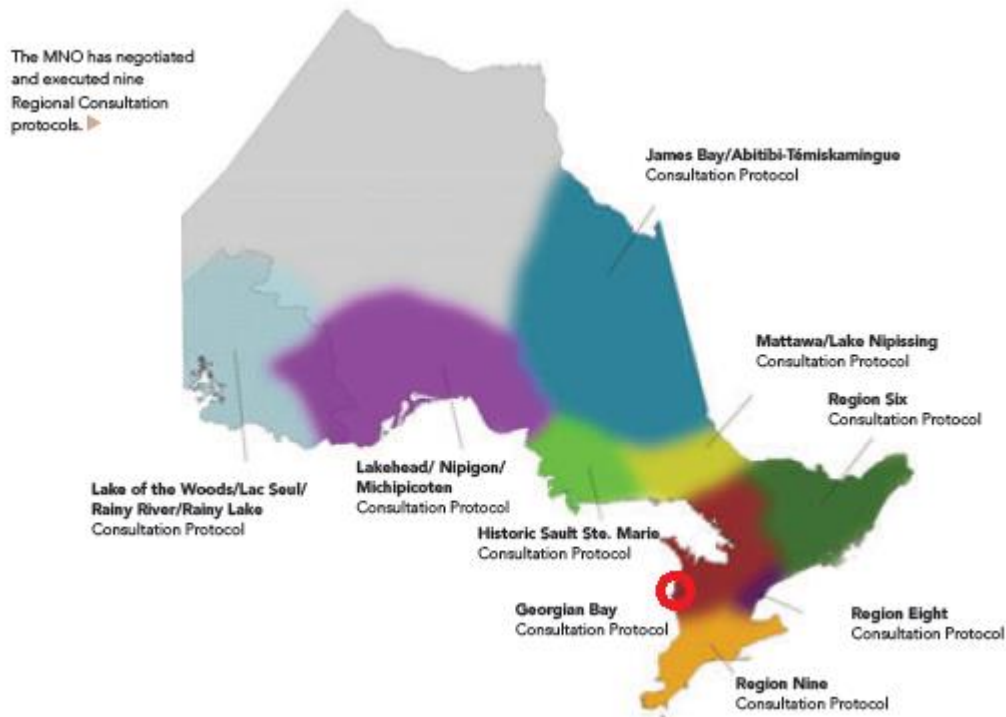
3.2 Métis Nation of Ontario

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.*" (MNC, 2019).

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 18,000 Métis citizens (MNO, 2019).

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 (MNO, 2019a). Across the province there are approximately 30 Chartered Community Councils representing local Métis citizens (MNO, 2019). 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) (MNO, 2019b). Nine Regional Consultation protocol areas are identified below the table below.



Source: Métis Nation of Ontario Annual Report, 2015-2016, with addition of Project location (MNO, 2016)

Figure 3 - Geographic Locations of Traditional Métis Harvesting Territories in Ontario

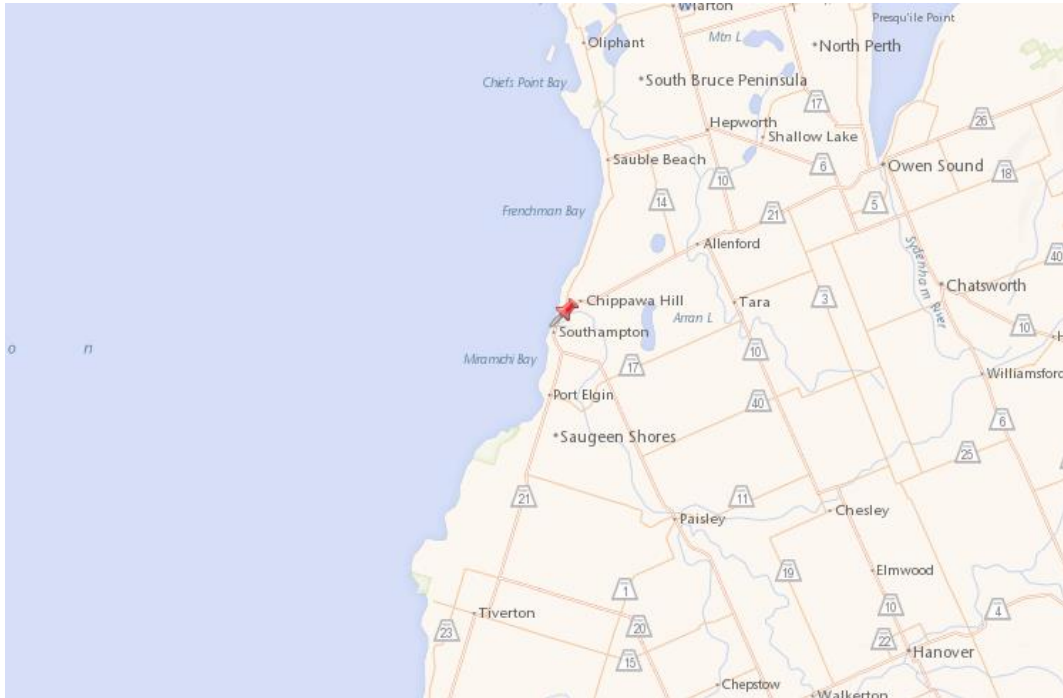
In 2008, the MNO signed an Ontario-Métis Nation Framework Agreement with the Provincial Government. An accommodation agreement has also been negotiated between Ontario and the MNO with respect to Métis harvesting rights. This agreement effectively allows harvesting of food by Métis without a licence in traditional territories, provided they hold a Harvester's Certificate. 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 (MNO, 2019c).

The Regional Consultation Protocol for the Georgian Bay Traditional Territory, the territory in which Douglas Point is located, was signed by the Georgian Bay Métis Council, the Grey-Owen Sound Métis Council (now Great Lakes Métis Council) and the Moon River Métis Council in 2009. Out of this protocol the MNO Georgian Bay Traditional Territory Consultation Committee (GBTTCC) was created to engage with the Crown and proponents on projects where the Crown's duty to consult is triggered. (MNO, 2009a) Note that in the case of licensing activities under the Nuclear Safety and Control Act (NSCA) or Environmental Assessments involving CNL as a proponent, the Crown is the CNSC.

3.3 Historic Saugeen Métis

The Historic Saugeen Métis (HSM) are identified as a distinctive Indigenous community, with a unique Métis history and culture who lived, fished, hunted, trapped, and harvested the lands and waters of the Bruce Peninsula, the Lake Huron proper shoreline and their traditional Métis territory.

The HSM are based out of Southampton, Ontario and determine that the geographic scope of the community covers: “275 km of shoreline from Tobermory and south of Goderich, and includes the counties of Bruce, Grey and Huron.” Douglas Point falls within this territory. (HSM, 2019)



Source: Google Maps (Google, 2019)

Figure 4 Location of the Historic Saugeen Métis Office

The HSM represent the descendants of the historic Métis who traded in the region. The first trader that the HSM note is Pierre Piché, who arrived around 1816 at Saugeen. According to the HSM: “Upon Piché’s arrival in the Saugeen territory, the Ojibwe invited Piché to share unmolested the resources of the Saugeen territory, with the understanding that Piché would share in the protection of the environment for the benefit of both aboriginal peoples.” (HSM, 2019a)

As the HSM are identified as among the Indigenous people who have, “lived in, cared for and relied on the traditional Saugeen territory for generations” the HSM works to “ensure a sustainable environment for current and future Métis families claiming Section 35, Canada Constitution Act (1982) Aboriginal rights in the traditional Métis Saugeen territory.” On behalf of the HSM Council the Lands, Resources and Consultation Department interacts with proponents on projects within the HSM territory. (HSM, 2019b)

4. INDIGENOUS COMMUNITIES ENGAGEMENT

The following section identifies CNL's Indigenous engagement objectives, the methods adopted to meet these objectives, the Indigenous communities that CNL has identified and included in its Indigenous engagement for the Project and planned engagement activities.

4.1 Objectives

As part of its corporate, environmental and social responsibility, CNL recognizes and encourages the ongoing engagement of Indigenous communities through the course of decommissioning the Douglas Point facility. Through its engagement activities, CNL seeks to engage, build and strengthen relationships as well as inform communities while building awareness and understanding of decommissioning activities. CNL will engage in dialogue with community members on the potential effects of decommissioning activities on the environment and on Indigenous and/or treaty rights including rights to trap, hunt, fish, gather or conduct cultural ceremonies.

CNL's Indigenous engagement objectives include:

1. Initiating and maintaining a dialogue - two way communication channels between CNL and Indigenous Peoples to determine the best methods for communicating Project information and to ensure opportunities for Indigenous communities to provide input on Project considerations including: design, assessment of impacts, etc.;
2. Developing meaningful, user friendly information and communication products geared for the public and Indigenous communities, and providing accessible and current information on Project activities;
3. Demonstrating CNL's long term commitment and approach to safe and responsible management of AECL's radioactive waste and decommissioning liabilities;
4. Informing and educating Indigenous communities about nuclear decommissioning, environmental remediation and radioactive waste management;
5. Using engagement to further the development and maintenance of long-term relationships with Indigenous Peoples; and,
6. Meeting all regulatory based communication and engagement requirements.

To meet these objectives, CNL is developing specific strategies to increase effectiveness so that Indigenous engagement requirements to support the decommissioning of the Douglas Point facility are met. These strategies include:

- Presenting information in a format that is easily understood through a variety of communications channels using targeted key messaging;
- Facilitating channels for Indigenous Peoples to provide feedback back to the project, particularly related to any potential impacts to Indigenous and/or treaty rights;
- Creating opportunities to build mutual understanding of CNL and Indigenous perspectives;
- Engaging technical experts to communicate information in various formats;
- Accomplishing all required activities in a timely manner; and,
- Providing various means for Indigenous Peoples to access information and to share information and perspectives with the project.

Regulatory requirements for Indigenous engagement are set out above in Section 2 of this IER. The REGDOC provides detailed information on Indigenous engagement and sets out the "requirements and guidance for licensees" with respect to Indigenous engagement. It also provides procedural direction for licensees as noted above in Section 2.

4.2 Identified First Nation and Métis Communities

A proposed list of Indigenous communities with a potential interest in the Project was identified by CNL and is included above in Section 3 of this IER, which describes how each community was identified. The proposed list of Indigenous communities is provided above in Table 3-1 along with a brief rationale for inclusion. As noted earlier, the proposed list is subject to change based on information and dialogue with the identified communities. Background information presented in this IER on these communities and/or representative organizations with a potential interest in the Project will be revised as additional information is provided by these communities and organizations through the engagement process.

The CNSC has made funding available through its Participant Funding Program. This funding is made available to assist Indigenous communities and the public to participate in the Project, review of the licence amendment application, and the CNSC's hearing processes.

CNL is offering supplementary funding to further enhance participation from Indigenous communities for projects. With respect to the Douglas Point facility, CNL has offered funding to all identified Indigenous communities to support participation in the licence amendment application hearing.

4.3 Engagement Methods

Engagement methods are designed to communicate information to and attain input from identified Indigenous communities, while fulfilling CNL's corporate and regulatory objectives. Methods will evolve based on feedback. CNL will also look to tailor its methods to the individual Indigenous communities based on the indicated preferences of the respective Indigenous communities. For instance, meetings and other community engagement activities could include involvement of third parties, such as CNSC or AECL, if requested by an Indigenous community.

Methods may include:

- Project notifications and newspaper advertisements;
- Letters to Indigenous communities and/or organization representatives (accompanied by follow up calls);
- Email correspondence and/or phone calls with Indigenous communities and/or organization representatives;
- Meetings with Indigenous communities and/or organization representatives to discuss the Project and potential impacts;
- Community information sessions, including display materials and handouts;
- Media notifications/releases;
- Web page;
- Presentations to Indigenous communities upon request;
- Distributing copies of maps, technical studies or reports upon request;
- Technical meetings, upon request, to provide interested communities an opportunity to discuss more detailed technical information concerning the Project;
- Targeted community initiatives;
- Workshops;
- Douglas Point site visits;
- Work plan development to formalize engagement processes with communities;

- Capacity assistance and building, as appropriate; and,
- Work with Indigenous Peoples to build upon and/or incorporate knowledge from existing Indigenous Knowledge studies to ensure that information is accurate and reflective of the diverse communities in the area.

4.4 Engagement Activities Completed

Indigenous engagement commenced in October 2019 with the notification letter and information package sent to all identified Indigenous communities on October 21, 2019.

The letter gave an overview of the licence amendment and plan to decommission the Douglas Point Waste Facility. It also provided mechanisms for comments and/or questions. The information package provided some of the information support (with the understanding that more would follow) that the Saugeen Ojibway Nation require, as outlined in their SON Consultation Process document, as a necessary part of the pre-engagement phase. Follow up outreach (by phone and email contact) was conducted with recipients to confirm receipt of the information and to ascertain the best means for ongoing contact.

Engagement activities are at the discretion of the various communities and subject to community availability.

Table 4-1 provides a summary of engagement activities up to 2020 March 23. As the decommissioning project for the Douglas Point Waste Facility progresses, the IER and future submissions (e.g., Commission Member Document) will be updated with any additional engagement activities undertaken.

Correspondence and other engagement activities, from meetings to phone calls, are tracked and logged. This table is means of showing the tracking of engagement activities, in this way it functions as an engagement logging system.

Table 4-1 Engagement Log to Date

Date	Event	Details
Saugeen Ojibway Nation		
October 21, 2019	Letter and information package	This letter from CNL to the two First Nation communities in the SON (the Chippewas of Saugeen First Nation and the Chippewas of Nawash Unceded First Nation) and copying the SON Environment Office enclosed a link to information on the project, including the DDP, the licence amendment application and some "Quick Facts" on the project.
October 21, 2019	Email	This email was to CNL from the Saugeen First Nation confirming of receipt of letter and directing to the SON Environment Office.
November 1, 2019	Phone call	This call was a follow-up call to the SON Environment Office from CNL.
November 13, 2019	Emails	Follow-up emails between CNL and the SON Environment Office.
January 14, 2020	Emails	Emails between CNL and the SON Environment Office to coordinate meeting.
February 06, 2020	Email	This email shared the CNSC public notice for hearing dates.
February 11, 2020	Email	This email from CNL to the SON Environment Office Shared the revised version of the DDP.

Date	Event	Details
February 26, 2020	Emails	These emails between CNL and the SON Environment Office coordinated a new meeting date.
March 04, 2020	Email	This email from CNL to the SON Environment Office shared the revised EER, ERA and 2018 Annual Compliance and Monitoring Report.
March 09, 2020	Meeting	This meeting between the SON Environment Office and CNL discussed the project and SON interest in the project.
March 20, 2020	Email	This email from CNL to SON Environment Office Energy Manager shared information on future engagement plans in light of pandemic, as well as the new hearing dates.
March 23, 2020	Email	This was an email from SON Environment Office to CNL.
April 22, 2020	Information package	This email shared the second revision of the Indigenous Engagement Report with the Saugeen Ojibway Nation.
May 1, 2020	Email	These emails coordinated the sharing of two requested documents related to the decommissioning project.
June 12, 2020	Emails	These emails from CNL to the SON Environment Office shared an invitation to a public webinar in June, provided link to revised notice of hearing and offered a community-specific webinar and capacity support.
July 21, 2020	Emails	These emails shared webinar links and coordinated a facility tour.
July 29, 2020 – August 5, 2020	Emails	These emails were to coordinate a facility tour at the Douglas Point facility.
August 25, 2020	Facility tour	This tour included representatives from the SON Environment Office, an ecological consultant for the SON and an archaeological consultant for the SON and representatives of CNL.
August 26, 2020	Email	This email from the SON Environment Office to CNL requested specific information for the SON's nuclear decommissioning technical consultant.
September 4, 2020	Email	This email from CNL to the SON Environment Office shared some documents and offered a meeting between CNL and the SON Environment Office and their nuclear decommissioning technical consultant.
September 9, 2020	Invitation	This invitation to the September 16, 2020 webinar on the Douglas Point Decommissioning was shared with the SON.
September 11, 2020	Emails	These emails were to coordinate a meeting between CNL and the SON Environment Office and their nuclear decommissioning technical consultant.

Date	Event	Details
September 17, 2020	Meeting	This meeting between CNL and the SON Environment Office and their nuclear decommissioning technical consultant. Discussed questions and information requests from the SON's nuclear decommissioning technical consultant.
September 18, 2020	Email	This email from CNL to the SON Environment Office shared an initial three documents for the SON's nuclear decommissioning technical consultant.
October 5, 2020	Email	This email from CNL to the SON Environment Office shared the remaining information and documents for the SON's nuclear decommissioning technical consultant.
Historic Saugeen Métis (HSM)		
October 21, 2019	Letter and information package	This letter enclosed a link to information on the project, including the DDP, the licence amendment application and some Quick Facts on the project.
October 22, 2019	Email	This email from the HSM Lands and Resources Coordinator to CNL confirmed receipt of the letter and information package from CNL.
November 1, 2019	Phone call	This phone call was a follow-up to the HSM Lands and Resources Coordinator from CNL.
November 8, 2019	Emails	These emails between HSM Lands and Resources Coordinator and CNL coordinated a meeting.
December 11, 2019	Meeting	This meeting between the HSM and CNL shared an overview of the project and the HSM and discussed interest in the project.
December 13, 2019	Emails	These emails between the HSM and CNL were in follow-up to the meeting.
February 06, 2020	Email	This email from CNL to the HSM shared the CNSC public notice or hearing dates.
February 11, 2020	Email	This email from CNL to the HSM shared the revised DDP.
February 26, 2020	Meeting	This meeting between CNL and the HSM discussed preliminary feedback on the DDP, enabling HSM participating at the hearing.
March 03, 2020	Emails sharing revised EER, ERA and 2018 Annual Compliance and Monitoring Report	This email from CNL to the HSM shared the revised EER, ERA and the 2018 Annual Compliance and Monitoring Report.
March 05-06 2020	Emails	These emails between the HSM and CNL were coordinating a facility tour for April and sharing documents.
March 11-13, 2020	Emails	Emails between HSM and CNL to coordinate support of hearing participation.

Date	Event	Details
March 20, 2020	Email	Email from CNL to HSM Lands and Resources Coordinator. The email shared information on future engagement plans in light of pandemic, as well as the new hearing dates.
March 20, 2020	Email	Email from HSM to CNL.
April 22, 2020	Information package	This email shared the second revision of the Indigenous Engagement Report, as well as a draft agreement for support for hearing participation with the HSM.
April 24, 2020 – June 6, 2020	Emails	These emails were to coordinate draft agreement for support for hearing participation.
June 12, 2020	Email	These emails shared an invitation to a public webinar in June, provided link to revised notice of hearing, offered a community-specific webinar and expressed interest in community specific webinar for the HSM, as well as other community specific information about the Project.
June 18, 2020	Signed short-term contribution agreement	Short-term contribution agreement between CNL and the HSM was signed to enable the HSM to fully participate in the licence amendment application hearing.
June 25, 2020	Emails	These emails coordinated the HSM community webinar for July 30, 2020.
July 7, 2020	Meeting	This meeting between the HSM and CNL was to coordinate the facilitation of the HSM community webinar as well as a community mail out to share information with the community on the Project.
July 20, 2020 – July 28, 2020	Emails	These emails were to coordinate the HSM community webinar on the Project, including CNL sharing information for the HSM's promotion of the webinar to HSM community members.
July 28, 2020	Meeting	This meeting was to test the webinar platform and coordinate logistics for the HSM community webinar on the Project.
July 30, 2020	Community Webinar	The HSM community webinar on the Douglas Point Decommissioning was jointly facilitated by the HSM and CNL for HSM community members. At least 12 individuals participated in the webinar (>7 community members, 3 HSM representatives, 2 CNL representatives).
July 31, 2020 – August 5, 2020	Emails	These emails were in follow-up to the webinar and to coordinate a facility tour of Douglas Point.
August 7, 2020 – August 12, 2020	Emails	These emails were to share a draft of the community mail-out and revisions on said draft.
August 21, 2020 – August 24, 2020	Emails	These emails were to coordinate the facility tour for the HSM.

Date	Event	Details
August 25, 2020	Site tour	Three individuals from the HSM and two individuals from CNL toured the Douglas Point site. The HSM expressed interest and had questions about the footprint of the site, the spent fuel canister area and the drainage system.
August 26, 2020	Community mail-out	The printed copies of the community mail out were supplied to the HSM to distribute to members of the HSM. Note that this mail-out was intended to share information and facilitate dialogue and feedback on the Project with community members.
August 27, 2020	Emails	These emails were in follow-up to confirm receipt and approval of the mail out.
September 9, 2020	Invitation	This invitation to the September 16, 2020 webinar on the Douglas Point Decommissioning was shared with the HSM.
Métis Nation of Ontario (MNO)		
October 21, 2019	Letter and information package	This letter from CNL to the MNO enclosed a link to information on the project, including the DDP, the licence amendment application and some Quick Facts on the project.
November 1, 2019	Phone call	Follow-up call from CNL to the MNO, Manager of Lands, Resources and Consultations.
December 12, 2019	Meeting	This meeting between CNL and the MNO, Georgian Bay Traditional Territory Consultation Committee shared an overview of the project and the MNO Region 7 and discussed interest in the project.
December 13, 2019	Emails	These emails between CNL and the MNO were in follow-up to the previous meeting.
December 16, 2019	Emails	These emails between CNL and the MNO were in follow-up to the previous meeting.
February 06, 2020	Email	This email from CNL to the MNO shared the CNSC public notice or hearing dates.
February 11, 2020	Email	This email from CNL to the MNO shared the revised DDP.
March 03, 2020	Email	This email from CNL to the MNO shared the revised EER, ERA and 2018 Annual Compliance and Monitoring Report, as well as reaffirming offer of CNL support for MNO participation in hearing.
March 11, 2020	Email	This email from CNL to the MNO invited the GBTTCC to the Douglas Point site for a meeting and facility tour.

Date	Event	Details
March 13, 2020	Email	This email to CNL from the MNO confirmed that any meetings would need to wait until site restrictions were lifted.
March 20, 2020	Email	Email from CNL to the MNO. The email shared information on future engagement plans in light of pandemic, as well as the new hearing dates.
April 22, 2020	Information package	This email shared the second revision of the Indigenous Engagement Report with the MNO.
May 4, 2020 – May 6, 2020	Emails	These emails were to coordinate a capacity assistance to enable the MNO to participate in the licence amendment application hearing.
June 5, 2020 – June 6, 2020	Emails	These emails were to coordinate a draft agreement to enable the MNO to participate in the licence amendment application hearing.
June 12, 2020	Email	This email from CNL to the MNO shared an invitation to a public webinar in June, provided link to revised notice of hearing and offered a community-specific webinar.
July 21, 2020	Emails	These emails shared webinar links and coordinated a facility tour.
August 17, 2020 – August 21, 2020	Emails	These emails explored the possibility of coordinating a facility tour and followed up on the draft agreement.
August 31, 2020	Signed short-term contribution agreement	Short-term contribution agreement between CNL and the MNO was signed to enable the MNO to fully participate in the licence amendment application hearing.
September 3, 2020 – September 14, 2020	Emails	These emails were to determine the possibility of a facility tour for the MNO.
September 9, 2020	Invitation	This invitation to the September 16, 2020 webinar on the Douglas Point Decommissioning was shared with the MNO.

4.5 Feedback Received

Indigenous interests are considered any interests that CNL is generally aware of or that is expressed to CNL during engagement with identified Indigenous communities.

Information on traditional land use activities by communities will be drawn from existing studies and reports, formal and informal engagement activities and general knowledge of the region.

Consideration of any feedback will be integrated into planning for decommissioning, where applicable. In particular, CNL will seek feedback on potential impacts to Indigenous and/or treaty rights and potential mitigation measures.

CNL understand any feedback is preliminary and continuing engagement is necessary to ensure all interests are determined and addressed. Note that all three communities that CNL is currently engaging with have indicated interest in moving forward with relationship development between CNL and their community.

The table below is a preliminary look at potential interest by community, based on feedback received through

discussions with each community.

It is essential to note that as of October 15, 2020 the issues stated in this table were determined only from CNL's understanding of conversations held with each community. Further engagement is required to confirm or refine these issues in order to reach a mutual understanding with each community.

Table 4-2 Feedback Received

Date	Community	Issue	Incorporation into Planning	Response from Community
Saugeen Ojibway Nation (SON)				
March 09, 2020	SON Environment Office	The SON indicated interest in pursuing further engagement activities with CNL.	CNL is working to coordinate further meetings with the SON Environment Office.	
March 09, 2020	SON Environment Office	The SON cited preliminary/potential interest in archaeological potential or site.	CNL shared that there was precedent at other CNL sites for involving Indigenous Peoples in archaeological work.	
March 09, 2020	SON Environment Office	The SON shared information on the importance of SON perspectives in environmental monitoring.	CNL acknowledges interest in exploring ways to do so.	
March 09, 2020	SON Environment Office	The SON Environment Office indicated an interest in incorporating SON values into site restoration.	CNL acknowledged that this is something that could be explored when looking at next land use. CNL share that the current plan is to put the site into a state appropriate for industrial reuse.	
August 25, 2020	SON Environment Office	The SON Environment Office indicated an interest in exploring longer term relationship to ensure the SON is engaged throughout the decommissioning process and in determining the state of the land post-decommissioning.	CNL has acknowledged this interest and shared with the SON that decisions about the land post-decommissioning are with AECL, and that all parties (AECL, the SON and CNL) can discuss what this could look like.	
September 17, 2020	SON Environment Office	The SON, through their nuclear decommissioning technical consultant expressed interest in the end state post-decommissioning and what this would look like, as well as waste management practices and regulations.	CNL shared a number of documents and information relating to these interests and is interested in continuing to discuss these areas of interest with the SON.	

Date	Community	Issue	Incorporation into Planning	Response from Community
Historic Saugeen Métis (HSM)				
December 11, 2020	HSM	The HSM cited interest in migratory birds with respect to next land use of the site.	CNL has stated to the HSM that CNL will involve Indigenous communities in site restoration plans.	
December 11, 2020	HSM	The HSM raised concerns with wording in a table in the presentation showing lack of understanding of cultural or archaeological significance from an Indigenous perspective. The table indicated that there was unlikely to be items of significance, whereas the HSM cited that this should not be assumed.	CNL changed the wording and have taken this issue into consideration for planning of decommissioning activities and stated interest in working with the HSM to ensure that any items of cultural significance from the site are recognized as such.	
December 11, 2020	HSM	The HSM indicated interested in reviewing the IER, DDP and EER.	CNL have shared the DDP and EER, as well as other environmental documents with the HSM.	
February 26, 2020	HSM	The HSM cited concern that there had been a lack of knowledge of activities in the past under SWS licence.	CNL understands need for regular information updates to the HSM to keep community informed of activities at the facility. CNL has made documents available to the HSM. Routine updates and the regular sharing of documents will be incorporated into any cooperation agreement.	
February 26, 2020	HSM	The HSM are interested in involvement in site restoration and long-term site planning.	CNL has stated to the HSM that CNL will involve Indigenous communities in site restoration plans.	

Date	Community	Issue	Incorporation into Planning	Response from Community
August 25, 2020	HSM	The HSM cited interest in ensuring work involving the drain system is done in manner that is protective of Lake Huron.	CNL stated that its staging plans for decommissioning work will be done in such a manner to ensure protection of Lake Huron.	
Métis Nation of Ontario				
December 12, 2020	MNO	The MNO cited interest in visiting the site.	CNL offered to work on coordinating a visit for MNO citizens.	
December 12, 2020	MNO	The MNO indicated interest in assistance to participate in hearing.	CNL has offered funding to support MNO participation.	
December 12, 2020	MNO	The MNO shared importance of the importance of Métis rights being considered and incorporated into project.	CNL acknowledged this importance and indicated that since the project was lengthy and occurred in phases there was enough time that this could be done.	
December 12, 2020	MNO	The MNO indicated early/preliminary interest in environmental monitoring to ensure Métis perspectives are accounted for.	CNL acknowledges this interest and indicated that since the project was lengthy and occurred in phases there was enough time that this could be done.	

4.6 Planned Engagement Activities

Engagement activities with Indigenous communities regarding environmental remediation of the Douglas Point site, including the proposed decommissioning and demolition of the reactor and associated structures will progress and evolve as appropriate, necessary and requested. CNL will endeavour to evaluate and integrate information provided by identified Indigenous communities in the Project planning and design.

CNL has identified engagement activities that are planned to take place as the decommissioning project progresses. In general, these additional activities may include:

- Sharing IERs with identified communities;
- Meetings and/or community information sessions to provide information on the decommissioning of the Douglas Point facility, solicit feedback on the decommissioning plan and traditional land use activities, and discuss environmental activities and findings;
- Ongoing engagement with identified communities;

- Technical meeting facilitation, upon request, to provide interested parties with more in depth information and opportunities to question subject matter experts and provide feedback to inform the project and engagement activities;
- Opportunities for site visits, as requested,
- Participating in various targeted community initiatives, when appropriate, such as pow wows, heritage days;
- Project updates (e.g., letters, email correspondence, newspaper advertisements);
- Updates to web content as Project continues;
- Ongoing tracking and recording of comments, questions, issues and other feedback provided by Indigenous Peoples, providing responses and incorporating feedback, as appropriate;
- Identification of Indigenous community needs for capacity assistance to effectively participate in the project through a collaborative work plan;
- Ensuring capacity and accessibility for Indigenous communities to participate in the Project; and,
- Notifying identified communities of important regulatory activities.

Indigenous community specific engagement activities will be determined through discussions and identification of community interests. CNL will engage with Indigenous communities (i.e., Chief and Council, representative bodies, community members) to address community information requirements and input. Engagement will also outline and schedule the documentation that will be shared with groups for their review and comment (e.g., future detailed decommissioning plans and environmental reviews).

Table 4-3 Planned Activities

Date	Event
2020 October 16	Share current IER (Revision 2) with all identified Indigenous communities and inquire whether there is outstanding questions or information needed for each Indigenous community's participation in the hearing.
2020 December	Facilitate follow-up to the hearing with each Indigenous community.
2021	Coordinate facility tour with the MNO. Develop work plans with identified Indigenous communities.

4.7 Conclusion

As CNL prepares to take the Douglas Point facility out of its current state of storage with surveillance, CNL's engagement on the Phase 3 decommissioning of the Douglas Point facility is a starting point to developing relationships with Indigenous Peoples. With this initial engagement, Indigenous communities have the opportunity to share input on the decommissioning project and in particular any potential impacts decommissioning may have on Indigenous and/or treaty rights and CNL and Indigenous communities have the opportunity to discuss appropriate mitigation measures to any impacts. A key outcome of engagement is that CNL has the opportunity to incorporate Indigenous values into the remediation of the facility.

As engagement becomes more established, methods will aim at establishing meaningful discussions between CNL and identified Indigenous communities on issues of interest to both parties, potential impacts to Indigenous and/or treaty

rights and potential mitigation measures, enabling valuable feedback into the project. CNL will continue engagement efforts to support growth in awareness and understanding of the decommissioning of the Douglas Point facility.

CNL is committed to ongoing and meaningful Indigenous engagement and will inform and engage communities to improve understanding of the decommissioning project.

5. TRADITIONAL LAND AND RESOURCE USE BY INDIGENOUS PEOPLES

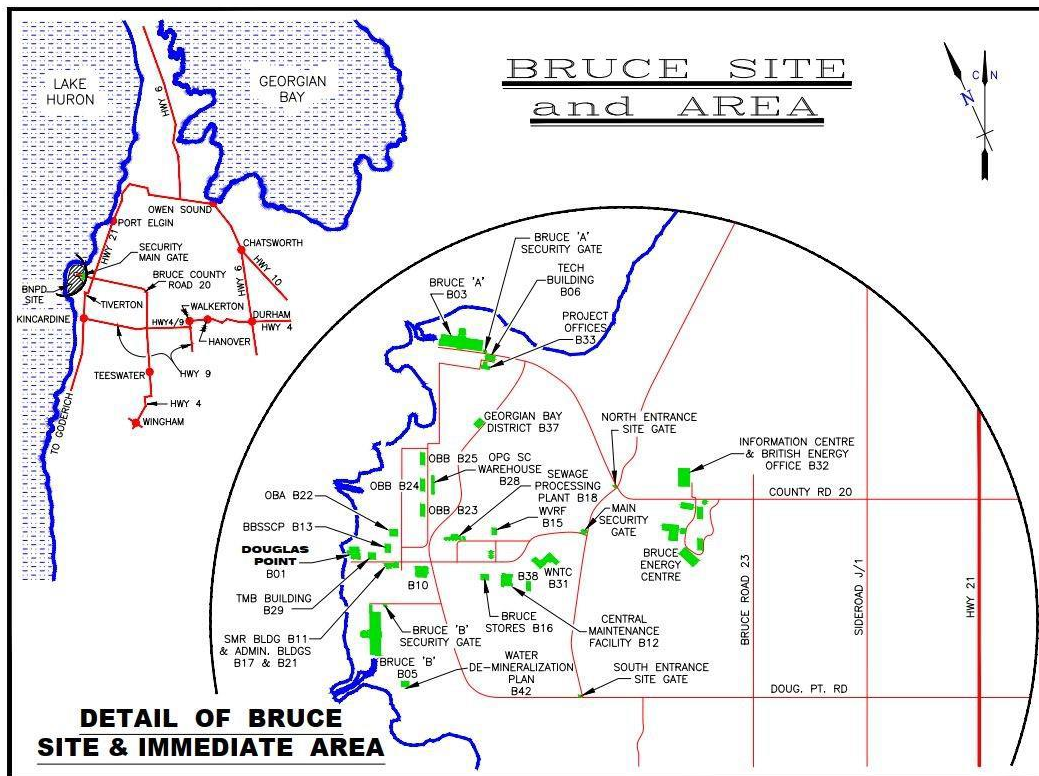
The assessment of effects on land and resources identifies linkages between the planned decommissioning activities and current environment, to determine the residual effects of the decommissioning of the Douglas Point prototype reactor and associated structures on land and resource use. Residual effects (i.e., those effects remaining after the implementation of all mitigation) are placed in the context of the cumulative effects of previous, existing and future projects.

5.1 Spatial Boundaries

The Douglas Point facility is surrounded by the adjacent Bruce Power site, which is located on the eastern shore of Lake Huron in Bruce County, Ontario, about 230 km northwest of Toronto. Lake Huron forms the northern and western boundaries of the facility, which is located approximately 100 m from the shoreline. The facility is bordered to the south and east by the Bruce Power site, which is itself 18 km north of Kincardine, 17 km southwest of Port Elgin/Saugeen Shores and about 5 km northeast of Tiverton.

The Bruce Power site covers an area of 932 hectares (9.32 km) and is completely enclosed by a fence, with all access to the site restricted by Bruce Power. There is a 1.6 km non-residential radius around the site and beyond this, land use in the vicinity of the site is primarily rural and includes agricultural lands, rural residential developments and recreational lands. Lake Huron is widely used for sport and commercial fishing as well as swimming and boating.

The spatial boundaries selected for the traditional and resource use assessment were chosen because they permit a description of existing conditions in sufficient detail to enable potential project VC interactions and effects to be identified, understood and assessed, including the contribution of the Project to cumulative effects.



Source: Environmental Effects Review (CNL, 2019)

Figure 5 - Location of the Douglas Point facility including the prototype reactor and its associated structures

5.2 Temporal Boundaries

Temporal boundaries (i.e., project phases) establish the timeframe during which project effects are assessed. The temporal boundary represents the timeframe during which project activities are actively occurring and considers the duration of predicted residual effects. The duration of an effect is defined as the amount of time between the start and end of a project activity or stressor (which is related to the project phases) plus the time required for the residual effect to be reversed. In the case of social land use changes, residual effects may be irreversible due to the nature of changes in human activity.

Table 5-1 Schedule of planned activities

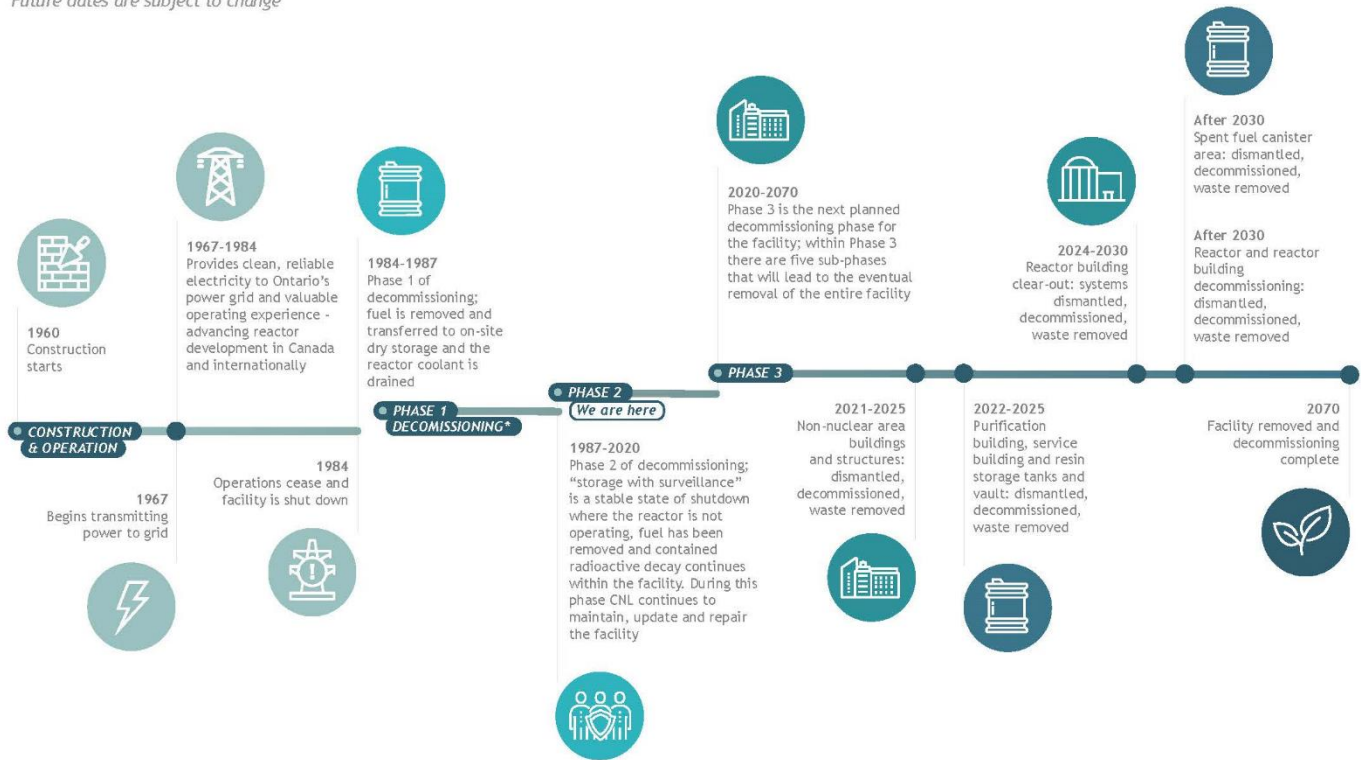
Planned Work	Dates*
Non-nuclear area buildings and structures	
Submit DDP including environmental review report	2020
Dismantling, decommissioning, demolition, waste disposal, closeout	2021-2025
Purification building, service building and resin storage tanks and vault	
Submit DDP including environmental review report	2021
Dismantling, decommissioning, demolition, waste disposal, closeout	2022-2025
Reactor Building Clear-out	
Submit DDP including environmental review report	2022
Dismantling, decommissioning, demolition, waste disposal, closeout	2024-2030
Spent Fuel Canister Area	After 2030 (Dates TBD)
Reactor and Reactor Building Decommissioning	After 2030 (Dates TBD)
Site Transfer	2070

*Subject to change

The following timeline shows the proposed phases for the decommissioning of the facility:

Douglas Point Prototype Reactor Decommissioning Timeline

Future dates are subject to change



*Public and Indigenous participation and engagement is ongoing throughout the Licensing and Decommissioning process.

Figure 6 Graphic Representation of the Timeline

6. CNL'S LONG-TERM RELATIONSHIP WITH INDIGENOUS PEOPLES

CNL is working towards developing long-term relationships with Indigenous Peoples that occupy and have traditional territories and modern day interests near its operations.

Specifically, CNL is committed to meaningful engagement with local Indigenous communities and is working to establish long term agreements with them. These interactions are on-going and allow CNL to learn how the Project could impact the rights and interests of Indigenous groups and to identify actions to be taken.

CNL recognizes that relationships may take time to form and evolve beyond the scope of one project, but believes this is consistent with the Government of Canada's approach to reconciliation with Indigenous Peoples and the right path forward.

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