



Oral Presentation

Written submission from the Mississaugas of Scugog Island First Nation

In the Matter of the

Cameco Fuel Manufacturing Inc.

Application to Renew the Class IB Nuclear
Fuel Facility Licence for Cameco Fuel
Manufacturing Inc. in Port Hope, Ontario

Commission Public Hearing

November 23-24, 2022

Exposé oral

Mémoire de la Première Nation des Mississaugas de Scugog Island

À l'égard de

Cameco Fuel Manufacturing Inc.

Demande de renouvellement du permis
d'exploitation de l'installation de combustible
nucléaire de catégorie IB pour Cameco Fuel
Manufacturing Inc. à Port Hope (Ontario)

Audience publique de la Commission

23 et 24 novembre 2022

Intervenor Submission: Cameco Fuel Manufacturing Licence Renewal Application



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Mississaugas of Scugog Island First Nation
Consultation Office

October 7th, 2022



1.0 Introduction

1.1 Background

MSIFN understands that Cameco Fuel Manufacturing (CFM) operates the facility at 200 Dorset Street East, Port Hope, Ontario. This parcel includes approximately 16 hectares (ha) of land, of which 2.3 ha operate under a fuel facility operating license, while approximately 14 ha are undeveloped. Cameco is currently requesting the renewal of this license. A MSIFN representative visited this facility in October 2022 in addition to completing review of background documentation and ecological databases. This review is outlined in the subsequent Section 2, it has helped to inform our comments and requested conditions for license renewal (Section 3).

1.2 Highlights

If the license renewal request is approved, MSIFN requests that Cameco proceed with the following activities:

1. **Collaborative Planning:** to prevent reduced communication as a result of an extended license for the CFM facility, MSIFN requests that Cameco work together with MSIFN and other interested Williams Treaties First Nations to design and implement a collaborative planning process for lands and facilities within Cameco's site control. This should be accompanied by capacity funding to cover costs of MSIFN's participating through staff, advisors, and leadership. In the below commentary, we outline how this could touch on issues related to the following:
 - a. Lands & Waters
 - b. Safety & Communication
2. **Offsite Restoration Fund:** To work towards the restoration and stewardship of the landscape around CFM facilities, MSIFN requests that Cameco establish a restoration fund that would facilitate projects on lands outside of Cameco's site control in collaboration with First Nations, other governments (e.g., municipalities), and environmental groups. This funding should sustain projects over the medium to long term, helping to fill the gap that exists due to this type of this funding currently being largely offered by government grants with short cycles (i.e., 1 – 3 years).



2.0 Background Review

2.1 Safety & Communication

Nuclear safety is of paramount importance to MSIFN. Almost every portion of the nuclear fuel lifecycle exists in our territory, excluding mining. Our community has been and will continue to be impacted by these activities, which did not exist prior to colonization. The responsibility of the CNSC and Cameco to keep our community members safe must not be taken lightly.

We request that Cameco proceed with activities that would reflect a collaborative planning process with MSIFN and other interested Williams Treaties First Nation, surrounding both safety/communications and environmental considerations. This request is outlined further in Section 3.1. Such a process would help to ensure that interested First Nations are regularly involved in Cameco's planning and safety audit activities, and are fully aware of the results.

As an example of the need for this collaborative process, there are instances in CFM's submission that touch on safety assessments that MSIFN is not fully aware of. In Section 3.1.2. it is stated that "*Cameco conducts safety culture assessments approximately every five years at all FSD sites*". The parameters and frequency of safety assessments must be defined to allow for greater communication between Cameco and communities, which would be possible through collaborative planning.

During our site visit in October, our representative was encouraged to hear that Cameco has had their leadership undertake Indigenous cultural awareness training. It was mentioned that Cameco is looking to extend this training to the entirety of their staff. We ask that this training occur following discussion with MSIFN and other Williams Treaties First Nations (WTFNs), and exploration of the possibility for training to be delivered in whole or part by WTFNs member(s), staff, and/or leadership.

2.2 Ecology and Natural Areas

The majority of CFM's Port Hope lands are comprised of natural areas, including the Sculthorpe Marsh, which is an Unevaluated Wetland according to Ontario's Natural Heritage Information Centre (NHIC, 2022). Surrounding the CFM facility is approximately 1.5 ha (per desktop measurements) of cleared lands that are adjacent to this wetland and other natural lands. There are records of several Species at Risk on these lands (Table 1), which include species that use open meadow habitats (e.g., the Threatened bobolink & eastern meadowlark).



Table 1. Species at Risk Records within the vicinity of the CFM Port Hope site, from NHIC (2022).

Common Name	Scientific Name	Provincial SAR Status	National SAR Status
Northern Bobwhite	<i>Colinus virginianus</i>	Endangered	Endangered
Eastern Meadowlark	<i>Sturnella magna</i>	Threatened	Threatened
Bobolink	<i>Dolichonyx oryzivorus</i>	Threatened	Threatened
Canada Warbler	<i>Cardellina canadensis</i>	Special Concern	Threatened
Restricted Species			
Least Bittern	<i>Ixobrychus exilis</i>	Threatened	Threatened

While we understand that areas around the CFM fence are kept clear to ensure security, there appears to be potential for restoration of lands without security considerations that are currently cleared for aesthetics. These lands could be planted with native plants that support the natural ecosystems that many species rely on, including humans.

The forest and wetland margin surrounding the CFM facility is comprised of a mix of native and non-native species. MSIFN appreciates that this area is currently surveyed for noxious weeds, and looks forward to further collaboration on the control of invasive species as part of the proposed collaborative planning process. This is an important action that we can take together to ensure that surrounding ecosystems and waterways (i.e., Lake Ontario and its tributaries) are not further impacted by invasive species that have only entered these lands and waters since colonization.

2.3 Infrastructure

The licensed portion of the CFM site features dominant impervious surfaces, including the general parking lot, which does not allow for retention of stormwater. MSIFN is concerned about impacts of developed surfaces on watercourses, wetlands, and waterbodies, and in particular, Lake Ontario, which is in close proximity to both of Cameco's Port Hope facilities. There is an opportunity for Cameco to improve the condition of receiving waters by implementing Low Impact Development (LID) measures on the existing developed surfaces. This could also help to minimize the risk of contaminants from the facility's processes entering receiving waters if a land or water-based exceedance were to occur.

Some examples of LID measures that could apply to the site include bioswales, rain gardens, and green roofs. As an example, the on-site parking lot could be retrofit to include a bioswale and retention system that feature rain gardens comprised of native plant species. These systems are relatively common in newer developments, but were much less common when the CFM facility



opened. This approach would reduce peak flows to the adjacent wetland on Cameco's lands, as well as to receiving water/wastewater systems.

We further outline how Cameco could act on this item with the collaborative planning process in Section 3.1.

3.0 Requested Conditions of Approval

3.1 Collaborative Planning

If the proposed license renewal is issued, a probable issue is that less frequent renewals could lead to reduced communication around the CFM site. We recommend that communication is enhanced through the creation of a collaborative planning process for lands within Cameco's site control. This would be co-led by Cameco, MSIFN, and other interested Williams Treaties First Nations. It is critical that Cameco provides capacity funding to involved First Nations that will cover the participation, preparation, and follow up activities carried out by our staff, advisors, and Council members. MSIFN recommends that preliminary topics for this collaborative planning process include safety and on-site environmental restoration.

3.2 Offsite Restoration Fund

As previously mentioned, MSIFN's territory is home to all stages of the nuclear life cycle, aside from mining. The legacy of this industry has had vast impacts on the lands and waters within our territory. Various proponents are beginning to take steps towards ecological rehabilitation and restoration within the area. However, a more coordinated approach between the various proponents would help to maximize benefits.

To further extend benefits of restoration activities, which could include both natural and cultural heritage projects, MSIFN asks Cameco to support the creation of a restoration fund for lands and waters outside of Cameco site control. This could include funding projects that support the restoration of shorelines along Lake Ontario in partnership with First Nations, other governments, and environmental groups, and could extend to support for First Nation led projects on lands beyond nuclear facilities.

This fund should be created with capacity building at the forefront by providing long term funding for projects, not only on a short-term grant cycle. With a preliminary commitment from Cameco on this item, we can help to co-design this fund through the previously outlined collaborative planning process.



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4.0 Conclusion

MSIFN emphasizes that the health and safety of our community members must be a key consideration if the Cameco Fuel Manufacturing facility license is to be renewed for the requested period. Impacts of the site on ecology of the immediate and connected areas must also be a priority, and we encourage Cameco to look at ways that they can give back to the lands and waters that their facilities exist on. To ensure that communication and collaboration is maintained and enhanced throughout the proposed license renewal period, we ask that Cameco proceed with the creation of a collaborative planning process for lands within Cameco's site control, and the creation of a restoration fund for other lands. We encourage Cameco to continue improving their communication of safety measures taken on their sites to our leadership, staff, and members, and look towards strengthening these measures. Communication also extends to Cameco staff training surrounding Indigenous cultures and treaties, and we look forward to discussions on this as part of the collaborative planning process outlined within this intervention.



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