



Supplementary Information

Renseignements supplémentaires

Presentation from the Manitoba Métis Federation

Présentation de la Fédération des Métis du Manitoba

In the Matter of the

À l'égard des

Canadian Nuclear Laboratories Ltd.

Laboratoires Nucléaires Canadiens Ltée

Application for the renewal of the nuclear research and test establishment decommissioning licence for the Whiteshell Laboratories site

Demande visant le renouvellement du permis de déclassement d'un établissement de recherche et d'essais nucléaires pour le site des Laboratoires de Whiteshell

Commission Public Hearing

Audience publique de la Commission

October 23, 2024

23 octobre 2024

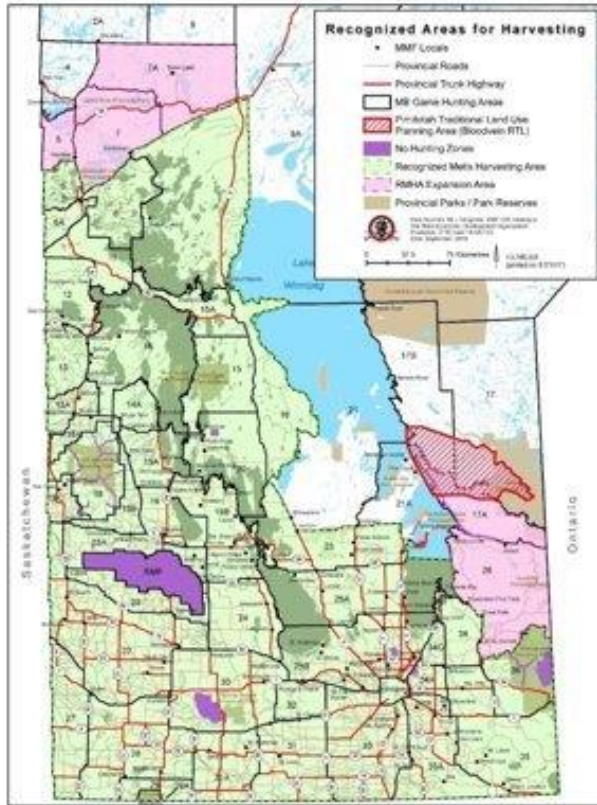
Manitoba Métis Federation

Whiteshell Laboratories Nuclear License Renewal

Key Issues and Concerns



Manitoba Métis Federation



- Whiteshell Laboratories (WL) site is located within the National Homeland of the Red River Métis.
- Red River Métis Citizens use the lands and waters surrounding the WL site for harvest and exercise of rights.
- Red River Métis were not adequately consulted prior to the development of the WL site.
- The Manitoba Métis Federation (MMF) has great interest in long-term stewardship of the WL site, transitioning the site for future beneficial use by Red River Métis Citizens.



Consultation Informed Decision-Making

- Decisions must align in principle and spirit with the outputs from deep and meaningful consultation.
- The MMF expects CNL to work with the MMF to ensure Red River Métis rights, interests, and values are reflected during decommissioning.
- Licensing framework must recognize obligations of CNSC, AECL, and CNL to uphold the Crown's obligations to consult, and be informed by the principles established in the *United Nations Declaration on the Rights of Indigenous Peoples Act*.



Land Use End State Planning and Decision Making

- The Land Use End State planning effort lacks consideration for mutually agreed upon end-state objectives, with a narrow scope to public and Indigenous engagement.
- The Land Use End State planning fails to integrate a shared vision aimed at achieving the *desired* end state for all affected lands, including biological, physical, cultural, and social aspects.
- The MMF is concerned that the plan is being driven by decommissioning activities rather than shaping decommissioning to achieve a desired land use outcome.



Long-Term Engagement and Relationship Building

- The MMF is dissatisfied with CNL's approach to engagement and relationship building throughout the term of the existing license.
- CNL have hand picked engagement activities to shine a light on CNL's efforts. Absent from this record are the many instances where the MMF's concerns have been dismissed by CNL.
- The MMF does seek to continue to build a meaningful relationship with CNL, however, this relationship must be built on a foundation of trust and mutual respect.



Culture of Safety and Security

- The MMF is concerned for WL's safety culture and compliance, including proactive monitoring and oversight of emergency preparedness and security.
- Setbacks have been experienced in fire protection, worker safety, and security.
- The MMF strongly advocates for a more proactive approach to identifying and mitigating safety issues to prevent future non-compliance.



2002 Comprehensive Study Report

- WL continues to use information from the 2002 Comprehensive Study Report (CSR).
- The MMF is concerned that assumptions based on the CSR may no longer be valid.
- CNL should undertake appropriate assessment to validate the 2002 CSR. Where the CSR is not considered valid, the MMF requests that CNL be required to address gaps in a revised CSR.



Environmental Impacts and Concerns

- Elevated tritium levels in waste management area ditches and beyond suggest that tritium can escape containment.
- MMF is concerned about the perceptions and psycho-social impacts to Red River Métis Citizens.
- The MMF seeks commitment from both CNL and CNSC to work with the MMF to continue to address these impacts, and to develop programming that both recognizes these impacts and works to address them.



Future Directions

- The MMF advocates for ensuring that any amendments to the Nuclear Research and Test Establishment Decommissioning Licence for WL align with the rights and values of the Red River Métis and be driven by shared end state goals.
- The MMF calls for CNL to proactively address safety and environmental management gaps and in working with the CNSC and AECL engage meaningfully with the MMF to define a shared vision for WL through and post-decommissioning.

