



**Written submission from the  
Algonquins of Pikwàkanagàn  
First Nation**

**Mémoire de la Première Nation des  
Algonquins de Pikwàkanagàn**

In the Matter of the

À l'égard des

**Canadian Nuclear Laboratories Ltd.**

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**Laboratoires Nucléaires Canadiens Ltée**

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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 23-24, 2024**

**23-24 octobre 2024**



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# *Algonquins of Pikwàkanagàn First Nation*

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## **AOPFN Written Submission on**

Canadian Nuclear Laboratories' Whiteshell Laboratories 3-Year Renewal of Decommissioning License

**Date Submitted:** September 16, 2024

## **CNSC Public Hearing on the Renewal of the Whiteshell Laboratories Decommissioning License**

Public Hearing

Scheduled for:

October 23-24, 2024

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Regarding: Written Submission from Intervenors for Canadian Nuclear Laboratories 3-Year Renewal of the Whiteshell Laboratories Decommissioning License

Submitted by:

Intervenor – Algonquins of Pikwàkanagàn First Nation (Chief Greg Sarazin)

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## Acronyms

AAC	Algonquins of Pikwàkanagàn First Nation Advisory Committee
AOPFN	Algonquins of Pikwàkanagàn First Nation
CMD	Commission Member Documents
CNSC	Canadian Nuclear Safety Commission
CNL	Canadian Nuclear Laboratories

## Introduction

The Algonquins of Pikwàkanagàn First Nation (AOPFN) are pleased to provide this written submission to the Canadian Nuclear Safety Commission (CNSC or the Commission) in relation to the 3-year licence renewal for Canadian Nuclear Laboratories' (CNL or the Proponent) Whiteshell Laboratories (Whiteshell or the Project) located in Pinawa, Manitoba.

The AOPFN provides this submission to update the Commission on the AOPFN's findings from their review of the relevant documents for CNL's application.

Supporting the AOPFN Chief and Council and Consultation Team on this file was Tony Brown, an engineer with a strong background in the nuclear sector. The AOPFN relied on these resources and our reading of technical issues and concerns from other parties, as well as what we learned from engaging with the CNSC, CNL and Atomic Energy of Canada Limited (AECL), the site owner on behalf of Canada, to understand the potential risks of the NSDF on the environment, our people and our rights. In addition, we engaged our Algonquins of Pikwàkanagàn First Nation Advisory Committee (AAC) through a meeting to gather any relevant Algonquin perspectives on this license renewal application.

## About the AOPFN

The Algonquins of Pikwàkanagàn First Nation (AOPFN) is a proud and progressive Algonquin community with a firm grasp on the impact of destructive historical relationships and resulting hardships that remain evident among members today. Since time immemorial our members have been practicing our culture and living in accordance with our spiritual laws within our unceded traditional territory.

We are a self-defined people. The AOPFN continues to assert and exercise Algonquin aboriginal title and aboriginal rights to and in all parts of AOPFN unceded traditional territory, including lands under water. The AOPFN has an obligation to our members to plan for the future and to ensure self-determination, self-reliance, and self-governance. The AOPFN is committed to respecting and protecting our unceded traditional territory and the rights and interests of our members.

In addition to Algonquin aboriginal title, the AOPFN's rights in unceded Algonquin territory include but are not limited to Algonquin aboriginal rights:

- To hunt, fish and trap, to harvest plants for food and medicine;
- To protect and honour burial sites and other sacred and culturally significant sites;
- To sustain and strengthen its spiritual and cultural connection to the land;
- To protect and steward the environment that supports our members' survival, to govern ourselves; and
- To participate in all governance and operational decisions about how the land and resources will be managed, used, and protected.

Algonquin Culture and worldview include intimate relationships to the land and its natural resources. In Algonquin creation stories, the relationship with the Earth is described and understood as to be synonymous to a maternal relationship. The Earth is our first mother. In addition, AOPFN's laws require AOPFN to preserve and enhance a mutually respectful relationship with the Environment, to co-exist with Mother Earth and to protect this relationship.

## The AOPFN's Understanding of the License Renewal

Canadian Nuclear Laboratories (CNL) has applied to the Canadian Nuclear Safety Commission (CNSC) to renew an existing decommissioning licence for the Whiteshell Laboratories site in the municipality of Pinawa Manitoba. The current decommissioning licence is valid until December 31, 2024. The licence authorizes CNL to conduct decommissioning activities at the Whiteshell Laboratories site, including the decommissioning of the Whiteshell Reactor #1 (WR-1), waste management areas, storage facilities, and other nuclear and non-nuclear buildings. In its licence renewal application, CNL is not requesting the authorization of any new licensed activities; the application is limited to a temporal extension of previously approved activities.

With respect to the decommissioning of WR-1, the decommissioning approach authorized under the current licence is a complete dismantlement and removal of the facility. In its licence renewal application, CNL indicates that it intends to submit a separate licence amendment application related to the potential *in situ* decommissioning of WR-1. While that licence is not directly within the scope of the current application, it is relevant to the proposed extension in that it could reduce the quantity of waste that will need to be shipped off site for storage/disposal at Chalk River Laboratories (CRL).

## AOPFN's Findings and Conclusions

As the Whiteshell project could result in radioactive waste being transported into AOPFN's traditional territory, AOPFN requested to be involved in the license renewal process. This was made possible through funding from CNL and the CNSC's PFP process.

AOPFN conducted a technical review of the relevant documents from CNL. The review focused primarily on the following two documents:

1. Amended Application for Renewal of the Nuclear Research and Test Establishment Decommissioning Licence for the Whiteshell Laboratories (CNL: February 2024)
2. Commission Member Document (CMD) for Renewal of the Nuclear Research and Test Establishment Decommissioning Licence for the Whiteshell Laboratories (CNSC Staff: July 2024)

Following the review of the above-noted documents, AOPFN had a few additional questions in relation to the transport of radioactive waste. AOPFN sent questions to CNL regarding the transportation of radioactive waste to AOPFN's traditional territory, as well as some technical information surrounding this transportation. CNL provided a written response to these questions, which were considered when evaluating the potential incremental environmental impacts associated with the proposed license amendment.

AOPFN's review found that CNL is not requesting the authorization of any new activities and, by extension, there are no new environmental impacts to AOPFN's traditional territory associated should the license amendment be approved.

Consistent with the current licence, CNL indicates they will continue to transport radioactive wastes from the Whiteshell site to the Chalk River Laboratories (CRL) for long-term storage/disposal throughout the duration of the extended licence. AOPFN is opposed to the importation of radioactive waste into its traditional territory. We will note, however, that the transfer of radioactive waste from the Whiteshell site to CRL is an activity under the current licence and an activity that is being discussed between AOPFN, CNL and Atomic Energy of Canada Limited (AECL). AOPFN recommends future meaningful engagement on the transportation of radioactive waste or any changes to the license.



## Closing

In conclusion, AOPFN has no further technical comments on CNL's license renewal application that they would like to share with the CNSC.

AOPFN requests to continue to be engaged on this process, as well as future ones related to the Whiteshell project, to ensure that any impacts on AOPFN's traditional territory are thoroughly understood and reviewed.

We sincerely appreciate the opportunity to review the documents to thoroughly understand the potential impacts to AOPFN's traditional territory.

Requests for follow-up discussions can be sent to Amanda Two-Axe Kohoko, Manager, AOPFN Consultation Department, [consultation@pikwakanagan.ca](mailto:consultation@pikwakanagan.ca).

Meegwetch,

A handwritten signature in blue ink, appearing to read 'A. Two-Axe Kohoko', with a large, stylized flourish extending to the right.

Amanda Two-Axe Kohoko, Manager of Consultation  
Algonquins of Pikwàkanagàn First Nation