



Supplementary Information

Oral presentation

Written submission from the Algonquins of Pikwàkanagàn First Nation

In the Matter of the

Canadian Nuclear Laboratories (CNL)

Application from the CNL to amend its Chalk River Laboratories site licence to authorize the construction of a near surface disposal facility

Commission Public Hearing Part 2

May 30 to June 3, 2022

Renseignements supplémentaires

Exposé oral

Mémoire de la Première Nation des Algonquins de Pikwàkanagàn

À l'égard des

Laboratoires Nucléaires Canadiens (LNC)

Demande des LNC visant à modifier le permis du site des Laboratoires de Chalk River pour autoriser la construction d'une installation de gestion des déchets près de la surface

Audience publique de la Commission Partie 2

30 mai au 3 juin 2022

Algonquins of Pikwàkanagàn First Nation Diet and Harvest Study

Executive Summary

This is the diet and harvest baseline and initial impact pathway identification report for the Canadian Nuclear Laboratories' (CNL or the proponent) proposed Near Surface Disposal Facility Project (NSDF), prepared for Algonquins of Pikwàkanagàn First Nation (AOPFN; Pikwàkanagàn). The impact pathways this report identifies are: confidence in the quality and safety of food and water, food security, and sensory disturbance. This research was completed alongside a Culture and Rights Impact Assessment (Malone et al. 2021). The findings of this report must be read alongside this report and do not replace the findings of the Culture and Rights Study. The intent of the NSDF project is to create a permanent, low-level radioactive waste disposal facility at Chalk River Laboratories (CRL), in AOPFN territory. After closure in approximately 2100, the area is expected to remain fenced with limited/no access for 300 years.

It is important to recognize that the information shared by AOPFN members for this study reflects an already heavily impacted diet and harvest baseline. AOPFN has long been concerned about the sufficiency to practice Indigenous cultural rights related to food sovereignty, including sustaining relationships with the water, plants, and animals in AOPFN territory and ensuring that Algonquin foods are safe to eat. Colonialism, privatization, and the transformation of the landscape in AOPFN's territory wrought large changes to the seasonal round and reliance on local foods. By the late 1800's, many AOPFN members settled at the community's present location. Specific to NSDF, there has been long term alienation from the CRL site since 1944. AOPFN members have identified it as high-quality habitat for moose and deer and a common fishing area.

AOPFN undertook this household harvest, consumption and food security study (the diet and harvest study or the Study) with assistance from the Firelight Group, to identify the priorities and concerns related to two CNL proposed projects (NSDF and the Nuclear Power Demonstration Project Decommissioning, (NPD) - together, called the Projects) in AOPFN territory on AOPFN members' health and well-being related to harvesting and confidence in the safety and quality of Algonquin foods.

The Study (the diet and harvest research conducted in relation to both NSDF and NPD) addresses gaps identified by AOPFN with the Proponent's draft Environmental Impact Statements for each respective project, which includes uncertain characterization of potential effects and impact pathways of the Projects on Aboriginal groups, and assumptions that lacked the support from site-specific information on diet and lifestyle. This diet and harvest study was funded by CNL and was

conducted during the Canadian Nuclear Safety Commission review stage of both projects' draft Environmental Impact Statements.

A key focus of this report (specific to NSDF) is to provide a baseline of current harvesting patterns, along with an understanding of reliance on and concerns related to both the Algonquin food system and commercially available food products in order to inform human health risk modelling for the AOPFN general population and most sensitive consumer. Results from the study were also used to identify potential project impact pathways and recommendations for further research. The scope of the study does not include initial or residual impact characterization or significance estimation or valuation of loss. Results are largely drawn from primary data collected in fall 2020 from AOPFN members who participated as key informants, focus group members or survey respondents in an AOPFN community survey.

The traditional food system of the Algonquins of Pikwàkanagàn First Nation (AOPFN) is made up of well over 100 kinds of fish, birds, large and small mammals, and plants. The study affirmed the deep and ongoing connection and reliance on the land and water for food and medicinal purposes. Most AOPFN members reported actively harvesting (hunting, fishing, and collecting plants and mushrooms) in areas around the Golden Lake Residential reserve (Pikwàkanagàn), including Algonquin Park, Whitney, and Bancroft. Ninety-four per cent of respondents indicated that they had eaten Algonquin foods and/or medicines in the last year. However, many members in both surveys and interviews pointed out that there were multiple stressors on the traditional food system and many barriers to accessing Algonquin food.

The long-term alienation of AOPFN members from much of their territory, including complete alienation from the CRL site, has substantially reduced accessible areas for harvesting and a concomitant decline in the frequency and use of the traditional food system, at the expense of nutrition and food security as evidenced by the high degree of food insecurity reported by AOPFN members.

Research has shown that not only are traditional foods more nutrient rich than commercially available food but that, as traditional food intake declines, there is a much higher risk of poorer diet and health outcomes. Too many AOPFN members are currently unable to afford nutritious equivalents at the store as evidenced by the high rate of food insecurity and relatively low levels of household income. These barriers to reliance on the traditional food system and/or affordability of acceptable quality food make it impossible for many families to have a basic foundation of healthy eating, making members highly vulnerable to immediate and chronic nutrition inadequacies, which can have serious long term impacts on mental and physical health. The results of this study and the associated NSDF Culture and Rights Study (Malone et al. 2021) indicate that the NSDF is likely to contribute to the continuation of chronic ongoing alienation

from portions of the CRL site (Malone et al. 2021) and contribute to uncertainty about the safety of traditional food in the territory. Benefits of the Project are a clean-up of contaminated areas and the decommissioning of approximately 100 buildings. However, until the anxiety and stress of the area are addressed, any 'new' project is likely to be met with resistance and skepticism by AOPFN members. Adverse effects from the Project may be moderated by proponent support for a traditional foods and water sampling and monitoring program to better understand if there are areas within AOPFN territory and/or in proximity to or within the CRL area that members can harvest with greater confidence. It is also imperative that AOPFN receive sufficient economic benefits to ensure that current and future members have similar health to those others living around them. This can come through a multitude of paths, including stable employment income that allows families to cover basic food security needs, along with immediate investments to ensure that the community no longer has an unsafe drinking water supply that increases their vulnerability to poor health.

Algonquins of Pikwàkanagàn First Nation Culture and Rights Study

EXECUTIVE SUMMARY

The purpose of this Culture and Rights study (the Study) is to provide current information and context regarding the status of Algonquins of Pikwàkanagàn First Nation (AOPFN) culture and Section 35 rights in relation to the Near Surface Disposal Facility (NSDF, the Project) proposed by Canadian Nuclear Laboratories (CNL, the Proponent). This Report is based on current and available AOPFN cultural and rights data pertaining to the traditional lands of the AOPFN, and in a defined Study Area at and around the Project. The Study Area includes the following components: the NSDF Project Footprint (NSDF site, within 250 m of the Project), Local Study Area (LSA, 5 km radius around the NSDF site), and Regional Study Area (RSA, 25 km radius around the NSDF site). The NSDF site falls entirely within the existing Chalk River Laboratories (CRL) site.

This Study is part of an AOPFN-driven approach to the environmental assessment (EA) process in which potential impacts to culture and Aboriginal rights are understood and assessed in ways that foreground Algonquin Knowledge and perspectives on the land and the meaning of what occurs on the land. Methods for the Study include scoping and selection of Valued Components (VCs), focus groups and verification sessions, Key Informant Interviews with “direct-to-digital” mapping, quantitative data collection via survey, and review of existing data and relevant documents provided by AOPFN.

This Study should be read as a companion document to AOPFN’s Rights Impact Assessment for the NSDF Project, a summary of which is planned to be integrated into the Report of Environmental Assessment filed by CNSC staff with the Commission. This Culture and Rights study is primarily a baseline, trend over time and initial project interaction focused study, rather than a full residual effects characterization. It was developed prior to the completion of the final EIS for the proposed NSDF. Mitigation, monitoring and accommodation measures committed to by the Proponent (CNL), the site owner (AECL on behalf of Canada) or the regulator (CNSC) have not been integrated into these findings and will need to be considered when identifying residual effects likely on AOPFN rights from the NSDF Project

The findings of the Study are summarized as follows:

Changes Over Time to AOPFN Rights in the NSDF and CRL sites

AOPFN ancestors had full access to their unceded territory prior to the establishment of the European fur trade in the 1600s. However, harvesting and traditional use rights, governance and stewardship rights, and cultural continuity rights have all been seriously constrained throughout AOPFN territories for over a century due to cumulative effects including displacement, settlement, cultural disruption, lack of consultation with AOPFN, and systemic and other forms of racism. AOPFN families residing in (and practicing rights in) the NSDF and CRL sites were displaced from the larger federal Chalk River Laboratories (CRL) site in the 1940s, and AOPFN members have since had essentially no access to the CRL site, and thus no ability to practice their rights at the site for over 75 years.

Valued Components for the Study are Harvesting and Traditional Use Rights, Governance and Stewardship Rights, and Cultural Continuity Rights. The results listed below show how AOPFN participants conceptualize the rights in each of these VCs, including current conditions and change over time, and summarize AOPFN-member identified potential interactions between the NSDF Project and AOPFN culture and rights.

Harvesting and Traditional Use Rights

Rights described by AOPFN participants include: hunting; trapping; fishing; gathering food plants and medicines; gathering plants and other natural materials for crafting and other cultural activities; and habitation sites.

Current conditions of these rights in the Study Area:

- Diminished quantities and qualities of game and fur-bearing species in preferred hunting and trapping areas;
- Diminished ability to access preferred harvesting and traditional use areas;
- Lack of confidence in drinking water and water quality in water bodies;
- Lack of access to the CRL site since 1944, including lack of access to good moose and deer habitat on site; and
- Lack of confidence in health of animals, fish, plants, medicines, and water in the Study Area due to lack of access to data about the health of these resources.

In summary, according to AOPFN members the Project interactions could impact AOPFN harvesting and traditional use rights in the NSDF and CRL site areas by contributing to and potentially exacerbating long-term physical alienation from the land, and exacerbating concerns about contamination of water, land, plants, and wildlife in proximity to the Project.

Governance and Stewardship Rights

Rights described by AOPFN participants include: rights to self-determination; to participate in decision-making matters which would affect their rights; to use Algonquin government structures in decision-making; to exercise traditional land tenure systems and traditional stewardship systems to conserve lands and resources for future generations; and to access information about the health of animals, fish, plants, medicines, and water, to make informed decisions about harvesting, and consumption of resources.

Current conditions of these rights in the Study Area:

- No permissions were sought from AOPFN to convert the area into a nuclear facility, and no recognition or accommodation for loss of use for over 75 years;
- AOPFN families were displaced from their traditional areas as a result of the CRL site;
- No uncontrolled access to the CRL site;
- No opportunities for AOPFN to provide input into how the CRL site is being managed;

- AOPFN has not been consulted until very recently on anything to do with the management of the CRL site;
- No confidence that AOPFN input will be adequately considered and accommodated by the Proponent on the proposed NSDF Project; and
- Lack of confidence in the ability to protect and conserve lands and resources in the Project areas due to lack of trust in the consultation process.

In summary, according to AOPFN members the Project interactions could impact AOPFN members' ability to participate in decision-making and to practice stewardship in the NSDF and CRL site areas. This is due to continued long-term physical alienation of AOPFN members from the NSDF and CRL sites, feelings of powerlessness due to alienation from lands and waters, lack of trust in the consultation process, lack of trust in AOPFN's ability to be heard during decision-making processes regarding the Project, and lack of access to information about the Project and associated impacts.

Cultural Continuity Rights

Rights described by AOPFN participants include: rights to practice AOPFN culture; to transfer knowledge between generations; to travel freely across the land and water of AOPFN territory; and to protect and conserve the lands and resources so future generations can practice their rights.

Current conditions of these rights in the Study Area:

- Diminished ability to teach and transfer knowledge about harvesting and traditional use rights, and governance rights and responsibilities;
- No ability to teach and transfer Algonquin knowledge or revive cultural practices in the Study Area due to long-term lack of access;
- Concerns about reduced quality of culturally/spiritually important sites at or near the CRL site, and the ability to protect and use these sites by AOPFN members.

In summary, according to AOPFN members the Project interactions could impact AOPFN cultural continuity rights in the NSDF site (and CRL site) area due to continued (and potentially longer-term) loss of access to this piece of their land base, and impacts to the future condition of the land and resources, thus impacting future generations' ability to learn and practice their culture or harvest resources at and near the NSDF site (and CRL site).

Recommendations from AOPFN participants for the Project should it go ahead include:

1. Environmental monitoring and site maintenance based on Algonquin knowledge and employment of AOPFN members;
2. Access to information and testing for AOPFN members, so they may exercise their governance and stewardship rights at the NSDF and CRL sites as well as in the general vicinity;

3. Open communication between the Proponent and AOPFN members regarding processes, benefits, and safety; and
4. Recognition of the history of the CRL site and the cumulative impacts on AOPFN culture and rights Acknowledgement from the Proponent of the displacement of those families and the lack of consideration for AOPFN rights throughout the lifetime of the CRL site.

The material reported herein is faithful to the insights and knowledge shared by AOPFN members involved in the Culture and Rights Study. It is a valuable and powerful resource for understanding pre-existing and Project Case potential impacts on AOPFN rights. AOPFN reserves the right to identify additional project interactions and impact pathways, conduct a full and proper effects characterization of Project-specific and cumulative effects on rights, and identify additional mitigation, monitoring and compensatory measures that should be applied to protect AOPFN rights from further infringement in the Project-affected area. It is understood this work is ongoing in the working group with the Canadian Nuclear Safety Commission on the rights impact assessment for NSDF, and at bilateral and trilateral tables between AOPFN, CNL and Atomic Energy of Canada Limited.

Algonquin Knowledge and Land Use Study

Executive Summary

Introduction

This AKLUS was completed by Shared Value Solutions (SVS), on behalf of AOPFN, and under the guidance and direction of band staff and leadership. The Study was scoped to focus specifically on areas of Algonquin land use¹ and occupancy² surrounding the proposed NSDF and NPD Projects.

This Study had three major objectives:

- Document evidentiary information that shows where and how Algonquins currently and historically have used the lands and waters around the NSDF and NPD sites, and Algonquin concerns related to these projects.
- Demonstrate how proposed and ongoing nuclear projects may impact Algonquin land use and occupancy.
- Propose appropriate mitigation measures and recommendations to ensure impacts to AOPFN rights and interests are minimized or accommodated.

The goal of the Study was to determine how the proposed NSDF and NPD projects will intersect with Algonquin land use and occupancy and the extent to which they will impact AOPFN's Aboriginal rights and interests. It is AOPFN's understanding and expectation that the results and recommendations of this Study will inform the EA processes (under CEAA, 2012) for these proposed Projects, and that AOPFN and CNL will work collaboratively to ensure impacts to Aboriginal rights and interests will be appropriately avoided, mitigated, and/or accommodated.

Methodology

The methodology used in this Study was based on the best practices outlined in Terry Tobias' Terry manual, *Living Proof: The Essential Data-Collection Guide for Indigenous Use and Occupancy Map Surveys*³. This approach is widely recognized as the best practice data collection method for Traditional Knowledge and Land Use and Occupancy Studies in Canada, and centers around semi-structured map biography and oral history interviews. Interviews were conducted in June 2020, and due to the COVID-19 pandemic, occurred through videoconferencing software (Microsoft Teams) using Esri Arc GIS Pro Online or Webapp (Geographical Information System software). A total of 13 AOPFN members were interviewed through this Study, two of whom chose to share their data with the Algonquins of Ontario (AOO)⁴. Other than these two interviews, data from AOPFN interviews was collected and stored separately from that of the AOO interviews.

During the map biography portion of the interviews, participants were asked a series of questions about their knowledge and uses of the lands and waters, including:

- wildlife harvesting (e.g. hunting, trapping, fishing)
- plant/medicine/natural material gathering

¹ Defined generally as hunting, fishing, trapping and gathering, and the use of sites and resources for cultural, ceremonial purposes and AOPFN members' connection to the land.

² Refers to an area that is known to an Indigenous group by virtue of continued use, habitation, naming, knowledge and control

³ Tobias, Terry. (2009). *Living Proof: The Essential Data-Collection Guide for Indigenous Use and Occupancy Map Surveys*. The Union of BC Indian Chiefs and Ecotrust.

⁴ Note: Interviews with AOO members were conducted concurrent with AOPFN interviews. Eighteen (18) interviews were conducted with AOO members, amounting to a total of 31 interviews for this Study. The results of the AOO are provided in a separate report.

- cultural and/or historically significant sites
- camping or overnight stays on the land
- travel routes and trails
- areas of ecological importance,
- and areas of demographic importance

A map of the AKLUS Study Areas, and broader Algonquin Settlement Area, were displayed on the screen and participants were asked to map the geographic location of the categories described above, specifically those that are of importance to them and within the proposed NSDF and NSDF Study Areas. The research team also collected descriptive information for each feature (e.g. seasonality, timing, Algonquin names, personal stories, etc.). During the oral history portion of the interview, participants were asked questions that focused on their general knowledge of the area, harvesting philosophies and techniques, uses of harvested species for food, ceremony, and crafts, personal stories about their Algonquin identity, culture, and life on the land, concerns about potential impacts of the NSDF and NPD projects, and recommendations for CNL regarding these projects, among other topics.

Interviews did not proceed unless the research team obtained informed consent and signed permission forms from participants. Each participant was assigned a four-digit PIN number to ensure confidentiality – no names or identifiers or other forms of personal information are included in the attached report. Participants were also given the opportunity to verify their interview transcripts and personal map, and revise or redact any information as appropriate. Once the Study is completed, all data will be transferred to AOPFN staff and leadership to ensure long-term ownership, control, access, and possession (OCAP).

The total geographic scope focused on for interviews included a 25 km terrestrial radius, with an additional 5 km aquatic area downstream of the Kichi-Sibi, for both the proposed NSDF and NPD project locations. The temporal scope of this Study included documentation of current use⁵ and historic use⁶, but participants were also prompted to discuss their concerns related to future/intended uses of the lands and waters.

Background: Algonquin History and Archaeology

Algonquins have been present on the lands and waters surrounding the proposed NSDF and NPD projects since time immemorial, and long before the EA processes for these projects were initiated. Subsequently, AOPFN history and archaeology peppers the landscape surrounding these projects. The attached Final Report contains a brief history of Algonquin use and occupancy of these lands, based on archival research completed by Joan Holmes & Associates Inc. It also contains a summary of the archaeological assessment work that has been completed at the NSDF Project site, by Kinickinick Heritage Consulting and Cameron Heritage Consulting.

Study Findings

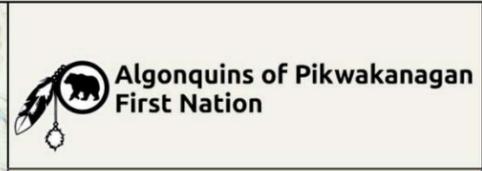
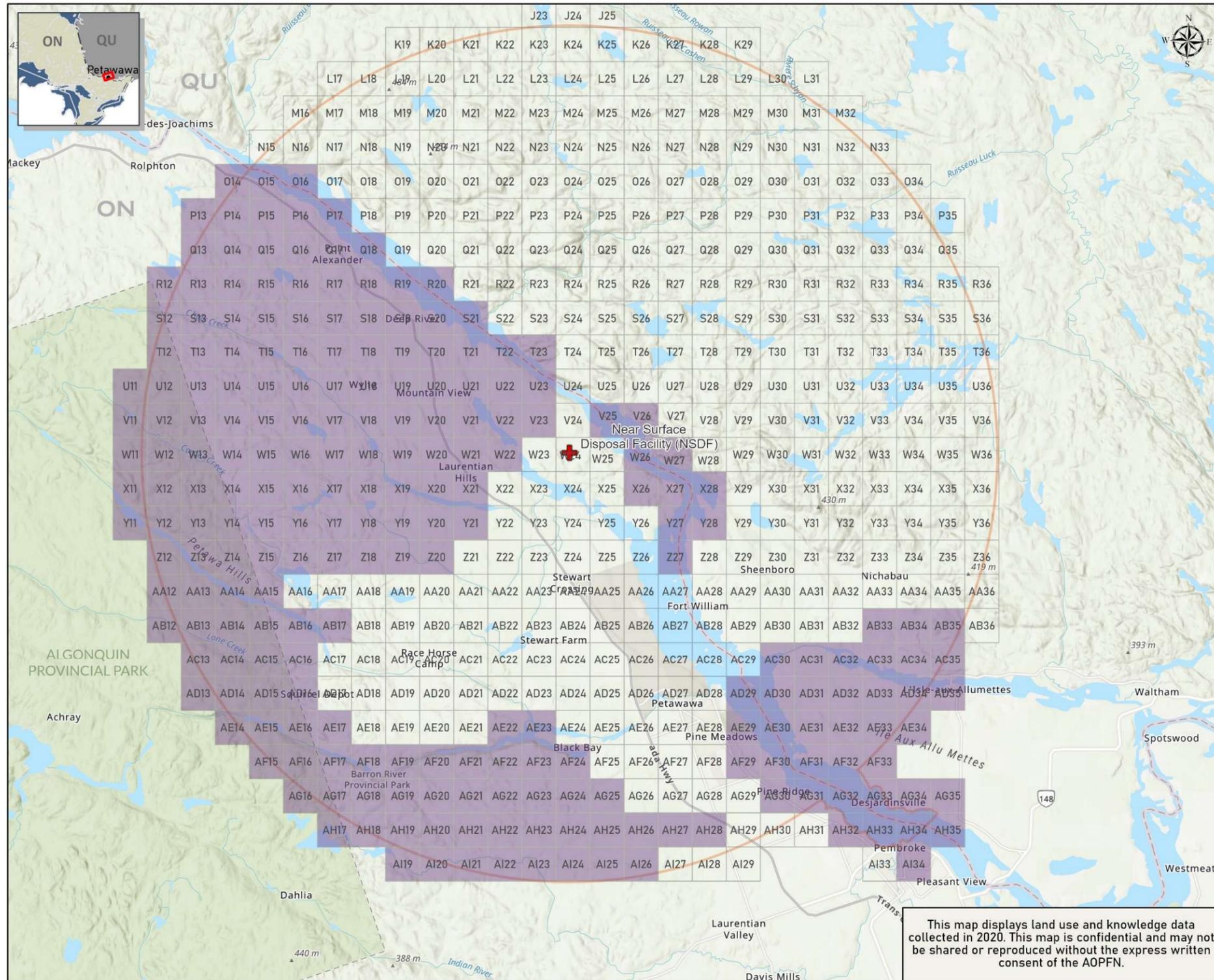
The study findings outlined below are specific to the NSDF Study Area.

⁵ Within the participants' lifetime.

⁶ Information participants know through teaching or knowledge transfer from past generations

Features Mapped in the Study Area

Participants mapped features extensively throughout the Ontario side of the NSDF Study Area, as shown in Figure 1 below. Participants mapped features all along the Ontario side of the Kichi-Sibi, except for a small section north of Petawawa, underscoring the significance of these rivers to Algonquin culture, history and contemporary land use. Other areas where participants mapped features include the lands and waters between Deep River, Rolphton and Algonquin Provincial Park, as well as those south of the CFB Petawawa boundary, and into Algonquin Provincial Park. It is clear from the map below that areas that have restricted access, such as the CFB Petawawa and CNL facilities, have restricted access to this part of an otherwise heavily used region within their territory. Participants expressed concerns about potential long-term and wide-ranging impacts related to radiation, non-radiological contamination, and access to traditional Algonquin lands and waters within this whole Study Area.



Algonquin Knowledge, Land Use & Occupancy Study for the Near Surface Disposal Facility

Algonquin Occupancy & Use in the Study Area

Presence of Data
 Absence of Data
 CNSC Facility
+ Near Surface Disposal Facility (NSDF)
STUDY AREAS
 NSDF Study Area

Scale: 1:210,000

Data sources: Esri, Canadian Nuclear Safety Commission, Algonquins of Pikwakanagan First Nation
 Spatial Reference: NAD 1983 UTM Zone 18N

Prepared 2020-09-11 by: **SHARED VALUE SOLUTIONS**

This map displays land use and knowledge data collected in 2020. This map is confidential and may not be shared or reproduced without the express written consent of the AOPFN.

Executive Summary Figure 1: Areas of Algonquin Land Use And Occupancy around the NSDF Project Site

Participants mapped the following categories of Algonquin land use and occupancy within the NSDF Study Area, as outlined in Table 1.

Executive Summary Table 1: Algonquin land use and occupancy categories mapped within the NSDF Study Area

ALGONQUIN LAND USE AND OCCUPANCY CATEGORY MAPPED	SPECIES OR SUB-CATEGORY
Personal fishing areas	<ul style="list-style-type: none"> • Bass • Lake trout • Pickerel/Walleye
Fish spawning habitat	<ul style="list-style-type: none"> • Pickerel/Walleye • Lake sturgeon
Species at Risk Habitat	<ul style="list-style-type: none"> • Bald eagle
Mammal Habitat	<ul style="list-style-type: none"> • Rabbit • Bear • White-tailed deer • Moose • Wolf
Wildlife Harvesting Locations (Area or Kill Site)	<ul style="list-style-type: none"> • Bear • Grouse • Moose • Partridge • White-tailed deer
Plant and Natural Materials Gathering Areas	<ul style="list-style-type: none"> • Blueberries • Birch • Cattails • Cedar • Chaga • Fiddleheads • Labrador tea • Wiken (Muskrat root/sweet flag) • Pine • Poplar • Raspberries • Spruce • Tamarack • Wild leek or onion
Overnight Locations	<ul style="list-style-type: none"> • n/a
Algonquin Cultural Sites	<ul style="list-style-type: none"> • Historically significant sites • Historic family or village sites • Spiritual, ceremonial, or sacred sites

Participants also identified a total of 61 unique species that they consider significant during the Study. They include species that were consumed and those that are not consumed but significant for other purposes such as monetary income (trapping, guiding, or sale), building or craft materials, or cultural importance.

*Table 2: All species documented by AOPFN participants during the AKLUS interviews.
NOTE: This is a list of all species mapped by AOPFN participants in both the NPD and NSDF Study Areas.*

SPECIES OF IMPORTANCE TO ALGONQUINS (AOPFN)
<i>Vegetation (Trees)</i>
Birch, Cedar, Pine, Poplar, Spruce, Tamarack, Willow
<i>Vegetation (Shrubs, herbs, flowers, berries, ferns, mosses)</i>
Blueberries, Cattails, Dandelions, Fiddleheads, Juniper bush, Labrador Tea, Wiken (Muskrat Root or Sweet Flag), Prickly Ash, Raspberry (berries, leaves), Red Willow, Gzibimkshk (Scouring Rush), Magajim mashkiai (Sweet Fern), Wild Leek or Onion
<i>Fungi & Lichens</i>
Chaga
<i>Mammals</i>
Badger, Bear, Beaver, Coyote, Fisher, Fox, Marten, Moose, Muskrat, Otter, Rabbit, Raccoon, Squirrel, Weasel, White-tailed Deer, Wolf (Algonquin)
<i>Fishes</i>
Bait fish, Bass, Brook Trout, Burbot, Catfish, Chub, Jackfish/Northern Pike, Lake Sturgeon, Lake Trout, Lake Whitefish, Mud Pout (or Brown Bullhead), Muskellunge, Pickerel/Walleye, Speckled Trout, Sucker, Sunfish, Yellow Perch
<i>Birds</i>
Bald Eagle, Barn Swallow, Ducks, Goose, Grouse, Partridge
<i>Reptiles & Amphibians</i>
Turtle (species unknown)

The full report contains detailed information on the importance of these animal and plant species (including their medicinal, ceremonial, and food uses, and the need to preserve these species), as well as the importance of hunting, fishing, knowing proper harvest protocols, and the overall importance of cultural sites found within the Study Area (e.g., Pointe Au Baptême, Oiseau Rock, and the Kichi-Sibi). Importantly, this information is told through the voices of AOPFN members, themselves.

Features Mapped on or near the NSDF Project

In addition to broader concerns, participants expressed concerns related to the features mapped on or near the NSDF Project, due to potential site-specific impacts related to site preparation and construction activities (e.g., vegetation clearing, mobilization of construction equipment, excavation, blasting, hauling of materials, grading, use of roads and increased vehicle traffic, engineered containment mound construction, surface and waste water management, waste management, and construction of supporting site infrastructure).

Participants mapped seven features within the grids bordering the NSDF site including wildlife harvesting for moose and white-tailed deer and cultural sites. More detailed information on the features participants mapped within these grids is shown in Table below.

Table 3: Algonquin land use and occupancy features mapped on or near the NSDF Project Footprint

#	GRID #	ALGONQUIN LAND USE AND OCCUPANCY IDENTIFIED
1.	U23	Wildlife Harvesting – Moose, white-tailed deer
2.	V22	Wildlife Harvesting – Moose, white-tailed deer
3.	V23	Wildlife Harvesting – Moose, white-tailed deer
4.	V25	Pikwakanagan Cultural Site - Historically, Significant Site
5.	W21	Wildlife Harvesting – Moose, white-tailed deer
6.	W21	Pikwakanagan Cultural Site - Historic Family or Village Site
7.	W22	Wildlife Harvesting – Moose, white-tailed deer

Participant Concerns & Suggestions

In addition to mapping features within the NSDF Study Area and describing their importance to Algonquin culture, participants described several concerns and suggestions related to the potential impacts of the NSDF project on their ability to exercise their Algonquin rights and interests. More detailed information on these concerns and suggestions, as described through the words of AOPFN participants can be found in the attached Final Report.

Key themes related to concerns included the following:

- Concerns about Environmental Impacts
- Concerns about Impacts to Harvesting
- Concerns about the Kichi-Sibi, Fish, and Bioaccumulation
- Concerns for the Ability of Future Generations to Use the Area
- Concerns about Protection of, and Access to, Sites of Cultural and Spiritual Significance
- Concerns about Loss of Access
- Concerns about Accidents

Key themes related to suggestions included the following:

- Monitoring Animal Populations over time
- Compensating AOPFN members appropriately
- Providing More Communication Materials
- Only Accepting Waste from the Chalk River Laboratories Site
- Protecting Areas of Ecological Concern
- Communicating Project Details More Clearly
- Creating Monitoring Programs for Species of Importance to Algonquin Harvesters

Analysis & Recommendations

The data demonstrates that there are potential impacts to Algonquin Aboriginal rights and interests as a result of the NSDF project that require accommodation and mitigation measures. These impacts are primarily related to the ability of the Algonquins to continue to use the area around the NSDF project to exercise their Aboriginal rights, including harvesting, accessing culturally significant sites, and otherwise using or occupying the land.

Participants voiced concerns about the safety of using the area and harvesting species for consumption, concerns about access to cultural sites, and concerns about environmental contamination and degradation. These concerns, if not addressed, have the potential to affect the land use and occupancy choices Algonquins make in the future. Building upon concerns and suggestions voiced by AOPFN participants, the research team drafted these recommendations, in consultation with technical and regulatory experts. They offer general mitigation and accommodation measures to apply to the NSDF site in response to participant concerns. Specifically, AOPFN is putting forward the following recommendations:

1. CNL should commit to pre-planning or engagement activities with AOPFN as early as possible for all forthcoming decision-making on this Project.
2. CNL should support a collaborative CNL-AOPFN process to complete a Valued Component (VC) gap analysis of the intersection between AKLUS findings and recommendations and Revised Draft EIS content.
3. CNL should fund a follow-up program, including an Algonquin country foods survey and monitoring program, focusing on species harvested within the AKLUS Study Area.
4. CNL should protect fish, wildlife, and plant species of importance to Algonquins during Project Construction, and ensure that sufficient habitat for these species continues to be available during Operations, Closure, and Post-Closure.
5. CNL should develop and implement a strong environmental monitoring program throughout all Project Phases (Construction, Operations, Closure, Post-Closure), using an adaptive risk management approach.
6. CNL should establish a holistic, Algonquin-specific follow-up program approach to monitoring that recognizes the interdependencies between ecological, socio-economic, community, and cultural health.
7. CNL should provide measures to ensure access to Algonquin sites of importance.
8. CNL should provide socio-economic accommodation measures to address cumulative effects and unavoidable impacts on Algonquin ecological and cultural species and sites of importance.

9. CNL should implement the following recommendations with respect to the three archaeological sites located at the NSDF site: CaGi-65 Upper, CaGi-66 Middle, CaGi-67 Lower:
 - a. Develop a contingency plan for artifact discovery and work stoppage.
 - b. Send all artifacts to Omàmiwinini Pimàdjowin (The Algonquin Way Cultural Centre).
 - c. Develop an archaeological research program in partnership with AOPFN to provide technical training and advance knowledge of Algonquin archaeology.

To reiterate, the information summarized here and in the attached Final Report reflects the understandings of the lead authors and is not intended to be a complete depiction of the dynamic and living system of use and knowledge maintained by Algonquins of Pikwakanagan First Nation (AOPFN) members. It is critical that CNL and CNSC read this correspondence and the enclosed Final Report in their entirety as all content has important details and supporting information that must be considered in the EA process for the proposed NSDF Project. We look forward to discussing the results of this Study further and collaboratively determining the ways in which impacts to Aboriginal rights and interests will be avoided, mitigated, and/or accommodated.

Should you have any questions, or require further information, please do not hesitate to contact me by telephone at [Phone Number for Authorized Representative] or by email at [Email for Authorized Representative].

Sincerely,

Chief Wendy Jocko
Algonquins of Pikwakanagan First Nation