CMD 20-H102.7A

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Supplementary Information

Renseignements supplémentaires

Written submission from the Kebaowek First Nation

Mémoire de la Première nation de Kebaowek

In the Matter of

À l'égard de

Decision on the scope of an environmental assessment of the proposed Micro Modular Reactor Project at the Canadian Nuclear Laboratories Ltd., in Chalk River

Décision sur la portée de l'évaluation environnementale pour le projet de microréacteur modulaire aux Laboratoires Nucléaires Canadiens Itée, à Chalk River

Hearing in writing based on written submissions

Audience par écrit fondée sur des mémoires

June 2020

Juin 2020





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June 20, 2020

Re: Global First Power's Micro Modular Reactor project Supplemental Submission

Dear CNSC,

Kebaowek First Naton (herein, "KFN") submit this supplemental submission in response to the Canadian Nuclear Safety Commission Staff's Supplementary Commission Member Document (CMD) released on June 18, 2020 regarding the scope of factors to be considered in the environmental assessment of Global First Power's Micro Modular Reactor project.

After reviewing CNSC's staff summarized recommendation to the Commission KFN finds the document to be deficient for the following reasons:

- 1. On May 14, 2020 KFN and the Algonquin Anishinabeg Nation Tribal Council (AANTC) wrote the Prime Minister expressing deep concern about Canada's Need for an Overarching Indigenous Cooperation Agreement with the Algonquin Nation for Chalk River Nuclear Site Proposed Developments. Particular attention was focused on CNSC recent "Failing to Support Meaningful Indigenous Participation in the Global First Power SMR EA".
- 2. For the record KFN and AANTC's ability to meaningfully participate in the consultation on the assessment of scope of factors to be considered for the Global First Power SMR EA is unresolved and remains an outstanding issue not communicated in the pre-hearing CMD June 18, 2020.

3. As noted in our letter:

We will not accept meager or discretionary consultation methods by the CNSC given the scale and importance of these environmental assessments and potential impacts. As such, we request that the environmental assessment of the Global First Power Micro Modular Reactor project, including the June 1, 2020 deadline for interventions at the hearing be suspended until adequate provisions for Indigenous cooperation with our Nation are in place [emphasis added].

4. We do not agree with the imposed terms of REGDOC-3.2.2, for Indigenous Engagement [5], or CNSC policies-known as REGDOCs- which limit the scope of studies that can be carried out in an assessment in order to properly analyze potential nuclear projects that have significant potential to impact our territory(s).

Once again given the deficiencies in the CMD to effectively communicate our community's position we request **the hearing be suspended until adequate provisions for Indigenous consultation and engagement with our Nation are in place**.

Meegwetch,

Chief Lance Haymond Kebaowek First Nation