



Supplementary Information

Oral presentation

Presentation from the Mississaugas of Scugog Island First Nation

In the Matter of the

Ontario Power Generation Inc.

Application to extend the operation of
Pickering Nuclear Generating Station
Units 5 to 8 until December 31, 2026

Commission Public Hearing

June 2024

Renseignements supplémentaires

Exposé oral

Présentation de la Première Nation des Mississaugas de Scugog Island

À l'égard d'

Ontario Power Generation Inc.

Demande visant à prolonger l'exploitation
des tranches 5 à 8 de la centrale nucléaire de
Pickering jusqu'au 31 décembre 2026

Audience publique de la Commission

Juin 2024

Mississaugas of Scugog Island First Nation Intervention

OPG's Application to extend the operation of
Pickering Nuclear Generating Station Units 5 to 8

Presentation for the Canadian Nuclear Safety Commission

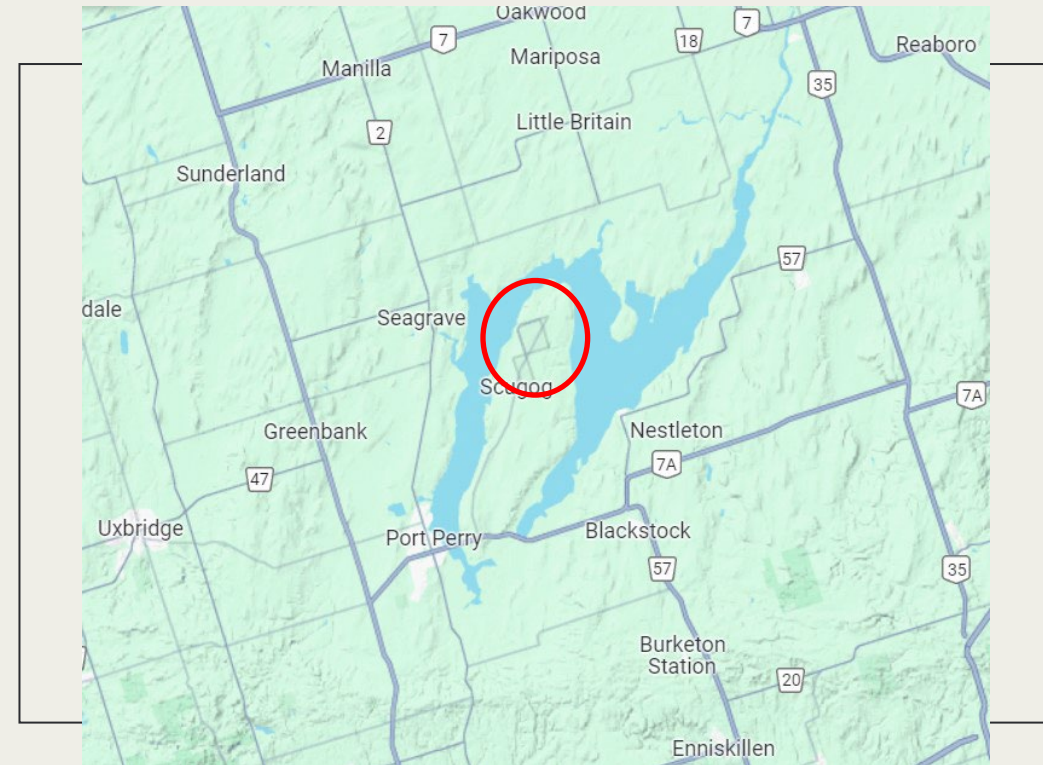
Presenter: Chief Kelly LaRocca

June 19th, 2024



OPENING – Introduction to MSIFN

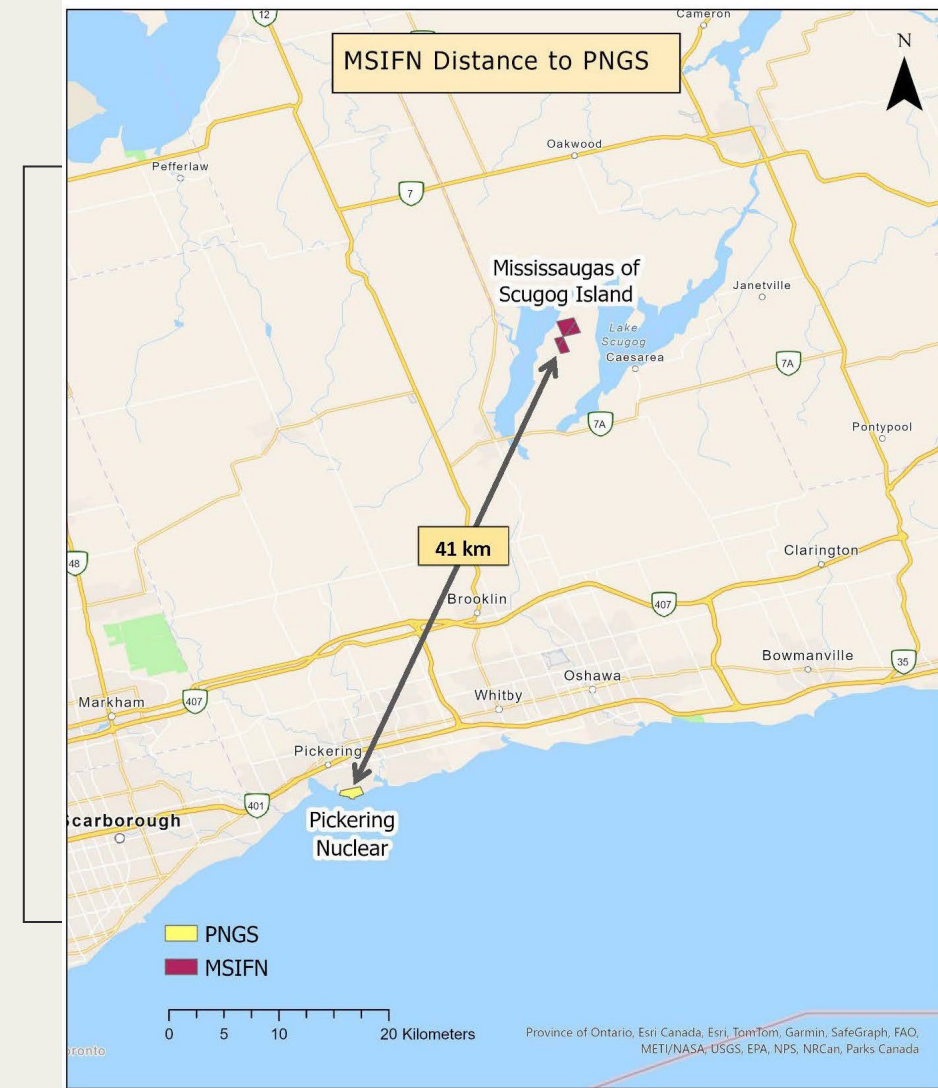
- MSIFN is situated on Lake Scugog in Port Perry, Ontario
- MSIFN is one of the 7 Williams Treaties First Nations (WTFNs)





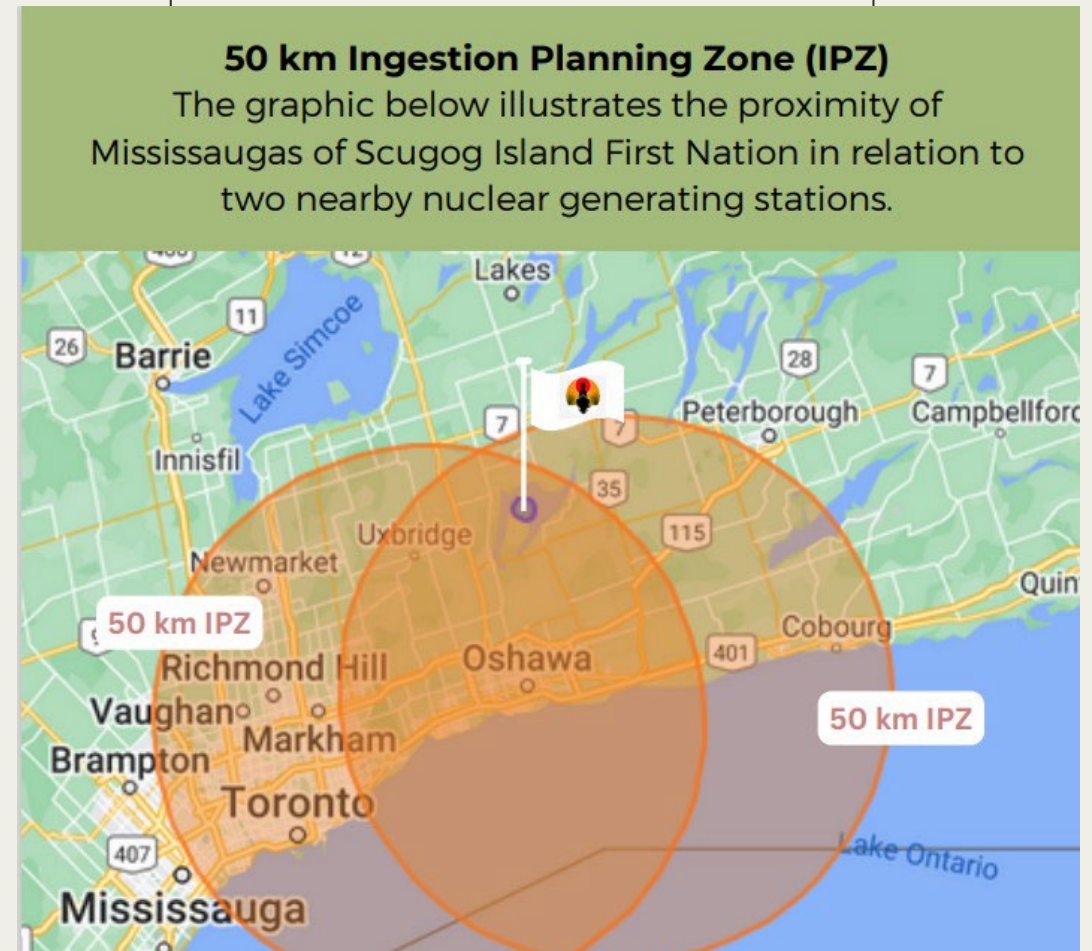
OPENING – Why are we here?

- PNGS is located in MSIFN's traditional territory, covered by the Gunshot Treaty and Williams Treaties of 1923
- Crown consultation for establishing PNGS did not happen. First Nation consent has never been sought or provided.
- MSIFN is committed to protecting lands, waters, wildlife, and fisheries within our traditional territories, as well as community safety
- MSIFN's consent for the application is required



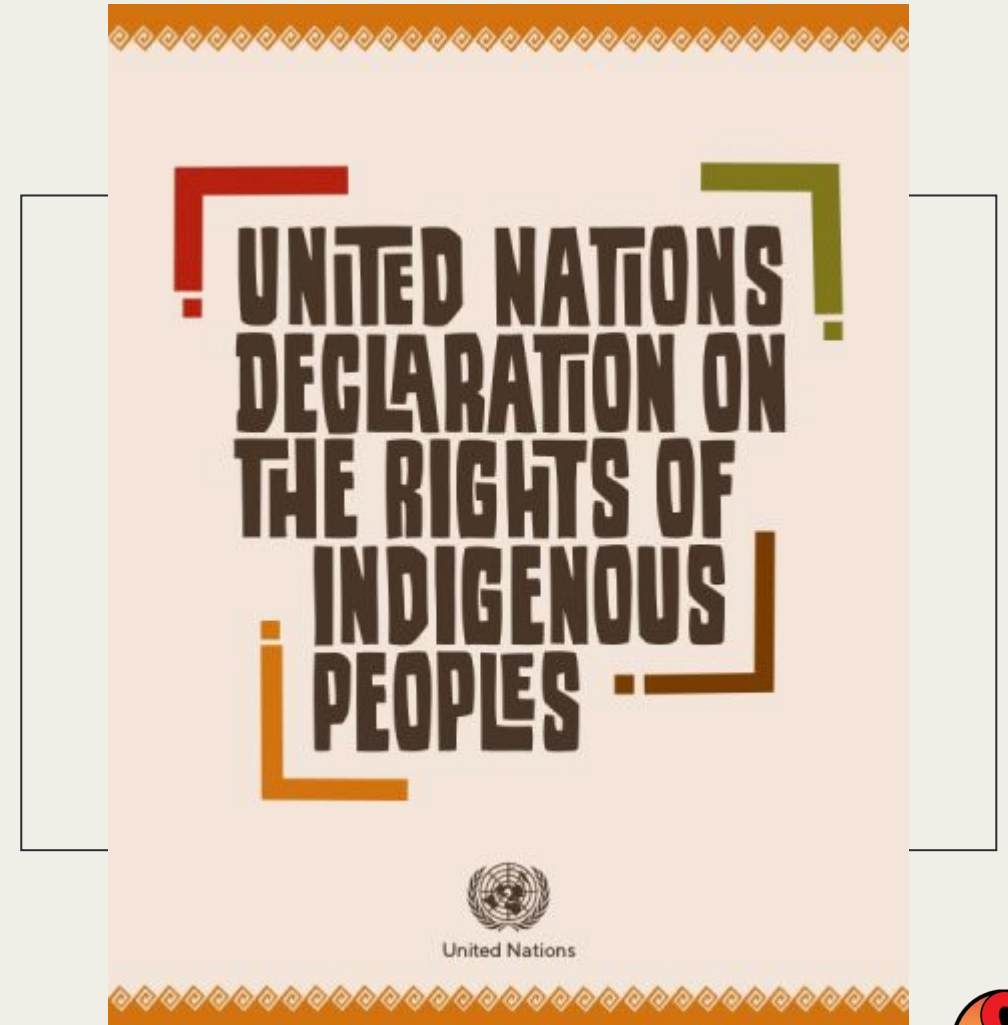
Key Concerns - Safety

- Emergency Planning
 - 50 km IPZ and PNERP
- Fitness for Service
 - Operation of Pressure Tubes
 - Monitoring and inspection
- **A collaborative planning approach is needed for all safety and emergency planning processes.**



Key Concerns - Rights, UNDRIP, and Consent

- Domestic positive law: UNDRIP and the provision of FPIC
- Fitting model – Action Measure #34
- **MSIFN never consented to the PNGS or the associated waste facilities which will accumulate additional waste if the application is approved**
- Secure consent from MSIFN for any licensing changes with the PNGS



Key Concerns – Nuclear Waste

- **There is no long-term plan for the management and storage of used nuclear fuel generated at PNGS – “interim” only**
- Benchmarking international best practices
 - OPG’s practices vs. global standards
- Risks of storing radioactive waste in the Treaty Territory, possibly indefinitely
- Consent for nuclear waste management is a necessity



Key Concerns – Environmental Risks

- Importance of up-to-date ERAs
- MSIFN was not consulted in the original baseline assessment for Pickering NGS, despite historic First Nation use of the site
- OPG must adopt a collaborative approach, considering First Nation-specific risk factors and concerns



Conclusion – Requests for Accommodation

1. OPG and the CNSC engage in a collaborative planning approach with MSIFN and other interested WTFNs concerning safety and emergency response planning.
2. CNSC, representing the Crown, require OPG to obtain consent from MSIFN and other WTFN for changes to the PNGS and PVMF projects, prior to issuing license amendments or approvals.
3. CNSC staff initiate Action Measure #34 specific discussions with MSIFN and other interested Indigenous communities.



Conclusion – Requests for Accommodation

4. CNSC require OPG to consult and collaborate with MSIFN on the development of new ERAs for the Pickering NGS.
5. CNSC require OPG to provide MSIFN with a regulatory roadmap for the proposed Pickering NGS Refurbishment before any further planning or infrastructure preparation work is initiated by OPG.
6. OPG formally commit to supporting MSIFN leadership for a review of International Best Practices for the management and storage of used nuclear fuel at reactor sites.



Conclusion - Requests for Accommodation

7. OPG provide clarity and a comprehensive consultation and collaborative decision-making plan for nuclear waste generated at its facilities.
8. OPG collaboratively work toward the implementation of a Cumulative Effects Assessment that encompasses all facilities within the Treaty Territory, including extensive Indigenous Knowledge study work required for a fulsome Cumulative Effects Assessment.

We urge the CNSC and OPG to work in true partnership with MSIFN, and advocate for a future where MSIFN's rights and safety are paramount in all decisions concerning the PNGS.



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