



**Oral presentation**

**Exposé oral**

**Written submission from  
Sarah Gabrielle Baron and  
Joan Morningstar**

**Mémoire de  
Sarah Gabrielle Baron et  
Joan Morningstar**

In the Matter of the

À l'égard de

**Cameco Corporation,  
Blind River Refinery**

---

**Cameco Corporation,  
Raffinerie de Blind River**

---

**Application to renew licence for Cameco  
Corporation's Blind River Refinery**

**Demande de renouvellement de permis pour  
la raffinerie de Blind River appartenant à  
Cameco Corporation**

**Commission Public Hearing**

**Audience publique de la Commission**

**November 24, 2021**

**24 novembre 2021**

Regarding CAMECO relicense for operations at Blind River uranium fuel processing facility.

We, Sarah Gabrielle Baron and Joan Morningstar, wish to intervene on the Blind River Refinery (BRR) CAMECO re licence application, by way of written submission and oral presentation to the Commission.

Comments for the written and oral intervention will include the following:

- CAMECO refused to hear or understand Elder Traditional Ecological Knowledge during the original deal in which the First Nation reserve of Mississaugi Indian Reserve No. 8 agreed to a partition of land for the creation of the facility. In particular, in the 80's, the Elders said that the water table goes in a circle. On the day of the signing of the land sale, Joan and the Elders were locked out of the Band Office. Please direct questions to Joan Morningstar who was a representative with the Elders at that time.
- There might be a history of bribes between Mississaugi Indian Reserve No. 8 band officials and CAMECO. There are rumors the original signatory band council members got \$10 000.00 each. A current example, Cameco might be paying the bus driver salary and overall costs of the busses. Apparently, Cameco has \$600 000.00 set aside for the reserve every year. There is a MOU where the chief talks with them twice a year (see MOU, Appendix A). There is no report given to community members on the results of these meetings. Gifts to the reserve act as a deterrent to adequately addressing problems. People don't want to speak up, because they're afraid to lose those gifts.
- BRR CAMECO illegally removed the remains of Indigenous peoples from a burial ground in the 1980's. Oral testimony about this will be provided by Joan Morningstar. Joan is fighting multiple cancers, including to her nervous system. Additional time beyond 10 minutes, for Joan to tell this spiritually and emotionally difficult story, is requested.
- BRR CAMECO has a history of racist double-standards in its safety protocols between the Blind River settler community and the reserve. See past work by Joan Morningstar in 2015 and 2016: Appendix B and C. Appendix B and C highlight concerns and possible resolutions that have yet to be adequately addressed.
- The refinery was originally determined to have a life expectancy of 25 years. It has now been operating for 38 years. Adding another 13 years, and now starting another 10 year extension, was not part of the original agreements.
- CAMECO and CNSC were not transparent to the reserve and gave misinformation after an incident of fallout - airborne toxic chemicals - in the 1980's. The people got up in the morning, everything was covered in a yellow-green powder. All the cars in the CAMECO parking lot were repainted by the company. Joan's car rusted out quickly after that incident. When the operators came to the community to talk about the incident, they did not properly assess the area of the community and they minimized potential affects. Refer questions to Joan Morningstar for first-hand accounts of this time.
- There are ongoing inadequacies and concerns regarding both the fuel processing plant and the incinerator over toxic releases: how, when, where, and to what degree these affect and are detrimental to the peoples of Mississaugi First Nation and the

environment. For example, many people have cancer. A study on cancer rates and cancer types in the community is required, including those who are deceased. Urine testing for individuals throughout the community is required. See Appendix D, which shows the extreme toxic and cancer-causing effects of burning uranium or its derivatives.

- The trees are not healthy and show signs of dying, both in the community and downriver towards Iron Bridge. A full environmental assessment is required before Cameco license is renewed. For first-hand Indigenous Traditional Ecological Knowledge, please question Joan Morningstar.
- There has never been adequate testing for radionuclides in the soil, air and water at Mississagi First Nation No. 8. Information of this sort is not publicly available. Most importantly, there needs to be groundwater testing.
- The soil needs to be tested at a new daycare located near the CAMECO facility. A report in the late 1980s by Dr. Rosalie Bertelli showed, through ground soil testing, that emissions from the BRR facility concentrated in the area where the daycare is now. First hand testimony can be provided by Joan Morningstar. Joan is trying to get a copy of this study.
- There are Indigenous burial grounds on the golf course near the facility, that have never been adequately protected or recognized.
- Soil, water, and air intermittent testing is not enough, as it is always approved by the Canadian Nuclear Safety Commission, and it is always found to be within 'allowable limits'. What is required is comprehensive investigation on the build-up of toxins in humans, plants, invertebrates, fish, fowl, birds and animals in the region, since small exposures over time build up in these living beings, and cause terrible disease and death. **Bioaccumulation** of toxins is a well-known fact and it is not okay that this isn't being tracked or studied or used in hearings of applications for ongoing nuclear industry in this deeply affected Indigenous community and traditional territory ecosystems. Ceramic Uranium is one chemical that must be tested for - see Appendix D.
- Homes on the reserve need to be tested for Radon and other possible toxins, because people are getting sick.
- There is a dump on the reserve, which might have been built by CAMECO, in which illegal nighttime dumping of CAMECO materials might be occurring. This needs to be investigated.
- The Canadian Nuclear Safety Commission is aware of and complicit in all of the above, as well as many other infractions against public health at many other facilities around the country, and therefore can no longer be trusted to act in citizen's best interest. Please see Appendix L, evidence of CNSC's egregious interference in regulatory frameworks for the promotion of industry profits, and against human and ecological health.

As per the official legal document recently revealed, known as the 'Queen's Bargain', we demand a stop on all operations at CAMECO site in Blind River, and we demand the creation of an independent body to complete an inquiry on the above issues, as well as any issues that may arise. Please see a copy of the 'Queen's Bargain', Appendix E.

Furthermore, whereas UNDRIP, which is international law that Canada has now ratified, the following articles are hereby invoked, as they have all been abrogated by previous and continued operation of the CAMECO facility in Blind River, and by CNSC in its ongoing approval of this and other operations:

#### Article 7

1. Indigenous individuals have the rights to **life, physical** and mental integrity, liberty and security of person.

#### Article 11

1. Indigenous peoples have the right to practise and revitalize their cultural traditions and customs. This includes the right to maintain, protect and develop the past, present and future manifestations of their cultures, such as archaeological and historical sites, artefacts, designs, ceremonies, technologies and visual and performing arts and literature.

2. States shall provide redress through effective mechanisms, which may include restitution, developed in conjunction with indigenous peoples, with respect to their cultural, intellectual, religious and spiritual property taken without their free, prior and informed consent or in violation of their laws, traditions and customs.

#### Article 12

1. Indigenous peoples have the right to manifest, practise, develop and teach their spiritual and religious traditions, customs and ceremonies; the right to maintain, protect, and have access in privacy to their religious and cultural sites; the right to the use and control of their ceremonial objects; and **the right to the repatriation of their human remains.**

2. **States shall seek to enable the access and/or repatriation of ceremonial objects and human remains in their possession through fair, transparent and effective mechanisms developed in conjunction with indigenous peoples concerned.**

#### Article 19

States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free, prior and informed consent before adopting and implementing legislative or administrative measures that may affect them.

#### Article 22

1. Particular attention shall be paid to the rights and special needs of indigenous elders, women, youth, children and persons with disabilities in the implementation of this Declaration.
2. States shall take measures, in conjunction with indigenous peoples, to ensure that indigenous women and children enjoy the full protection and guarantees against all forms of violence and discrimination.

#### Article 24

1. Indigenous peoples have the right to their traditional medicines and to maintain their health practices, including the conservation of their vital medicinal plants, animals and minerals. Indigenous individuals also have the right to access, without any discrimination, to all social and health services.
2. **Indigenous individuals have an equal right to the enjoyment of the highest attainable standard of physical and mental health.** States shall take the necessary steps with a view to achieving progressively the full realization of this right.

#### Article 25

Indigenous peoples have the right to maintain and strengthen their distinctive spiritual relationship with their traditionally owned or otherwise occupied and used lands, territories, waters and coastal seas and other resources and to uphold their responsibilities to future generations in this regard.

#### Article 26

1. Indigenous peoples have the right to the lands,

territories and resources which they have traditionally owned, occupied or otherwise used or acquired.

**2. Indigenous peoples have the right to own, use, develop and control the lands, territories and resources that they possess by reason of traditional ownership or other traditional occupation or use, as well as those which they have otherwise acquired.**

3. States shall give legal recognition and protection to these lands, territories and resources. Such recognition shall be conducted with due respect to the customs, traditions and land tenure systems of the indigenous peoples concerned.

#### Article 27

States shall establish and implement, in conjunction with indigenous peoples concerned, a fair, independent, impartial, open and transparent process, giving due recognition to indigenous peoples' laws, traditions, customs and land tenure systems, to recognize and adjudicate the rights of indigenous peoples pertaining to their lands, territories and resources, including those which were traditionally owned or otherwise occupied or used. Indigenous peoples shall have the right to participate in this process.

#### Article 28

1. Indigenous peoples have the right to redress, by means that can include restitution or, when this is not possible, just, fair and equitable compensation, for the lands, territories and resources which they have traditionally owned or otherwise occupied or used, and which have been confiscated, taken, occupied, used or **damaged without their free, prior and informed consent.**

2. Unless otherwise freely agreed upon by the peoples concerned, compensation shall take the form of lands, territories and resources equal in quality, size and legal status or of monetary compensation or other appropriate redress.

#### Article 29

**1. Indigenous peoples have the right to the conservation and protection of the environment and the productive capacity of their lands or territories and resources. States shall establish and implement assistance programmes for indigenous peoples for such conservation and protection, without discrimination.**

**2. States shall take effective measures to ensure that no storage or disposal of hazardous materials shall take place in the lands or territories of indigenous peoples without their free, prior and informed consent.**

**3. States shall also take effective measures to ensure, as needed, that programmes for monitoring, maintaining and restoring the health of indigenous peoples, as developed and implemented by the peoples affected by such materials, are duly implemented.**

Article 32

1. Indigenous peoples have the right to determine and develop priorities and strategies for the development or use of their lands or territories and other resources.

2. States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources.

3. States shall provide effective mechanisms for just and fair redress for any such activities, and appropriate measures shall be taken to mitigate adverse environmental, economic, social, cultural or spiritual impact.

Article 35

Indigenous peoples have the right to determine the responsibilities of individuals to their communities.

Article 37

1. Indigenous peoples have the right to the rec-

ognition, observance and enforcement of treaties, agreements and other constructive arrangements concluded with States or their successors and to have States honour and respect such treaties, agreements and other constructive arrangements.

2. Nothing in this Declaration may be interpreted as diminishing or eliminating the rights of indigenous peoples contained in treaties, agreements and other constructive arrangements.

#### Article 39

Indigenous peoples have the right to have access to financial and technical assistance from States and through international cooperation, for the enjoyment of the rights contained in this Declaration.

#### Article 40

Indigenous peoples have the right to access to and prompt decision through just and fair procedures for the resolution of conflicts and disputes with States or other parties, as well as to effective remedies for all infringements of their individual and collective rights. Such a decision shall give due consideration to the customs, traditions, rules and legal systems of the indigenous peoples concerned and international human rights.

#### Article 41

The organs and specialized agencies of the United Nations system and other intergovernmental organizations shall contribute to the full realization of the provisions of this Declaration through the mobilization, inter alia, of financial cooperation and technical assistance. Ways and means of ensuring participation of indigenous peoples on issues affecting them shall be established.

-----

As supported by UNDRIP, the following Appendices form a body of mandates that empower Joan Morningstar and others like her to demand that BRR CAMECO license is not renewed:

Appendix F: the photo of the most recent mail-out by Mississauga First Nation to its members on their collective duties to protect nature and future generations.

Appendix G: WE ARE THE LAND



Anishinaabek, Mushkegowuk, Onkwehonwe Declaration (November 17 – 19, 2009)

Appendix H: Great Lakes Water Accord, 2004

See the appendices below in which Indigenous Nations call for a moratorium on all new nuclear plans in their territory and in Canada. These documents support Joan in her call for the license to be suspended for BRR Cameco, as uranium processed here will go to the new nuclear or 'Small Modular Nuclear' (SMR) industry over the next 10 years.

Appendix I:

Anishinabek First Nation and Iroquois Caucus joint statement, 2017

Appendix J:

Anishinabek Nation statement on National Water Day

Appendix K:

Assembly of First Nations resolution 62 / 2018

Appendix L:

Evidence that CNSC is 'captured' by for-profit nuclear industrialists

Sarah Gabrielle Baron  
58 Hill St. Aundek Omni Kaning First Nation  
P.O. box 224  
Little Current, ON  
P0P 1K0  
(705) 210-8976  
[sarahgabriellebaron@gmail.com](mailto:sarahgabriellebaron@gmail.com)

Joan Morningstar  
Box 985 Blind River, ON  
P0R 1B0  
(705) 356-0851 (home)  
(705) 227-9869 (cell)  
[joanmstar@gmail.com](mailto:joanmstar@gmail.com)

APPENDIX A: Memorandum of Understanding

## Memorandum of understanding with Mississauga First Nation

*Ontario*

In 2010, Cameco's Blind River refinery in northern Ontario signed a memorandum of understanding with the local Mississauga First Nation to work together co-operatively to benefit the community and the company.

Under the agreement, the chief of Mississauga First Nation and the Blind River refinery's general manager will meet at least twice a year to discuss how best to work together on matters of mutual concern.

Both parties confirmed their commitment to focus on socio-economic development projects related to youth, education, health and wellness and community development – key priorities for Cameco and the Mississauga First Nation.

[Cameco - Sustainable Development Report - Supportive Communities - Case Studies - Aboriginal Engagement](#)

APPENDIX B:

# **Summary Report**

## **CAMECO EMERGENCY RESPONSE PLAN**

Cameco Corporation Fuel Services Division  
Blind River Refinery  
EP 100  
Revised 11, May 27, 2015

**Chart:**

Page	Issue(s)	Concern(s) and/or Question(s)
Page 10	1.0: Introduction The Blind River refinery is located about 5 km to the west of the Town of Blind River.	No mention of the location of Mississauga First Nation community.
Page 10	1.1 Goal: The Fire Safety Plan is part of the Emergency Response Program and should be referenced with the Emergency Response Plan.	Do we have a copy of the Emergency Response Program? It is indicated that this program should be referenced with the Emergency Response Plan. We do have the Emergency Response Plan.
Page 16	Figure 2-2: Cameco Head Office Notification: Text box 8 – Bullet One: An occurrence which may produce an unexpected release of hazardous substance?	Could we have a list of these hazardous substance and what steps should home owners take if an occurrence which may produce an unexpected release of hazardous substance such as; closing all windows, putting blankets at bottom of external doorways, shutting of air conditioners, etc.
Page 20-22	2.1.2 External Contact (7 contacts) <ul style="list-style-type: none"> <li>● Blind River Fire Chief – 24 hour cell number</li> <li>● Municipal Office – Business hour telephone number</li> <li>● Deputy Fire Chief – 24 hour cell number</li> <li>● East Algoma Blind River Detachment OPP – 24 hour telephone number</li> <li>● Town of Blind River Public Works – Business hour telephone number</li> </ul>	Page 22: Neighbors Mississauga First Nation – Administration & Fire Chief –Business hours 705-356-1621 Ext. 2204 N/A for 24 hours  <b>Concern:</b> We have no number for a 24 hour emergency number and no number for the Fire Chief.  There are a total of seven contacts for the Town of Blind River.

	<ul style="list-style-type: none"> <li>Ministry of Natural Resources – Business hour telephone number</li> <li>Huron Pines Golf Course and Country Club – Business hour telephone number</li> </ul>	
Page 23	<p>3.0.1 General</p> <ul style="list-style-type: none"> <li>Emergency Response Organizations (ERO) located in Port Hope and Blind River</li> <li>Transportation Emergency Response Organizations (TERO) located in Port Hope and Blind River</li> </ul>	<p>We have no information on:</p> <ul style="list-style-type: none"> <li>Emergency Response Organizations (ERO) located in Port Hope and Blind River</li> </ul> <p>Transportation Emergency Response Organizations (TERO) located in Port Hope and Blind River</p>
Page 32	<p>4.2 Definition of Emergency Levels</p> <ul style="list-style-type: none"> <li>4.2.3 Level 2 (4<sup>th</sup> bullet)</li> </ul> <p>Requirement to request assistance from the Town of Blind River</p>	<p>Mississauga First Nation is not mention in the <u>Definition of Emergency Levels</u> but the Town of Blind River is mentioned in 4.2.3 level 2.</p>
Page 37	<p>5.1.3 Planning and Logistics Coordinator (PLC)</p> <p>Responsibilities Responds to the Command Centre: (5<sup>th</sup> bullet)</p> <ul style="list-style-type: none"> <li>Arranges for access control to site with OPP, ambulance, local fire department if required.</li> </ul>	<p>Mississauga First Nation has no Command Centre for emergency situations.</p>
Page 41	<p>5.1.7 Scribe</p> <p>Location: At the Blind River Command Centre</p>	<p>Where is the Blind River Command Centre? Should we be looking at a Command Centre since we are closer to the refinery?</p>
Page 42	<p>5.1.8 Fire Brigade Leader</p> <ul style="list-style-type: none"> <li>Responsibilities: (3<sup>rd</sup> bullet)</li> </ul> <p>Coordinates fire attack with <b>municipal fire department(s)</b> if required</p>	<p>Is Mississauga First Nation Fire Department included in 5.1.8?</p>
Page 54	<p>6.2 Public Affairs/Media Relations</p> <p>6.2.3 Media Procedures</p> <p>The Local Crisis Management Team (LCMT) Public Information Officer at the Blind River site will be contacted to respond to the Blind River facility.</p>	<p>Where is the Blind River site?</p> <p>Is Mississauga First Nation a part of the Local Crisis Management Team (LCMT)?</p>

Page 66	<p>6.10 Off Site Notification by Senior Management – Senior management will notify the following organizations if an off-site or on-site event threatens to have an off-site impact on the local population.</p> <ul style="list-style-type: none"> <li>● OPP</li> <li>● Mayor of Blind River</li> <li>● <b>Mississauga First Nation Chief</b></li> <li>● Huron Pines Golf and Country Club</li> </ul> <p>A perimeter check may be necessary to ensure there are no unauthorized personnel in the affected area.</p>	<p>How far is a perimeter check for Cameco? Does a perimeter check goes as far as the golf course?</p> <p>What about a perimeter check for Mississauga First Nation?</p> <p>Mississauga First Nation will need to ensure that we have a 24 hour contact number.</p>
Page 68 and 69	<p>6.12.2</p> <ol style="list-style-type: none"> <li>1. Failure of the Absorber Fume Blower – No<sub>x</sub> Fumes Generated</li> <li>2. Venturi Scrubber Failure in Denitration</li> <li>3. Accidental Release of Uranium</li> <li>4. Nitric Acid Spill</li> <li>5. Abnormal Intake of Uranium</li> </ol>	<p>What precautions should Mississauga First Nation prepare for events of 1 to 5 because we are less than one kilometer from the Blind River Refinery?</p>
Page 81	<p>9.1.2 Man-Made On Site</p> <ul style="list-style-type: none"> <li>● Chemical Vapor Release – Potential of Occurrence: Medium</li> <li>● Chemical Liquid Release</li> </ul>	<p>Because Mississauga First Nation community is less than one kilometer from the Blind River Refinery what precautions should we prepare for?</p>
Page 86	<p>First Responders</p> <p>The Emergency Response Administrator will schedule site tours annually and <b><i>periodic drills with Blind River Fire Department.</i></b></p>	<p>Is Mississauga’s Fire Department involved in these exercises? If our fire department is included in page <b><i>42 statement</i></b> then it is expected that Mississauga Fire Department should have the same consideration and training as Blind River Fire Department.</p> <p><b><i>Reference to Page 42:</i></b> Coordinates fire attack with municipal fire department(s) if required</p>
Page 89	<p>9.4.1 General</p> <p>The <b><i>nearest permanent resident lives over 1 km away from the refinery.</i></b></p> <p>Given the location of the refinery and the type and significance of the</p>	<p>Who is the resident that Cameco is referring to? Our nearest permanent residences are less than 1 km away from the refinery.</p>

	<p>plausible accident scenarios, as described in <b><i>Section 6 of this manual</i></b>, a formal widespread public information program is <b><i>not</i></b> warranted.</p>	<p><b>Section 6: 6.0 Specific Functions Index</b>          6.0 Specific Functions Index          6.1: Evacuation          6.2: Public affairs/media relations          6.3: Off-site response to transportation emergencies          6.4: Communications          6.5: Bomb threat          6.6: Emergency shutdown          6.7: Serious injuries and fatalities          6.8: Medical treatment and handling of contaminated personnel          6.9: On site spill response for Security Guards          6.10: Off- site notification          6.11: Reporting          6.12: Accident scenarios</p>
Page 89	<p>9.4.4 Emergency Measures Community Control Group          Cameco is a member of the Emergency Measures Community Control Group. Other committee members include representative from the Town of Blind River, the OPP, the fire department and the Algoma Health Unit. The purpose of this committee is to discuss possible emergency situations that may arise in the community and how these emergency situations should be addressed. The Town of Blind River has an Emergency Plan, which encompasses emergencies that may occur at the Blind River Refinery.</p>	<p>Does Mississauga First Nation have a member and/or members sitting on the Emergency Measures Community Control Group?</p>
Page 92	<p>10.6.1 Distribution List – Emergency Response Plan</p> <ul style="list-style-type: none"> <li>● Blind River Fire Department</li> </ul> <p>Town of Blind River</p> <ul style="list-style-type: none"> <li>● Ontario Provincial Police Blind River Detachment</li> <li>● Blind River District Health Centre</li> <li>● Mississauga First Nation Chief</li> </ul>	<p>We will need to ensure that the Fire Department, Health Department, First Nation Police officers, Chief and Council, Lands and Resource Manager and Infrastructure Director are on the Distribution List for the Emergency Response Plan.</p>

Appendix 1: Letter from Blind River Fire Department

January 6, 2016

Attention: Chris Astles, General Manager

Dear Chris:

The Blind River Fire Department supplies fire protection to all of the Municipality of Blind River including Cameco. We do note however, that has it's own trained fire team on site. In the event of an emergency at the plant, **the Blind River Fire Department would respond in a Mutual Aid capacity.** We would respond to your main gate and await orders from your Incident Commander.

**We have been given tours of your facility annually so that we are familiar with the layout in case of an emergency. I have also attended and participated in your Emergency Response Exercises. Note that 4 of our firefighters and 2 of our Captains are also members of the Cameco emergency response team.** We hope we are never needed, but will always be available and ready to assist you in any emergency you may encounter.

Kenneth Raymond, Fire Chief Blind River Fire Department

**Concerns:**

1. Is the Mississauga Fire Department involved in the **Mutual Aid Agreement?**
2. Does the Mississauga Fire Department have annually tours of Cameco facility?
3. Have Mississauga Fire Department and/or Mississauga First Nation Health Unit participated in the Emergency Response Exercises.
4. Does Mississauga Fire Department have members sitting on the Cameco emergency response team and/or all other committees pertaining to emergency situations?

APPENDIX C:

# **Summary Report**

## **CAMECO**

### **2015 Annual Compliance Monitoring & Operational Performance Report**

**Reporting Period January 1 – December 21, 2015**

Submitted to: The Canadian Nuclear Safety Commission Ottawa  
Ontario, March 28, 2016

<http://www.greatlakescommonsmap.org/reports/view/168>

In 2012, the Blind River facility was granted a ten-year license extension as well as an increase in production quotas. That same year, June 2012, the facility also experienced a contamination incident where three workers were exposed to airborne uranium dust.

This is not the only exposure incident that has occurred at the Blind River facility. Reports published by Northwatch and the Serpent River First Nation, the two most prominent NGO authorities commenting on the actions of the refinery, have documented an ‘accidental’ emission of 178 kilograms of uranium dust into the atmosphere in May, 1990. The 1990 leakage is similar to the June, 2012 incident but occurred on a much larger scale. The effects of the 1990 spill, as well as the continued presence of the refinery, are found in the elevated uranium levels in soil samples collected by the NGOs in the area. Northwatch has also noted that the overall uranium emissions from the Blind River Facility have remained in the 12-15 kilogram/year range over the last several years. Airborne uranium can remain in the lungs, or it can enter the bloodstream, kidneys, and/or bones, causing damage to these organ systems.

**CAMECO**

**Report Submitted by: Joan Morningstar – July 20, 2016**

2015 Annual Compliance Monitoring & Operational Performance Report  
Reporting Period January 1 – December 21, 2015

Submitted to: The Canadian Nuclear Safety Commission Ottawa Ontario, March 28, 2016

---

**Chart**

<b>Issue</b>	<b>Concern</b>
Please refer to agenda for the notice of meeting July 5, 2016. <ul style="list-style-type: none"><li>● Committee not identified</li><li>● 2:15 – 2:45 CNSC Independent Environment Monitoring Program &amp; <b>plans for Blind River</b></li></ul>	The agenda had to be amended before the meeting started due to <ul style="list-style-type: none"><li>● Inaccuracy to identify committee</li><li>● Plans for Blind River and there are no plans for Mississauga First Nation</li></ul>



<ul style="list-style-type: none"> <li>Location of meeting – Dreamcatcher Complex Blind River, Ontario.</li> </ul>	<ul style="list-style-type: none"> <li>The location of Dreamcatcher is inaccurate</li> </ul>	
<p><b>Recommendation:</b> We need to send a solid description and map of where we are; who we are; and the committee that Cameco and CNSC are working with.</p>		
Page	Issue(s)	Concern(s) and/or Question(s)
Page 2: ISO	5 <sup>th</sup> paragraph: Were there recommendations from ISO?	Can Mississauga First Nation have access to the ISO report?
Page 3: Mutual Aid Agreement	<p>3<sup>rd</sup> paragraph: BRR has an Emergency Response Plan in place to cover potential on-site and off-site emergency situations.</p> <p>3<sup>rd</sup> paragraph: The site also maintains a Fire Hazard Analysis that has been reviewed and accepted by CNSC staff. Lastly, BRR has a mutual aid agreement in effect with the Town of Blind River Fire Department.</p>	<p>Is Mississauga First Nation recognized in the Emergency Response Plan?</p> <p>Does BRR have a mutual aid agreement with Mississauga First Nation?</p>
Page 6	4 <sup>th</sup> paragraph: States the approximate kilometers that the Town of Blind River is from Blind River Refinery	There is no mention of the kilometer that Mississauga First Nation is from the Blind River Refinery.
<p><b>Recommendation:</b> There is a need to send CNSC and Cameco a good description of where our First Nation community is located, the exact kilometer and a map.</p>		
Page 29: UO3	2 paragraphs: The average whole body dose has not exceeded 1.0 mSv in the five year period and has decreased for three years in a row. One of the reasons for the decrease may be related to lower UO3 production in 2014/2015 compared to the prior years.	Does this mean the more UO3 is produce the higher number for whole body dose mSv will increase?
Page 44: Near misses	4 <sup>th</sup> paragraph: There were 32 health safety related incidents recorded in the CIRS database in 2015. Of these, 16 were related to injury or illness, 2 were other health safety	Can CNSC provide a report to Mississauga First Nation in regards to the near misses?

	incidents not related to injury or illness and <b><i>14 were identified as near misses.</i></b>	
<b>Page 46: Environmental Monitoring Program</b>	(3 <sup>rd</sup> paragraph): The refinery's Environmental Monitoring Program (EMP) is comprised of the following components Sampling of water and air emissions; High-volume sampling of ambient air, both <b>near the refinery and in the Town of Blind River;</b> and Additional ambient samplings; including soil, surface water and groundwater monitoring	There is no mention of Mississauga First Nation in regards to: Sampling of water and air emissions; High-volume sampling of ambient air, and Additional ambient samplings; including soil, surface water and groundwater monitoring
<b>Recommendation:</b> Due to the years of operation, it is recommended that an Environmental Monitoring Program be situated at Mississauga First Nation that will monitor the above mention.		
<b>Page 47: Environmental Risk Assessment</b>	1 <sup>st</sup> paragraph: Five of the six environmental objectives set at the start of 2015 have been completed. These objectives were related to a storm water assessment, construction of a berm, shredded drum disposal, completion of an environmental risk assessment and selection of dust suppression and sorbent compounds.  * <b>Last paragraph states:</b> <u><i>Additional detail on the 2015 audit program is being provided to the CNSC under separate confidential correspondence.</i></u>	Can CNSC and/or Cameco provide Mississauga First Nation the Environmental Risk Assessment report and other reports pertaining to the five of the six environmental objectives?  Can Mississauga First Nation have access to this report? Is Mississauga First Nation mentioned in this report?

<p><b>Page 48: Separate assessment &amp; Dose to the Public</b></p>	<p><b>2<sup>nd</sup> paragraph:</b> A separate assessment, referred to as the Plume Modeling, Delineation and Sediment Study, was also carried out in 2015. This assessment confirmed the effectiveness of the liquid effluent outfall diffuser in Lake Huron and also confirmed that there is no adverse impact on sediment in Lake Huron as a result of refinery operations.</p>	<p>Was there a study of this type completed on the Mississauga River?</p>
<p><b>Page 50: Golf Course</b></p>	<p><b>2<sup>nd</sup> paragraph:</b> Despite the fact that environmental dosimeters are now being used along the fence line, the critical receptor for the gamma component of dose to the public remains the <b><u>hi-vol station at the neighboring golf course;</u></b> as the land immediately outside the perimeter fence continues to be owned and controlled by Cameco. The <b><u>golf course is the closest location where members of the public can reasonably be expected to be in proximity to the refinery for any significant period of time.</u></b></p>	<p>No mention of Mississauga First Nation.</p>
<p><b>Page 54: Golf Course; Hydro yard; and Town Location</b></p>	<p><b>2<sup>nd</sup> paragraph:</b> Two of the stations, the SE Yard and the East Yard, are located within the Cameco fence line, while the Golf Course location is also on Cameco property but located outside the fence line, which defines the CNSC licensed area. <b><u>The remaining stations, the Hydro yard and the Town location, are located approximately 1 to 5 km from the refinery respectively.</u></b> Results in 2015 are comparable to prior years. For the three</p>	<p>No mention of Mississauga First Nation.</p>

	<p>stations furthest away from the refinery, the year-to-year results are largely unchanged over the five year period.</p>	
<p><b>Page 55 and 56: Charts</b></p>	<p>Page 55 and 56 has charts of golf course, SE yard, E yard, Hydro yard and Town results of stations.</p> <p><b>Last paragraph:</b> This means a few new sampling locations will need to be selected in 2016. The locations selected will preferably be in open areas, not under trees canopies, and in areas where the soil has been undisturbed by human activity.</p>	<p>No charts for the area of Mississauga First Nation.</p> <p>Where will the new sampling locations be constructed? Will Mississauga First Nation be one of the selected locations?</p>
<p><b>Page 62: Emergency Management and Response</b></p>	<p><b>Paragraphs 5 and 6:</b> A mutual aid agreement has been signed by the Blind River Fire Department and Cameco.</p> <p>The commitment for assistance by the BRFD provides an additional layer of support to the refinery's emergency response capability. In addition, Cameco provides the BRFD with support, either financial or through the donation of equipment, and now conduct joint training exercises periodically with the BRFD so that in the event of an emergency at the refinery requiring off-site assistance, there will be a coordinated and effective response.</p> <p>It should be noted that a number of the refinery's firefighters also belong to the town fire department.</p>	<p>Has Mississauga First Nation Fire Department signed a mutual aid agreement with Cameco?</p> <p>Does Mississauga First Nation Fire Department have joint training exercises with Cameco?</p> <p>Does Mississauga First Nation Fire Department have firefighters belonging to any type of committee at the refinery</p>

		<p>pertaining to Emergency Management and Response?</p> <p>Do we have to be considered a town in order to have the same consideration as Blind River in the area of safety for our community?</p>
<p><b>Page 63: Full Scale Simulation Emergency Response Exercise</b></p>	<p><b>2<sup>nd</sup> paragraph:</b> A full scale simulation emergency response exercise involving the local EMS and hospital, typically held once every three years, was carried out in the fall of 2015. A number of non-Cameco BRR personnel, including representatives from the CNSC, observed the exercise.</p>	<p>Was Mississauga First Nation made aware of this exercise? Was our Fire Department notified? Was our Health Unit notified? Was Chief and Council notified?</p>

**Questions:**

1. CNSC – Received this report on March 28, 2016. Do CNSC make recommendations? If CNSC do make recommendations, does the public have access to the report?
2. Do CNSC and/or Cameco have concerns that Mississauga First Nation is not mentioned or recognized in this report as Cameco being on the doorsteps of our community?
3. What other reports does Cameco issue to CNSC? And do Mississauga First Nation’s Chief and Council have access to these reports?
4. Have CNSC and/or Cameco made recommendations in regards to safety precautions for Mississauga First Nation community?
5. Can CNSC and/or Cameco provide Mississauga First Nation all emergency plans such as Emergency Response plan; Emergency Assistance plan; Fire Protection plan; Fire Hazard Analysis (FHA); Fire Protection Program (FPP); Fire Safety Plan and Emergency Response Team Information? Is Mississauga First Nation included in these plans?
6. What attempt(s) made by CNSC and/or Cameco to ensure Mississauga First Nation safety?

7. So how do we address these issues for the negligence of our community's safety, our children's health and safety? Who can we trust to ensure that our community safety is being met?
8. Can Mississauga First Nation ask for a list of what reports are issued to the Town of Blind River?
9. Could Mississauga First Nation form our own monitoring committee such as the Blind River Area Environmental Monitoring Committee? And if formed, can BRR fund this committee? This committee would ensure compliance to all areas of concerns regarding safety within our community and in our traditional territories.

**My Conclusion:** This report demonstrated negligence and discrimination in regards for the safety of Mississauga First Nation's community and for the future of our next 7 generations.

#### APPENDIX D:

In 2007, the Canadian Nuclear Safety Commission (CNSC) gave Cameco approval to upgrade its existing incinerator at the Blind River refinery so that it could burn radioactively-contaminated by-products generated at Blind River and Port Hope. Uranium, a metal, cannot be destroyed by incineration. It is pyrophoric, that is, it can catch fire even at normal temperatures when it is in fine particles. Incinerated, it will burn at 3,000 to 6,000 degrees centigrade and the uranium particles turn into ceramic uranium. "Ceramic uranium is not soluble in body fluids after being breathed into the lungs. This metal vapour will solidify in the cooling air and form respirable particles. Some particles will be nanometre in size (a nanometre is 1 billionth of a metre), so small that they can pass through the lung blood barrier, escape from the blood vessels and enter into the cells. They can also pass through the blood-brain barrier and enter into the brain itself. These particles have been found in seminal fluid and in the female where they can cross the placenta and cause havoc to the developing embryo or foetus. These metal fumes also pose an immediate danger for the residents of downwind communities." —Burning Radioactive Waste: Blind River and the CNSC Decision, International Institute of Concern for Public Health, March 17, 2007

Tilman, Anna. *On the Yellowcake Trail Part 2: Uranium Mining in Canada*. Watershed Sentinel. Sept 15, 2019. <https://watershedsentinel.ca/articles/yellowcake-road-part-2-uranium-mining-in-canada/>

#### APPENDIX E:

The Queen's Bargain

Agreement between  
Dekis and Queen Victoria, The Year 1665 on the Bargain 1835

New King of Canada, I am writing to you. We have to change the rules of the whites. We will put Head Offices in Canada on the Indian Act and superintend on provincial rules. Lawyer for your business, Doctor, Indian Affairs, and on this Indian Act, and rules of Canada.

In the year of 1820 we sent Simpson to control the company, in the year 1821 we sued Hudson for selling your goods, so I am renewing the treaty and money. One hundred and twenty dollars (\$120.00) a year and tax free. The rules of the Indian Act of Canada, when the year is due, the superintendent will give you the money tax-free.

Now you will have to make the township. The whites will have to pay you for everything you have, you make head townships in Canada, have reservations to keep the whites off the Reserve, and Free Indian navigation, free gates for settlers, and timber of 100 acres. We leave it as you gave it to the settlers, only the pine for the lumbermen, and sixty-cents share on Navigation Rights, if you are on the boat.

It's free traveling all over Canada, any place you go. If you want a house in Canada, you go to the Superintendent, put in your order and he will see that it is built.

It will cost nothing; they will pay for it. I will put a Warden in, to mind your game wherever your animal will make its track in Canada; you can follow it until you get it. If the whites want your animal they will have to pay for it with the license.

If you work for a white man, they cannot garnish your wages. The whites will have to pay the taxes, you are entitled to three per cent on the taxes and three per cent on the timber and \$3.00 stumpage besides, and five per cent on the mines, and if you have money in the Band it is five per cent; also game money is yours. If the whites crowd you, you are to go to the Superintendent and put in your complaint and he will take it up to the lawyer and he will be prosecuted.

The Bargain is made and I am sending you a medal as good as gold, as long as there is an Indian in the country generation to generation, King Chief Brother, I am telling you a nephew is born. My son, I am your sister Queen Victoria, forever this Bargain, we made between you and I, will stand, as long as there is water in the lakes and run in the rivers and Creeks, and the green grass grows. The bargain the year of 1665 comes the year 1835 is good as long as the sun and moon shines, it cannot change. This Bargain is for the King Chief of Canada, from Queen Victoria.

APPENDIX F:

COUNCIL STATEMENT ON PROTECTING MFN LAND FOR FUTURE GENERATIONS

Anishinaabe law concerns not only human concerns, but also our place in relationship with all of nature. Our role is to relate to the winds and rains, to move with the seasons, to give thanks for our place in creation. Balance is a foundational concept for Anishinaabe law. What balance means for harvesting is that we must allow for the animal and plant nations to live in harmony. If we take too much, they do not have time to regrow and regenerate, and it puts our relationship at risk. When that happens, it is our obligation as Anishinaabeg to restore the balance and make amends.

**The following are a list of Anishinaabeg responsibilities under our traditional law, Mississauga people;**

1. Must protect the land, waters, animals, and plants for future generations;
2. Must take only what your family needs to live *mino-biimadziwin*;
3. Must harvest sustainably respecting the rights of animals, especially the Moose Nation which has been especially affected by over-hunting and climate change.

Listening to the messages brought forth by our members, we recognize that over-harvesting is a concern for the whole community. **For this reason, Chief & Council will not be granting permission, or issuing 'Shipman Letters', for any individuals to harvest on either on reserve land or Mississauga Traditional Territory.**

Anishinaabe Rights are communal in nature, grounded in the historical harvesting traditions and practices of our people. Certain responsibilities, including conservation and safety, are an important part of exercising these rights. This relationship is based on subsistence needs and cultural values, which have continued since time immemorial.



## APPENDIX G:

### WE ARE THE LAND

Anishinaabek, Mushkegowuk, Onkwehonwe Declaration

#### Preamble

The Nuclear Energy Sessions were hosted by the Chiefs in Ontario office in Nigigoonsiminikaaning First Nation, Whitefish River First Nation, Six Nations, Moose Factory, and Batchewana First Nation in 2009. A Chiefs Gathering on Nuclear Energy was hosted in Obashkaandagaang First Nation (November 17 – 19, 2009)

The Anishinaabek, the Mushkegowuk, and the Onkwehonwe (AMO) met to discuss nuclear energy and nuclear waste. Central to the discussions were ceremony and spirituality as the AMO reflected on their inherent responsibilities and intimate relationship to the land and all our relations.

#### Declaration

We, the Anishinaabek, the Mushkegowuk, and the Onkwehonwe, are the land. Our ancestors were the land, we are the land and our youth and future generations will be the land.

We have heard the voices of our youth, of our women and men, of our spiritual advisors, of our Elders – they have told us —WE ARE THE LAND.!!

What we do to the land – we do to ourselves, and to our future generations.

We were placed here on Turtle Island to be a part of creation.

We were given our instructions, our jurisdiction, our laws – by the Creator. These instructions were followed by our ancestors.

We have already established our own laws such as the Great Law and the Thanksgiving Address that guides us in our decision making.

We exercise our jurisdiction on a Nation to Nation basis.

We draw from sacred law, traditional law, customary laws – we need to protect the lands, the waters and all living things for future generations.

The Treaties were made to share with the newcomers – we were and are not giving up anything – surrender was not included in the treaties.

We must remember our ancestors, honour our ancestors, honour our treaties, honour the future generations, honour the lands, honour all gifts given to us and take our rightful place as the First Peoples of Turtle Island.

We have the right to decide our own forms of government, to use our own laws to raise and educate our children, and to have our own cultural identity without interference.

We maintain our inalienable rights to our lands and territories, to all our resources — above and below — and to our waters. We assert our ongoing responsibility to pass these on to the future generations.

We, the Anishinaabek, the Mushkegowuk and the Onkwehonwe walk to the future in the footprints of our ancestors.

#### GENERAL RECOMMENDATIONS

We must consider future generations as they are the ones that will be affected by our decisions.

We must become and remain collective in our decisions about the land – and think only of the future generations – allow them to guide our decision-making.

We must follow our original instructions given to us by the Creator – like our ancestors did when

they made treaties to protect the land and all living things for future generations.

We must reconcile with Mother Earth through our original instructions

We cannot poison the land as we are poisoning ourselves - we cannot allow others to poison the land.

We must exercise our exclusive jurisdiction to our lands.

We must respect each other as nations

We must involve the youth in our decisions.

#### NUCLEAR ENERGY

The Anishinaabek, the Mushkegowuk, and the Onkwehonwe call on and remind governments, industries, corporations, organizations, communities and individuals

1. **Government and industries to place a moratorium on the development of nuclear energy**
  2. To recognize and respect the inherent rights, treaty rights, and our jurisdiction
  3. To recognize and respect the laws of our peoples – the First Peoples
  4. To recognize and respect our knowledge systems given to us by the Creator through our Ancestors
  5. To work on a true nation to nation basis
  6. To provide resources for research capacity to our peoples for our views, our knowledge and our research – we must create our own research to provide to our peoples
  7. To make our peoples part of the solutions
  8. To involve youth
- To empower and support our leadership

APPENDIX H: Great Lakes Water Accord 2004

## **Tribal and First Nations Great Lakes Water Accord**

November 23, 2004, Page 1

Our ancestors have inhabited the Great Lakes Basin since time immemorial, long before the current political boundaries were drawn. Our spiritual and cultural connections to our Mother Earth are manifest by our willingness to embrace the responsibility of protecting and preserving the land and Waters.

Traditional teachings and modern science combine to strengthen our historical understanding that Water is the life-blood of our Mother Earth.

Indigenous women continue their role as protectors of the Water. Ceremonial teachings are reminders of our heritage, they are practices of our current peoples, and they are treasured gifts that we hand to our children.

When considering matters of great importance we are taught to think beyond the current generation. We also are taught that each of us is someone's seventh generation. We must continually ask ourselves what we are leaving for a future seventh generation.

We understand that the whole earth is an interconnected ecosystem. The health of any one part affects the health and well being of the whole. It is our spiritual and cultural responsibility to protect our local lands and Waters in order to help protect the whole of Mother Earth.

Tribes and First Nations have observed with growing interest that the Great Lakes Basin governments of the United States and Canada have begun to share our concerns about the preservation of the quality and quantity of the Great Lakes Waters.

The eight States and two Provinces of the Great Lakes Basin entered into the 1985 Great Lakes Charter, Annex 2001, and have drafted an Interstate Compact and International Agreement to implement the provisions of Annex 2001. These agreements, however, make no provisions for including Tribes and First Nations as governments with rights and responsibilities regarding Great Lakes Waters. These agreements also assert that only the States and Provinces have governmental responsibility within the Great Lakes Basin.

---

## **Tribal and First Nations Great Lakes Water Accord**

November 23, 2004, Page 2

Through International treaties and court actions, however, Tribes and First Nations continue to exercise cultural and spiritual rights of self-determination and property rights within traditional territories for our peoples and nations. Tribal and First Nation governments, like all governments, have the duty to protect the interests and future rights of our peoples. Since we have recognized rights and we are not political subdivisions of the States or Provinces, the assertion that the States and Provinces own and have the sole responsibility to protect the Waters is flawed.

Thus, the efforts of the States and Provinces to protect the Waters of the Great Lakes Basin are flawed because these efforts do not include the direct participation of the governments of Tribes and First Nations. This fundamental flaw endangers the interests of all of the inhabitants of the Great Lakes Basin and, ultimately, because of the interconnectedness of the worldwide ecosystem, endangers the interests of the entire earth.

It is thus our right, our responsibility and our duty to insist that no plan to protect and preserve the Great Lakes Waters moves forward without the equal highest-level participation of Tribal and First Nation governments with the governments of the United States and Canada. Merely consulting with Tribes and First Nations is not adequate, full participation must be achieved.

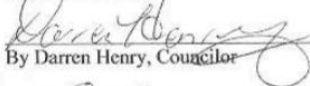
*By this accord signed on November 23, 2004, at Sault Ste. Marie, Michigan, the Tribes and First Nations of the Great Lakes Basin do hereby demand that our rights and sovereignty be respected, that any governmental effort to protect and preserve the Waters of the Great Lakes Basin include full participation by Tribes and First Nations, and we also hereby pledge that we share the interests and concerns about the future of the Great Lakes Waters, further pledging to work together with each other and with the other governments in the Great Lakes Basin to secure a healthy future for the Great Lakes.*

---

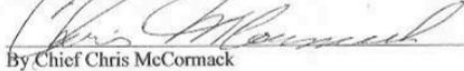
### Tribal and First Nations Great Lakes Water Accord

November 23, 2004, Page 3

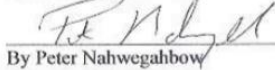
AAMJIWNAANG

  
By Darren Henry, Councilor

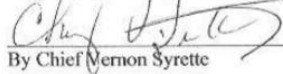
ASSOCIATION OF IROQUOIS AND ALLIED NATIONS

  
By Chief Chris McCormack

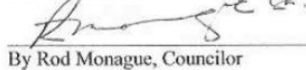
AUDECK OMNI KANING

  
By Peter Nahwegahbow

BATCHÉWANA FIRST NATION

  
By Chief Vernon Syrette

BEAUSOLEIL FIRST NATION

  
By Rod Monague, Councilor


BIJITWAABIK ZAAING ANISHINAABEK

  
By Chief Mike Esquega

CHIEFS OF ONTARIO

By Regional Chief Charles Fox

CHIPPEWAS OF NAWASH UNCEDED FIRST NATION

  
By Geewadin Elliott

**Tribal and First Nations Great Lakes Water Accord**  
November 23, 2004, Page 4

DELAWARE (MORAVIAN) NATION

  
By Denise Stonefish

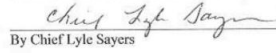
FIRST NATION OF CREES QUEBEC

  
By Daisy Costas

FOND DU LAC

  
By Eugene Reynolds

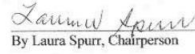
GARDEN RIVER FIRST NATION

  
By Chief Lyle Sayers

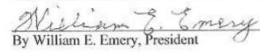
GRAND TRAVERSE BAY BAND OF OTTAWA AND CHIPPEWA INDIANS

  
By Robert Kewaygoshkum, Chairperson

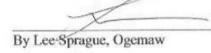
HURON POTAWATOMI, INC.

  
By Laura Spurr, Chairperson

KEWEENAW BAY INDIAN COMMUNITY


  
By William E. Emery, President

LITTLE RIVER BAND OF OTTAWA INDIANS

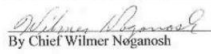
  
By Lee Sprague, Ogemaw

**Tribal and First Nations Great Lakes Water Accord**  
November 23, 2004, Page 5

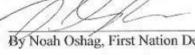
LITTLE TRAVERSE BAY BANDS OF ODAWA INDIANS

  
By Frank Ettawageshik, Chairman

MAGNETAWAN FIRST NATION

  
By Chief Wilmer Noganosh

MATAWA FIRST NATION

  
By Noah Oshag, First Nation Delegate

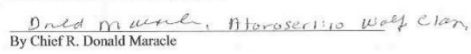
M'CHIGEENG FIRST NATION

  
By Chief Glen Hare

MISSISSAUGA FIRST NATION

  
By Chief Bryan Lal'orn

MOHAWKS OF BAY OF QUINTE

  
By Chief R. Donald Maracle

MOHAWKS OF BAY OF QUINTE

Donald Maracle, Htoraseriio Wolf Clan  
By Chief R. Donald Maracle

MOHAWKS OF AKWENSASNE

A. Francis Boots  
By Chief A. Francis Boots

NISHNAWBEASKI NATION

Dan Kooses  
By Deputy Grand Chief Dan Kooses

---

**Tribal and First Nations Great Lakes Water Accord**

November 23, 2004, Page 6

ONEIDA NATION OF THE THAMES

Chief Randall Phillips Biine'kwe  
By Chief Randall Phillips

POKAGON BAND OF POTAWATOMI INDIANS

Dan Rapp  
By Dan Rapp, Tribal Secretary

SAGAMOK ANISHNAWBEK

Angus Toulouse  
By Chief Angus Toulouse

SAGINAW CHIPPEWA INDIAN TRIBE OF MICHIGAN

Audrey Falcon  
By Chief Audrey Falcon

SAUGEEN FIRST NATION

Vernon Roote  
By Chief Vernon Roote

SAULT STE MARIE TRIBE OF CHIPPEWA INDIANS

Aaron Payment  
By Aaron Payment, Chairperson

SOKAOGAN CHIPPEWA

Tina Van Zile  
By Tina Van Zile, Tribal Delegate

STOCKBRIDGE MUNSEE

Robert Chicks  
Robert Chicks, Chairperson

**Tribal and First Nations Great Lakes Water Accord**  
November 23, 2004, Page 7

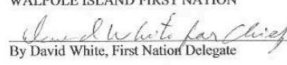
THESSALON FIRST NATION

  
Chief James Wabigwan

UNION OF ONTARIO INDIANS

  
By Grand Council Chief John Beaucage

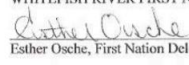
WALPOLE ISLAND FIRST NATION

 Sean-Juan  
By David White, First Nation Delegate

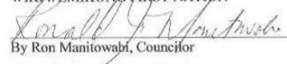
WASUKSING FIRST NATION

  
Chief Joel King

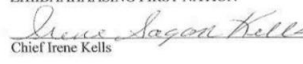
WHITEFISH RIVER FIRST NATION

  
Esther Osche, First Nation Delegate

WIKWEMIKONG FIRST NATION

  
By Ron Manitowabi, Councilor

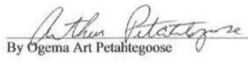
ZHIIBAHAASING FIRST NATION

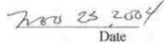
  
Chief Irene Kells

**Tribal and First Nations Great Lakes Water Accord**

*By the accord presented on November 23, 2004, at Sault Saint Marie, Michigan, the Tribes and First Nations of the Great Lakes Basin do hereby demand that our rights and sovereignty be respected, that any governmental effort to protect and preserve the Waters of the Great Lakes Basin include full participation by Tribes and First Nations, and we also hereby pledge that we share the interests and concerns about the future of the Great Lakes Waters, further pledging to work together with each other and with the other governments in the Great Lakes Basin to secure a healthy future for the Great Lakes.*

WHITEFISH LAKE FIRST NATION

  
By Ogema Art Petahitegoose

  
Date

**APPENDIX I: Anishinabek First Nation and Iroquois Caucus joint statement 2017:**

Joint Declaration between the Anishinabek Nation and the Iroquois Caucus on the transport and abandonment of radioactive waste

LAC LEAMY, QC (May 2, 2017)—The Anishinabek Nation and Iroquois Caucus have unified and strongly oppose the transportation of highly radioactive liquid material from Chalk River to

South Carolina and the abandonment of nuclear waste from Chalk River in a giant mound situated beside the Ottawa River. Anishinabek Nation Grand Council Chief Patrick Madahbee and Chief Clinton Phillips (on behalf of the Iroquois Caucus and Kahnawà:ke Grand Chief Joseph Tokwiro Norton) jointly declare opposition and voice the serious concerns on radioactive waste at the Chiefs of Ontario – Special Chiefs Assembly.

“We, the Anishinabek Nation and Iroquois Caucus, have jurisdiction over the Great Lake and St. Lawrence River Basins as a result of Aboriginal titles, and the treaties that have been entered into by First Nations and the Crown,” stated Grand Chief Madahbee.

The transportation and abandonment of nuclear waste within the territories has the potential to adversely affect these rights, areas, and activities. The potential for long-lived contamination to the environment and to all living entities is too great.

“Many projects are being proposed, decided upon, and initiated in our territories without consulting our First Nation communities,” stated Chief Clinton Phillips. “A joint letter to Prime Minister Justin Trudeau was sent on April 21, 2017, advising Canada of our concerns on these matters and we expect a prompt reply.”

“We are continuing to build consensus with our Nations. The Treaties are evidence of our inherent rights and authorities,” stated Ontario Regional Chief Isadore Day. “The joint declaration states we must consider the future generations. As the leaders of today, it is our duty to preserve and protect Mother Earth. We cannot risk the long-term, irreversible destruction of our lands and waters, which are life-giving for all beings.”

The Assembly of the First Nation of Quebec and Labrador (AFNQL) and Bawating Water Protectors are youth and grassroots First Nation citizens who stand united with the Iroquois Caucus and the Anishinabek Nation in the opposition of the transportation and abandonment of radioactive waste in their territories.

For the long-term management of radioactive wastes, the five (5) principles that were all agreed upon are:

**No Abandonment:** Radioactive waste materials are damaging to living things. Many of these materials remain dangerous for tens of thousands of years or even longer. They must be kept out of the food we eat, the water we drink, the air we breathe, and the land we live on for many generations to come. The forces of Mother Earth are powerful and unpredictable and no human-made structures can be counted on to resist those forces forever. Such dangerous materials cannot be abandoned and forgotten.

**Monitored and Retrievable Storage:** Continuous guardianship of nuclear waste material is needed. This means long-term monitoring and retrievable storage. Information and resources must be passed on from one generation to the next so that our grandchildren’s grandchildren will be able to detect any signs of leakage of radioactive waste materials and protect themselves. They need to know how to fix such leaks as soon as they happen.



**Better Containment, More Packaging:** Cost and profit must never be the basis for long-term radioactive waste management. Paying a higher price for better containment today will help prevent much greater costs in the future when containment fails. Such failure will include irreparable environmental damage and radiation-induced diseases. The right kinds of packaging should be designed to make it easier to monitor, retrieve, and repackage insecure portions of the waste inventory as needed, for centuries to come.

**Away from Major Water Bodies:** Rivers and lakes are the blood and the lungs of Mother Earth. When we contaminate our waterways, we are poisoning life itself. That is why radioactive waste must not be stored beside major water bodies for the long-term. Yet this is exactly what is being planned at five locations in Canada: Kincardine on Lake Huron, Port Hope near Lake Ontario, Pinawa beside the Winnipeg River, and Chalk River and Rolphton beside the Ottawa River.

**No Imports or Exports:** The import and export of nuclear wastes over public roads and bridges should be forbidden except in truly exceptional cases after full consultation with all whose lands and waters are being put at risk. In particular, the planned shipment of highly radioactive liquid from Chalk River to South Carolina should not be allowed because it can be down-blended and solidified on site at Chalk River. Transport of nuclear waste should be strictly limited and decided on a case-by-case basis with full consultation with all those affected.

#### Appendix J:

##### Anishinabek Nation statement on National Water Day

Anishinabek Nation calls for healing and restoration of Mother Earth on Great Lakes Day  
ANISHINABEK NATION HEAD OFFICE (April 22, 2021) – The Anishinabek Nation and Iroquois Caucus Alliance on Radioactive Waste have grave concerns that the Nuclear Waste Management Organization (NWMO) will develop self-serving policies which will potentially impact the safety and health of all occupants of this land. On this Earth Day and Great Lakes Day, the Anishinabek Nation and Iroquois Caucus Alliance on Radioactive Waste are looking to the public for assistance in carrying forward their message as they call for protection of our Great Lakes Basin and Mother Earth in order to bring healing and restoration.

“Much like Mother Earth, the Great Lakes face many issues that include pollution and invasive species, demonstrating why a dedicated day is an added necessity to raise awareness and encourage all inhabitants of this land to take care of them in order to bring healing to Mother Earth,” says Anishinabek Nation Grand Council Chief Glen Hare. “We need to protect our water bodies from anything that can harm them, and that includes toxic pollution such as nuclear waste. We have made our objections to putting the nuclear industry in charge of Canada’s Radioactive Strategy and believe that Canada should have an independent agency in place whose only concern is the environment and its inhabitants and not if the nuclear waste industry has any future or not.”

Canada is currently reviewing its Radioactive Waste Policy for the first time in 25 years; however, late last year, Minister of Natural Resources Seamus O’Regan wrote a letter to the President and Chief Executive Officer of the Nuclear Waste Management Organization (NWMO)

requesting that the organization lead the dialogue and work on developing Canada's Integrated Strategy for radioactive waste. Because it is owned by the nuclear waste producers, the NWMO is a stakeholder representing the nuclear industry. Indigenous people are not just stakeholders but rights holders and their views must be heard directly and not filtered through an industry lens.

In 2017, the Anishinabek Nation and the Iroquois Caucus of the Assembly of First Nations made a joint declaration against the transportation and abandonment of radioactive waste. In February 2021, the Chiefs of Ontario Leadership Council passed a motion to take a position on nuclear waste in Ontario. One addressed Nuclear Energy Disposal and Use and the other Small Modular Reactors and First Nations Energy Requirements.

"Small Modular Reactors (SMRs) and nuclear power, in general, represent an unacceptable risk to our communities," states Grand Council Chief Hare. "The Anishinabek Nation continues to vehemently oppose any effort to situate SMRs within our territory. The stance we have taken is in support of the seven generations to come. We demand that the nuclear industry abandon its plans to operate small modular nuclear reactors in Ontario and elsewhere in Canada."

There are five Great Lakes: Superior, Huron, Michigan, Ontario, and Erie. Together they comprise the largest body of freshwater making up more than 20 per cent of the world's freshwater supply, and stretch 750 miles from east to west, bringing drinking water to approximately 40 million people and providing a home to over 4,000 species of plants and wildlife.

"As First Nations people, we have a sacred responsibility to our lands and waters and call on all levels of governments to invest in renewable power generation and storage solutions alongside efficient energy transmission and distribution be utilized in place of nuclear energy," says Ontario Regional Chief RoseAnne Archibald. "Indigenous Peoples around the world are consistently sounding the alarm that water needs to be protected and we as First Nations people have a sacred relationship with water. Storing nuclear waste close to our water sources is not an acceptable option. We use days such as Great Lakes Day and Earth Day to raise awareness and encourage everyday Canadians to learn and join us in our calls to protect Mother Earth for future generations."

Appendix K:  
Assembly of First Nations resolution 62/20218

---

<b>TITLE:</b>	<b>Small Modular Nuclear Reactors (SMR's)</b>
<b>SUBJECT:</b>	Environment
<b>MOVED BY:</b>	Chief Duncan Michano, Ojibways of the Pic River First Nation, ON
<b>SECONDED BY:</b>	Chief Melvin Hardy, Biinjitiwaabik Zaaging Anishinaabek (Rocky Bay First Nation), ON
<b>DECISION</b>	Carried by Consensus

---

**WHEREAS:**

- A. The United Nations Declaration on the Rights of Indigenous Peoples states:
  - i. Article 29 (2): States shall take effective measures to ensure that no storage or disposal of hazardous materials shall take place in the lands or territories of indigenous peoples without their free, prior and informed consent,
- B. The Nuclear Industry, particularly in Ontario, seeks to build and operate small modular nuclear reactors and to operate these reactors in small communities throughout the north.
- C. The Nuclear Industry is seeking assistance from the Government of Canada to conduct research and build these Small Modular Nuclear Reactors (SMR's).
- D. Nuclear reactors, regardless of size, produce bi-products and radioactive waste material that will be toxic and dangerous to human health for thousands of years.
- E. The Nuclear Industry in Canada has nowhere to store this waste and as of June 30, 2017, Canada has an inventory of about 2.8 million used nuclear fuel bundles with an average of 90,000 additional used fuel bundles being generated each year.
- F. The Nuclear Waste Management Organization is currently seeking out willing communities to construct a long-term underground repository in Ontario to store Canada's nuclear waste.

---

**Certified copy of a resolution adopted on the 6th of December, 2018 in Ottawa, ON.**

**SPECIAL CHIEFS ASSEMBLY  
DECEMBER 4, 5, AND 6, 2018, OTTAWA, ON**

**Resolution no. 62/2018**

- G. The First Nations of Ontario oppose the construction and operation of these reactors.
- H. The First Nations of Ontario have a duty to protect the health of their citizens today and in the future.

**THEREFORE BE IT RESOLVED that the Chiefs-in-Assembly:**

1. Demand that free, prior and informed consent is required to ensure that no storage or disposal of hazardous materials shall take place in First Nations lands and territories.
2. Demand that the Nuclear Industry abandon its plans to operate Small Modular Nuclear Reactors in Ontario and elsewhere in Canada.
3. Demand that the Government of Canada cease funding and support of the Small Modular Nuclear Reactors program.
4. Direct that the National Chief and appropriate staff work to ensure that the Nuclear Industry and the Canadian Government abandon this program.

Appendix L

September 28, 2018 Canadian Nuclear Safety Commission P.O. Box 1046, Station B 280 Slater Street Ottawa, Ontario K1P 5S9 Via:

cncs.consultation.ccsn@canada.ca. Re. Greenpeace comments on REGDOC-1.1.5: Licence Application Guide: Small Modular Reactor Facilities

To whom it may concern,

Thank you for this opportunity to comment on the draft licence application guide for Small Modular Reactors (SMR). As will be discussed, Greenpeace is concerned that the Canadian Nuclear Safety Commission's (CNSC) proposed regulatory approach has been driven primarily by a desire to encourage the expansion of the Canadian nuclear industry. This is contrary to the CNSC's legislated mandate to protect Canadians from unreasonable risk. Although SMR developers tout the increased safety benefits of their hypothetical reactor designs, others have observed that these asserted safety benefits could be undermined by the dilution of regulatory requirements.(1)

1 After reviewing REGDOC 1.1.5, Greenpeace shares this concern. Greenpeace urges the Commission to reassess the motivations behind its proposed regulatory approach. In Greenpeace's view, the CNSC should test the adequacy of its proposed guidance against the

growth scenarios proposed by SMR developers. Industry has been propagating a hopeful public narrative where fleets of SMRs will be deployed in communities across Canada. In such scenarios, affected communities will rightly expect broad access to information on the risks of SMRs and the justification for claims made by the CNSC and SMR proponents. The public may also reasonably hope to participate in decisions related to the siting of SMRs in their communities. Greenpeace feels the draft REGDOC would be unable to address such expectations.

2 Request: The CNSC should review and revise the regulatory document with an eye to whether the proposed guidance meets modern social expectations for transparency, pro-active disclosure and public participation, especially in light of industry proposals to deploy fleets of SMRs in communities across Canada. Siting & Environmental Assessments Considering the industry's hope of siting SMR reactors in communities across Canada, the guidance document needs to provide clearer direction on how site suitability will be transparently evaluated. As discussed in past submissions to the CNSC (2), the Commission has relied on environmental assessments to judge site suitability for current reactors. However, the CNSC has never stated this publicly. Greenpeace only learned of the CNSC's use of environmental assessments to judge site suitability from documents obtained through Access to Information.(3) Greenpeace urges CNSC staff consider how the failure to explicitly consider site suitability undermines public trust in the Commission.

3 Request: Greenpeace requests the CNSC explicitly state how it has used environmental assessments to judge the suitability of existing nuclear stations so it can be contrasted with whatever approach is used with SMRs. Notably, the draft regulatory document states there will only be an environmental review if it is required under the proposed Impact Assessment Act (IAA). However, what is not acknowledged is that **the CNSC has been lobbying the federal government to exclude SMRS from assessments under the IAA**. Greenpeace learned this through documents obtained through Access to Information.

**For example, an Information Note prepared for the CNSC's previous president in April 2018 states: "The CNSC has indicated that the [project] list should not be expanded, particularly given the strong oversight of the CNSC under the NSCA. The CNSC is recommending that a threshold be established for power reactors so that small units are not subject to an impact assessment (IA).** The number of nuclear project (sic) subject to an IA will likely be very limited in the foreseeable future."(4) 2 For example, 15-H8.10A, Greenpeace, Supplementary Comments The Darlington Nuclear Station.

(1) M. V. Ramana et al., "Licensing small modular reactors," Energy, 61, pgs. 555 – 564.

(2) For example, 15-H8.10A, Greenpeace, Supplementary Comments The Darlington Nuclear Station: Risking Toronto and the Environment, October 19, 2015 3 See Access to Information request A00036517\_93-000904 4 Prepared by Sarah Eaton et al., Information Note for the President – Meeting with Cameco, April 12, 2018, pg. 5 EDOC# 5476531, A-2018- 00061.

(3) See Access to Information request A00036517\_93-000904

(4) Prepared by Sarah Eaton et al., Information Note for the President – Meeting with Cameco, April 12, 2018, pg. 5 EDOC# 5476531, A-2018- 00061.

The CNSC has refused to release its detailed requests and reasons for exempting SMRs from impact assessments.(5) However, all other submissions to the government on the IAA are publicly available. This has undermined Greenpeace’s ability to participate in consultations on the Impact Assessment Act and comment on REGDOC 1.1.4. The CNSC’s secrecy is unaccountable and unacceptable. Notably, a review of licensee submissions shows the nuclear industry is also requesting SMRs be exempt from impact assessments. It thus appears that the CNSC’s closed-door lobbying effort is motivated by a desire to encourage the expansion of the Canadian nuclear industry. **For example, a Briefing Note prepared for the CNSC’s previous president states: The future of the nuclear industry, especially for Canadian participants, is dependent on the success of SMRs. It will be very important to get the Project list right so that there is a reasonable threshold on what kind of projects need an IA. It will also be important that “early review” about the “national interest” be timely and that a “yes” decision is not reversed later in the process for reasons that are not evidence-base.**6 For the record, Greenpeace is deeply disappointed by the Commission’s closed-door lobbying effort to exempt SMRs from impact assessments. In effect, the CNSC has been lobbying to reduce public scrutiny of the deployment of SMRs and deprive Canadians of information on the potential impacts of SMRs in their community. As noted, the objective of the CNSC’s lobbying appears to be to encourage the development of the Canadian nuclear industry. It is noteworthy that the federal government’s Expert Panel on environmental assessment observed there is a “...perceived lack of independence and neutrality because of the close relationship the NEB and CNSC have with the industries they regulate.” The CNSC’s decision to secretly encourage the federal government to exempt SMRs from impact assessments provides additional evidence that the CNSC continues to lack neutrality in its oversight of the nuclear industry. Request: Greenpeace requests the development of REGDOC 1.1.5 be put on hold until the CNSC has released all correspondence with federal Ministries outlining its recommendations and reasons for excluding SMRs from impact assessments.

Transparent Accident Consequence Analysis Given the CNSC has used environmental assessments (EA) in the past to assess site suitability, the Commission’s lobbying efforts to exclude projects from EAs raises a question: what criteria will be used to judge whether a site is unsuitable? This is not addressed in the proposed regulatory guidance. Environmental assessments under the Canadian Environmental Assessment Act (1992 and 2012) required the CNSC to publicly assess the offsite impacts of accidents and malfunctions. Although Greenpeace has opposed the CNSC’s decision to exclude accidents on par with Fukushima or Chernobyl from consideration in environmental assessments, such reviews were the only publicly accessible source of possible accident impacts. In Greenpeace’s view, it is no longer socially acceptable or prudent to ignore such accident scenarios in light of the Fukushima disaster. Indeed, the transparent assessment of major accidents has been a focus of public concern during CNSC hearings since the Fukushima disaster. Notably, the CNSC’s Fukushima

Task Force's observed that "...it may be useful for the environmental assessment process to include consideration of severe accidents, should this be regarded as responsive to public concerns".<sup>7</sup> Unfortunately, the CNSC failed to change its approach to accident consequence assessment. In Greenpeace's view, it is essential that the CNSC require licencees to produce and publish accident consequence assessments for proposed SMR facilities. Such information will be needed for the public to assess the suitability and acceptability of proposed SMR sites. Provincial public safety agencies will also require such information to develop emergency response plans with impact municipalities. **Of note, internal CNSC documents obtained by Greenpeace acknowledge that SMRs "...all could produce energies (and potential source terms) equivalent to a single unit NPP..." if deployed as multi-unit facilities.**<sup>8</sup> This underlines why transparent worst-case accident assessments will be needed to inform siting reviews. Request: Greenpeace requests the Commission require SMR developers publish accident modelling, including worst-case scenarios, before siting decisions are made.

Transparency Greenpeace feels the draft regulatory document lacks sufficient guidance for licencees and Commission staff related to transparency, pro-active disclosure and public participation during the approval of SMRs. The CNSC's safety philosophy assumes that licencees are responsible for the safety case. In the past, the CNSC has denied Greenpeace access to correspondence and assessments related to pre-licensing reviews. This has deprived Greenpeace of a meaningful opportunity to assess the safety of reactor proposals. This practice should not be permitted for the approval and licensing of SMRs. In Greenpeace's experience, licencees have used their ownership of safety analysis and licence applications to prevent or delay the release of information needed to assess the adequacy of licence applications and facility operations. Given the broad range of SMR developers undergoing design reviews by the CNSC, the Commission should set clear expectations related to pro-active and reactive information release. Request: The draft document should state that SMR developers and operators are expected to operate within a culture of openness and transparency. This should include a stand-alone section on transparency and public disclosure.

Transparency: Traceability of Novel Regulatory Approaches The CNSC's proposed flexible approach to regulating "novel" reactor designs requires new guidance to ensure that regulatory decisions are traceable and intelligible. Historically, the CNSC has regulated the development of CANDU reactors. Although the Commission subscribes to a non-prescriptive regulatory approach, its unique focus on CANDU reactors has meant its detailed requirements reflected the particularities of CANDU reactors. Proposed SMR designs have a wide range of "novel" safety features that are not reflected in current safety requirements. The CNSC's non-prescriptive regulatory approach allows staff assessments to theoretically accommodate and accept such novel safety features. Otherwise put, the CNSC's regulatory approach provides staff a high degree of subjectivity in assessing the adequacy of SMR designs. Considering the lack of detailed design requirements for SMRs and the range of prototype designs being proposed in Canada, it is reasonable to assume that CNSC staff will make numerous decisions to accept or reject unique design features and adapt regulatory expectations. The CNSC should ensure that these subjective staff judgements are well documented and transparent. Staff decisions to adapt regulatory expectations to the novel characteristics of different SMR designs should be both intelligible and traceable. In Greenpeace's view, the CNSC's current approach to pre-licensing is opaque. It will not permit members of public or civil society groups to understand and scrutinize the approval of

SMR designs. Request: The CNSC should create a registry of all correspondence and documentation detailing the basis for pre-licensing reviews of SMR reactors. **This should be acknowledged in the proposed regulatory guidance for SMRs. Waste Management The draft regulatory guidance should acknowledge that there is no accepted method for managing the radioactive fuel wastes produced by proposed SMR designs.** The government of Canada made a significant policy mistake when it allowed reactors to be built in the 1950s and 1960s without a technically feasible and socially acceptable means of storing long-live radioactive wastes. Repeating this mistake should not be implicitly encouraged by the CNSC. In its comments on the proposed Impact Assessment Act, Durham Region, which is currently the host community for ten reactors, has asked that: "Approval of a nuclear project should require a proponent to have a nuclear waste disposal solution available before the new/refurbished nuclear reactors are permitted to operate."<sup>9</sup> Durham Region's request is in line with a key objective of sustainability assessment: discouraging decisions that will result in adverse effects or risks to future generations.<sup>10</sup> Notably, Durham Region is currently concerned that it will become a de-facto long-term host community for radioactive waste due to the failure of industry and government to develop offsite facilities as promised. In Greenpeace's view, the draft regulatory guidance is flawed because it fails to acknowledge the lack of long-term waste options for radioactive wastes produced by SMRs. **Although the responsibility and policies for radioactive waste policy are outside of the CNSC's responsibilities, the draft regulatory document should acknowledge the lack of accepted long-term waste management options for SMRs proponents. The draft regulatory document implies that wastes produced by SMRs will be managed eventually by Nuclear Waste Management Organization (NWMO). However, the** fundamental assumption of the NWMO's 2004 risk assessment was that "...the volume of used nuclear fuel which needs to be managed was assumed to be limited to the projected inventory from the existing fleet of reactors."<sup>11</sup> What's more, the Nuclear Fuel Waste Act required the NWMO to take into account ethical considerations when assessing the viability of differing waste management approaches. The NWMO's Roundtable on Ethics observed that an ethical nuclear waste management approach is an intractable problem. While acknowledging we must find a method of managing existing wastes, it stated outright that producing additional wastes would be unethical: "[g]iven the large stockpile of high level nuclear waste that already exists in Canada and that will be hazardous for thousands of years, some solution to managing wastes as safely and effectively as possible must be found. Even if no ethically optimal solution exists, it would be ethically justified to adopt the least unacceptable option available. By contrast, to justify new nuclear power plants or even replacing the ones now in place when they reach the end of their serviceable life, one would have to have an ethically sound waste management method, not just a least-bad one."<sup>12</sup> [Emphasis added] Based on these assumptions, the NWMO's Advisory Committee made the following statement in its report to government in 2005: The Advisory Council would be critical of an NWMO recommendation of any management approach that makes provision for more nuclear than the present generating plants are expected to create, unless it were linked to a clear statement about the need for broad public discussion of Canadian energy policy prior to a decision about future nuclear energy development.. <sup>13</sup> Notably, Greenpeace raised these issues with



Commission staff during a 2008 meeting of the Non-Governmental Organization Regulatory Advisory Committee (NGO-RAC). Commission staff committed to respond to these issues, but never scheduled a follow up meeting. Request: Greenpeace requests the Commission acknowledge that the NWMO's Adaptive Phased Management approach was only designed to accommodate waste from existing CANDU reactors.

Request: Greenpeace requests the Commission acknowledge that the ethical issues raised by the NWMO fall outside of its legislated mandate, but remain a legitimate issue of public concern that need to be considered before the construction of SMRs. Request: The regulatory document should be revised to acknowledge that radioactive wastes produced by SMRs will not be managed by the NWMO. Request: The regulatory document should state clearly that SMRs will not be approved without an already approved long-term radioactive waste management. Conclusion Thank you for this opportunity to comment on the draft licence application guide for SMRs. As noted, Greenpeace feels the Commission should put the development of this guide on hold until it releases all documents and correspondence with the federal government related to the treatment of Small Modular Reactors under the proposed Impact Assessment Act. What's more, the Commission needs to review and rewrite REGDOC 1.1.5 in light of its legislated mandate to provide Canadians objective information on nuclear risks and protect Canadians from unreasonable risk.

Thank you for your attention.

Shawn-Patrick Stensil Senior energy analyst Greenpeace Canada

Blaise K., Stensil SP. (2020) *Small Modular Reactors in Canada: Eroding Public Oversight and Canada's Transition to Sustainable Development*. In: Black-Branch J., Fleck D. (eds) *Nuclear Non-Proliferation in International Law - Volume V*. T.M.C. Asser Press, The Hague. [https://doi.org/10.1007/978-94-6265-347-4\\_11](https://doi.org/10.1007/978-94-6265-347-4_11)