



CMD 23-M27.21

Date: 2023-08-03

File / dossier : 6.02.04

Edocs pdf : 7100729

## **Oral presentation**

## **Exposé oral**

### **Written submission from Historic Saugeen Métis**

### **Mémoire de Historic Saugeen Métis**

#### **Bruce Power**

---

#### **Bruce Power**

---

#### **Bruce Power Mid-Term Update of Licensed Activities**

#### **Rapport de mi-parcours au sujet des activités autorisées de Bruce Power**

Commission Meeting

Réunion de la Commission

September 20 and 21, 2023

Le 20 et 21 septembre 2023



**Historic Saugeen Métis**  
204 High Street  
Southampton, Ontario  
N0H 2L0  
(519) 483-4000

**Historic Saugeen Métis**

**Written Submission to  
Canadian Nuclear Safety Commission**

**Comments on**

**Bruce Power Mid-Term Update on licensed  
activities at the Bruce Nuclear Site**

**CNSC Public Meeting**  
Scheduled for:

September 20-21, 2023  
Kincardine, Ontario

Submitted by:  
Historic Saugeen Métis

## Table of Contents

	Page
Executive Summary	3
1.0 The Historic Saugeen Métis Community	4
1.1 Overview of HSM practices	4
2.0 CNSC Consultation	5
3.0 The First Five Years	5
3.1 Indigenous Relations	5
3.2 Protecting the Environment	5
3.3 Environmental Sustainability	6
3.4 Lake Huron	6
3.5 Nuclear Waste	6
3.6 Social Responsibility	6
3.7 Business Development and Employment	7
3.8 Community Engagement and Social Responsibility	7
4.0 The Next Five Years	7

## **Executive Summary**

The Historic Saugeen Métis (HSM) continue their subsistence fisheries and land-based harvesting practices and assert Aboriginal rights over the lands and waters surrounding the Bruce Nuclear Generating Station site. These lands and waters provide vital support for our Métis culture and way of life, as well as the economy, health and social relationships in the HSM community.

HSM's intention with regard to the environment is long-term preservation of natural features and resources. HSM supports development that meets the needs of the present without compromising the ability of future generations to meet their needs, specifically where it relates to HSM's ability to continue their traditional harvesting practices, rights and interests.

Our concerns are for the safe operation of the Bruce site with minimal imprint on the water and lands that support our community's asserted Aboriginal rights. These are communal Aboriginal rights affirmed by Section 35 of the *Constitution Act* (1982), and relate to sustenance and harvesting on the land and in the waters surrounding the Bruce site.

HSM is committed to providing an environmental legacy to future generations of HSM citizens that they can be proud of and be confident will continue to support at least the next seven generations of HSM citizens. The involvement of local Métis decision-makers is essential to these goals.

## **1.0 The Historic Saugeen Métis Community**

The local Historic Saugeen Métis (HSM) Community consists of the politically independent historic Métis, whom have resided for over two-hundred years along the Lake Huron proper shoreline from the islands at the tip of the Bruce Peninsula to the Ausable River in the vicinity of Port Franks, Ontario.

Our distinctive Métis community is rooted along the shoreline of eastern Lake Huron. For almost three decades prior to settlement of the Saugeen region, the Historic Saugeen Métis traded in a south-north axis along the shoreline from above Sarnia to Lake Huron's North Shore.

Present-day Historic Saugeen Métis community members are descendants of the *historic* Métis who have lived in, cared for the land around the Bruce Nuclear Site.

### **1.1 Overview of HSM practices**

Prior to 19<sup>th</sup> century treaties with the Crown, the HSM harvested the lands and waters bordering Lake Huron proper and the Saugeen Peninsula to as far south as the Port Franks area. This area included HSM places of residence, places where HSM pursued their traditional practices and pursuits, and places of cultural and spiritual significance. Today, HSM continue their subsistence fisheries and land-based harvesting practices and asserts aboriginal rights over the lands and waters surrounding the Bruce site. These lands and waters provide vital support for our Métis culture and way of life, as well as the economy, health and social relationships in the HSM community.

**2.0 CNSC Consultation**

HSM and CNSC conduct semi-annual meetings to discuss a broad range of nuclear industry topics, oversight activities and regulatory matters. Additionally, staff provide regular communications with updates and follow-up regarding action items, reportable events, regulatory commenting opportunities and new information. HSM has also taken the time to review the CNSC report (CMD: 23-M27) dated June 8, 2023, Bruce Power Mid-Term Update of Licensed Activities.

HSM and CNSC staff have also collaborated in the field with the Independent Environmental Monitoring Program by introducing a new sampling site of cultural interest to HSM. CNSC staff also participated in a cultural/natural heritage hike led by HSM at MacGregor Provincial Park. During the COVID-19 pandemic, HSM and CNSC staff took the opportunity to organize 3 on-line workshops to learn more about the HSM history and culture. HSM looks forward to continuing to be informed, consulted and engaged, and to maintaining the good relationship with CNSC.

**3.0 The First Five Years**

HSM has taken the time to review and reflect upon Bruce Power’s Mid-Term Update report (CMD 23-M27.1) dated June 1, 2023. Included in our comments below are excerpts from the report and a recount of accomplishments and opportunities to meet new challenges.

**3.1 Indigenous Relations**

*“Bruce Power has worked closely with the SON, the HSM, and the MNO since 2018 on a variety of community engagement activities and meets regularly on items related to training, employment, business opportunities, sponsorships and special projects.”*

Bruce Power continues to make timely and effective efforts in addressing HSM’s interests and comments related to operations and activities. HSM and Bruce Power conduct regular quarterly meetings to discuss environmental activities, operations, projects, employment/training and economic opportunities. Additionally, special working group meetings are held to discuss regulatory activities and special projects. HSM and Bruce Power also conduct field visits to view new projects, environmental related activities and opportunities to share cultural knowledge.

**3.2 Protecting the Environment**

*“Bruce Power is committed to environmental protection as demonstrated through a successful audit in 2022 of the Environmental Management System which forms the basis of our environmental protection programs.”*

HSM and Bruce Power collaborated to develop and implement a *Fisheries Authorization* Offset project to reduce non-native *Phragmites* and improve fish habitat within the Lake Huron Fishing Islands area. The preservation of these coastal areas is richly important to the unique history and culture of the HSM people who fished, hunted, trapped, and harvested these lands and waters. HSM incorporated community knowledge related to coastal habitats and fish interactions into the scope of the project. The project is a comprehensive blended offset project that takes into consideration the values and interests of the HSM Community and DFO offsetting principles. The project has set a new standard for future engagement when considering environmental projects and situations.

**3.3 Environmental Sustainability**

*“Bruce Power is committed to environmental sustainability in all areas of the business to minimize its environmental footprint and has adopted applicable best industry standards.”*

Climate change is rapidly advancing and the need to reduce our footprint on the earth is much greater today than just five years ago. Setting targets to lower greenhouse gas emissions is a critical step forward and nuclear energy is a recognized low carbon alternative energy source. Equally as important is the need to set new thermal effluent targets beyond the status quo. Similar to carbon emissions, thermal effluent deserves an actual reduction target that incites innovation and lessens the cumulative effects of rising water temperatures in the Great Lakes.

**3.4 Lake Huron**

*“Bruce Power recognizes that the operation of Bruce A and Bruce B poses a risk to fish due to the potential for impingement and entrainment.”*

The impingement and entrainment of fish is an ongoing situation that has benefited very little from innovation or change since operations originally began at the Bruce site. Habitat enhancement projects have been employed to offset the effects but still the number of fish killed each year marches on with no change, no target for reduction. HSM is also concerned about invertebrates which are not closely monitored despite the vital role they play in this delicate ecosystem. At present, impingement and entrainment is not in need of more offsets but it does need a champion for innovation to set targets to reduce the number of fish killed.

**3.5 Nuclear Waste**

*“Bruce Power manages and fully funds the storage and disposal of its radioactive waste under a commercial arrangement with Ontario Power Generation (OPG).”*

Minimizing spent fuel waste is critical as it reduces the overall impact to the environment today and for generations to come. The current waste hierarchy requirement of prevention, reduction, re-using, and re-cycling before disposal is valued as an important strategy. Investigating and implementing new technologies to reduce and reuse spent fuel is a key area that needs investment not only by industry but also Canada. Canada and the nuclear industry need to play a lead role to champion novel approaches and set realistic targets to reduce spent fuel waste.

**3.6 Social Responsibility**

*“Bruce Power’s operations support 22,000 direct and indirect jobs annually, contributing \$4 billion through the direct and indirect spending in operational equipment, supplies, materials and labour income in Ontario.”*

Bruce Power’s leadership and response during the COVID 19 pandemic was very supportive to the HSM community. Bruce Power provided assistance throughout the pandemic with hand sanitizer, masks and sanitizing wipes which were distributed to the HSM community. Bruce Power staff maintained a high level of communication with staff and the community which proved to be very comforting during this stressful time.

**3.7 Business Development and Employment**

*“Bruce Power has been a Gold Certified company under Progressive Aboriginal Relations (PAR) for more than a decade. The PAR pillars (Employment, Leadership Actions, Community Actions and Business Development) drive the engagement and collaboration with Indigenous communities.”*

Bruce Power continues to demonstrate its commitment to achieving economic reconciliation with the HSM community. HSM and Bruce Power conduct regular monthly meetings to identify and improve opportunities for employment, education and training. Additionally, monthly meetings explore opportunities for economic development within the HSM community.

**3.8 Community Engagement and Social Responsibility**

*“Bruce Power’s Community Investment Fund supports many initiatives in local Indigenous communities and helps to support social programs to sustain necessities such as roads, water, education and recreation.”*

Bruce Power supports a variety of initiatives within the HSM Community including public outreach, cultural reclamation, traditional knowledge, community knowledge development, cultural projects and education. In addition, support is provided for HSM’s annual Rendezvous through both funding and participation at the event.

**4.0 The Next Five Years**

The nuclear industry faces many environmental challenges when it comes to meeting the growing demand for energy...and with this challenge comes great responsibility. It’s a challenge that can learn from traditional teachings when it comes to safeguarding mother earth...to harvest with minimal impact...to give thanks for what we have taken...and to give back, often greater than what we received.

The historic outcomes of climate change in the last 5 years have brought pause to the HSM community. We are witnessing changes that have the power to forever alter the lands and waters that provide vital support for our Métis culture and way of life. The Historic Saugeen Métis community is prepared to help champion these new challenges and participate in discussions and actions that can help change the status quo.

The nuclear industry is very capable at meeting new challenges and innovating when you consider the example of Bruce Power’s production of life saving medical isotopes. The environment is experiencing new challenges and innovation is needed to change specific operational outcomes that were developed over 50 years ago.