



**Written submission from  
Historic Saugeen Métis**

**Mémoire de  
Historic Saugeen Métis**

In the Matter of

À l'égard de

**Application to allow the production of  
lutetium-177(Lu-177) at the Bruce Nuclear  
Generating Station (NGS)**

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**Demande de modification de permis visant à  
permettre la production de lutécium 177 à la  
centrale nucléaire de Bruce**

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Public Hearing - Hearing in writing based on  
written submissions

Audience Publique - Audience fondée sur des  
mémoires

**June 2021**

**Juin 2021**



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May 18, 2021

**Historic Saugeen Métis**  
**Written Submission to**  
**Canadian Nuclear Safety Commission**

**Comments on**  
**Bruce Power Inc.**

**Licence Amendment Application to allow the production of**  
**Lutetium-177 at the Bruce Nuclear Generating Station**

**CNSC Public Hearing**  
Ref. 2021-H-100  
Scheduled for: June 25, 2021

**Submitted by:**  
Historic Saugeen Métis Council  
Chris Hachey – Co-ordinator Lands, Resources, and Consultation

## **EXECUTIVE SUMMARY**

The Historic Saugeen Métis (HSM) long-term vision and objective is focused on promoting and protecting the sustainability of the environment within the traditional Saugeen territory as it relates to local Métis interests, rights and way of life.

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.

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.

Our concerns are for safe operation of the nuclear generating stations 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 Nuclear Site.

The Historic Saugeen Métis Council and staff has reviewed and considered the information regarding the Licence Amendment Application to allow the production of Lutetium-177. We trust that the following comments and recommendations will receive careful consideration.

## **1. Bruce Power Engagement Activities with HSM**

HSM has been actively engaged with Bruce Power regarding the licence amendment application to allow the production of lutetium-177. HSM and Bruce Power held a special meeting on September 8, 2020 to discuss the proposed application and the production of lutetium-177. Since that time, Bruce Power has also provided additional information and updates at joint working group meetings held on October 9, 2020, December 14, 2020 and March 18, 2021.

During these scheduled meetings, HSM expressed no concerns related to the proposed licence amendments. HSM Council and staff were very supportive of the proposal to produce lutetium-177 given the remarkable benefits to our health care system.

## **2. CNSC Engagement Activities with HSM**

CNSC ensures that all its licensing decisions under the *Nuclear Safety and Control Act* (NSCA) uphold the honour of the Crown and consider Aboriginal peoples' potential or established Aboriginal and/or treaty rights pursuant to section 35 of the *Constitution Act, 1982*.

CNSC and HSM held a biannual meeting on February 5, 2021 where Bruce Power's proposed licensed amendment application to allow the production of lutetium-177 was thoroughly discussed. HSM noted no concerns and fully supported the application while expressing the utmost satisfaction with engagement discussions.

## **3. CONCLUSIONS AND RECOMMENDATIONS**

Sufficient information about the application has been shared to enable the Historic Saugeen Métis and its elected community representatives to assess any potential impacts on Métis rights and interests. The Historic Saugeen Métis strongly supports the life-saving therapies in the treatment of cancers and sterilization of medical equipment that the production of Lutetium-177 will bring to the community and the world.

The consultation and review process has indicated that there are no anticipated adverse impacts to Historic Saugeen Métis rights, culture or way of life and that the duty to consult has been fulfilled. HSM is pleased to support this very important Licence Amendment Application submitted by Bruce Power.