



Canadian Nuclear Laboratories | Laboratoires Nucléaires Canadiens

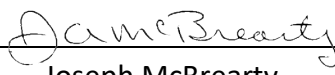
# Canadian Nuclear Laboratories Written Submission – Near Surface Disposal Facility Procedural Direction

**232-508760-REPT-004**

**Revision 0**

Approved by:

2023/05/01

  
\_\_\_\_\_  
Joseph McBrearty  
President and Chief Executive Officer

\_\_\_\_\_  
Date

UNRESTRICTED

This page is for Content Controls that apply to this document. If no Content Controls apply,  
none will be listed.

UNRESTRICTED

### Revision History

Rev. No.	Date	Details of Rev.	Prepared By	Reviewed By		Approved By
0	2023/05/01	Issued as Approved for Use	S. Faight N. LeBlanc A. Morin			J. McBrearty
D3	2023/04/20	Issued for Review and Comment	S. Faight N. LeBlanc A. Morin	A. Tisler L. Riccoboni A. Mahabir M. Steedman J. Willman	P. Quinn G. Dolinar S. Innes M. Vickerd S. Brewer D. Waldman	
D2	2023/03/21	Issued for Review and Comment	M. Ball S. Faight N. LeBlanc	S. Brewer M. MacKay M. Vickerd D. Waldman	A. Morin G. Dolinar S. Innes	
D1	2022/12/13	Issued for Review and Comment	M. Ball S. Faight N. LeBlanc	S. Brewer M. MacKay M. Vickerd D. Waldman	P. Stirbys A. Morin G. Dolinar	

*Canadian Nuclear Laboratories respectfully acknowledges that the Chalk River Laboratories site is located on the unceded and unsurrendered territory of the Algonquin Anishinaabe Nation.*

*We recognize and appreciate their historical connection to this land, and as the customary keepers and defenders of the Ottawa River Watershed and its tributaries.*

*We also recognize and appreciate the contributions that all First Nations, Métis, and Inuit peoples have made, and continue to make, in shaping this land we now know as Canada.*

*We acknowledge, respect, and seek to better understand the unique Indigenous history, rights, and title on the lands where we work.*



## **Canadian Nuclear Laboratories' Engagement with Kebaowek First Nation and the Kitigan Zibi Anishinabeg Executive Summary**

### **Introduction and Acknowledgement**

As outlined in our Land Acknowledgement, Canadian Nuclear Laboratories (CNL) recognizes and affirms all First Nations, Métis communities, and Inuit in this land we now know as Canada. We acknowledge, respect, and seek to better understand the unique Indigenous history, rights, and title on the lands where we work and develop projects. Indigenous peoples have and continue to be stewards of the land. At CNL we wish to honour and respect the importance of the relationship between Indigenous peoples and their lands, waters and territories.

We wish to thank Kebaowek First Nation (KFN) and the Kitigan Zibi Anishinabeg (KZA) for their interest in, and contribution to, the Near Surface Disposal Facility (NSDF) Project. It will be better due to the Indigenous led studies KFN has conducted, the Indigenous knowledge shared by KFN and KZA and KFN's and KZA's meaningful participation in the NSDF Project.

CNL acknowledges that it is at the beginning of its reconciliation journey. As part of our corporate, environmental and social responsibility, we understand the importance of establishing our Reconciliation Action Plan (RAP), which is being developed, bolstered and enriched through our ongoing engagement efforts. CNL is committed to establishing and maintaining relationships and meaningfully engaging with Indigenous peoples on the NSDF Project, today and in the longer term.

### **Procedural Direction**

The duty to consult, a responsibility of the Crown, is established by the Canadian common law and is grounded in the principle of the honour of the Crown, which arises from Section 35 of the *Constitution Act, 1982*. The Crown must consult with Indigenous Nations and communities when a Crown action or decision has the potential to adversely affect existing or asserted Aboriginal and treaty rights. Aboriginal and treaty rights are affirmed, upheld and protected by Section 35 of the *Constitution Act, 1982*.

In the case of the NSDF Project, the Canadian Nuclear Safety Commission (CNSC or the Commission) is responsible for the procedural and substantive aspects of the duty to consult, and where appropriate, accommodate. CNL appreciates that, while it is not responsible to fulfil the duty to consult, the CNSC may rely on aspects of CNL's engagement with Indigenous Nations and communities to fulfil such duties.

In 2022 July, the Commission issued a Procedural Direction [3] stating that it would not close the record for the NSDF hearing. The Commission left the record open to allow more time for engagement and consultation with KFN and the KZA, and for the filing of additional information about these efforts. KFN, the KZA, Atomic Energy of Canada Limited, CNL, and the CNSC staff were directed to file the additional information required by the Procedural Direction.

The Procedural Direction, with its focus on additional information about engagement with KFN and the KZA, respectively, is therefore an important submission to demonstrate CNL's efforts to assist the CNSC with the fulfillment of the Crown's duty to consult, as it relates to the NSDF Project.

### **CNL Engagement Approach**

As part of CNL's engagement activities, we seek to understand the interests and concerns of Indigenous Nations and communities while also building awareness and understanding of NSDF Project activities. CNL seeks to reach a mutual understanding of the potential effects of NSDF Project activities on the environment and any potential negative impacts on Aboriginal and/or treaty rights including, but not limited to, rights to trap, hunt, fish, gather, or harvest as well as the access to lands for perform cultural and spiritual activities.

CNL's engagement approach strives for collaboration with Indigenous Nations, communities and organizations to share information; identify opportunities to collaborate; understand concerns and issues, and potential impacts of a project on Aboriginal and/or treaty rights and opportunities for participation; and work together to address these through incorporating Indigenous Knowledge Systems, values and perspectives when considering avoidance and mitigations strategies.

Outreach to Indigenous Nations and communities and organizations regarding the NSDF Project started in late 2015, and a summary of this engagement is documented in the [NSDF Project Indigenous Engagement Report \(IER\)](#) [4]. CNL, with assistance of the CNSC, identified a list of 15 Indigenous Nations, communities and organizations based on the proximity of their communities, treaty areas or unceded traditional territories to the NSDF Project, as well as those that expressed interest in the NSDF Project or CNL's activities who may have rights or interests in the project as summarized in the table below, which distinguishes between rights bearing and non-rights bearing Indigenous Nations, communities and organizations.

<b>Indigenous Nations and communities that have established or asserted treaty and/or Aboriginal rights</b>	<b>Indigenous Nations, communities and organizations that have interests</b>
<p>The NSDF Project is situated on lands that are the treaty lands and/or traditional territories of:</p> <ul style="list-style-type: none"> <li>• Algonquins of Pikwakanagan First Nation</li> <li>• Barriere Lake First Nation</li> <li>• Timiskaming First Nation</li> <li>• Wolf Lake First Nation</li> <li>• Métis Nation of Ontario</li> <li>• Kitigan Zibi Anishinabeg</li> <li>• Kebaowek First Nation</li> <li>• Williams Treaties First Nations <ul style="list-style-type: none"> <li>○ Alderville First Nation</li> <li>○ Beausoleil First Nation</li> <li>○ Chippewas of Georgina Island First Nation</li> <li>○ Chippewas of Rama First Nation</li> <li>○ Curve Lake First Nation</li> <li>○ Hiawatha First Nation</li> <li>○ Mississaugas of Scugog Island First Nation</li> </ul> </li> </ul>	<p>The NSDF Project is situated on lands that are of interest to:</p> <ul style="list-style-type: none"> <li>• Algonquin Anishinabeg Nation Tribal Council</li> <li>• Algonquins of Ontario</li> <li>• Anishinabek Nation</li> <li>• Algonquin Nation Secretariat</li> <li>• Mohawks of the Bay of Quinte</li> </ul>

### **Benefits of Procedural Direction**

The issuance of the Procedural Direction by the CNSC provided the opportunity to improve project relationships with KFN and KZA, understand better KFN and KZA's interests and concerns, and to collaborate and find meaningful ways to address concerns and focus engagement and discussion. We intend to continue this engagement and approach as the NSDF project continues.

Since the Procedural Direction was issued, CNL has developed a deeper understanding of each Nations' concerns related to the NSDF Project. We recognize that, while they will satisfy western science-based regulations and conclusions, there are areas which can be enhanced through the meaningful consideration of Indigenous Knowledge Systems, values and perspectives. We are committed to ensuring that this additional knowledge, data and values inform the NSDF Project as it continues, this includes seeking feedback and input on the

mitigation plans and strategies from Indigenous Nations, communities and organizations. During the time afforded by the Procedural Direction we have been able to work with KFN to better consider, through the First Nations's perspective, the proposed project. Through additional studies and gap analysis, we continue to receive additional information from and working collaboratively with the KZA. We are committed to strengthening our relationship and continuing the journey forward, throughout the lifecycle of the NSDF Project.

### **Summary of Engagement with Kebaowek First Nation and Kitigan Zibi Anishinabeg**

In 2016 during the early stages of engagement, CNL met with the Algonquins of Anishinabeg Nation Tribal Council (AANTC). It was CNL's understanding at the time that, as KFN and the KZA were member Nations, these meetings represented engagement with them. We appreciate and understand the feedback that, as individual rights holding Indigenous Nations, both KFN and the KZA need to be consulted and engaged with directly, through the right processes with the right representatives. CNL understands the importance of establishing a unique relationship with KFN and the KZA to ensure that they each may bring forward knowledge, interest and concerns or interest they have specific to the rights held collectively by each Nation.

Through our initial discussions with AANTC, we offered to provide supplementary resources and funding to AANTC to enable participation in the Environmental Assessment (EA) process.

In 2021, we were separately made aware that KFN and the KZA did not consider engagement with AANTC as engagement with each Nation. As a result, CNL reiterated the offer to establish an agreement to ensure each Nation had the capacity to participate in and support engagement as the project continued and made efforts to engage and build a relationship directly with each Nation.

The challenges in furthering the relationship have been identified by the KZA and KFN as:

- a. concern over CNSC processes and approach to engagement,
- b. concern regarding fulfillment of the duty to consult, and
- c. capacity challenges that were only recently acknowledged and addressed.

In 2020 May, AANTC, with the support of KFN, expressed concerns related to the EA process including a request for Crown consultation directly with the Federal Government. In 2020 September, AANTC expressed to the Government of Canada, that a Nation-to-Nation dialogue was the only option for engagement and consultation, and asked the engagement pause until these conversations could be had. With the understanding that there was an ongoing conversation between CNSC and the Nations that needed to occur, CNL continued to be available to the First Nations, sought input on the NSDF Project, and provided updates to KFN and the KZA.

KFN and the KZA expressed concerns with the project related to the impacts and interactions of the NSDF Project on the lands, waters, species and their habitats, which are all of cultural and spiritual significance. CNL appreciates and understands these concerns and is committed to continue working collaboratively on them with KZA and KFN and other Indigenous Nations and



communities who hold Aboriginal and treaty rights on the lands where the NSDF Project is proposed.

### **Engagement with Kebaowek First Nation**

In 2021 September, KFN identified that the proper channel of engagement on the NSDF Project was through the First Nation's consultation department. KFN expressed the need to be engaged as a First Nation, independent from the AANTC, regarding CNL related projects and activities. A high-level timeline of engagement since then, includes:

- 2021 December – Met virtually to establish direct relationship and agreed to develop a letter of intent.
- 2022 January – Signed Letter of Intent, including the establishment of capacity supports, monthly meetings, informing and assisting KFN in engagement on the NSDF Project and agreeing to negotiate a long-term framework agreement.
- Summer of 2022 – CNL and AECL leadership were invited to attend an event by KFN on Fitzpatrick Island where commitments were made to work together to decrease gaps in views and create common understanding.
- 2022 August – KFN attended the CNL Open House for an opportunity to learn more about CNL and its operations.
- 2022 December – Meeting between KFN, AECL, and CNL to collaboratively work through concerns articulated by KFN at a CNSC Case Conference and agreement to support KFN's request for a timeline extension to the Procedural Direction submission as well as an oral hearing to present KFN's final submissions to the Commission.
- 2023 January – CNL met with KFN's Chief, and representatives of AECL to sign a long-term Consultation and Engagement Framework Agreement.

KFN has indicated that they need to understand how the NSDF Project impacts and interacts with the lands, waters, and species of cultural importance to them, including interest in collecting biodiversity data within the NSDF footprint. Between 2022 September and 2023 April, CNL, along with AECL, have worked collaboratively with KFN to:

- Conduct NSDF Project site inventories for plants and other environmental features of cultural significance.
- Facilitate walk-downs around Perch Lake water basin searching for beaver habitat.
- Collect wolf DNA samples to identify the purity level of the Eastern Wolf pack known to be present at Chalk River Laboratories (CRL).
- Set up trail cameras to capture large mammal movements.
- Follow wolf tracks to understand the pack behavior.
- Conduct bird surveys.
- Validate the presence of nesting cavity for the Pileated Woodpecker, and

- Set up ultrasonic recording devices to obtain bat vocalizations to confirm bat species' presence.

The time spent together in the field has proven to be very valuable as it has significantly increased the search effort and collection of biodiversity data within the NSDF footprint, especially during the winter months. The field activities proved to be a beneficial and positive experience which advanced both the relationship with KFN, as well as biodiversity data gathering for the CRL site. CNL environmental staff have benefited from working in the field directly with various KFN community members who generously shared their knowledge on subjects such as mushroom foraging, animal tracking and beliefs. In turn we have been able to share information on the nuclear industry, including radiation safety, waste management practices and environmental monitoring.

### **Summary of Constraints and Concerns**

KFN expressed constraints in meaningful engagement on the project based on limited capacity and need for capacity funding and resources. KFN expressed concern that the project did not consider or understand the impacts to KFN's Aboriginal and treaty rights, and that the Nation did not have an opportunity to understand this either. KFN expressed concerns over the proximity and interaction of the NSDF Project with the surrounding waters, including the Ottawa River, Perch Lake and Perch Creek, as well as the impacts to wildlife and habitats.

In 2022 January, CNL and KFN signed the first of two agreements which provided funding for support meetings, review of materials and the fieldwork activities which would enable KFN to collect data and hire experts to help the Nation understand potential impacts of the NSDF Project on its Aboriginal and treaty rights. CNL appreciates that some aspects of the EA process such as the final NSDF EIS [7] were not informed by KFN knowledge or data, however, through the EA process we are committed to ensuring that any data, information, feedback and concerns gleaned from the studies being conducted by KFN, including any identified impacts to rights, will be incorporated and meaningfully addressed through collaboration as the NSDF Project moves forward.

During the time afforded by the Procedural Direction, CNL has had the opportunity to listen and grow a deeper understanding of KFN, and its interests, values, knowledge and perspectives. We recognize KFN's issues and concerns related to the NSDF Project and are committed to working together collaboratively to meaningfully address these concerns as the project advances. CNL is committed to strengthening our relationship and continuing this journey going forward, throughout the lifecycle of the NSDF Project. We recognize that engagement and relationship building takes work, and we are committed to doing so irrespective of the existence of the Procedural Direction.

### **Engagement with Kitigan Zibi Anishinabeg**

In 2016, KZA provided comments on the 2016 NSDF Project description and again in 2017 with comments on the draft NSDF EIS. In 2021 October, the KZA identified that the proper channel of engagement on the NSDF Project was through the First Nation's consultation department, a

position that they were in the process of filling. The KZA expressed the need to be engaged as a First Nation, independent from the AANTC regarding CNL-related projects and activities. A high level timeline of engagement since then includes:

- 2021 November – Met virtually to establish direct relationship, provide an overview of the NSDF Project to new staff, and reiterated goal of establishing an agreement to ensure support of the KZA's understanding of the NSDF Project and their participation and engagement as the project continues.
- Summer of 2022 – KZA staff attended an Environmental Stewardship Committee at the CRL site, participation in the meeting provided an opportunity to learn more about CRL operations and activities through presentations, discussions and waste facility tours.
- Summer of 2022 – Meeting and site visit with the KZA, hosted at CRL site.
- 2022 October – Met with Councilor Odjick to address NSDF Project commitments, capacity for engagement activities, discuss areas of improvement in relationship, and opportunity to enter into a long-term framework agreement.
- 2022 November – CNL attended a meeting at the KZA community including a feast, presentation and Q&A with community membership.
- 2023 March – CNL provided reassurances to the KZA regarding engagement and progresses on establishing monthly meetings and working together to establish a long-term formal agreement.

The KZA expressed interest in co-managing the lands, and protection of the lands, waters and environment which are all of cultural importance to the KZA.

### **Summary of Constraints and Concerns**

The KZA indicated that due to the lack of direct engagement by the CNSC or CNL prior to 2021 November, there was little time for the Nation to retain experts to study and understand the impacts of the project on its rights and interests, especially since the pool was small and there were many who faced conflicts of interest. The KZA also expressed constraints due to the limited capacity to sift through a large volume of documents, especially since many were technical in nature.

The KZA expressed concerns regarding the way in which the NSDF Project may interact with the lands and particularly the waters, the type of waste to be stored and the high tritium thresholds for controlled release of effluent.

CNL and the KZA continue to build the relationship through regular monthly meetings. It is CNL's intention that through this regular engagement, the KZA will continue to provide feedback. CNL is also looking for the opportunity to establish a capacity funding or relationship agreement with the KZA so that the First Nation may establish improved capacity and ability to identify concerns and inform the project in a meaningful way. CNL values the feedback we have received from the KZA over the last year and is committed to working collaboratively to address

all interests and concerns with the goal of building a stronger relationship and supporting the KZA's involvement in the NSDF Project.

### **Conclusion**

Over the last year we have been given the opportunity for more meaningful and collaborative engagement with KFN and the KZA. Progress has been made in improving relationships with KFN and the KZA, and we are learning each other's concerns and how to address them together.

We acknowledge that CNL is on a reconciliation journey. We are committed to build positive long-term relationships with Indigenous Nations and communities who have treaty and Aboriginal rights on the lands where the NSDF Project is being proposed, as well as work with other interested Indigenous communities and organizations.

We also remain committed to advancing environmental protection and remediation of the CRL site and believe that the NSDF is a responsible science-based solution, which can be informed by Indigenous Knowledge Systems and values. We are committed to collaboratively developing solutions throughout the NSDF Project that address concerns in a meaningful way.

CNL remains committed to continuing engagement with Indigenous peoples. The work done to date marks the beginning of a long journey of relationship building with Indigenous Nations, communities and organizations.

## Table of Contents

### Section

### Page

1. Introduction .....	16
1.1 Near Surface Disposal Facility Part 2 Hearing – 2022 June 02 .....	17
1.2 Acronyms .....	19
2. Engagement .....	19
2.1 Introduction .....	19
2.1.1 Kebaowek First Nation (KFN) .....	23
2.1.1.1 Engagement .....	26
2.1.1.2 Feedback .....	42
2.1.1.3 Summary Discussion of Interests and Concerns.....	44
2.1.1.4 Verification.....	54
2.1.1.5 Next Steps .....	54
2.1.2 Kitigan Zibi Anishinabeg (KZA) .....	54
2.1.2.1 Engagement .....	56
2.1.2.2 Feedback .....	60
2.1.2.3 Summary Discussion of Interests and Concerns.....	62
2.1.2.4 Verification.....	76
2.1.2.5 Next Steps .....	76
3. Conclusions .....	77
4. References .....	79
Appendix A Detailed Record of Engagement – Kebaowek First Nation 2022 January 01 to 2023 April 14	81
Appendix B Detailed Record of Engagement – Kitigan Zibi Anishinabeg – 2022 January 01 to 2023 April 14	165
Appendix C Letter from Kebaowek First Nation to the Canadian Nuclear Safety Commission -	

Re: CNSC Kebaowek First Nation (KFN) Request for Stop of NSDF Hearing Schedule .....	195
Appendix D Letter from CNL and AECL to Kebaowek First Nation - RE: Proposed meeting between Kebaowek First Nation, AECL and CNL .....	199
Appendix E Letter from CNL to KFN - RE: CSNC Reportable Event at Chalk River Laboratories	201
Appendix F Letter from CNL and AECL to the CNSC - Subject: Kebaowek First Nation's (KFN's) Request to Extend Submission Date for Procedural Directive Re: CNL's Application to Construct a Near Surface Disposal Facility .....	203
Appendix G Letter from KFN to CNL in Response to CNSC Reportable Event .....	205
Appendix H Letter from KFN to CNSC - RE: Request for In-Person Hearing (Hearing Ref. 2022-H-07)	208
Appendix I Letter from CNL to KZA - RE: Proposed meeting between Kitigan Zibi Anishinabeg, AECL and CNL .....	210
Appendix J Letter from CNL to KZA .....	212
Appendix K Letter from CNL to KZA - Reference: Federal Environmental Assessments, NSDF project	213
Appendix L CNL memo – Subject: Appendix L: Summary of the work conducted on the Eastern Wolf at Chalk River Laboratories .....	214

## Figures

Figure 2-1: Kebaowek First Nation and Kitigan Zibi Anishinabeg in relation to the Chalk River Laboratories Site (NSDF Project Regional Study Area circled in red). ....	21
Figure 2-2: Map of Wolf Lake First Nation, Timiskaming First Nation, and Kebaowek First Nation's Asserted Rights and Title territory (source: Kebaowek First Nation) ....	24
Figure 2-3: Map of Algonquin Territory (source: <a href="#">Di Gangi, 2018</a> ) .....	25
Figure 2-4: Images captured on trail cameras at the CRL site (top left: cow moose; top right: black bear; bottom left: fisher; bottom right: wolf) .....	34
Figure 2-5: Image of pregnant female captured on trail camera at the CRL site .....	38
Figure 2-6: Kitigan Zibi Anishinabeg Traditional Territory (source: KZA Wildlife and Resources Office).....	55
Figure 2-7: 2022 July Environmental Stewardship Council tour of Waste Characterization Facility .....	57

## Tables

Table 1: 2022 January 01 – 2023 April 14 Summary of Engagement .....	22
Table 2: Summary of KFN Field Activities (2022 September – 2023 April).....	39

## 1. Introduction

Canadian Nuclear Laboratories (CNL) applied to the Canadian Nuclear Safety Commission (CNSC or the Commission) for approval to amend the Chalk River Laboratories (CRL) Nuclear Research and Test Establishment Operating Licence [1] to authorize the construction of the Near Surface Disposal Facility (NSDF) [2]. The Commission held a two-part hearing on the NSDF in 2022: Part 1 was held virtually on 2022 February 22, and Part 2 was held in person and virtually 2022 May 30 – June 30 in Pembroke, Ontario. Three decisions were being sought from the Commission:

- An EA decision to determine if the proposed activities are likely to cause significant adverse environmental effects,
- A licensing decision to add the construction of a new Class 1B facility, the NSDF, to the CRL licensing basis,
- A decision that the CNSC, as an agent of the Crown, has upheld the honour of the Crown and has fulfilled its common law obligations to consult and where appropriate, accommodate Indigenous peoples pursuant to Section 35 of the *Constitution Act, 1982*.

The Commission considered information prepared by CNL and CNSC staff, as well as oral and written submissions from 165 intervenors, including eight Indigenous Nations and communities, as part of the NSDF hearing.

At the hearing, CNL recognized that there have been gaps in the approach to engagement that can be improved upon. CNL has much to learn and hopes to build trust with and seek guidance from Indigenous peoples, so all parties benefit from the success of the entire group.

In 2022 July, the Commission issued a [Procedural Direction](#) [3] stating that it would not close the record for the NSDF hearing; leaving the record open to allow more time for engagement and consultation with Kebaowek First Nation (KFN) and the Kitigan Zibi Anishinabeg (KZA), and for the filing of additional information resulting from these efforts.

KFN, the KZA, AECL, CNL, and CNSC staff were directed to file the additional information required by the Procedural Direction by 2023 January 31. In 2022 December, both [KFN](#) and the [KZA](#) submitted requests to the Commission to extend the deadline for the submissions to 2023 April 30, and to make an oral presentation before the Commission. Both [CNL and AECL](#) supported the requests. The Commission [granted the extension](#) to 2023 May 01 and a further oral hearing will occur virtually on 2023 June 27 in accordance with the Commission's Notices of Hearing, as amended. This submission by CNL is to provide the Commission with additional evidence and information regarding our engagement efforts with KFN and the KZA to fulfil our obligations pursuant to the Procedural Direction.

Notwithstanding that this submission focuses on CNL's engagement efforts with KFN and the KZA, CNL remains committed to engaging with Indigenous Nations, communities and organizations where the NSDF Project might impact asserted or established Aboriginal or treaty rights. We also remain committed to advancing environmental protection and remediation of the CRL site and believe the NSDF is a responsible science-based solution. We acknowledge, however, that this solution can become even more effective when it is informed by Indigenous



Knowledge Systems, values and perspectives and as such we are committed to collaboratively developing and implementing additional measures, mitigations and solutions throughout the NSDF Project with Indigenous peoples including KFN and the KZA.

### **1.1 Near Surface Disposal Facility Part 2 Hearing – 2022 June 02**

Both KFN and the KZA provided written submissions to the CNSC Registry in 2022 April (Published April 19 - KFN ([CMD-22-H7.111](#)) and the KZA ([CMD-22-H7.113](#)); Published April 29 – supplementary information from KFN ([CMD-22-H7-111A](#))). At the time, the KZA did not indicate they wished to provide an oral intervention at the hearing. CNL reviewed these submissions prior to the NSDF hearing. Issues and concerns identified in KFN and the KZA's written submissions are summarized in Sections 2.1.1.3 and 2.1.2.3, respectively, of this submission. CNL notes that capacity support was offered to KFN and the KZA in 2022 February for the Part 1 hearing and 2022 March for the Part 2 hearing. Both KFN and the KZA did receive participant funding from the CNSC to participate.

KFN was represented at the hearing by Councillor Justin Roy, Councillor Verna Polson, their legal counsel Renée Pelletier of Olthuis Kleer Townshend LLP and their advisor, Roseanne van Schie. CNL heard that the health of community members and the watershed is KFN's priority. KFN expressed procedural concerns with the colonial approach of the hearing, including time limits. KFN indicated that an Indigenous approach to the hearing might involve a circle discussion and an opportunity to feast together. KFN indicated that there had been a failure to consult with Algonquin communities and that they were participating in the hearing as consultation under protest. More specifically, KFN indicated that their Section 35 rights and the Crown's duty to consult have been ignored. Councillor Roy spoke of truth and reconciliation and the fact that reconciliation cannot be achieved without truth. KFN expressed concern that a disposal site would be a risk to future generations and would contaminate the air, animals and medicines. Finally, KFN asserted that the requirements under the *Canadian Environmental Assessment Act, 2012 (CEAA 2012)* (particularly, Section 5(1)(c) of *CEAA 2012*) and the *Nuclear Safety and Control Act* (Section 24(2)) were not met as KFN's concerns and impacts on rights have not been included in the NSDF Project's EA.

The KZA had originally requested to participate in the NSDF hearing by making a written submission only. CNL was pleased that Elder McGregor spoke at the hearing on behalf of the KZA, along with their legal counsel Renée Pelletier of Olthuis Kleer Townshend LLP. Elder McGregor provided teachings on the role of women as the keepers of water, and men as the keepers of fire. The KZA expressed a concern that the disposal of nuclear waste would jeopardize the safety of the water. Concern was also expressed by the KZA that the CRL site was built across from a sacred site (Oiseaux Rock), with no consultation on the original location, and there is continued impeded access to sacred sites. The KZA indicated that the NSDF EA did not include Indigenous knowledge as a result of the lack of proper consultation. The KZA raised the overall application of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and the rights of Indigenous peoples when it comes to having hazardous waste stored or disposed of on their lands and highlighted its context within the journey of truth and reconciliation. Elder McGregor spoke of reconciliation, and that reconciliation is not just about

the human aspects, but about the animals as well. The KZA also stated that just the sharing of information was not consultation, and more time was needed to incorporate Indigenous knowledge into the NSDF Project. The KZA was not asking for the NSDF Project never to happen, but to request more time for consultation so that Indigenous knowledge could be integrated into the NSDF Project.

It became apparent in the discussions at the NSDF hearing that both CNSC staff and CNL believed that they had been consulting and engaging with both KFN and the KZA through the Algonquin Nation Secretariat (ANS) and Algonquins of Anishinabeg Nation Tribal Council (AANTC). Both KFN and the KZA expressed that as independent First Nations who have Aboriginal and treaty rights, they should be consulted with directly about the NSDF Project. The Commission asked both KFN and the KZA about their willingness and intention to consult with CNSC staff and CNL now and in the future. Hearing a willingness and good faith intention to do so, the Commission issued the Procedural Direction.

At the closing of the NSDF hearing on 2022 June 03, CNL President and Chief Executive Officer (CEO) Mr. Joe McBrearty reiterated CNL's commitment to communication and engagement with Indigenous Nations and communities. Mr. McBrearty recognized that this commitment comes from all levels of the organization, starting with leadership. CNL strives to ensure that community members have the opportunity to understand the NSDF Project. Based on what CNL heard at the hearing, it was recognized that CNL needs to understand ways that engagement can be done better, and adjust our efforts based on these learnings. CNL has much to learn in seeking guidance from Indigenous Nations and communities and organizations so that all parties benefit from the success of the entire group. Mr. McBrearty recognized that Indigenous Nations and communities should be part of the operations at the CRL site and will continue to work collaboratively on meaningfully addressing comments and concerns that are raised.

## 1.2 Acronyms

AANTC	Algonquins of Anishinabeg Nation Tribal Council
AECL	Atomic Energy of Canada Limited
CEAA	Canadian Environmental Assessment Act
CEO	Chief Executive Officer
CMD	Commission Member Document
CNL	Canadian Nuclear Laboratories
CNSC	Canadian Nuclear Safety Commission
CRL	Chalk River Laboratories
EA	Environmental Assessment
EAfMP	Environmental Assessment Follow-up Monitoring Program
ECCC	Environment and Climate Change Canada
ECM	Engineered Containment Mound
EIS	Environmental Impact Statement
FPIC	Free, Prior and Informed Consent
GoCo	Government Owned Contractor Operated
IAEA	International Atomic Energy Agency
IER	Indigenous Engagement Report
KFN	Kebaowek First Nation
KZA	Kitigan Zibi Anishinabeg
NSDF	Near Surface Disposal Facility
RIA	Rights Impact Assessment
RSA	Regional Study Area
SARA	Species at Risk Act
UNDRIP	United Nations Declaration on the Rights of Indigenous Peoples
WAC	Waste Acceptance Criteria

## 2. Engagement

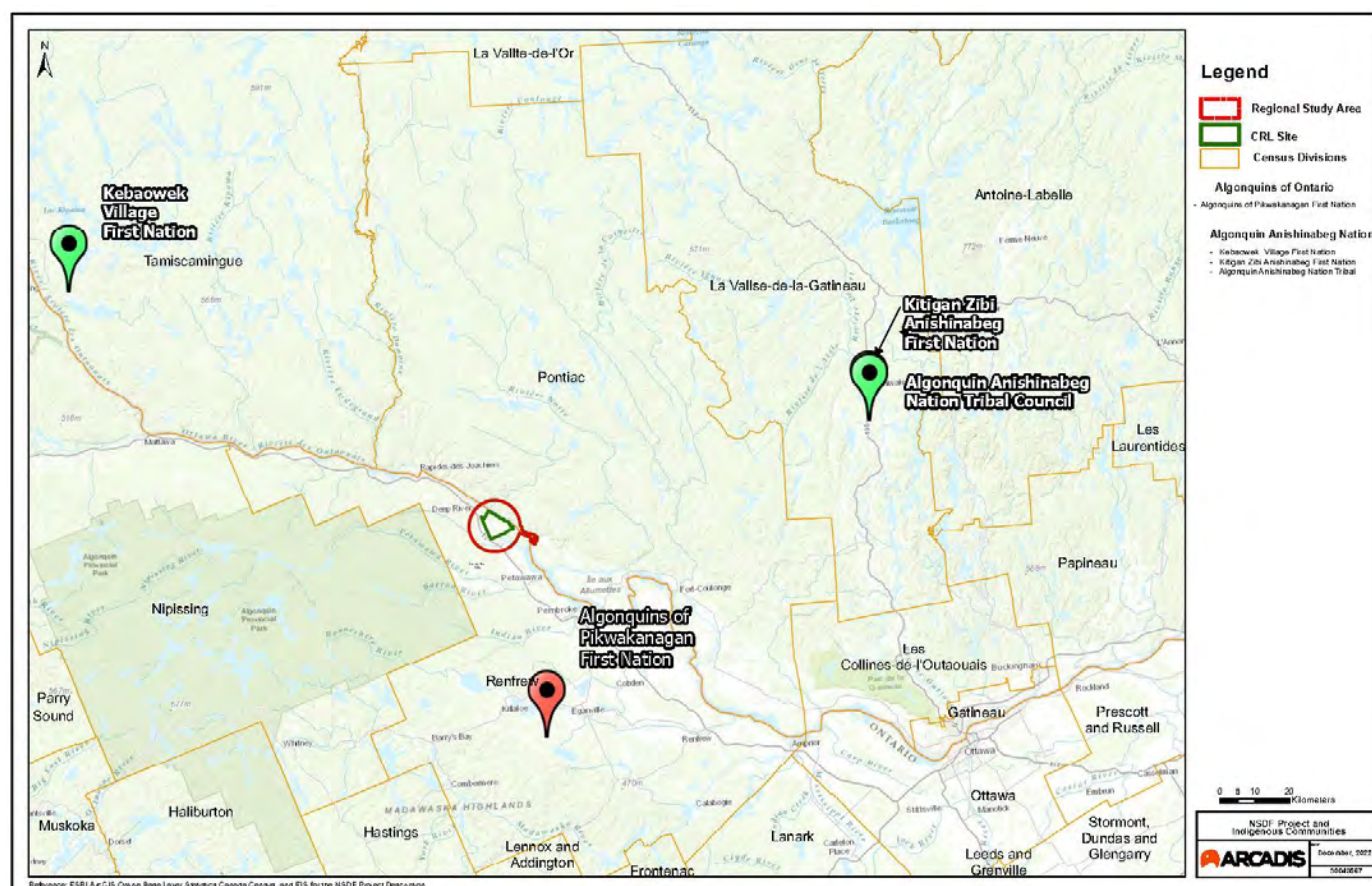
### 2.1 Introduction

Engagement with Indigenous Nations, communities and organizations on the NSDF Project started in 2015 October and is documented in the NSDF Indigenous Engagement Report (IER) ([CMD-22-H7.1C](#)) [4]. CNL, with the assistance of the CNSC, identified a list of 15 Indigenous Nations, communities and organizations based on the proximity of their communities, to the NSDF Project, treaty lands and/or unceded traditional territories on lands where the NSDF Project is proposed, or due to previously expressing interest of being kept informed. The identified Indigenous Nations, communities and organizations included, without limitation: Algonquins of Ontario; Algonquins of Pikwakanagan First Nation; Métis Nation of Ontario; AANTC; KZA; KFN; Williams Treaties First Nations; Anishinabek Nation; and ANS.

In addition to seeking information about Indigenous interests as required by the *Nuclear Safety and Control Act* [5] and *CEAA, 2012* [6], we adapted our engagement activities according to the unique interests, concerns, and information needs of Indigenous Nations, communities and organizations. The spectrum and depth of engagement has varied significantly between Indigenous Nations, communities and organizations, with some actively engaged with us early in the NSDF Project, and others only more recently. We have had significant discourse and formal exchange of comments and responses with certain Indigenous Nations, communities and organizations, the results of which have been incorporated in the [final NSDF EIS](#) [7] and are documented in the NSDF IER [\(CMD-22-H7.1C\)](#) [4]. As such, we have had the opportunity to learn that relationships evolve, and it is important to regularly validate that engagement is being conducted with the correct representatives. We now understand the importance of establishing a unique relationship with each First Nation to ensure their voice is heard by CNL directly.

CNL has been sharing information about the NSDF Project directly with KFN and the KZA since 2016, as documented in the NSDF IER [\(CMD-22-H7.1C\)](#) [4]. CNL also met with the AANTC in 2017, which included representatives from both KFN and the KZA. CNL also attended a community meeting at the KZA and the KZA visited the CRL site in 2018. At the time, CNL understood that it was engaging with KFN and the KZA through the AANTC but appreciates now that this was not the case. CNL now understands now that the AANTC does not represent either KFN or the KZA, and engagement must occur directly with the Nations through their respective consultation staff or Chief and Council. Throughout the EA process, CNL continued to send information on the proposed NSDF Project directly to KFN and the KZA, in addition to the other identified Indigenous Nations, communities and organizations. CNL also offered support to KFN and the KZA by way of capacity funding, through the AANTC, to enable their participation in the EA process as early as 2017. In 2021, CNL reiterated its commitment to provide capacity funding directly to KFN and the KZA, but no agreements for capacity support were put in place until just prior to the NSDF hearing.

As discussed, in this submission, concerns were expressed by KFN and the KZA about the consultation regarding the NSDF Project at the hearing. Notwithstanding our good faith attempts and progress that was made, there were challenges during the engagement between CNL and KFN, as well as CNL and the KZA. KFN and the KZA also expressed concern over the lack of consultation by the Crown. However, in connection with the Procedural Direction, we have been provided an opportunity to engage with KFN and the KZA in order to more meaningfully understand and commit to addressing the concerns of each Nation. A summary of our engagement activities with KFN and the KZA is provided in Table 1 and further details regarding the feedback, concerns, discussion and commitments we heard from each Nation are described in the remainder of this submission. A full list of our engagement activities with KFN and the KZA from 2022 January 01 to 2023 April 14 are provided in Appendix A and Appendix B respectively.



**Figure 2-1: Kebaowek First Nation and Kitigan Zibi Anishinabeg in relation to the Chalk River Laboratories Site (NSDF Project Regional Study Area circled in red).<sup>1</sup>**

<sup>1</sup> The Algonquins of Pikwakanagan First Nation is noted on the map the closest Indigenous Nation by physical distance to the project site (52 km as a straight line).

**Table 1: 2022 January 01 – 2023 April 14 Summary of Engagement**

First Nation	Letters from/to CNL (includes cc)	Phone & Email Correspondence	Meetings, Information Sessions, Tours and Webinars	Number of days in the field	Comments Submitted via EA Process (Project Description, 2017 Draft EIS)	CNSC Participant Funding Issued	MOUs & Contribution Agreements (CNL funding)
Kebaowek First Nation	6	346	27	33	—	Yes	Signed Letter of Intent and Consultation and Engagement Framework Agreement
Kitigan Zibi Anishinabeg	4	103	8	—	Yes	Yes	In discussion

### 2.1.1 Kebaowek First Nation (KFN)

KFN is one of the eleven communities that constitute the broader Algonquin Nation. The reserve is situated on the shore of Lake Kipawa to the northeast of Temiskaming, Quebec, and is approximately 50.6 ha in size, approximately 150 km from the NSDF Project site (measured as a straight line), as depicted in Figure 2-1.

The total registered population of this community is 1,074 (as of 2021 April). Approximately 72 per cent of the registered population reside off reserve lands (774). Within the community, the languages spoken include English, Algonquin and French. Community members reside, work, study, shop and maintain family ties in both Quebec and Ontario [8]. Various positions are held within the band government structure to administer services to the community (e.g., medical, education, land management, recreation etc.) [9].

KFN, formerly known as Eagle Village First Nation - Kipawa, is governed by an elected council comprised of a Chief and three councillors. KFN is a member Nation of the AANTC [10] and [11].

KFN (along with two other Algonquin First Nations - the Wolf Lake First Nation and Timiskaming First Nation) has asserted Aboriginal title and rights over a broad area that straddles the Kichi Sibi basin on both sides of the Quebec-Ontario boundary, as depicted in Figure 2-2.

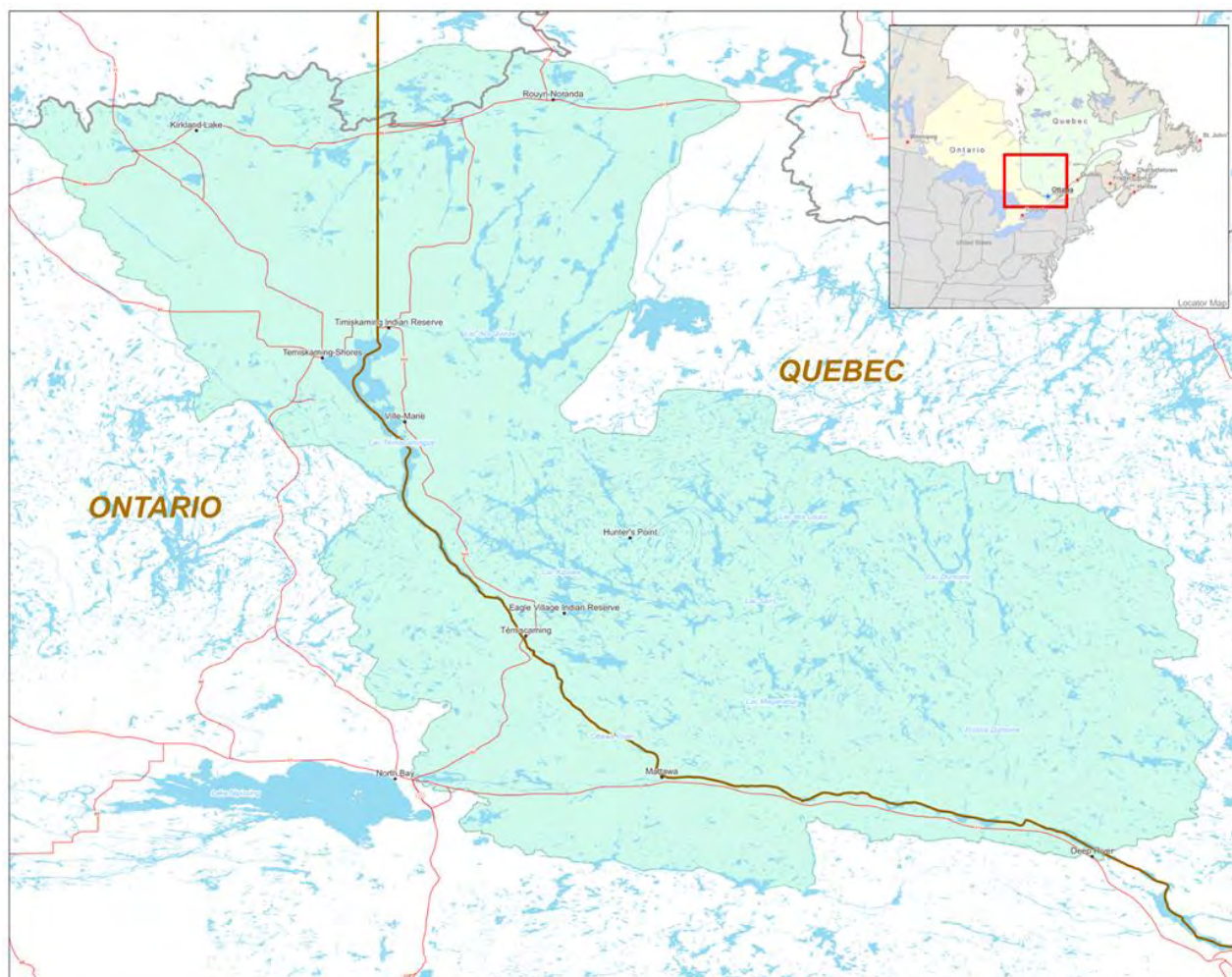
This map<sup>2</sup>, as well as a corresponding Statement of Asserted Rights and Title, was provided by KFN and the other First Nations to the Government of Canada, Québec, and Ontario in 2013 January. The map was based on the best evidence available at the time and should be noted is subject to change. It reflects the area where the three First Nations' have the strongest claims to title.

KFN's position is that their members— as members of the broader Algonquin Nation — can still exercise their rights throughout the Algonquin Nation's entire traditional territory, as depicted in Figure 2-3.

---

<sup>2</sup> The maps provided by KFN as to their traditional territory and asserted Aboriginal title and rights, which are represented in Figures 2 and 3 of this submission, do not reflect the position of the Government of Canada, Quebec or Ontario that the claimed Aboriginal title and rights are existing as of the date of this submission. Figures 2 and 3 solely represent the views of KFN, Wolf Lake First Nation and Timiskaming First Nation.





**Figure 2-2: Map of Wolf Lake First Nation, Timiskaming First Nation, and Kebaowek First Nation's Asserted Rights and Title territory (source: Kebaowek First Nation)**





Figure 2-3: Map of Algonquin Territory (source: [Di Gangi, 2018<sup>3</sup>](#))<sup>4</sup>

<sup>3</sup> Di Gangi, P. Algonquin Territory. Indigenous title to land in the Ottawa Valley is an issue that is yet to be resolved. Canada's History. Politics & Law. 2018 April.

<sup>4</sup> This map was created based on the evidence at the time and is subject to change.

### 2.1.1.1 Engagement

Engagement activities with KFN prior to 2022 January can be found in Section 4.4.6 of the NSDF IER [\(CMD-22-H7.1C\)](#) [4], though events that are related to the additional engagement CNL undertook since 2022 January, and pursuant to the Procedural Direction, are described within this submission.

CNL met virtually with KFN in 2021 December for the first time independent of the AANTC to establish a relationship and to discuss a formal agreement. The parties determined to proceed first with a Letter of Intent, to set the foundation to enable the parties to negotiate and execute a formal framework agreement thereafter. The Letter of Intent was signed in 2022 January and included capacity to finalize the Letter of Intent and the formal framework agreement that will result from the Letter of Intent. The Letter of Intent represented to CNL a commitment to build a direct working relationship with KFN. Monthly meetings were scheduled to begin to develop a relationship, to inform and assist KFN to engage on the NSDF Project, as well as to negotiate the formal framework agreement contemplated by the Letter of Intent. The value of the monthly meetings was two-fold, not only did they provide the platform for the agreement discussions but also genuinely evolved CNL's relationship with KFN.

CNL was copied on a letter (Appendix C) from KFN dated 2022 January 31 to the CNSC requesting the suspension of the NSDF hearing until a mutually agreeable consultation framework agreement and work plan for the NSDF Project is in place between KFN and the CNSC, which respects and upholds the honour and duty of the Crown. In response, the CNSC determined that it was premature to adjourn the proceeding.

In early 2022 February, CNL contacted KFN to coordinate and establish various meetings to discuss the development of a relationship agreement, as contemplated by the Letter of Intent. KFN provided a list of representatives for the meetings and the first meeting was held in 2022 March. CNL also provided KFN with a link to the NSDF virtual visitor centre, a virtual platform set up to help inform and assist people interested in learning more about the NSDF Project and/or participating in the Commission hearing process.

In 2022 March, CNL sent correspondence to KFN to encourage their participation in Part 2 of the Commission hearing process for the NSDF Project. CNL reiterated the offer of capacity to reduce any barriers to participate, but the offer was not accepted by KFN at this time, as they viewed that consultation should occur at a Nation-to-Nation level between themselves and CNSC before engagement with CNL could commence. On 2022 March 10, meetings commenced between CNL and KFN, and it was agreed that monthly meetings would follow.

In 2022 April, CNL reminded KFN of the deadline to submit a request to intervene in Part 2 of the Commission hearing and encouraged KFN participation. CNL also provided links to the updated revision of the NSDF IER [\(CMD-22-H7.1C\)](#) [4] and requested feedback from KFN. As of yet, no feedback has been received. It is important to acknowledge KFN's expressed concern regarding capacity to review documents with limited time and without funding. A monthly meeting was held on 2022 April 14. CNL also extended an invitation to KFN to attend CNL's Industry Day offering a complimentary booth at the suppliers' day event that included a trade

show, luncheon, networking, and a full schedule of presentations and updates on CNL's future plans and opportunities for the supply chain which was to occur on 2022 June 02.

In 2022 May, KFN shared the initial draft of a proposed Framework Agreement for discussion at the monthly meetings. Due to scheduling conflicts, the monthly meeting in May was cancelled. In May, CNL sent a reminder invitation to KFN to participate in CNL's Industry Day in 2022 June.

A monthly meeting was held on 2022 June 09 after the Part 2 hearing concluded. AECL, CNL and KFN representatives were able to discuss KFN's intervention at the Part 2 hearing, acknowledge what each party heard, and set a path forward for negotiating and executing a Framework Agreement that: (i) acknowledges that KFN enjoys and asserts constitutionally protected Indigenous rights and title, among other things, to KFN's traditional territory, (ii) acknowledges that the parties wish to build a strong, constructive, cooperative, mutually respectful and beneficial relationship, (iii) acknowledges and creates a process that respects and provides for the participation of KFN in CNL's projects; and (iv) provides for the process and means for KFN's consultation and engagement, as applicable, in respect of CNL's projects where the duty to consult must be fulfilled. Building a relationship and formalizing such an agreement was of high importance to CNL in light of concerns expressed by KFN at the Part 2 hearing, and specifically, their desire to be engaged meaningfully and provided with capacity support for the NSDF Project.

In 2022 July, CNL contacted KFN to acknowledge the Procedural Direction issued by the Commission and welcomed the opportunity to further engage with the community. CNL also extended an invitation to meet to share any information, concerns or questions that KFN had with respect to the NSDF Project in addition to the Framework Agreement discussions. Following the email to KFN staff, CNL's President and CEO, Mr. McBrearty, along with AECL's President and CEO, Mr. Dermakar, sent a letter (Appendix D) to Chief Haymond indicating their interest in a leadership meeting in the community. A meeting was held on 2022 July 14 with CNL, AECL and KFN to discuss the Procedural Direction, discuss priorities over the next six months and to plan a leadership meeting. The monthly meeting was held on 2022 July 29.

A monthly meeting was held on 2022 August 11. CNL and KFN continued to work together to secure a leadership meeting date. CNL also prepared a preliminary NSDF Project engagement schedule that was sent to KFN in mid-August with a request for feedback as well as budget input prior to the September monthly meeting. Upon receipt of the draft engagement schedule, KFN incorporated input and requested a number of CNL studies as well as the opportunity to walk down the NSDF Project site with Indigenous knowledge keepers, conduct bat surveys, and a waste separation and storage meeting/tour. As requested, CNL sent the final NSDF EIS [7] along with 16 NSDF technical support documents to KFN. The draft [NSDF Environmental Assessment Follow-up Monitoring Program](#) (NSDF EAFMP) [12], [Safety Case](#) [13], [Waste Acceptance Criteria](#) [14] and [Reference Inventory](#) [15] documents were also sent. Additionally, a Bat Telemetry Field Study report [16] and the Government Owned, Contractor Operated contracts were provided. Moreover, CNL offered to make CNL's technical experts available to provide a high level overview on any of the documents and answer questions to facilitate KFN's

review of the materials. CNL proposed multiple date options for the requested site visits as well as requested additional information on the intent to conduct bat studies.

In the summer of 2022, KFN extended an invitation to CNL and AECL leadership to join KFN's Chief and other members at Fitzpatrick Island, an island that is of cultural significance for the Algonquin Nations. This first leadership meeting was a valuable learning opportunity for CNL as well as an occasion to strengthen our relationship by breaking bread with no formal agenda to contend with. Commitments were made to work together to decrease gaps in views and create common understanding. Chief Haymond also extended an invitation for CNL and AECL leaders to come visit the KFN community.

*"Our experience at Fitzpatrick Island was important for the development of our relationship and understanding. We were witness to a powerful connection to the land and water, we recognized our shared goals in the protection of it and the many gaps in understanding that our organization and the community needs to work collectively on."*

-Lou Riccoboni, CNL Vice President of Corporate Affairs

*"I was honoured to meet with Chief Haymond and to exchange thoughts on the future of the site and, more broadly, the future of nuclear energy as part of the solution to climate change. Our meeting was a beginning, a start on the path of building trust: trust that is founded on the principles of respecting the rights of First Nations, listening to understand, and taking meaningful actions that show we have thoughtfully considered what we heard."*

-Fred Dermarkar, AECL President and CEO

We also acknowledge and appreciate that KFN leadership attended CNL's 2022 August Open House, which indicated to us KFN's genuine interest in learning more about our organization and its operations. A monthly meeting was held on 2022 September 15. As per the NSDF Project engagement schedule, in early 2022 September, CNL provided KFN with a list of fall biodiversity activities (turtle tracking, wolf howl survey, bat box survey, etc.) happening at the CRL site with a request for KFN to identify activities of interest in order for their representatives to accompany CNL's Environmental Protection staff in the conduct of such activities. CNL and KFN worked together to confirm the dates and attendees for KFN's requested site visits. It was determined due to KFN scheduling conflicts that the waste separation and storage meeting/tour be moved to late 2022 October.

In mid-September, KFN and a field team member met with CNL's lead biologist to discuss biodiversity, including bat research, at the CRL site prior to the NSDF Project site walk down. More than 25 shapefiles and/or documents were requested by KFN and sent prior to KFN's arrival at site. KFN conducted their on-site field research at the NSDF Project site on 2022 September 16, 19 and 20, which included a tour of CRL's site biodiversity initiatives, deploying ultrasonic bat detectors within the NSDF Project footprint and conducting a site inventory of the vegetation and wildlife present within the NSDF Project footprint Table 2. CNL

also sent eight documents and three images as per KFN's request during the on-site field research as well as shared biodiversity data of interest available in CNL's Environmental Data Management System.

In mid-2022 September, CNL explained via email that the NSDF IER ([CMD-22-H7.1C](#)) [4] is a living document that can capture all engagement activities, progress, issues and commitments between CNL and KFN that may arise as a result of the contemplated engagement activities. The IER will reflect the interests and concerns of KFN related to the NSDF Project and will outline the commitments for ongoing work between the parties that will extend beyond the conclusion of the NSDF hearing and any decision made by the CNSC. KFN acknowledged receipt of the email and indicated they were still working on the budget for the NSDF Project engagement activities. In late 2022 September, CNL requested an update on the budget for the NSDF Project engagement activities and KFN indicated it would be completed and sent in early 2022 October. In the same correspondence, KFN also requested additional on-site field research days in 2022 October and acknowledged that a date was yet to be secured for the waste separation and storage meeting/tour.

The monthly meeting was held on 2022 October 07. As Framework Agreement negotiations were progressing, a second meeting was held on 2022 October 12 in order to focus on advancing the negotiations on the agreement. KFN's budget and schedule for the NSDF Project engagement activities were shared with CNL during this meeting for inclusion in the agreement. A third meeting was held on 2022 October 27, and several revisions were shared between KFN and CNL prior to this meeting in order to finalize the submission for signature. From early on in the negotiations, the drafts consistently provided KFN with capacity to pursue engagement activities related to the NSDF Project. In addition, CNL expressed to KFN on multiple occasions that all of the capacity that was provided for in the Letter of Intent was available to KFN to use for purposes of their engagement on the NSDF Project while the Framework Agreement was being negotiated as KFN had expressed concern about commencing engagement activities without the Framework Agreement being in place. CNL further expressed a commitment to reimburse KFN for any expenses incurred as a result of their engagement on the NSDF Project prior to the execution of the formal agreement to permit the commencement of various engagement activities related to the NSDF Project as soon as possible.

In mid-October KFN requested 165 reference documents from the final NSDF EIS [7]. CNL provided links and/or the document for 164 of the documents. The remaining document request was not a CNL document, therefore due to proprietary information it could not be shared. CNL offered to make CNL's technical experts available to provide a high level overview on any of the documents and answer questions to facilitate KFN's review of the materials. CNL also continued to seek confirmation on a date for a leadership meeting in community with KFN, or elsewhere as per KFN leadership's availability, as well as a date for the waste separation and storage meeting/tour. KFN suggested an online poll would assist in finalizing a date for the leadership meeting and CNL proceeded with organizing an online poll.

CNL and KFN continued to work together to confirm the additional on-site field research dates and attendees. CNL and KFN also met to discuss specific activities related to the on-site field

research. As an outcome of this meeting, CNL provided KFN with detailed responses on how CNL could assist with each of the activity requests. KFN conducted their on-site field research at the CRL site starting on Tuesday, 2022 November 01 through to Friday, 2022 November 18 (See Table 2).

KFN's research included collecting additional data on vegetation and wildlife present in the NSDF Project footprint, surveys of the shoreline of Perch Lake and Perch Creek to identify presences and signs of species such as beaver's dams and muskrat huts, deploying trail cameras to aid in determining large game habitat use and movement within and surrounding the NSDF Project footprint and the collection of multiple wolf scat samples for DNA analysis purposes.

KFN identified to CNL their preferred methodology to collect canid DNA samples, which included the use of baiting practices in order to attract and maintain the pack in one location to help in the collection of either hair follicles or a blood sample from a female in estrus. Due to safety concerns related to the increased risk of wildlife/employee interactions, as well as the potential to disrupt natural behaviours of the wolf pack, CNL advised KFN that CNL preferred to use non-invasive methodologies to collect DNA samples from scats only on an opportunistic basis. CNL communicated on multiple occasions via email and in meetings that we did not approve of or consent to the use of baiting as a research methodology on the CRL site for the reasons outlined above and further detailed in Appendix L. For this reason, CNL provided KFN with alternative approaches such as using the CNL DNA results from Trent University to get a clear picture of the admixture level of the wolf pack present at the CRL site, collect their own DNA samples from scats and send them to the same laboratory as CNL or a laboratory of their choice. CNL also suggested to utilize the precautionary approach whereby the premise is that the canids present at the CRL site are highly pure Eastern Wolf, a species at risk.

On 2022 November 08, CNL learned that KFN or its representatives accessed the CRL site via Pointe au Baptême and placed several deer carcasses on the CRL site for baiting purposes, along with multiple trail cameras. CNL issued a letter (Appendix E) to KFN regarding security restrictions and limitations on access to the CRL site, as the actions resulted in CNL reporting the incident to the CNSC in compliance with its site license. Prior to issuance of the letter, CNL had a discussion with KFN and their representatives as to the impacts that the events had on CNL. CNL discussed with KFN and their representatives the requirements that KFN and their representatives must comply with in order to access the CRL site to ensure the security, safety and health of those persons at the CRL site, including visitors, and the physical site itself. Since this incident, the Eastern Wolf research initiatives have been progressing positively, with a collaborative approach between CNL and KFN, such as an improved data collection process, moving from collecting still photos to the installation of real-time cameras to reduce disruption and disturbance levels in the field and increase the chance of capturing wildlife on cameras. The groups have been successful in their opportunistic searches for wolf scats, which were intended to assist in determining the on-site population admixture level.

In 2022 November, KFN expressed safety concerns related to the waste separation and storage meeting/tour and requested information on radiation protection at the CRL site as well as the waste management areas that would be included in the tour. CNL provided detailed

information to KFN on radiation protection as well as safety measures in place for visitors to the CRL site. KFN acknowledged the information, and a visit date was scheduled. CNL committed to providing a thorough radiation protection information session by one of CNL's Health Physicists prior to the tour's commencement.

A monthly meeting was held on 2022 November 07. It was also confirmed in November that the leadership meeting in KFN would be held on 2022 December 15. CNL offered assistance with any planning related logistics for the meeting. During the November on-site field research CNL continued to work with KFN to organize dates and attendees for each week (Table 2)

In late November, KFN informed CNL that the KZA would like to participate in the waste separation and storage tour, which resulted in postponing the date to 2022 December 16. Unfortunately, due to weather conditions, this tour was deferred into 2023. CNL also extended an invitation to KFN to attend a CNL supply chain event in Pembroke, Ontario on 2022 December 07.

On 2022 December 05, KFN submitted a request to the CNSC Registry for an extension to the timeframe to submit a further filing pursuant to the Procedural Direction, as well as request that KFN's final submissions to the CNSC in respect of the NSDF Project is made orally. KFN are a people of oral traditions and storytelling, and KFN submitted that this would ensure KFN's meaningful participation in the regulatory process and demonstrate CNSC's respect and understanding of KFN's culture.

The monthly meeting was held on 2022 December 08, where the parties discussed the funding of the Framework Agreement and KFN's request to the CNSC Registry. It was also agreed at this meeting that the Framework Agreement would be signed at the leadership meeting on 2022 December 15 in KFN's community.

The CNSC Registrar held a case conference call 2022 December 14 (the Case Conference), where KFN, along with the KZA, CNL, AECL and CNSC Staff provided an oral status update, more particularly with regard to the timeline to file the follow-up additional information, and the participants' intentions with respect to the request that had been filed by KFN. In CNL's view, none of the participants understood whether the Case Conference was to form part of the record of the NSDF hearing, what the CNSC Registrar expected to hear and how the Case Conference was to occur procedurally. As requested by the CNSC Registrar, CNL prepared and presented remarks which provided a brief status update on the progress of the engagement with the First Nations to date, as well as the potential impact that KFN's request may have on CNL, the NSDF Project and the clean-up mission CNL is advancing on behalf of AECL. CNL's remarks strained the relationship with KFN and the KZA as it was felt these remarks did not take their views into account as they focused on the impact to CNL if the extension were to be granted.

CNL's President and CEO, Mr. McBrearty, and AECL's President and CEO, Mr. Dermarkar, among others, attended a leadership meeting in community with KFN's Chief and Council, and other representatives and members of the community on 2022 December 15. Much of the time spent at the leadership meeting was focussed on discussing views and impacts of the previous day's



Case Conference. As a result, all parties agreed to postpone the signing and execution of the Framework Agreement, but a commitment was made to reassess the potential for execution in early 2023 January. In support of the relationship with KFN, and as an outcome of meaningful discussions and engagement that occurred in community, CNL and AECL senior leadership agreed to support KFN's request for a timeline extension to the Procedural Direction submission as well as an oral hearing to present KFN's final submissions to the Commission. Following the 2022 December 15 leadership meeting, CNL sent a letter (Appendix F) to the Commission confirming that AECL and CNL support KFN's (and if made, the KZA's) request to extend the submission date to 2023 April 30 and the request for a further oral hearing. On 2022 December 22, the Commission agreed to extend the deadline to submit the additional information required by the Procedural Direction.

On 2022 December 21, KFN sent a letter (Appendix G) to CNL in response to the 2022 November 09 formal letter regarding actions that lead to a CNSC reportable event at the CRL site regarding the methodologies employed to document wolf presence. In response, KFN shared information about Indigenous-led work methodologies and how it can be used to conduct KFN's Rights Impact Assessment (RIA) and on-site activities.

The next monthly meeting of the parties occurred on 2023 January 12. The prior day, 2023 January 11, KFN's counsel advised CNL that KFN was ready to sign the Framework Agreement and provided some potential dates for the parties to meet in person in the Ottawa area and execute the agreement. CNL was extremely pleased to be able to meet with KFN's Chief, and representatives of AECL on 2023 January 13 to sign and formally execute the Consultation and Engagement Framework Agreement. After the conclusion of the Case Conference, this was a significant milestone for CNL and KFN. The signing of this agreement represents an opportunity to build trust and a collaborative relationship with KFN, enable KFN's engagement on the NSDF Project and other activities going forward, and to respect KFN's asserted Indigenous rights and interests generally and specifically where they may be impacted by CNL's activities. The success of this achievement in a relatively short timeframe is thanks to the commitment of all three parties to collaborate and communicate with each other through various means, such as the monthly meetings.

On 2023 January 20 KFN and CNL's Natural Resource Management team had a meeting with KFN to discuss upcoming field requirements and methodology for sampling wolf DNA. CNL and KFN discussed the use of trail cameras on site. On 2023 January 24, KFN provided CNL with a work plan detailing on-site activities every day for at least five weeks, beginning on 2023 January 30. Work of interest included collecting and analyzing photos from the trail cameras collaboratively set in the field during 2022 field work, deploying additional real-time trail cameras across the NSDF footprint, searching for signs of wolf such as tracks, collecting additional DNA samples, collecting data on wildlife use within the NSDF footprint, conducting a bird survey, and validating the Pileated woodpecker nesting cavity survey completed by CNL within the NSDF footprint. To help with the data collection in the field, CNL sent to KFN modelling maps of moose and deer winter habitats, deer browse, as well as NSDF forest inventory polygons and wildlife habitats. This modeling information was used to validate the habitat in the field and supported targeted surveys.



CNL and KFN have been collecting wolf scat samples using a mutual non-invasive Canis DNA sampling procedure. In 2023 January, twenty-seven samples that were collected by CNL at the CRL site were processed by CNL using fecal swab sampling kits and shipped to the Trent University Laboratory for analysis to identify the degree of Canis hybridization. Following this, wolf DNA sample collection has continued between KFN and CNL groups successfully, where samples of feces and urine have been collected and are either processed immediately or stored in a freezer to be processed at a later date. While in the field, CNL offered the first swab of the wolf scat to KFN, as that sample is likely to provide the highest and best quality of DNA for analysis. CNL offered KFN an option to send their scat samples for DNA analysis to the laboratories at Trent University under contract with CNL to help to expedite the analysis. KFN declined this offer.

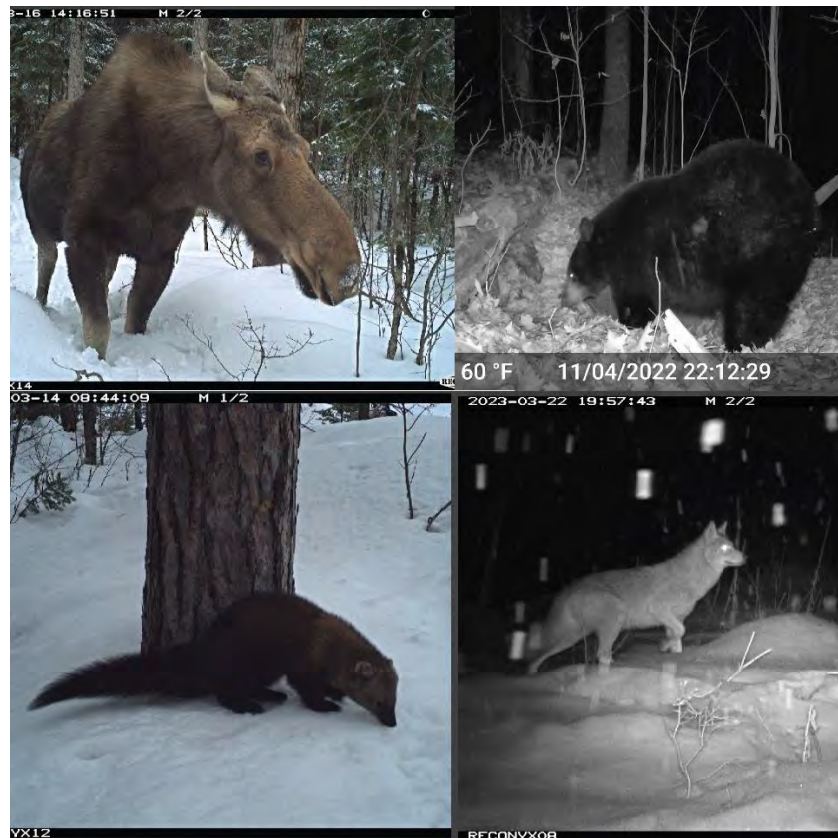
During the month of 2023 February CNL and KFN continued to discuss the use and implementation of the new real-time trail cameras and methodology for wolf DNA sampling. KFN shared an environmental review on the NSDF EIS by Dr. Lauren Gallant at Carleton University commissioned by the AANTC in 2021, and a Trent University researcher's view on baiting and DNA sampling. KFN stated that Dr. Gallant's comments related to the lack of an ecological baseline on high-value components and concerns around CNL's methodology for species at risk data collection in the NSDF EIS, where KFN has indicated they share the same concern. CNL had not previously received the environmental review in connection with its other engagement activities and committed to providing written responses, which was completed in 2023 April.

Over the course of the month CNL shared many wildlife images to KFN, including wolf rendezvous site pictures. KFN then requested the GPS locations of the wolf rendezvous site cameras, a recent kill site GPS location, and Pileated woodpecker nesting tree data, all of which CNL provided. CNL sent KFN over 100 images captured from the trail cameras deployed with KFN in fall of 2022. Once the pictures had been shared, KFN requested that a data sharing protocol be established.

A monthly meeting was held on 2023 February 09. During the meeting CNL and KFN discussed, among other things, the NSDF Project engagement schedule, Dr. Gallant's environmental review, the importance of a data sharing protocol, and baiting at the CRL site. As of the date of this submission, a data sharing protocol is under development by the parties, but it has not limited or restricted the NSDF Project engagement activities, as there is an understanding between the parties as to how the information obtained from the CRL site is to be handled and treated.

KFN conducted their on-site field research on the NSDF footprint 2023 February 07, 08 and 13, which included Pileated woodpecker nesting tree data collection and bird study fieldwork. Survey efforts focused on validating Pileated woodpecker nesting cavities with support from ecological subject matter experts, Dr. Oriana Porkorny and Robin Cunningham. Further to the on-site bird study work, CNL offered to include KFN in the Ontario Breeding Bird Atlas (OBBA) owl survey, which KFN expressed interest in participating. The group also visited two potential den sites identified within the NSDF footprint to retrieve camera pictures and assess whether

the dens were occupied by a wildlife species. A preliminary review of the pictures confirmed that one of the dens was occupied by a hibernating bear. In 2023 February, CNL purchased 15 additional real-time trail cameras to meeting KFN's requirements to receive real time data. As a team, KFN and CNL staff programmed the cameras 2023 February 14 and deployed them on 2023 February 21 and 22. Camera locations were selected by KFN in undisturbed areas to study the presence and movement of large game animals (i.e., wolves) on the CRL site and use of habitat within the proposed NSDF footprint. All game camera photos are made available to both CNL staff and KFN for review and interpretation (Figure 2-4). Into the end of 2023 February KFN postponed the waste separation and storage tour until KFN community members had an opportunity to be reassured about the safety of visiting the site. CNL reiterated our offer to have a discussion about their concerns.



**Figure 2-4: Images captured on trail cameras at the CRL site (top left: cow moose; top right: black bear; bottom left: fisher; bottom right: wolf)**

On 2023 March 2, CNL provided the draft Sustainable Forest Management Plan for the CRL site to KFN after the Petawawa Research Forest staff, who authored the plan, shared that KFN had requested it. CNL offered a meeting to discuss the plan and KFN committed to providing dates.

On 2023 March 3, representatives of CNL and KFN met to discuss the ongoing baiting request and CNL's safety concerns with this approach. The meeting resulted in implementing the alternative methodology of scent stations in order to collect DNA samples. Scent stations consist of using markers in the form of prey scent such as beavers or other canid markers such as urine or feces. Scent stations are used to attract wolf individuals in front of a game camera providing real time images. If wolves are detected on the camera, the field team quickly search the area for scat to collect DNA samples. If a DNA sample is collected from scat, the results can then be associated to an individual. Scent stations were to be in place up to the denning season of the Eastern Wolf, which is anticipated to start around April 1 for the Great Lakes St Lawrence region, in order to prevent interferences with their denning behaviour. A monthly meeting was held on 2023 March 9 to confirm that we would be moving forward with scent stations. CNL proposed a meeting with local residents and CNSC to help address KFN's concerns about coming to site for the waste tour, and KFN agreed to this meeting. To date, this meeting has not been scheduled as per KFN's instruction. Both parties discussed progress made related to the Procedural Direction, including the field work and the KFN community surveys conducted.

KFN requested the use of CNL snowmobiles for on-site field work for the first two weeks of 2023 March to increase the ability to access areas of interest in winter conditions, in a timely fashion. CNL was able to arrange for the use of two snowmobiles and operators to escort KFN to the desired locations, as these are restricted in use to CNL personnel for the purpose of conducting CNL's operations. KFN decided not to use the snowmobiles as they weren't as advantageous as anticipated. The remaining two real-time trail cameras were deployed 2023 March 2. KFN conducted their on-site field work 2023 March 6, 7 and 9 setting up seven scent stations in three concentrated areas. KFN indicated that for any remaining on-site work they would be waiting for information from the cameras to indicate animal movement before returning to site. On 2023 March 20 and 21 after wolf activity was spotted on the cameras, KFN went into the field with CNL staff to look for possible scat, repositioned one of the cameras and reviewed photos. On 2023 March 27 and 29 KFN returned to the site to replace batteries and SD cards in the cameras and reposition cameras. CNL and KFN are also coordinating the return of bat recorders from the CNL site to FRI Ecological Services. On 2023 March 31 KFN returned to site to review the game camera pictures with CNL staff as a result of animal movement detected in the cameras.

During the month of 2023 March, CNL and KFN worked to plan an open question and answer (Q&A) session to address concerns with respect to visiting the waste separation and storage areas. The meeting date was initially set for 2023 March 21. In advance of the meeting CNL requested KFN provide questions to ensure the appropriate CNL representatives were available to respond to KFN's questions and concerns. On 2023 March 16 KFN shared that the KZA would also attend. KFN later provided CNL a list of twenty-eight technical questions. After receiving the list of technical questions, KFN and CNL had a discussion about the importance of having the technical questions answered to support KFN's RIA being undertaken with the CNSC and as such agreed to prioritize responding to the technical questions over the open Q&A session. Accordingly, the 2023 March 21 open Q&A session was cancelled and replaced with a 2023 March 28 meeting to discuss CNL's response to the technical questions. KFN requested to

wait to revisit the waste separation and storage area tour as well as a potential open Q&A session. CNL provided written responses to all 28 technical questions on 2023 March 21. The day before the 2023 March 28 meeting KFN provided CNL a list of 13 additional questions to focus on for the meeting.

On 2023 March 28, CNL, KFN and the KZA held the meeting on KFN's technical questions. KFN and the KZA invited consultants to attend who CNL has had direct interactions within the past on the NSDF Project and including through their interventions at the NSDF hearing. The consultants included representatives from the Canadian Coalition for Nuclear Responsibility and the Concerned Citizens of Renfrew County. After a lengthy discussion, KFN thanked CNL for taking the time to answer the questions. CNL took an action to respond in writing to the 13 additional questions provided 2023 March 27. As of the date of this submission, CNL has not completed this action, but is working to provide answers shortly.

In the later part of 2023 March, KFN and CNL corresponded about CNL's draft Sustainability Forest Management Plan. KFN shared that they had requested a meeting with the CNSC on the draft Sustainable Forest Management Plan, noting they had some regulatory and Indigenous consultation concerns. KFN also requested responses to comments from Dr. Gallant on CNL's dispositions to her environmental review, on behalf of the AANTC, which was completed in 2023 April.

On 2023 March 29, CNL was copied on a letter (Appendix H) from KFN to the Commission requesting the CNSC reconsider the decision for the oral submissions to be made virtually and requested the oral submissions be presented in-person. In the letter KFN expressed their concerns about a virtual hearing. The letter followed the posting of the [Revised Notice of Public Hearing and Procedural Guidance for Final Submissions](#) on 2023 March 23. The Commission Registrar responded to KFN on 2023 April 17 indicating that the public hearing of 2023 June 27 would remain virtual, and that the Commission considers the virtual format to be a proven and effective approach.

On 2023 March 31 CNL sent KFN the executive summary and the KFN engagement sections of CNL's draft Procedural Direction submission. CNL acknowledged that KFN may have a different position and perspective and that CNL would work collaboratively with KFN to understand any additional matters that are raised after the date of this submission. CNL noted the draft was subject to change and requested feedback by 2023 April 14. The same day, and in good faith, CNL shared the genotype results report for the wolf DNA collected by CNL and analysed by Trent University. CNL stated that at the request of the researcher, the report should not be distributed outside of KFN. This was to honour our obligations of confidentiality that are owed to Trent University pursuant to the terms of our engagement.

On 2023 April 3, KFN alerted CNL to issues with the camera placement and shared the images captured. CNL and KFN worked together to resolve issues and CNL sent some requested photos to KFN on 2023 April 4. KFN requested additional photos which CNL sent on 2023 April 13.

On 2023 April 4, CNL and KFN met to discuss fieldwork and progress on related NSDF Project engagement activities, as part of the Consultation and Framework Agreement. At this meeting

CNL and KFN had further discussions related to the genotype results report shared with KFN on 2023 March 31. KFN requested the location and date stamp of the scat sampling. CNL indicated that some of the samples were second swabs, with KFN taking the first swab. KFN shared that their DNA result report will be included in their CNSC submission. KFN also indicated that they would like to move some of the cameras on the CRL site to continue to monitor the wolves' behaviour. CNL and KFN agreed to develop a protocol for fieldwork (i.e., roles and responsibilities) and that the remaining cameras could be collected at the end of 2023 April. On 2023 April 5, CNL responded in writing to a request for information from KFN for a remediation project which was unrelated to the NSDF Project.

On 2023 April 12 KFN returned to the CRL site to collect scat after being alerted to wolf movement on a trail camera. KFN also requested to place two real time cameras at the rendezvous site that was occupied in 2022. CNL worked with KFN to outline the conditions for installing the cameras including agreement that no subsequent visits to the rendezvous will be conducted once the cameras are installed. KFN also requested to reset the scent stations. CNL's position was that the opportunity to reset the scent stations would have to occur outside the denning period which is known to start around April 1 in the Great Lakes St Lawrence region (see Appendix L). CNL's priority is the protection of the wolves, including not interfering with their denning behaviour. Based on local knowledge of the CRL site wolf pack, as well as a picture of a pregnant female (Figure 2-5), confirmed that the denning period was about to start. KFN requested being able to carry out the wolf study with their own methodologies and practices to ensure the best study results within the Procedural Direction timeframe. CNL acknowledged KFN methodology has been effective to attract the wolves near the trail cameras and associate the DNA obtained from the scat. However, in CNL's view using scent station during the sensitive denning period for the species would represent harassment to Eastern Wolf individuals and therefore must be postponed.



**Figure 2-5: Image of pregnant female captured on trail camera at the CRL site**

On 2023 April 13, CNL, AECL and KFN held their monthly working group meeting at which the parties discussed KFN's concerns regarding CNL's position on the use of scent stations during the denning period. KFN expressed that CNL was obstructing their methodology. KFN shared that they were looking to DNA profile the wolves and track the patterns of the pack. At the same meeting CNL requested an estimated timeline for KFN's review of the provided sections of CNL's draft Procedural Direction submission. KFN requested that the submission be sent to KFN's legal counsel. Other topics discussed at the meeting were invoicing, the data sharing protocol, continued fieldwork to the end of April and scheduling a meeting to discuss Dr. Gallant's environmental review as well as extending the monthly meetings for another year. Following the April monthly meeting CNL had further email communications with KFN on the logistics for the installation of trail cameras at the rendezvous site, CNL restated their position on resetting the scent stations during the denning period, and CNL shared additional data for the scat samples as requested by KFN.

CNL has supported over 1,000 person-hours of field activities since 2022 September to support KFN's interests and environmental research as part of their engagement on the NSDF Project. We endeavor to offer valuable visits that are both welcoming and productive by ensuring that the right technical staff are available for each visit as well as providing the appropriate field equipment and personal protective equipment. Table 2 below provides a summary of KFN's field activities.

**Table 2: Summary of KFN Field Activities (2022 September – 2023 April)**

<b>Date</b>	<b>Personnel Involved</b>	<b>Details of field activities at CRL site</b>
2022 September 16	<ul style="list-style-type: none"> <li>• KFN Consultants<sup>5</sup> (2)</li> <li>• KFN Community Members (8)</li> <li>• CNL Environmental Staff (7)</li> </ul>	The group took part in a field tour of the ongoing CRL site biodiversity work. They were introduced to the Blanding's turtle telemetry research, turtle road mortality mitigation measures, including eco-passages, as well as monitoring of artificial habitats, including bat boxes. The group visited a known wolf rendezvous location on-site where trail cameras were retrieved to view pictures of the wolf family recorded. They deployed four acoustic bat recorders and carried out site inventory efforts within the NSDF footprint.
2022 September 19	<ul style="list-style-type: none"> <li>• KFN Consultants (2)</li> <li>• KFN Community Members (8)</li> <li>• CNL Environmental Staff (5)</li> </ul>	The group carried out site inventory efforts within the NSDF footprint, which focused on recording values of interest to KFN, including fungi communities. CNL Environmental staff provided information on the biodiversity program by sharing data and maps available in the Environmental Data Monitoring System in an office setting.
2022 September 20	<ul style="list-style-type: none"> <li>• KFN Consultants (2)</li> <li>• KFN Community Members (8)</li> <li>• CNL Environmental Staff (5)</li> </ul>	The group continued carrying out site inventory efforts within the NSDF footprint. The work focused on recording environmental values of interest to KFN.
2022 November 01	<ul style="list-style-type: none"> <li>• KFN Consultants (1)</li> <li>• CNL Environmental Staff (2)</li> </ul>	The group walked the footprint of the NSDF to conduct site inventory work, which included recording forest composition and wildlife markings.
2022 November 02	<ul style="list-style-type: none"> <li>• KFN Consultants (2)</li> <li>• KFN Community Members (1)</li> <li>• CNL Environmental Staff (2)</li> </ul>	The work included a survey of the shore of Perch Lake to identify mammal sand items such as beaver dams and muskrat huts.
2022 November 03	<ul style="list-style-type: none"> <li>• KFN Consultants (2)</li> <li>• CNL Environmental Staff (2)</li> </ul>	The work included walking the footprint of the NSDF to conduct additional site inventory work. The forest survey focused on measuring the diameter at breast height (DBH) of larger sized trees.
2022 November 04	<ul style="list-style-type: none"> <li>• KFN Consultants (2)</li> <li>• CNL Environmental Staff (2)</li> </ul>	The work included walking the footprint of the NSDF to conduct more site inventory work. The focus was on inspecting two known inactive den sites (unknown species) and recording more DBH of trees within the site.
2022 November 07	<ul style="list-style-type: none"> <li>• KFN Consultants (2)</li> </ul>	The work included walking the footprint of the NSDF

<sup>5</sup> KFN Consultants include consultants from RFI Ecological Services, subject matter experts, and staff employed by KFN, including a field technician and intern student.

Date	Personnel Involved	Details of field activities at CRL site
	<ul style="list-style-type: none"> <li>• CNL Environmental Staff (1)</li> </ul>	to conduct more site inventory work. The efforts focused on recording details of trees including size, type and evidence of wildlife.
2022 November 08	<ul style="list-style-type: none"> <li>• KFN Consultants (2)</li> <li>• KFN Community Members (1)</li> <li>• CNL Environmental Staff (2)</li> </ul>	The work included walking the footprint of the NSDF to conduct more site inventory work. Values of interest including vegetation and wildlife markings were recorded.
2022 November 11	<ul style="list-style-type: none"> <li>• KFN Consultants (2)</li> <li>• KFN Community Members (2)</li> <li>• CNL Environmental Staff (3)</li> </ul>	The work focused on collaborative wolf survey efforts, which involved opportunistically searching for wolf scat and tracks and deploying trail cameras.
2022 November 14	<ul style="list-style-type: none"> <li>• KFN Consultants (1)</li> <li>• CNL Environmental Staff (1)</li> </ul>	The work continued to focus on collaborative wolf survey efforts. This involved monitoring of back-roads for scat samples and wolf tracks.
2022 November 15	<ul style="list-style-type: none"> <li>• KFN Consultants (1)</li> <li>• CNL Environmental Staff (1)</li> </ul>	The work continued to focus on collaborative wolf survey efforts. The focus was on searching areas with past indications of wolf presence.
2022 November 16	<ul style="list-style-type: none"> <li>• KFN Consultants (2)</li> <li>• CNL Environmental Staff (1)</li> </ul>	The work continued to focus on collaborative wolf survey efforts. This involved inspecting wolf known rendezvous site locations and deploying additional trail cameras.
2022 November 17	<ul style="list-style-type: none"> <li>• KFN Consultants (2)</li> <li>• CNL Environmental Staff (1)</li> </ul>	The work continued to focus on collaborative wolf survey efforts. The emphasis was on revisiting areas where signs of wolves had been recorded.
2022 November 18	<ul style="list-style-type: none"> <li>• KFN Consultants (2)</li> <li>• CNL Environmental Staff (1)</li> </ul>	The work continued to focus on collaborative wolf survey efforts. The focus was on monitoring of back-roads and searching areas where wolf tracks were located.
2023 February 07	<ul style="list-style-type: none"> <li>• KFN Consultants (4)</li> <li>• KFN Community Members (2)</li> <li>• CNL Environmental Staff (2)</li> </ul>	A Pileated woodpecker cavity nest tree survey in the NSDF footprint was conducted with birding subject matter expert Oriana Porkorny.
2023 February 08	<ul style="list-style-type: none"> <li>• KFN Consultants (3)</li> <li>• KFN Community Members (2)</li> <li>• CNL Environmental Staff (2)</li> </ul>	Pileated woodpecker cavity nest tree survey was completed within the NSDF footprint. Trail cameras set at the two suspected bear's dens within the NSDF footprint were checked.
2023 February 13	<ul style="list-style-type: none"> <li>• KFN Consultants (3)</li> <li>• CNL Environmental Staff (2)</li> </ul>	Birding survey was conducted within the NSDF footprint with accompaniment of birding subject matter expert, Robin Cunningham.
2023 February 14	<ul style="list-style-type: none"> <li>• KFN Consultants (1)</li> <li>• CNL Environmental Staff (2)</li> </ul>	Afternoon spent in the office programming the new real-time trail cameras to get ready for deployment in the field.
2023 February 21	<ul style="list-style-type: none"> <li>• KFN Consultants (1)</li> <li>• KFN Community Members (1)</li> </ul>	Finalized getting the real-time trail cameras ready for deployment in the field and installed six cameras within the NSDF footprint in areas selected by KFN.



Date	Personnel Involved	Details of field activities at CRL site
	<ul style="list-style-type: none"> <li>• CNL Environmental Staff (3)</li> </ul>	
2023 February 22	<ul style="list-style-type: none"> <li>• KFN Consultants (1)</li> <li>• KFN Community Members (1)</li> <li>• CNL Environmental Staff (1)</li> </ul>	Continued deployment of the real-time trail cameras in areas desired by KFN. Six more cameras, accounting for twelve total, were installed in the field across the CRL site by the end of the day.
2023 March 02	<ul style="list-style-type: none"> <li>• KFN Consultants (1)</li> <li>• CNL Environmental Staff (1)</li> </ul>	Checked on the status of a few real-time trail cameras and brought in two that were have technical issues. Deployed the two remaining available real-time trail cameras in the field.
2023 March 06	<ul style="list-style-type: none"> <li>• KFN Consultants (1)</li> <li>• CNL Environmental Staff (1)</li> </ul>	Searched for signs of wolves and followed wolf tracks identified. Collected two scat and two) urine samples. Also followed moose tracks found within the NSDF footprint.
2023 March 07	<ul style="list-style-type: none"> <li>• KFN Consultants (1)</li> <li>• KFN Community Members (2)</li> <li>• CNL Environmental Staff (5)</li> </ul>	Set out six scent sites, in two concentrations locations of the CRL site, to attract canids to the area. Deployed real-time trail cameras at the scent sites. CNL made the use of two snowmobiles available for KFN to facilitate travel in snow in undisturbed areas of the CRL site.
2023 March 09	<ul style="list-style-type: none"> <li>• KFN Consultants (1)</li> <li>• KFN Community Members (1)</li> <li>• CNL Environmental Staff (2)</li> </ul>	Set another canid scent station (seven in total) in a third location desired by KFN. Snowmobiles were made available to facilitate work in areas difficult to access again.
2023 March 20	<ul style="list-style-type: none"> <li>• KFN Consultant (1)</li> <li>• CNL (1)</li> </ul>	Followed wolf tracks in search of DNA sample.
2023 March 21	<ul style="list-style-type: none"> <li>• KFN consultant (1)</li> <li>• CNL (1)</li> </ul>	Followed wolf tracks in search of DNA sample. Replaced trail camera batteries and relocated one real-time camera.
2023 March 22	<ul style="list-style-type: none"> <li>• KFN Consultant (2)</li> <li>• KFN Community Member (1)</li> <li>• CNL (1)</li> </ul>	Refreshed the scent stations and followed wolf tracks in search of DNA.
2023 March 24	<ul style="list-style-type: none"> <li>• KFN Consultant (1)</li> <li>• KFN Community Member (2)</li> <li>• CNL (1)</li> </ul>	Collected DNA samples from a wolf shown to defecate on camera overnight and followed wolf tracks.
2023 March 27	<ul style="list-style-type: none"> <li>• KFN Consultant (1)</li> <li>• CNL (1)</li> </ul>	Replaced batteries in real-time trail cameras, relocated cameras to areas of interest, including the bear den site within the NSDF footprint, and followed animal tracks.
2023 March 29	<ul style="list-style-type: none"> <li>• KFN Consultant (1)</li> <li>• CNL (1)</li> </ul>	Changed SD cards from the still trail cameras and reviewed the pictures collaboratively.
2023 March 30	<ul style="list-style-type: none"> <li>• KFN Consultant (1)</li> <li>• CNL (1)</li> </ul>	Continued visiting each game camera to change SD cards and reviewed pictures collaboratively.

Date	Personnel Involved	Details of field activities at CRL site
2023 March 31	<ul style="list-style-type: none"> <li>• KFN Consultants (2)</li> <li>• CNL (2)</li> </ul>	Continued visiting each game camera to change SD cards and reviewed pictures collaboratively. Retrieved bat recorders installed by KFN consultant (FRI Ecological Services) in 2022 November. Refreshed the scent stations.
2023 April 12	<ul style="list-style-type: none"> <li>• KFN Consultants (1)</li> <li>• CNL (2)</li> </ul>	Searched for wolf scat and followed tracks recorded on KFN's software to define movement patterns. Two scats collected with plenty of degraded scats appearing in snow melt. Planned for upcoming field work.
2023 April 13	<ul style="list-style-type: none"> <li>• KFN Consultants (1)</li> <li>• CNL (2)</li> </ul>	Investigated a large scrape caught on cell camera the previous night. Tracked the mating pair of wolves west along the beach with a very fresh scat found (caught on SD camera from the night before) plus old scat and one sandy urine collected. Planned for a full next day.
2023 April 14	<ul style="list-style-type: none"> <li>• KFN Consultants (1)</li> <li>• CNL (2)</li> </ul>	Changed SD cards on specific cameras and reviewed and stored the photos collaboratively. Found fresh tracks on west side of Skinny Wetland and recorded in to KFN's software. Retrieved real-time trail camera 12 and real-time trail camera 9 for redeployment at the last known wolf den.

CNL remains committed to working with KFN so that necessary information and material can be gathered in a manner that is safe, secure, collaborative and transparent. CNL looks forward to working with KFN to include the data and findings into the NSDF Project as it moves forward.

#### 2.1.1.2 Feedback

The final NSDF EIS (Section 6.2.4.7.3) [7] and NSDF IER ([CMD-22-H7.1C](#)) (Section 4.6.6.2) [4] include feedback from KFN that CNL heard prior to the NSDF hearing.

CNL took note during the Part 2 hearing and in meetings since the Procedural Direction on issues and concerns that have been raised by KFN and their representatives. CNL has also identified issues and concerns based on the NSDF specific activities that have been agreed to as part of the Consultation and Engagement Framework Agreement. CNL understands that the following are of importance to KFN with respect to the NSDF Project:

- **Lack of community engagement and consultation:** KFN has stated that they have not been adequately consulted by the Crown and do not believe that the duty to consult has been fulfilled with respect to the NSDF Project. KFN stated that the Nation had not been meaningfully engaged with, and community members have not been informed about the NSDF Project or how the NSDF Project may affect their Indigenous rights and interests. Lastly, KFN raised concerns about the need for capacity funding to support meaningful participation and engagement in the NSDF Project.

- **Consideration of species and habitat that are of cultural importance including some species at risk in the NSDF EIS:** KFN is concerned that terrestrial biodiversity and species at risk have not been adequately considered in the NSDF EIS.
- **Conditions under CEAA, 2012 not met [Section 5(1)(c)]:** KFN has indicated that they do not believe that the final NSDF EIS has met the requirements of *CEAA, 2012* with respect to Indigenous peoples and effects on changes to the environment that may affect health and socio-economic conditions, physical and cultural heritage, use of lands and resources for traditional purpose, and sites of historical significance.
- **Lack of KFN Traditional Land Use in the Area and the NSDF's potential impact to the lands:** KFN expressed concern that the final NSDF EIS does not include information on KFN's traditional land use in the area and has concern about the NSDF Project's potential impact to the lands.
- **Indigenous land use and occupancy and knowledge:** KFN had an interest in conducting a historical land use and occupancy study for the CRL site.
- **Socio-economic conditions and health and well-being:** KFN had an interest in conducting a study on socio-economic conditions and health and well-being, related to the overall CRL site operations.
- **Recognizing and applying Indigenous led environmental research methodologies:** KFN indicated a gap between Indigenous led environmental methodologies and western science and CNL's licence requirements. KFN expressed concern that they did not get to provide input to the final NSDF EIS, nor were they able to undertake their own studies.
- **Waste Inventory and Site Selection:** KFN raised concerns about the waste inventory of the proposed NSDF, as well as site selection and facility design.
- **Proximity of the NSDF to the Kichi-Sibi (Ottawa River):** KFN expressed concern with the location of the NSDF Project in proximity to the Ottawa River, as well as waterbodies in the Perch Lake Basin that drain to the Ottawa River.
- **Waste from away:** KFN raised concerns about how much waste will come in from other sites and travel through the unceded Algonquin territory.
- **Radiological risk:** KFN expressed concerns about radiological impacts, how radiological risks are communicated and the use of plain language with respect to the CRL site and the NSDF Project.
- **Section 35 Aboriginal rights:** KFN asserted that the final NSDF EIS has not adequately assessed impacts to Algonquin health, wellbeing and socio-economics, and in turn has not adequately conveyed the full range and depth of impacts to KFN's Section 35 Aboriginal rights and interests.
- **Application of UNDRIP and Free, Prior and Informed Consent (FPIC):** KFN raised concerns that since the Canadian government's adoption of UNDRIP in 2021 June, the CNSC should incorporate the "minimal standards" developed by states and Indigenous

peoples from around the world with respect to the protection of waters used and valued by Indigenous people.

### **2.1.1.3 Summary Discussion of Interests and Concerns**

CNL has made our best efforts to understand and document KFN's positions, while acknowledging that KFN may articulate their position and perspective somewhat differently. We acknowledge that due to the ongoing nature of the work that we may not have captured all of KFN's positions and will work collaboratively with KFN to understand any additional matters that are raised after the date of this submission.

It is important to recognize that the concerns raised by KFN are made to both CNSC and CNL, and therefore, CNL has attempted to address those concerns that are within its scope.

#### **Lack of community engagement and consultation**

KFN has consistently raised the concern that they do not believe that the Crown's duty to consult and has been fulfilled by the CNSC. KFN expressed concern over the lack of meaningful engagement or consultation in the CNSC processes leading up to the hearing, including previous decisions and the need for a Consultation Framework Agreement between the CNSC and KFN. As the duty to consult lies with the Crown, the ability to address these concerns fall outside of the scope of CNL, though CNL may be called upon as the proponent to support the CNSC's fulfillment of its duty and as expressed in this submission. CNL is aware that CNSC staff considered potential impacts to Aboriginal and treaty rights by completing a community specific RIA with KFN.

KFN indicated that the final NSDF EIS has not contemplated impacts to KFN's Aboriginal and treaty rights, and that through the EA process, KFN was not directly engaged with and as such community members were not informed about the NSDF Project and how the project may affect their rights and interests. CNL acknowledges this gap in direct engagement, and as such undertook to reiterate its commitments to ensure meaningful engagement takes place with KFN, as summarized in Section 2.1 of this submission.

Since the issuance of the Procedural Direction, KFN has expressed a need to solicit community feedback on the NSDF Project. As such, CNL has supported KFN with capacity through the Consultation and Engagement Framework Agreement to undertake activities such as a community meeting, newsletters and other communications with the community. CNL provided material on the proposed NSDF Project to distribute and offered for CNL representatives to be available at the community meeting to respond to questions from the community. As of the date of this submission, and to CNL's knowledge, a community meeting has not been held and the date for a community meeting has not been established. It is CNL's understanding that the project specific survey was completed however CNL is not aware of the results of the survey.

CNL has supported and provided capacity through the Consultation and Engagement Framework Agreement for KFN to undertake its own studies, hire experts and review materials. CNL remains committed to working with KFN to collaboratively address any concerns it may

have as the project moves forward. CNL reiterates that engagement with KFN will not end at the closure of the Procedural Direction, the final oral presentations or after a decision is rendered by the CNSC in respect of the NSDF Project. CNL remains available and committed to assist KFN with engagement at a community and leadership level.

**Consideration of species and habitat that are of cultural importance including some species at risk in the NSDF EIS**

KFN is concerned that terrestrial biodiversity and species at risk have not been adequately considered in the final NSDF EIS.

The final NSDF EIS [7] was completed utilizing western science and frameworks. Through engagement with KFN, CNL has listened and understands that while the final NSDF EIS may satisfy regulations and western scientific outcomes, there are additional considerations which can be better understood through the incorporation of Indigenous Knowledge Systems, values and perspectives. CNL values the information already shared by KFN which has added a much more nuanced understanding of lands, waters and species living within the NSDF and CRL site. CNL is committed to ensure that this additional knowledge is incorporated into the avoidance and mitigation strategies and will continue to seek feedback from and work collaboratively with KFN as the project moves forward.

From a western science and regulatory perspective, the Regional Study Area (RSA) for Traditional Land and Resource Use (Section 6.4.3.1 of the final NSDF EIS [7]), was selected as the combined area of the air quality, terrestrial, and aquatic assessments' RSAs (Figure 6.4.3-1 of the final NSDF EIS [7]). The RSA is defined to capture and evaluate residual environmental effects as a result of the NSDF Project because these may, in turn, affect traditional land and resource use (e.g., habitat loss, sensory disturbance for wildlife, changes to habitat from air quality and surface water quality, changes in groundwater and surface water quality, changes in species abundance, distribution, and disturbance to terrestrial and aquatic biota). Under this framework, the NSDF Project is not predicted to have significant terrestrial or aquatic effects beyond the CRL site. CNL recognizes that additional knowledge, data and input from KFN, or other Indigenous Nations, communities and organizations, may augment these findings and lead to a need to work collaboratively to address any identified impacts, such as with future environmental monitoring. As stated in the final NSDF EIS (Section 1.4.1) [7], a permit from Environment and Climate Change Canada will be required under the *Species at Risk Act* (SARA) (Section 73 of the Act). It is noted that the terms and conditions related to the SARA permit for the NSDF Project are being finalized in parallel to the completion of the EA process. While the final NSDF EIS [7] does include mitigation measures for the protection of species at risk, the terms and conditions of the finalized SARA permit will be the overarching requirements. Several mitigation measures are and will be implemented to compensate for habitat loss and improve existing conditions to ensure species at risk are not negatively impacted. Prescriptions made through the Blanding's Turtle Road Mortality Mitigation Plan, Sustainable Forest Management Plan and the draft NSDF EAFMP include project controls, habitat compensation measures and monitoring objectives to ensure that terrestrial biodiversity and species at risk are accounted for and protected from project development. These plans have been shared with KFN for input

and feedback and CNL remains committed to incorporating any feedback and working collaboratively with KFN to address additional avoidance or mitigation strategies.

Species at risk were considered as part of the NSDF site selection process where species at risk observations, residence and critical habitat were considered. The final proposed site does not overlap with sensitive wetland habitats, a permanent source of water or high concentrations of species at risk. In addition, the final NSDF EIS [7] included components of an ecological risk assessment to evaluate the potential significance of residual effects on ecological health. Valued components were selected with due consideration of the results of baseline studies and through subsequent discussion with stakeholders and Indigenous Nations, communities and organizations. CNL recognizes however, that the CRL site is home to species of significance to KFN, and as such is committed to working collaboratively with KFN to identify additional appropriate avoidance and mitigation strategies.

The Eastern wolf (*Canis lupus lycaon*), for example, was chosen as an indicator species for large carnivores due to its presence in the local study area, SARA status, and public interest. This species, along with other indicator species, was assessed to determine the potential effect of radiological emissions. Ecological Risk Assessment (EcoRA) modelling, (Section 5.7.4.10 in the final NSDF EIS [7]), estimated that the total dose to Eastern wolf, like other large mammals, would be considerably less than the benchmark of 100  $\mu\text{Gy/hr}$ . As part of a contract with Trent University genetic analysis of DNA collected at the CRL site on wolf scat was conducted. The analysis provided genetic assignments of three different Eastern wolf individuals. Of importance to the conservation is that the male individual was assigned with very high ancestry ( $Q = 0.97$ ) to Eastern wolves, suggesting that this individual is representative of the federally and provincially threatened species. One of the female individuals was assigned with high ancestry ( $Q = 0.99$ ) to eastern coyotes and the other female was identified as an eastern wolf x eastern coyote hybrid ( $Q = 0.3; 0.62$ , respectively). However, regardless of the purity of the wolf population on the CRL site, CNL is committed to applying the precautionary principle and protecting all canids on the CRL site in collaboration with KFN and other interested Indigenous Nations, communities or organizations. Furthermore, CNL would be happy to work collaboratively with any First Nations expressing an interest in participating in a joint effort with CNL to collect samples, share data and results for the protection of the species. For more details about CNL work on the Eastern Wolf at CRL since 2012, please refer to Appendix L.

The proposed timing of construction work is planned to mitigate potential effects to wildlife species. Site preparation work involving tree clearing and grubbing is to take place outside of sensitive periods (i.e., outside the migratory bird nesting season and Eastern wolf denning period). In addition, in-water work is planned to avoid spawning and egg/larval development periods. The duration of construction activities are anticipated to be short term and additional mitigations, including erosion and sediment control practices, fencing and appropriate buffers, will be applied to limit the magnitude of potential effects on wildlife. Should any other mitigations be identified by KFN through their studies, CNL is committed to working collaboratively with KFN to evaluate additional mitigations.

The NSDF Project also has proposed a Sustainable Forest Management Plan as an offset to habitat loss and offered to KFN the opportunity to be involved in its development. This proposed offset will contribute to no net loss of habitat by the NSDF Project by improving the long-term CRL forest conditions to be healthier and more diverse, further promoting ecological diversity and benefiting the large mammal and bat populations within the Algonquin territory. KFN has requested a discussion on the Sustainable Forest Management Plan with the Petawawa Research Forest, which CNL offered to coordinate. KFN indicated they will meet with CNSC staff regarding this topic first. CNL is committed to seeking guidance and input on the Sustainable Forest Management Plan from KFN should they have interest as well as with any other interested Indigenous Nation, community or organization.

Detailed species at risk studies, including acoustic bat detection surveys, songbird acoustic recording analyses and turtle trapping and telemetry studies have taken place across the CRL site since 2008 to provide information on presence, abundance and distribution of species at risk within the RSA. Further targeted baseline studies have been conducted within the NSDF Project site since 2017 to aid in predicting potential project impacts to species at risk individuals, populations and habitats. From a western science perspective, these studies have provided CNL with information to evaluate species present in the area and further to which appropriate permits will be required from Environment and Climate Change Canada to ensure protection of species at risk and keystone species that are protected under applicable Acts and Regulations. Pileated woodpecker nesting cavities, for example, are protected year-round as their nest cavities are known to be reused in subsequent years by secondary cavity nesters. As five (5) Pileated woodpecker nesting cavities have preliminarily been identified within the NSDF footprint, a permit to relocate the nests will be required prior to construction. As part of the permitting process, appropriate due diligence and mitigation measures will be conditioned. CNL recognizes that additional data and input from KFN, or other Indigenous Nations, communities and organizations, may augment these findings and lead to a need to work collaboratively to address any identified impacts, and evaluate additional mitigations above and beyond what is prescribed by ECCC.

KFN expressed concerns regarding the endangered hickory nut clams. The NSDF Project is not anticipated to have significant offsite residual effects on aquatic biodiversity. Further, CNL has not identified this species in the RSA throughout years of clam survey efforts beginning in 2006 and evidence has not yet been presented that suggests a presence of suitable habitat, described as sand and gravel substrates, with steady to moderate flows at depths of up to 2 m for the hickory nut clam. CNL remains open to receiving knowledge, data or other inputs from KFN regarding hickory nut clams. Should they be identified, CNL remains committed to working with KFN to identify appropriate avoidance and/or mitigation strategies.

The draft NSDF EAFMP has been designed based on predictions of the final NSDF EIS [7] to ensure that it's monitoring objectives, procedures and activities inherently consider the complex interrelationships between different environmental disciplines with which the NSDF Project will interact. The monitoring program including effluent, air, groundwater, operations control monitoring and all the elements selected to be monitored within, are designed to ensure that it remains effective in achieving monitoring objectives to continue to protect

environmental valued components. Annual review of environmental monitoring components, including biodiversity aspects, will be applied to the follow-up monitoring for the NSDF. The draft NSDF EAFMP includes monitoring for several species of interest as prescribed during each project stage. CNL is willing to involve all interested Indigenous Nations, communities and organizations in the NSDF EAFMP and is committed to discussing this further with KFN.

CNL is committed to working collaboratively with KFN to continue to meaningfully address any concerns regarding terrestrial biodiversity and species at risk as the NSDF Project continues.

### **Conditions under *CEAA, 2012* not met [Section 5(1)(c)]**

KFN has indicated that they do not believe that the final NSDF EIS has met the requirements of *CEAA, 2012* with respect to Indigenous peoples and effects on changes to the environment that may affect health and socio-economic conditions, physical and cultural heritage, use of lands and resources for traditional purpose, and sites of historical significance.

As part of the EA process, the CNSC staff was required to determine if CNL demonstrated all of the applicable requirements of *CEAA, 2012* were met. The NSDF IER (CMD-22-H7.1C) [4] includes a summary of guideline requirements and concordance (Table 2-1 of the IER). The final NSDF EIS [7] was accepted by the CNSC staff as having met the requirements of *CEAA, 2012* and having considered Indigenous peoples and effects on changes to the environment that may affect health and socio-economic conditions, physical heritage, use of lands and resources for traditional purpose, and sites of historical significance. As such, the concerns raised by KFN regarding CNSC's approval of the NSDF EIS falls outside of CNL's scope. Through continued engagement beyond the Procedural Direction, CNL remains committed to understanding and working collaboratively to address any identified effects on changes to the environment that may affect health and socio-economic conditions, physical and cultural heritage, use of lands and resources for cultural purposes, and sites of historical or cultural significance to KFN.

### **Lack of KFN Traditional Land Use in the Area and the NSDF's potential impact to the lands**

KFN expressed concern that the final NSDF EIS [7] does not include information on KFN's traditional land use in the area and has concern about the NSDF Project's potential impact to the lands. While the final NSDF EIS does include information on Algonquin knowledge and land use (e.g., Algonquins of Pikwakanagan First Nation – see Section 6.4.4.1 of the final NSDF EIS [7]), we recognize that KFN was not directly included in these specific studies and as an independent First Nation has its own knowledge, values and perspectives. As such CNL has provided support and capacity for KFN to conduct its own studies.

KFN did state at the 2023 March working group meeting that an Indigenous led study on historical land use and occupancy and knowledge and socioeconomic conditions has been completed and a report is being finalized. It was acknowledged that this study was not specific to the NSDF Project, however, would inform questions for a community survey more specific to the NSDF Project. CNL remains open to incorporating any knowledge or information gleaned from this study, and ensuring it informs the NSDF Project as it moves forward. We are committed to work collaboratively with KFN to address any concerns raised.



Within the regulatory and western science framework, the final NSDF EIS [7] was developed with the assumption that cultural land uses do occur adjacent and near to the CRL site, whether on the Ottawa River or on accessible private lands or provincial Crown lands outside the restricted/fenced area. Due to the fact that the CRL site is inaccessible to the public and cultural use of the site is not permitted, CNL has concluded that the NSDF Project is not expected to affect the traditional land and resource uses. CNL does not anticipate any off-site effects from the NSDF Project that would affect traditional land use and resource valued components (VCs) (Section 6.4.6 of the final NSDF EIS) [7], therefore CNL considers this concern to be addressed in the final NSDF EIS. CNL appreciates that KFN is collecting additional data and knowledge that may provide additional insights into possible impacts. Should any impacts to cultural land uses be identified, CNL remains committed to working with KFN to address these impacts collaboratively as the project progresses.

### **Indigenous land use and occupancy and knowledge**

KFN has requested capacity to conduct a historical land use and occupancy study for the CRL site, which was agreed to as part of the Consultation and Engagement Framework Agreement. The study includes a historical overview, displacement and resettlement efforts, spatial and temporal boundaries and ceremonial jurisdiction. While not specific to the NSDF Project, CNL is supportive of this study. CNL is committed to continued discussions with KFN on findings related to this study. As of the date of this submission, CNL is of the understanding the study has been completed but has not seen the final report.

### **Socio-economic conditions and health and well-being**

KFN has requested capacity to conduct a study on socio-economic conditions and health and well-being, related to the overall CRL site operations, which was agreed to as part of the Consultation and Engagement Framework Agreement. This study includes a baseline overview, historical effects and cumulative effects of the CRL site. While not specific to the NSDF Project, CNL is supportive of this study. CNL is committed to continued discussions with KFN on findings related to this study. As of the date of this submission, CNL is of the understanding the study has been completed but has not seen the final report.

### **Recognizing and applying traditional Indigenous led environmental research methodologies**

KFN indicated a gap between Indigenous led environmental methodologies and western science and CNL's licence requirements, specifically highlighting that decolonized research is entirely participatory and in this case, directed by specific Algonquin Anishinaabeg community laws, interests, values and needs. Specifically, KFN expressed that the issue is related to wolf research at the CRL site and its interest to KFN, as this area represents an important portal to past relationships on the land that both Mahingan (wolf) and Anishinaabeg Peoples are struggling to reclaim. Both CNL and KFN have an interest in understanding the level of purity of the CRL wolf population with the Eastern Wolf taxon. While there were some initial divergent perspectives on methodology for studying the Eastern Wolf population, in 2023 February CNL and KFN came to a collaborative agreement to use scent as an attractant for the wolves in order to capture them on camera and collect DNA samples from scat and urine. CNL is

committed to working with KFN to support Indigenous led studies, including through incorporation of Indigenous traditional methodologies in the draft NSDF EAFMP.

### **Waste Inventory and site selection**

KFN expressed concerns related to the waste inventory and site selection. In 2023 mid-March, CNL received a list of 28 technical questions from KFN mainly related to the waste inventory of the proposed NSDF, as well as questions around site selection and facility design. The waste inventory questions were mainly related to the reference and licensed inventory (maximum quantity of radionuclides), waste acceptance criteria, the inclusion of a restricted amount of long-lived radionuclides, the non-radioactive inventory, and mobile radionuclides such as tritium and strontium. CNL responded to all questions in writing on 2023 March 22. In responding to the dispositions, CNL provided links to publicly available documents as references to where information contained in the responses can be found. CNL also noted that a majority of the topics raised by the technical questions were covered during the Part 1 and Part 2 NSDF hearings. CNL provided specific citation of which days the topic was covered and the page number in the transcript. CNL noted that transcripts were available on request to the Commission or CNL could share if needed.

The following is a summary of how the final NSDF EIS addresses waste inventory utilizing a western scientific framework. Section 3.3.1.3 of the final NSDF EIS [7] provides information on the radionuclides that are considered acceptable for disposal in the NSDF. An estimation of the total inventory is required for the safety assessments in which the inventory is tested against selected scenarios to determine the long-term consequences of the proposed facility. It also informs design criteria for NSDF Project components such as the Wastewater Treatment Plant.

The Reference Inventory (Table 3.3.1-2 of the final NSDF EIS [7]) establishes a representative radionuclide inventory by considering waste already in storage and waste forecasts from environmental remediation and decommissioning projects data to predict an assumed total volume of waste at the NSDF at time of closure. The NSDF Reference Inventory has been used to inform the design and safety analyses. In the Post Closure Safety Assessment for the NSDF Project (PostSA), a recommendation was made to lower the maximum radioactivity of two radionuclides listed in the reference inventory (i.e., I-129 and Pu-239/240), to support the claim that future public doses in the post-closure phase will be well below the long-term dose acceptance criteria. As a result, the licensed inventory is a modified reference inventory and represents the maximum radiological inventory limit for the NSDF.

Long-lived radionuclides are included in the NSDF inventory as they are intrinsically part of the radiological fingerprints of waste streams at CRL. It is not technically or economically feasible to separate the long-lived radionuclides from the waste streams. However, the concentrations of long-lived radionuclides that are proposed in the NSDF inventory are in limited concentrations consistent with Canadian Standards Association and International Atomic Energy Agency guidance.

The NSDF Waste Acceptance Criteria (WAC) includes radionuclides that are soluble and/or mobile such as Tritium and Strontium-90. Leachate controlled waste packages are intended to

provide short-term barriers for wastes with higher radionuclides concentrations during the time the disposal cell is not covered with the final cover system (approximately 5-10 years); thus, more mobile radionuclides are kept isolated from the environment minimizing radionuclide concentrations in the liquid effluent during the operations phase.

The alternative means Sections 2.5.4 (Facility Location) and 2.5.5 (Site Selection) of the final NSDF EIS [7] documents the assessment. The NSDF Site Selection Report is a technical supporting document for the final NSDF EIS [7]. Evaluation Criteria included environmental, technical and economic factors (see Section 2.5.1 of the final NSDF EIS [7]). To determine the preferred or most favourable means of developing a disposal facility, each alternative is evaluated first for its technical feasibility. For those alternatives deemed technically feasible, a comparison of economic feasibility (i.e., cost) and the likely environmental effects is completed. Criteria for evaluating each of the alternatives are summarized in Table 2.5.1-1 of the final NSDF EIS [7], with further rationale provided in Section 2.5 of the final NSDF EIS.

Section 2.5.2 of the final NSDF EIS [7] outlines the facility types assessed as part of the alternative means:

- 2.5.2.1 – Ongoing Waste Storage
- 2.5.2.2 – Near Surface Disposal Facility
- 2.5.2.3 – Geologic Waste Management Facility
- 2.5.2.4 – Very Low-Level Waste Facility

Evaluation criteria included environmental, technical and economic factors (see Section 2.5.1 of the final NSDF EIS [7]). To determine the preferred or most favourable means of developing a disposal facility, each alternative is evaluated first for its technical feasibility. For those alternatives deemed technically feasible, a comparison of economic feasibility (i.e., cost) and the likely environmental effects is completed. Criteria for evaluating each of the alternatives are summarized in Table 2.5.1-1 of the final NSDF EIS [7].

CNL recognizes that waste inventory was assessed through the final NSDF EIS [7] within the limits of western science and satisfies regulations. CNL remains committed to continuing to discuss concerns KFN has regarding waste inventory as the project progresses.

### **Proximity to and interaction of the NSDF to the Kichi-Sibi (Ottawa River)**

KFN has expressed concern over the waters, including the close proximity of the NSDF Project to the Ottawa River and the potential impacts on the Ottawa River and Perch Lakes basin that the NSDF Project may have. These concerns were raised during the Part 2 NSDF hearing, as well as specifically by Chief Haymond during a leadership meeting with CNL and AECL. In particular, KFN raised concerns about changes to surface water quality, increased infiltration of surface water to the emplaced waste, and changes to downstream discharge patterns.

CNL recognizes that the waters, including the Kichi-Sibi (Ottawa River) are of significant importance to KFN. CNL has made efforts to communicate and demonstrate to KFN how the proposed NSDF Project is designed to protect the Ottawa River (Section 2.3 of the final NSDF

EIS [7]). When examined through western scientific frameworks, the NSDF Project will be an improvement over the current environmental conditions at the CRL site.

As a first step in response to concerns for the protection of the Ottawa River and Perch Lake basin, CNL increased the RSA. The RSA for surface water (Section 5.4.2.3.1 of the final NSDF EIS [7]), aquatic environment (Section 5.5.3.1 of the final NSDF EIS [7]), land and resource use (Section 5.9.3.1 of the Final NSDF EIS [7]), ecological health (Section 5.7.3.1 of the final NSDF EIS [7]), and human health (Section 5.9.3.1 of the final NSDF EIS [7]) increased to extend 8 km downstream of the CRL site within the Ottawa River. Section 8.3.3 of the final NSDF EIS [7] summarizes the cumulative effects on the surface water environment. It concludes that from a western science perspective, residual effects on the Ottawa River water quality are determined to be negligible during operations and post-closure phases and may result in a net benefit due to remediation of legacy waste storage areas at the CRL site.

CNL recognizes we have used a western science approach and is committed to continue to discuss steps to further enhance the protection of the Ottawa River with KFN, and is open to receiving additional knowledge, data and feedback regarding Indigenous led methodologies. CNL acknowledges that there remain outstanding information requests and reviews with respect to the protection of the Kichi-Sibi (Ottawa River) which are currently in progress. CNL has made the draft EAFMP [12], which including monitoring of the Ottawa River and Perch Lake basin, available to KFN for technical review and input.

CNL recognizes this will be an ongoing area of interest for KFN thus CNL remains committed to ongoing discussions.

### **Waste from away**

At the 2022 August and 2022 December leadership meetings, Chief Haymond raised concerns about how much waste will come in from other sites through the unceded Algonquin territory. CNL has identified that approximately 10% of the NSDF's capacity will be waste from other sites.

The transportation of off-site waste to the CRL site is not specific to the NSDF Project and is an existing activity and service that CNL undertakes currently.

Consolidation of AECL-owned low-level waste is reflective of the intention to minimize the number of waste repositories required to manage AECL's liabilities in respect of such waste. CNL also receives radioactive waste from Canadian universities and hospitals that is generated from diagnostic procedures or cancer treatments performed for the benefit of patients. Consolidation of these wastes ensures that they are being handled by persons with appropriate facilities, training and protections in place to do so, such as CNL. Any waste accepted by CNL must meet the applicable waste acceptance criteria.

While this concern is not specific to the NSDF Project, CNL is committed to working with KFN to understand and find approaches to alleviate concerns as part of the NSDF Project engagement. Where there are differences of opinion or concerns that need to be addressed, CNL is willing to explore mitigation measures and formulate commitments with KFN with the intention of trying to remove or lessen the concern.

## **Radiological risk**

KFN expressed concerns regarding radiological risk, how radiological risks are communicated and the use of plain language with respect to the CRL site and the NSDF Project. KFN also indicated that members were concerned about visiting the CRL site, in particular for a tour of the waste separation and storage areas, because of radiation risks.

CNL does recognize its obligation to continue to work with Indigenous Nations, communities and organizations in addressing such concerns. As part of the proposed KFN and KZA tour of the CRL waste facilities with KFN and the KZA, CNL offered an open Q&A session in 2023 March with tour participants to understand concerns and provide assurances of the safety prior to the site visit. The open Q&A session was deferred by KFN, and questions submitted were technical in nature and in relation to NSDF waste inventory and site selection (discussed above), not concerns about radiological risk.

CNL notes that this concern is not specific to the NSDFS Project but is broader to the CRL site and possibly the nuclear industry. However, CNL is committed to continue work with KFN on how to communicate radiological risk with its members going forward and to provide educational sessions for the community, if desired.

## **Section 35 Aboriginal Rights**

CNL acknowledges KFN's assertion that the final NSDF EIS has not adequately assessed impacts to Algonquin health, wellbeing and socio-economics, and in turn has not adequately conveyed the full range and depth of impacts to KFN's Section 35 Aboriginal rights and interests. CNL recognizes that what KFN is requesting is consistent with the new provisions and commitments under the *Impact Assessment Act* (IAA). The final NSDF EIS [7] was prepared to meet the requirements of *CEAA, 2012* but has also incorporated good practices consistent with the IAA. This concern is recognized as separate from KFN's concern expressed relating to the Crown's duty to consult.

The final NSDF EIS [7] was considered by CNSC staff to meet the requirements of *CEAA, 2012* including the conclusion that the potential impacts of the NSDF Project on Aboriginal and/or treaty rights have been adequately and appropriately mitigated to the greatest extent possible.

Given the concerns expressed by KFN, CNL understands that KFN and CNSC are completing a RIA related to the NSDF Project. If any potential impacts to KFN's Aboriginal and/or treaty rights are identified, CNL remains committed to understanding these rights and working collaboratively to ensure that they are appropriately mitigated to the greatest extent possible.

## **Application of UNDRIP and FPIC**

KFN's concerns in this regard appear to be directed to the CNSC as to how the licensing process should be conducted. We defer to the CNSC to address these aspects of KFN's concerns.

CNL's engagement with Indigenous Nations, communities and organizations regarding the NSDF Project began well before Canada's adoption of UNDRIP. It is unclear how UNDRIP, and specifically the notion of FPIC, will be interpreted and applied to constitutionally protected Aboriginal and treaty rights. There is much more work to be done by the Government of

Canada in consultation with Indigenous communities and proponents to establish this clarity. As an example, the standard of consent required by FPIC is inconsistent with Canadian jurisprudence and must be reconciled accordingly.

CNL is fully aligned with the Government of Canada on the principle of FPIC and committed to advancing Canada's policy and objectives. Participation of Indigenous peoples in work undertaken by CNL, such as the NSDF Project, ensures consideration of Indigenous Knowledge Systems, collaboration, mutual respect and ongoing participation and relationship building for the future.

#### **2.1.1.4 Verification**

As outlined in Section 4.4.6.4 of the NSDF IER [\(CMD-22-H7.1C\)](#) [4] CNL has sought to validate with KFN assumptions CNL made in the NSDF EIS including those with respect to traditional activities that may be occurring within proximity to the NSDF Project, and while KFN has not to date provided this information, CNL anticipates that it will be provided soon.

CNL provided the executive summary and Section 2.1.1 of this submission to KFN for review in 2023 March to verify that engagement, and any issues and concerns have been accurately documented. As a result of this review, KFN provided CNL with revised text on the KFN community background, as well as additional information on the map of KFN's asserted rights and title territory, as well as the Algonquin Nation's entire traditional territory. CNL acknowledges that KFN may not regard this submission as a full portrayal of their views.

#### **2.1.1.5 Next Steps**

CNL is committed to the development of next steps on NSDF Project activities based on feedback from KFN and their outstanding issues and concerns. CNL will continue to work with KFN through the working group discussions and otherwise to determine next steps.

### **2.1.2 Kitigan Zibi Anishinabeg (KZA)**

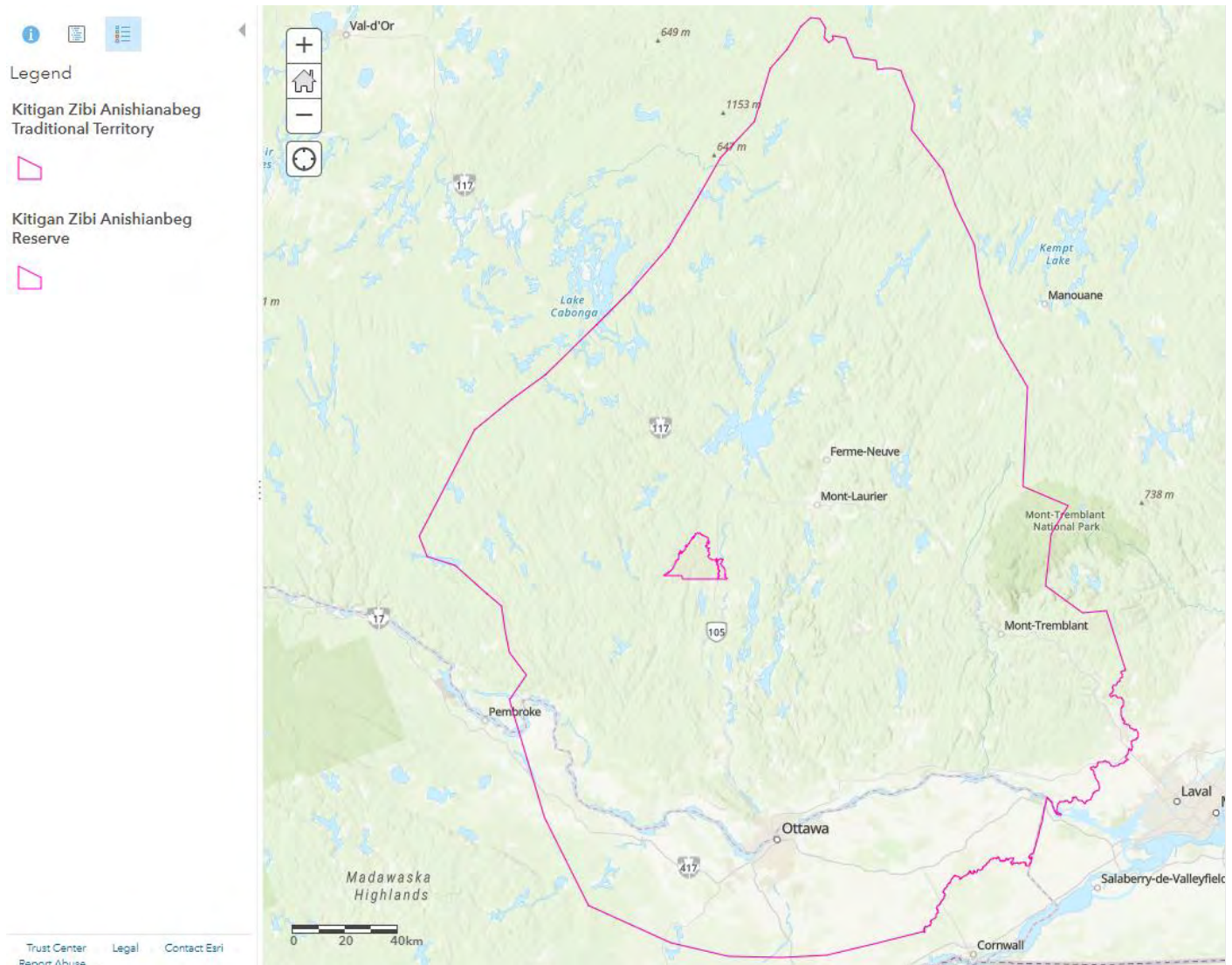
The KZA (also known as the River Desert Band or Maniwaki) is one of the nine currently federally recognized Algonquin communities in Quebec. The community resides on reserve lands that were founded in 1851. The main reserve is situated to the south-west of the borders of Maniwaki in the Outaouais region of Quebec, on the west bank of the Gatineau River approximately 113 km from the NSDF site (measured as a straight line) (Figure 2-1).

The KZA occupy one area of reserve lands: Kitigan Zibi No. 06100. The reserve covers an area of 21,009 ha. As a result of earlier displacement by the encroachment of Europeans along the Ottawa River this community became a place for many Algonquins to settle [17].

The KZA has a total registered population of 3,578 (as of 2021 April), the largest population of the nine Algonquin First Nations recognized by the federal government in Quebec. More than half of the registered population reside off reserve lands (1,934). Band administration oversees various departments providing services to the community (e.g., employment, land management, education etc.) [18].

The KZA is currently governed by an elected council comprised of a Chief and six councillors. The KZA is a member Nation of the AANTC [11].

The KZA traditional territory is depicted in Figure 2-6 (source: [KZA Natural Resources and Wildlife Office](#)).



**Figure 2-6: Kitigan Zibi Anishinabeg Traditional Territory (source: KZA Wildlife and Resources Office)**

### 2.1.2.1 Engagement

Engagement activities prior to 2022 January can be found in the last revision of the NSDF IER ([CMD-22-H7.1C](#)) [4], though events that are related to the additional engagement CNL undertook since 2022 January and pursuant to the Procedural Direction are described in this submission.

In late 2021, CNL met with two newly identified contacts with the KZA. An NSDF Project overview was provided as well as a discussion on establishing a contribution agreement between the KZA and CNL on the NSDF Project and other CNL activities. As committed at the meeting, an example of a CNL short-term contribution agreement was sent to the KZA in 2021 December for review. In 2022 January, a follow-up email was sent to confirm the Nation's receipt of the example agreement.

In 2022 March, CNL reached out to the KZA to encourage their participation in Part 2 of the Commission hearing process for the NSDF Project. CNL reiterated the offer of capacity funding to reduce any barriers to participate.

In 2022 April, the KZA expressed their need for experts to help understand how the NSDF Project will impact the environment and therefore their Aboriginal and/or treaty rights and requested a meeting to discuss what funding was available to hire experts and what was a reasonable timeframe to have this work carried out. CNL acknowledged this request and proposed four possible date options in 2022 April. CNL followed up on the KZA's request to meet several times as no response had been received. CNL also extended an invitation to the KZA to participate in CNL's Industry Day offering a complimentary booth at the suppliers' day event that included a trade show, luncheon, networking, and a full schedule of presentations and updates on CNL's future plans and opportunities for the supply chain.

In 2022 May, CNL spoke with a representative of the KZA and offered to meet with the KZA in early summer 2022 as the KZA indicated their team were very busy. CNL reiterated the offer of capacity funding to continue with engagement activities and the KZA communicated to CNL that they had also requested capacity through the CNSC participant funding program. CNL sent a reminder invitation to the KZA to participate in CNL's Industry Day in 2022 June.

In 2022 July, CNL reached out to the KZA to acknowledge the Procedural Direction issued by the Commission and welcomed the opportunity to further engage with the community. CNL also extended an invitation to meet to share any information, and address concerns or questions that the KZA had with respect to the NSDF Project. Following the email to KZA staff, CNL's President and CEO, Mr. McBrearty, and AECL's President and CEO, Mr. Dermakar, sent a letter (Appendix I) to Chief Whiteduck indicating their interest in a leadership meeting in the community. In mid-July, CNL received a request from the KZA to attend CNL's 2022 July Environmental Stewardship Council (ESC) meeting. CNL was pleased to welcome two staff members from the KZA to participate in the ESC meeting (Figure 2-7) held at the CRL site, giving the KZA the opportunity to learn more about the CRL site operations and activities. The KZA have expressed an interest in becoming a member of the ESC and the request is currently underway.





**Figure 2-7: 2022 July Environmental Stewardship Council tour of Waste Characterization Facility**

As a follow-up from the ESC meeting and in part due to the Procedural Direction, in early 2022 August, CNL hosted three representatives of the KZA to the CRL site which included a NSDF Project update including a discussion on next steps regarding the Procedural Direction as well as a walk-down of the proposed NSDF site. This visit afforded CNL one on one time with the KZA to talk about concerns regarding the nuclear industry as well as a chance to answer questions related to the NSDF Project. The KZA shared that they would be doing community consultation on the NSDF Project and CNL offered to assist by providing information as well as having NSDF Project staff available for meetings within the community and/or to host a larger CRL site visit for community members. Following the site visit, CNL followed up via email with several links to information sources that were requested during the tour (i.e., NSDF Project videos, IAA registry, CNL careers etc.). CNL also restated its interest to attend a meeting in Maniwaki, Quebec to assist KZA staff with their engagement to community members on the NSDF Project. In 2022 September, CNL's President and CEO, Mr. McBrearty, sent a letter (Appendix J) of congratulations to Chief Whiteduck on his re-election as Chief of the Kitigan Zibi Anishinabeg Nation which included an invitation to meet in-person. CNL provided the KZA consultation team with a list of biodiversity activities (i.e., turtle tracking, wolf howl survey, bat box survey etc.) that were occurring in the fall of 2022 at the CRL site and encouraged the KZA's participation. CNL also followed up with the consultation team on the progress of the community consultation meeting and again offered support if required.

In late 2022 September and early October, CNL reached out to the KZA to remind the Nation of the fall 2022 biodiversity activities happening at the CRL site and recommended the KZA participation based on their interest in the Blanding's Turtle.

In 2022 October, CNL's Director of Indigenous Relations contacted the KZA consultation staff as multiple communications attempts by CNL went unanswered by the Nation. Upon speaking with a representative of the KZA, it was agreed that CNL and KZA would meet, and this meeting would also include a Councillor. CNL proposed five date options in 2022 October. During the planning of this meeting, the KZA expressed an interest in a tri-partite meeting with CNL, AECL and the CNSC. The KZA determined they would meet with CNL first and then proceed with the tri-partite meeting. CNL and the KZA met in late 2022 October. During this meeting CNL addressed specific topic requests from the KZA on NSDF Project commitments, capacity for engagement activities, how to improve our relationship and the development of a long-term relationship agreement. We also discussed our role in the community meeting. It is of importance to note that the KZA clearly stated that this meeting was not part of consultation and only for the purpose of information sharing. We did learn through the KFN Councilor that members of the KZA community were concerned about the work being done at the CRL site. Following the meeting, CNL sent the KZA an example of a CNL short-term contribution agreement.

The CNSC notified CNL, after a meeting with the KZA, that a community meeting would be held in Maniwaki, Quebec on 2022 November 17, and CNL and the CNSC had been invited to attend. During the month, CNL also sent an employment opportunity for an Indigenous Engagement Coordinator position and asked the KZA to share the opportunity with their networks.

In early 2022 November, as requested through the CNSC, CNL sent the KZA consultation team a one-page fact sheet on the NSDF Project for use in the KZA community flyer prior to the community meeting. Based on discussions during the 2022 October 27 meeting, CNL also provided the KZA with an updated list of proposed dates for a leadership meeting in 2022 December. CNL also proposed 2022 November 18 as an option as CNL would already be in the community.

On 2022 November 17, CNL attended the community information meeting in Maniwaki, Quebec which included dinner, an NSDF Project overview utilizing poster boards, an open Q&A session as well as a closed community meeting upon the departure of CNL and the CNSC. The community members asked over 45 questions and had the opportunity to voice their concerns on the NSDF Project. We understand that the opportunity to feast together and converse prior to the formal portion of the meeting is an important part of meaningful engagement, and we were honoured to be invited to participate in this tradition with the KZA. The KZA clearly stated that this event was not part of consultation and only an information session that serves KZA interests only.

Following the community information meeting, the KZA consultation staff requested a follow-up meeting to discuss the outcome of the community information meeting. CNL followed up to meet regarding the community meeting and CNL also proposed continued discussions on establishing the contribution agreement (including engagement activities) as well as confirming a date for the leadership meeting. After several email exchanges with the KZA, it was advised that the KZA staff were very busy and were involved with the Chief and Council on last minute files and other consultation, therefore, they would not be available to meet with CNL until

2023 January. In late November, CNL extended an invitation to the KZA to attend a CNL supply chain event in Pembroke, Ontario on 2022 December 07.

The CNSC Registrar held a case conference call 2022 December 14 (the Case Conference), where the KZA, along with KFN, CNL, AECL and CNSC Staff provided an oral status update, more particularly with regard to the timeline to file the follow-up additional information, and the participants' intentions with respect to the request that had been filed. In CNL's view, none of the participants understood whether the Case Conference was to form part of the record of the NSDF hearing, what the CNSC Registrar expected to hear and how the Case Conference was to occur procedurally. As requested by the Registrar, CNL prepared and presented remarks which provided a brief status update on the progress of the engagement to date. CNL's remarks strained the relationship with the KZA and KFN as it was felt these remarks did not take their views into account. CNL and AECL senior leadership agreed to support KFN's and the KZA's request for a timeline extension to the Procedural Direction submission as well as an oral hearing to present their final submissions to the Commission.

In 2023 January, CNL continued to reach out to the KZA to request a meeting. On 2023 January 26 CNL's Director of Indigenous Relations telephoned the KZA to discuss the coordination of a meeting. During the phone call the KZA informed CNL that there had been no decision made related to proceeding with a contribution agreement between the parties.

On 2023 February 17, CNL and AECL leadership issued a letter (Appendix K) to the KZA expressing gratitude for the opportunity to engage with the community. The letter acknowledged the joint letter to the CNSC on 2022 December 15 to support the request to extend the submission date to 2023 April 30 (Appendix F) and the request for a final hearing. CNL and AECL requested a leadership meeting to understand KZA's objectives during the Procedural Direction extension period. To date a leadership meeting date has not been confirmed. Additionally, the KZA attended the 2023 February 21 CNL bi-monthly webinars which included updates on CNL's Integrated Waste Strategy: NSDF as a Key Enabling Facility; Decommissioning of Building 250 at CRL; and the Nuclear Power Demonstration Closure Project EIS.

On 2023 February 22, the KZA informed CNL that the KZA leadership was looking into the NSDF consultation and would be interested in looking at a long-term agreement with CNL. The KZA requested a meeting, at the working level. CNL provided agreement templates and worked with KZA to plan a meeting for 2023 March 8. In advance of the meeting the KZA requested the NSDF commitment list and specified the meeting would be specific to the NSDF Project for capacity reasons. During the meeting we learned that the delay in meeting after the 2022 November community session was because the Chief and Council were unsure of continuing engagement activities due to the opposition of the NSDF Project within the community.

In 2023 March, CNL sent the [NSDF Project Consolidated Commitment List document](#) in advance of the meeting. CNL and the KZA met on 2023 March 8. The participants included KZA staff, Councillors and their consultants. All parties provided thoughts on the 2022 November Community Information Session. The KZA then shared they were working with KFN on a community survey for the RIA. As requested, CNL presented on the changes to the final NSDF

EIS resulting from feedback. Before a leadership meeting could be planned, the KZA requested another meeting to focus on the commitment list and more information on the type of agreements – including an outline of a long-term relationship agreement and a hard copy of the final NSDF EIS. KZA agreed to reoccurring monthly meetings and meeting dates have been set. A hard copy of the final NSDF EIS was printed and mailed to the KZA on 2023 March 23.

On 2023 March 28, the KZA had consultants present at a meeting between CNL, KFN and the KZA and AECL to discuss question on the NSDF waste inventory. The consultants included representatives from the Canadian Coalition for Nuclear Responsibility and the Concerned Citizens of Renfrew County. CNL verbally responded to the written questions provided from KFN on 2023 March 27 and additional questions that came up during the meeting.

On 2023 March 31, CNL sent to the KZA the executive summary and the KZA engagement section of CNL's draft Procedural Direction submission for feedback. CNL acknowledged that the KZA may have a different position and perspective and that CNL would work collaboratively with the KZA to understand any additional matters that are raised after the date of this submission. CNL noted the draft was subject to change and requested feedback by 2023 April 14.

The first monthly meeting between CNL, AECL and the KZA occurred on 2023 April 12. Following introductions, the KZA stated that they do not consider the meetings to be consultation. The KZA members expressed concerns about the NSDF Project, mainly the location, proximity to the Ottawa River, alternatives considered, security of the site, transportation of waste and CNL's plan for the disposal of intermediate-level waste and high-level waste. The KZA raised the issue that they felt they were not consulted early in the project and disagreed that CNL shared the same concerns as the KZA about the project. CNL asked for an update on the review of the executive summary and the KZA engagement sections of CNL's draft Procedural Direction submission. The KZA requested more time to review and information on the plan for high-level waste referring to the recently released Government of Canada's Modernized Policy for Radioactive Waste and Decommissioning. CNL sent the information requested shortly after the meeting. CNL also sent a general outline of a Long Term Relationship Agreement with timelines.

The KZA provided comments on CNL's executive summary, the KZA engagement sections and the list of the KZA's feedback included in CNL's draft Procedural Direction submission on 2023 April 14. The KZA noted that due to the short review timeline the comments are preliminary and do not imply KZA's consent to the drafts.

#### **2.1.2.2 Feedback**

CNL took note during the Part 2 NSDF hearing and in meetings since the Procedural Direction on issues and concerns that have been raised by the KZA and their consultants. CNL understands that the following are of importance to KZA with respect to the NSDF Project:

- **Long-term accountability (GoCo):** The KZA expressed concern that the long-term accountability provided by the Government of Canada is not sufficient and will have significant cost over the life cycle of the NSDF Project.

- **Cumulative effects:** The KZA expressed a concern that the cumulative effects of all activities at and in near proximity to the CRL site were not assessed.
- **Proximity of the NSDF to the Kichi-Sibì (Ottawa River):** The KZA raised concerns regarding the proximity of the proposed NSDF to the Kichi-Sibì (Ottawa River) and drinking water quality.
- **Use of CEAA, 2012:** The KZA indicated concern that the NSDF EA was conducted under CEAA, 2012 rather than the IAA.
- **Site selection process:** The KZA expressed concerns regarding the facility location at the CRL site and the site selection process including the geologic suitability of the NSDF site.
- **National security protection and NSDF vulnerability:** The KZA expressed concern regarding the security of the CRL site, in particular with regards to vulnerability from an air strike.
- **Risk assessments:** A concern was raised by the KZA regarding the impacts and cumulative costs, including cost of remediation and restoration.
- **Species at risk at the CRL site:** The KZA raised concerns about species at risk and the assessment in the NSDF EIS.
- **Worker safety:** An issue was raised by the KZA with regards to worker safety.
- **Assessment of Aboriginal and treaty rights:** An issue was raised by the KZA that the NSDF EIS does not have a complete cumulative effects study or other studies to assess the impacts on the KZA's Aboriginal and treaty rights.
- **Transparency:** The KZA expressed concern that CNSC and CNL should have been more transparent about environmental concerns being brought forward and how they are mitigated.
- **Consultation process and need for capacity funding:** The KZA indicated that it was not adequately consulted by either the CNSC or CNL and that it required capacity support to be able to meaningfully participate and engage on the NSDF Project.
- **Definition of low-level waste and control of inventory:** The KZA stated that the term low-level waste was a misleading term and concerns with controlling the inventory as it relates to assumptions based on historical knowledge, segregating intermediate-level waste and toxic non-radiological materials.
- **Tritium in Water:** The KZA are opposed to the very high tritium threshold for the release of effluent from the waste water treatment facility to Perch Lake.
- **Long-term monitoring:** The KZA have a concern that a mitigation measure is required to ensure that leachate from these materials do not eventually make their way into the Ottawa River.

- **Design (longevity):** Assumption of institutional control for 300 years is unrealistic and an issue for the KZA.
- **Precautionary Approach:** The KZA advocate for a precautionary approach over assumptions based on scientific understanding and modelling.
- **NSDF EA Commitments:** The KZA expressed concern regarding how the EA commitments were developed and next steps with EA commitments.

### 2.1.2.3 Summary Discussion of Interests and Concerns

CNL has made our best efforts to understand and document the KZA's positions, while acknowledging that the KZA may articulate their position somewhat differently. We acknowledge that due to the ongoing nature of the work that we may not have captured all of the KZA's positions and will work collaboratively with the KZA to understand any additional matters that are raised after the date of this submission.

It is important to recognize that some of the concerns raised by the KZA fall outside CNL's mandate or authority, and therefore, CNL has attempted to address those concerns that are within its scope.

#### Long-term accountability (GoCo)

At the community meeting with the KZA in 2022 November, concern was raised that the long-term accountability provided by the Government of Canada is not sufficient and the NSDF Project will have significant cost over the life cycle of the NSDF Project.

AECL is the federal Crown Corporation responsible for managing safely and effectively the Government of Canada's radioactive waste liabilities. AECL is the owner of the CRL site and of the associated liabilities. AECL has committed to ensuring that the CRL site, including the proposed NSDF, is safely managed and controlled for as long as necessary.

Therefore, in its capacity of responsibly managing the Government of Canada's radioactive waste liabilities, and as the owner of the proposed NSDF, AECL is and will be responsible for the entire life cycle of the NSDF. AECL currently oversees, and will continue to oversee, CNL's operation of its assets pursuant to the Government Owned Contractor Operated (GoCo) model. CNL, as the enduring entity as well as the licensee, will continue to monitor and assess performance of the NSDF for the full life cycle. Additionally, the CNSC provides independent oversight of licenced activities as the federal nuclear regulator.

Concerns regarding the sufficiency of federal accountability and costs of the NSDF Project fall outside the scope of CNL's mandate, and these concerns must be addressed by AECL or the federal government.

#### Cumulative effects

At the community meeting with the KZA in 2022 November, concern was raised that cumulative effects of all activities at and in near proximity to the CRL site were not assessed as part of the NSDF EIS.

The following is a summary of how the final NSDF EIS addresses cumulative effects utilizing a western scientific framework: CNL conducted a cumulative effects assessment, as required by *CEAA, 2012*, where reasonably foreseeable developments were identified that have the potential to overlap spatially and temporally with the NSDF Project. Activities in the region that have not yet been approved or developments and activities that are currently under application review, or that have officially entered a regulatory application process, are considered reasonably foreseeable. This assessment is detailed in Section 8.0 of the final NSDF EIS [7].

The reasonably foreseeable developments that were identified at the time of the finalization of the EIS were activities at the CRL site as outlined in the 10-year plan, the proposed Small Modular Reactor at the CRL site, activities associated with the NPD Closure Project and activities at Garrison Petawawa. The cumulative effects assessment considers all primary pathways that are likely to result in detectable changes in measurement indicators and subsequent residual effects on valued components after implementation of environmental design features and mitigation.

CNL recognizes that we have used a western science approach, and while the final NSDF EIS [7] conclusions satisfy western regulatory requirements, this can be enhanced through the meaningful consideration of Indigenous Knowledge Systems, data, values and perspectives of the KZA.

Additionally, cumulative effects will be monitored through the EAFMP. CNL encourages participation of the KZA in the EAFMP and is open to receiving feedback and input. Decades of environmental monitoring at CRL, combined with Indigenous Knowledge Systems, data, values and perspectives can provide a robust baseline that increases the confidence of the results of the EA and cumulative effects assessment.

CNL remains committed to continuing to discuss and evaluate cumulative impacts and appropriate mitigation strategies with the KZA as the NSDF Project continues.

### **Proximity of the NSDF to the Kichi-Sibì (Ottawa River)**

At the community meeting with the KZA in 2022 November, as well as in the KZA written intervention submitted by the KZA and during meetings with the KZA, the proximity of the NSDF to the Kichi-Sibì (Ottawa River) and drinking water quality was raised as a primary concern.

CNL recognizes that the waters, including the Kichi-Sibì (Ottawa River) are of significant importance to the KZA. CNL has made efforts to communicate and demonstrate to KFN how the proposed NSDF Project is designed to protect the Ottawa River (Section 2.3 of the final NSDF EIS [7]). When examined through western scientific frameworks, the NSDF Project will be an improvement over the current environmental conditions at the CRL site.

As a first step in response to concerns for the protection of the Ottawa River and Perch Lake basin, CNL increased the RSA for surface water (Section 5.4.2.3.1 of the final NSDF EIS [7]), aquatic environment (Section 5.5.3.1 of the final NSDF EIS [7]), land and resource use (Section 5.9.3.1 of the final NSDF EIS [7]), ecological health (Section 5.7.3.1 of the final NSDF EIS [7]), and human health (Section 5.9.3.1 of the final NSDF EIS [7]) to extend 8 km downstream of the CRL site within the Ottawa River. This represents a significant expansion from the RSA used in the

2017 Draft EIS which was limited to the mouth of Perch Creek relative to the Ottawa River. Furthermore, Section 8.3.3 of the final NSDF EIS [7] summarizes the cumulative effects on the surface water environment. It concludes that residual effects on the Ottawa River water quality are determined to be negligible during operations and post-closure phases and may result in a net benefit due to remediation of legacy waste management areas at the CRL site.

As outlined in Section 3.4.2.5.1 of the final NSDF EIS [7], the Wastewater Treatment Plant (WWTP) effluent discharge targets for radionuclides are the maximum acceptable concentrations for drinking water and are derived using Health Canada Guidelines for Canadian Drinking Water Quality. The use of drinking water concentrations for radionuclides is considered conservative as there is no public access to the Perch Creek and Perch Lake watershed where WWTP effluent discharges will occur. In all cases, the concentrations of radionuclides in the Ottawa River will be less than the drinking water guidelines.

In the [Post-Closure Safety Assessment \(PostSA\)](#) (Section 4) [21] receptors of public interest were included. This category includes two representative residents located downstream from the NSDF: one in Sheenboro, Quebec (approximately 8 km downstream of CRL), the other in the Ottawa/Gatineau region (approximately 200 km downstream from CRL). These receptors were added specifically to address concerns about downstream effects from the NSDF. The only exposure pathway to these receptors is through drinking from, and bathing in the Ottawa River. Doses to these receptors are a million times lower than the public dose limit, and concentrations of both radiological and non-radiological contaminants are 100,000 times lower than the environmental quality standards.

CNL recognizes that we have used a western science approach and is committed to continue to discuss further steps that could be taken to enhance the protection of the Ottawa River watershed with the KZA, and is open to receiving additional knowledge, data and feedback regarding Indigenous led methodologies or strategies. CNL acknowledges that there remain outstanding information requests and reviews with respect to the protection of Kichi-Sibi (Ottawa River) which are currently in progress. CNL has made the draft EAFMP [12], which includes proposed monitoring of the Ottawa River and Perch Lake basin, available to the KZA for review and input.

CNL recognizes this will be an ongoing area of interest for the KZA thus CNL remains committed to ongoing discussions.

### **Use of CEAA, 2012**

At the KZA community meeting in 2022 November, a concern with the continued application of CEAA, 2012 for the NSDF Project rather than the IAA, 2019 was raised. This concern was directed to the Government of Canada and the Minister of Natural Resources as well as CNSC both provided a response. This concern is addressed by the IAA, 2019 and CNL will defer to CNSC staff to respond on this further if required.

### **Site selection process**

During meetings with the KZA, concerns were raised regarding the alternatives examined for the facility at the CRL site (i.e., “Were other locations considered?”) and the location of the



facility on the CRL site in proximity to the Kichi-Sibi (Ottawa River). KZA also expressed concerns as part of its written intervention for the Part 2 NSDF hearing regarding the suitability of the site including its slope and geological makeup of the site indicating that in KFN's view the ideal location would have deep soils, very little slope to support below the surface facility.

From a western science and regulatory perspective the assessment of site locations for the proposed NSDF was conducted in accordance with the requirements of the *CEAA, 2012* and an associated [Operational Policy Statement](#). The siting process is also consistent with International Guidance (IAEA [SSG-29](#), Appendix I – Siting of Near Surface Disposal Facilities) whereby one or more preferred candidate sites are selected after the investigation of a large area, the rejection of unsuitable sites, and screening and comparison of the remaining sites.

Since the beginning of the EA process in 2016, CNL clearly identified that the alternatives for facility location included only sites currently under AECL ownership and operated by CNL under an existing licence from the CNSC. The CRL site was identified as the preferred site for a number of reasons. Appropriate infrastructure is already in place at that site, such as security, access to power, roads, and a trained and experienced workforce. About 90% of the waste proposed for disposal in the NSDF is on, or will be generated at the CRL site, and the site has a long history of environmental monitoring – the geology, groundwater pathways, and biodiversity are well understood.

In total, fifteen different sites at the CRL site were evaluated as alternative locations. The siting process included mandatory criteria, such as the space needed for the project, and exclusionary criteria such as proximity to wetlands and presence of species at risk. Two sites were brought forward in and evaluated through the alternative means assessment. Ultimately, the East Mattawa Road site was chosen as the preferred option as it is adjacent to legacy waste management areas.

The alternative means Sections 2.5.4 (Facility Location) and 2.5.5 (Site Selection) of the final NSDF EIS [7] documents the assessment. Evaluation Criteria included environmental, technical and economic factors (see Section 2.5.1 of the final NSDF EIS [7]). To determine the preferred or most favourable means of developing a disposal facility, each alternative is evaluated first for its technical feasibility. For those alternatives deemed technically feasible, a comparison of economic feasibility (i.e., cost) and the likely environmental effects is completed. Criteria for evaluating each of the alternatives are summarized in Table 2.5.1-1, with further rationale provided in the following sections.

CNL considers this concern to be addressed by the final NSDF EIS [7] however recognizes this will likely be an ongoing area of interest for the KZA thus CNL remains committed to ongoing discussions.

While CNL is confident that the final NSDF EIS [7] satisfies western regulatory requirements, we understand the KZA's view is that more suitable locations may exist, however, based on CNL established criteria they fall outside of the AECL owned lands and are therefore ineligible. CNL remains committed to continue conversations with the KZA regarding their concerns related to the site selection process, as well as the suitability of the site, as the NSDF Project progresses.

**National security protection and NSDF vulnerability**

During meetings with the KZA, an issue was raised regarding the security of the CRL site, in particular with regards to vulnerability from an air strike.

CNL has a Security Program to implement CNL's *Security Policy* within CNL operating sites in Canada to ensure compliance with all applicable legal and corporate requirements. The Security Program is responsible for ensuring the protection of CNL employees, facilities and nuclear materials in accordance with the CNL *Security Policy*.

The Security Program applies to the operation and activities that affect the security in and around CNL sites. The Security Program also applies to all employees and other personnel (e.g., visitors and contract staff) conducting work at CNL sites. Access to the NSDF site is controlled via gates and fencing, administered in accordance with CNL's Security Program. The security measures or institutional controls proposed for the NSDF are appropriate for the type of nuclear substance (i.e., low-level radioactive waste) and will provide additional assurance of the safety and nuclear security of the facility. This includes integrated measures to prevent:

- unauthorized access by individuals
- unauthorized removal of radioactive material
- acts of sabotage or attempted sabotage.

Fires and explosive events are bounded by the assessment of an internal fire within the Engineered Containment Mound during operations. While the initiating event of the fire may vary, it is the consequence of the event which is relevant. Section 7.0 of the final NSDF EIS [7] includes the assessment of accident and malfunctions and determines that the potential health effects to the on-site worker and the public from a fire within the Engineered Containment Mound are negligible. The dose to the on-site worker is 2.4 mSv and the dose to a member of the public, who is offsite, is 0.021 mSv, which are below the regulatory dose limits for a Nuclear Energy Worker (50 mSv/yr) and a member of the public (i.e., 1 mSv/yr).

CNL considers this concern to be addressed by the CNL Security Program and the final NSDF EIS [7], however recognizes this will likely be an ongoing area of interest for the KZA thus CNL remains committed to ongoing discussions.

**Risk assessments**

During meetings with the KZA, a concern was raised regarding the impacts and cumulative costs, including cost of remediation and restoration.

The project life cycle cost for the NSDF is provided in Section 2.5.2.2.2 of the final NSDF EIS [7] and is approximately \$750 million.

In accordance with *Canada's Radioactive Waste Policy Framework*, the waste producers and owners of radioactive waste are responsible for the funding, organization, management and operation of disposal and other facilities required for their wastes. Nuclear waste owners are responsible for developing strategies and plans to effectively manage the wastes that are

generated as a consequence of producing energy, advancing science and medicine for the benefit of Canadians.

In the interest of effectively managing AECL's nuclear liabilities, CNL and AECL are working actively at strategic and operational levels to identify strategies and solutions for management of the entire life cycle of all radioactive waste classifications including low-level waste, intermediate-level waste, high-level waste, hazardous waste and clean (non-radiological) waste. Aligned to this, CNL has developed an [Integrated Waste Strategy](#) that concisely details a cradle to grave approach for all CNL-managed radioactive wastes, from generation to disposal. The Integrated Waste Strategy is based on the inventory of AECL waste and forecast data and built on the fundamental principles of waste avoidance, minimization and reuse.

The purpose of the NSDF Project is to provide the permanent disposal of current and future low-level waste at the CRL site, as well as a small percentage of waste volume from off-site locations, in a manner that is protective of both the public and the environment. The practice of continuing to build additional temporary storage systems at the CRL site for low-level waste is not consistent with modern nuclear waste management principles. Further, the NSDF Project would enable the remediation of historically contaminated lands and legacy waste management areas, as well as the decommissioning of outdated infrastructure to facilitate the CRL site revitalization.

CNL has considered alternatives for Facility Type, Facility Design, Facility Location, and Site Selection. Evaluation Criteria included environmental, technical and economic factors (see Section 2.5.1 of the final NSDF EIS [7]). To determine the preferred or most favourable means of developing a disposal facility, each alternative is evaluated first for its technical feasibility. For those alternatives deemed technically feasible, a comparison of economic feasibility (i.e., cost) and the likely environmental effects is completed. Criteria for evaluating each of the alternatives are summarized in Table 2.5.1-1 of the final NSDF EIS [7], with further rationale provided in Section 2.5 of the final NSDF EIS.

CNL considers this concern to be addressed by the final NSDF EIS [7]. CNL remains committed to ongoing discussions with the KZA if requested.

### **Species at risk**

During meetings with the KZA, the Nation raised concern that species at risk have not been adequately considered in the final NSDF EIS.

The final NSDF EIS [7] was completed utilizing western science and frameworks. Through engagement with KZA, CNL has listened and understands that while the final NSDF EIS [7] may satisfy regulations and western scientific outcomes, it can be enhanced through the meaningful consideration of Indigenous Knowledge Systems, values and perspectives.

From a western science and regulatory perspective, the Regional Study Area (RSA) for Traditional Land and Resource Use (Section 6.4.3.1 of the final NSDF EIS [7]), was selected as the combined area of the air quality, terrestrial, and aquatic assessments' RSAs (Figure 6.4.3-1 of the final NSDF EIS [7]). The RSA is defined to capture and evaluate residual environmental effects as a result of the NSDF Project because these may, in turn, affect traditional land and

resource use (e.g., habitat loss, sensory disturbance for wildlife, changes to habitat from air quality and surface water quality, changes in groundwater and surface water quality, changes in species abundance, distribution, and disturbance to terrestrial and aquatic biota).

Under this framework, the NSDF Project is not predicted to have significant terrestrial or aquatic effects beyond the CRL site. CNL recognizes that additional knowledge, data, and input from the KZA, or other Indigenous Nations, communities and organizations, may augment these findings and lead to a need to work collaboratively to address any identified impacts, such as with future environmental monitoring.

Species at risk were considered as part of the NSDF site selection process where species at risk observations, residence and critical habitat were considered. The final proposed site does, as described in the final NSDF EIS [7], CNL has used appropriate exclusion criteria and buffer zones to ensure no adverse impacts to wetland habitats, water, and species at risk. In addition, Section 5.7 of the [final NSDF EIS](#) [7] included components of an ecological risk assessment to evaluate the potential significance of residual effects on ecological health. Valued components were selected with due consideration of the results of baseline studies and subsequent consultation. CNL recognizes however, that the CRL site is home to species of significance to the KZA, and as such is committed to working collaboratively with the KZA to identify additional appropriate avoidance and mitigation strategies.

As stated in the final NSDF EIS (Section 1.4.1) [7], a permit from Environment and Climate Change Canada will be required under the *Species at Risk Act* (SARA) (Section 73 of the Act). It is noted that the terms and conditions related to the SARA permit for the NSDF Project are being finalized in parallel to the completion of the EA process. While the final NSDF EIS [7] does include mitigation measures for the protection of species at risk, the terms and conditions of the finalized SARA permit will be the overarching requirements. Several mitigation measures are and will be implemented to compensate habitat loss and improve existing conditions to ensure species at risk are not negatively impacted. Prescriptions made through the Blanding's Turtle Road Mortality Mitigation Plan, Sustainable Forest Management Plan and the draft NSDF EAFMP include project controls, habitat compensation measures and monitoring objectives to ensure that terrestrial biodiversity and species at risk are accounted for and protected from project development. These plans have been shared with the KZA for input and feedback and CNL remains committed to incorporating any feedback and working collaboratively with the KZA to address additional avoidance or mitigation strategies.

### **Worker safety**

An issue was raised by the KZA with regards to worker safety.

Both Sections 7.0 and 5.8 of the final NSDF EIS [7] include assessments where the safety of workers have been comprehensively evaluated through identification of workers as a valued component in the assessment of environmental effects as a result of the NSDF Project. In Section 5.8 of the final NSDF EIS [7], the potential external and internal radionuclide exposure as well as the potential non-radionuclide exposure to the worker is assessed in accordance with CEAA, 2012 requirements. In Section 7.0 of the final NSDF EIS [7], the potential health effects

from an accident or malfunction on workers is assessed also in accordance with *CEAA, 2012* requirements. These sections are the results of supporting analysis which have been developed in alignment with regulatory requirements and guidance under the *Nuclear Safety Control*. Specifically, the NSDF [Safety Analysis Report](#) was reviewed and accepted by CNSC as part of the licence application [2] for the NSDF Project.

The NSDF [Safety Analysis Report](#) presents the operational safety analysis of the NSDF based on the detailed design package, proposed operations and identified hazards including all credible events identified through hazard analysis and Operating Experience. The NSDF Safety Analysis Report assesses the normal operations, anticipated operational occurrences and accident conditions. The purpose of the safety analysis is to identify the hazards, describe how hazards are controlled and or mitigated, and describe the CNL Management System in place to ensure the controls are effectively and consistently applied. CNL's Management System, which includes health, safety, security and environmental programs, is described in Section 3.5.2 of the final NSDF EIS [7]. The CNL Management System provides the framework of processes, procedures, and practices used to ensure that CNL can fulfill all tasks required to achieve our objectives safely and consistently.

From a western science and regulatory perspective, CNL's implementation of the Management System and the final NSDF EIS [7] addresses this concern. CNL remains committed to ongoing discussions with the KZA if requested. As with other activities conducted by CNL at any of its sites, the safety and security of all employees and the public is paramount in the success of the proposed NSDF Project.

### **Assessment of the KZA's rights**

The KZA expressed concerns with respect to the NSDF Project's potential impacts on the KZA's Aboriginal and treaty rights.

The final NSDF EIS [7] was considered by the CNSC staff to meet the requirements of *CEAA, 2012* including the conclusion that the potential impacts of the NSDF Project on Aboriginal and/or treaty rights have been adequately and appropriately mitigated to the greatest extent possible.

Given the concerns expressed by the KZA, CNL understands that the KZA and CNSC are completing a RIA related to the NSDF Project. If any potential impacts to the KZA's Aboriginal and/or treaty rights are identified, CNL remains committed to understanding these rights and working collaboratively to ensure that they are appropriately mitigated to the greatest extent possible.

### **Transparency**

In the KZA written intervention for the Part 2 NSDF hearing provided by the KZA, the Nation raised concern that CNSC and CNL should have been more transparent about environmental concerns being brought forward and how they are mitigated.

CNL dispositioned all 669 comments submitted in 2017 from the public, organizations, stakeholders and Indigenous Nations, communities and organizations on the draft NSDF EIS.

These were submitted to CNSC and available on the IAA website (available here: [CNL's Consolidated Responses](#)). All comments and dispositions from Federal-Provincial reviews are also on the IAA website (available here: [Federal-Provincial Responses](#)). Topics included environmental concerns expressed by engaged public and Indigenous Nations, communities and organizations. A number of changes to the final NSDF EIS since the 2017 draft were a result of the environmental concerns being brought forward. For example, the removal of intermediate-level waste from the inventory, expansion of the assessment of alternative means, project design changes, an increase in spatial boundaries to include 8 kilometers of the Ottawa River downstream of Perch Creek and covering the Ontario and Quebec border, and a number of additional baseline studies.

While the KZA staff members have participated in a number of webinars, and received presentations on the NSDF Project, CNL appreciates, restrictions faced by the KZA in terms of access to readily available materials and information in community, including having information that is accessible to elders and other community members who may not have the technical background to fully assess the materials. Since the time of the Procedural Direction, the KZA and CNL were able to work together collaboratively to create a community information poster, host community meetings, have a tour of the CRL site, and are planning to have an open community-based Q&A session. CNL remains committed to working with the KZA to identify strategies to be more transparent and ensure that information is readily accessible in the KZA community.

### **Consultation process and need for capacity funding**

In the KZA written intervention for the Part 2 NSDF hearing, the Nation raised concern the community was not adequately consulted by the CNSC or CNL and that the engagement with the AANTC should not be a replacement for direct involvement with the KZA.

The duty to consult lies with the Crown. The Procedural Direction, with its focus on additional information about engagement with the KZA, is an important aspect to allow CNSC to consult, and CNL to engage, with the KZA, in regard to the fulfillment of the Crown's duty to consult, as it relates to the NSDF Project. CNL is aware that the CNSC staff are considering potential impacts to Aboriginal and treaty rights by the NSDF Project by completing a community specific RIA with the KZA. Should any impacts be identified, CNL is committed to working with CNSC and the KZA to address these and mitigate any impacts to the fullest extent possible.

CNL acknowledges the KZA's concern regarding a lack of direct engagement and capacity, and as such undertook to reiterate its commitments to ensure meaningful engagement and offers for capacity funding took place with the KZA, as summarized in Section 2.1 of this submission.

CNL is committed to working with the KZA directly going forward and encourages an increased level of engagement. Recently, a monthly meeting has been established with the KZA, CNL and AECL. CNL has offered funding related to NSDF Project activities with the KZA as an interface for NSDF Project engagement. CNL reiterates that engagement with the KZA will not end at the closure of the Procedural Direction, the final oral presentations or after a decision is rendered

by the CNSC in respect of the NSDF Project. CNL will remain available and committed to assist the KZA with engagement at a community and leadership level.

### **Definition of low-level waste (LLW) and control of inventory**

In the written intervention for the Part 2 NSDF hearing provided by KFN, the Nation stated that the term low-level waste was a misleading term and expressed concerns with controlling the inventory as it relates to assumptions based on historical knowledge, segregating intermediate-level waste and toxic non-radiological materials.

The classes of radioactive waste in Canada are determined by the CNSC (information [available here](#)). These waste classes are also consistent with definitions of the Canadian Standard Association (CSA) N292.0-19 *General principles for the management of radioactive waste and irradiated fuel*. Low-level waste contains primarily short-lived radionuclides and restricts the amount of long-lived radionuclides. The Engineered Containment Mound design life of 550 years has been established to meet the required time period to allow for radioactive decay of the waste inventory, (illustrated on Figure 3.3.1-2 of the final NSDF EIS [7]). The radioactivity concentration in the Engineered Containment Mound decreases about 2,000 times in the first 100 years and begins to approach background levels of concentration shortly thereafter (Section 3.3.1.3 of the final NSDF EIS [7]).

CNL's Waste Management Program oversees the Waste Certification process. Waste Certification ensures that the Waste Management process can be repeated and evaluated for producing waste that is within the expected characteristics. This is achieved through waste assurance or verification activities conducted prior to, and following, waste generation including planning documents and waste observations and surveillances. Verification of the waste may include visual inspection, non-destructive assays and/or destructive sampling and analysis. All waste intended to be emplaced in the NSDF, including legacy waste, shall have sufficient characterization data to ensure compliance with the [NSDF Waste Acceptance Criteria](#) (WAC) [14]. The approach for verification of compliance with NSDF WAC is described in Section 3.3.2 of the final NSDF EIS [7].

As noted in Section 3.3.3.3 of the final NSDF EIS [7], waste placed in the NSDF will meet the intent of land disposal and leachate requirements specified in Ontario's Regulation 347, *General – Waste Management* [19]. The acceptance of waste into NSDF will be controlled through proper waste characterization and application of Ontario Regulation 347 limits. Waste that, not considering its radioactive component, is classified as hazardous waste is not permitted for disposal in NSDF unless the hazardous waste has been treated using methods for land disposal described in Ontario Regulation 347.

CNL considers this concern to be addressed by the final NSDF EIS [7] as well as there were detailed questions and responses related to waste inventory throughout both Part 1 and Part 2 NSDF hearing. CNL remains committed to ongoing discussions with the KZA if requested.



## **Tritium in Water**

The KZA has indicated that they are opposed to the high tritium threshold in water in the written intervention for the Part 2 NSDF hearing and concerned about the lack of mechanisms in place to restrict flow from Perch Lake to the Ottawa River should the thresholds become too high.

The following is a summary of how the final NSDF EIS addresses appropriate tritium thresholds from a western scientific framework: As stated in Section 3.4.2.5.1 of the final NSDF EIS [7], the tritium threshold of 360,000 Bq/L is protective of the environment (and well below the ecological risk benchmark for protection of aquatic biota (17.4 MBq/L). The NSDF Wastewater Treatment Plant tritium discharge target (360,000 Bq/L) is based on maintaining tritium concentrations below the Health Canada drinking water guideline of 7,000 Bq/L in Perch Creek.

Because the Perch Lake and Perch Creek watershed is located within the CRL site, it is not accessible to the public; therefore, none of its open water bodies (i.e., Perch Creek and Perch Lake) are used as a source of potable water. As such, these water bodies do not present any exposure risks via ingestion to humans (i.e., there are no cottages or dwellings near the Lake). Additionally, the Wastewater Treatment Plant effluent tritium discharge target of 360,000 Bq/L (Table 3.4.2-2 of the EIS) is well below the ecological risk benchmark for tritium of  $17.4 \times 10^6$  Bq/L (17,400,000 Bq/L). The ecological risk benchmark is the level above which adverse effects may occur in aquatic species. Current tritium concentrations in Perch Lake are in the order of a few thousand Bq/L (Table 5.7.4-8 of the final NSDF EIS [7]). Tritium concentrations are predicted to remain a small fraction of the ecological risk benchmark during the operation of the NSDF Wastewater Treatment Plant.

Due to the impracticality of treating the wastewater to remove tritium, CNL has instead placed stringent limits on the total amount of tritium that can be placed in the NSDF (see Table 3.3.1-2 EIS) and on the tritium concentration in individual waste packages (see Table 3.3.3-1). The amount of tritium emplaced in the Engineered Containment Mound is controlled and limited through the NSDF WAC; this enables the NSDF Wastewater Treatment Plant tritium discharge targets to be maintained below the Health Canada drinking water guidelines in Perch Creek.

While CNL is confident that the final NSDF EIS [7] satisfies western regulatory requirements related to tritium thresholds, and from a western scientific perspective does not pose a risk, we acknowledge this can be enhanced through the meaningful consideration of Indigenous Knowledge Systems, data, values and perspectives of the KZA. CNL remains committed to continue conversations with KZA regarding these concerns as the NSDF Project progresses.

## **Long-term monitoring**

The KZA was concerned about safeguards and mitigation measures that CNL would have in place to ensure that leachate from the waste in the NSDF do not eventually make their way into the Ottawa River. The KZA suggested protecting the open cells from rain in order to limit radioactive leachate as much as possible and indicated they did not have an opportunity to review the weather shielding design.



Section 4 of CNL's CMD ([CMD-22-H7.1](#)) and Section 8.1.2 of the [Safety Case](#) [13] address how the Ottawa River is protected. As described in the CMD, these safeguards include the following:

- The main containment features of the proposed NSDF facility are the natural and synthetic barriers – in both the base liner and cover systems – which are designed to work together to isolate the waste materials from the environment for hundreds of years after which the radioactivity of the waste will have decayed to levels found naturally in the environment.
- The dedicated Wastewater Treatment Plant will remove contaminants from any leachate or wastewater collected during the operational period. The treatment or removal of contaminants from the wastewater are not novel and are used within the international nuclear industry.
- The discharge to the environment during the operational period is controlled and only occurs after the treated effluent has been confirmed to meet the discharge criteria, which are reflective of the federal and provincial water quality guidelines and ensure protection of the Ottawa River and surrounding environment.

The NSDF EAFMP [12] will be part of the licensing basis for the NSDF Project and its objective is to outline the monitoring to be conducted to verify and confirm predictions in the EIS. The EAFMP includes effluent verification (airborne and waterborne), environmental monitoring (air, surface water, sediment), and groundwater monitoring. CNL is continuing to conduct baseline characterization of dust surrounding the NSDF, groundwater, sediment at the Ottawa River and conducted an updated traffic study. The EAFMP continues during construction, operation and closure. Following closure, monitoring will continue throughout the institutional control period. The EAFMP will be implemented for as long as necessary as determined by the CNSC.

CNL is willing to involve all interested Indigenous Nations, communities and organizations in the NSDF EAFMP. CNL shared the draft EAFMP with the KZA for review and is open to receiving input and feedback. CNL is committed to discussing this further with the KZA as the NSDF Project progresses.

With respect to the weather shielding design, as mentioned in Section 4.3.1 of CNL's CMD ([CMD-22-H7.1](#)), CNL is exploring additional measures that could be taken to keep the waste dry during waste handling and placement which includes assessing the feasibility of using a conceptual weather cover structure. However, at the time of the NSDF Commission Hearing the design had not been progressed as it would support the operation phase of NSDF, not the construction phase. As noted in Section 6.4.1.5 of the CNSC CMD (CMD-22-H7), CNSC staff have issued a regulatory action to track submission of the weather cover structure design prior to submission of a licence application to operate the NSDF. CNL is willing to share with the KZA the detailed design when available.

### **Design (longevity)**

In the written intervention for the Part 2 NSDF hearing provide by the KZA, the Nation raised concerns that the design life and institutional control period for the NSDF Project was unrealistic.

The following is a summary of how the final NSDF EIS [7] addresses design longevity from a western scientific framework: As noted in Section 3.1.1.1 of the final NSDF EIS [7] the engineered containment mound is designed with a number of engineered barriers to provide multiple layers of safety to support the long-term containment and isolation requirements. In accordance with the defence-in-depth principle, the safety performance of the NSDF Project is not dependent on any single safety function. The perimeter berm, the high density polyethylene (HDPE) geomembrane cover system, and the double HDPE geomembrane liner system supported by a compacted clay liner contain individual components of natural and synthetic materials designed to work together to mitigate the release of contaminants into the environment for thousands of years.”

As also stated in Section 3.1.1.1 of the final NSDF EIS [7], CNL partnered with Queens University to perform a comprehensive HDPE geomembrane testing and evaluation program. The results of the program demonstrated that candidate HDPE geomembranes are not only expected to meet the 550-year design life of the facility but is likely to have a design life of up to 2000 years.

The post-closure phase is described in Section 3.2.4 of the final NSDF EIS [7]. Included are discussions of maintenance, monitoring, and institutional controls that will be implemented. The Post-Closure Safety Assessment (PostSA) [21] has been prepared and utilizes the reference inventory [15] at closure to predict radiological dose to humans and contaminant concentrations in the environmental media. The approach to the PostSA ensures the assessment is performed to demonstrate that the NSDF long-term safety is not reliant on institutional controls in order to meet the regulatory dose requirements. For the NSDF, the radiation concentration levels decay very rapidly in the first 100 years of the post-closure period. As a result, the NSDF does not require a 300-year period of institutional control in order to maintain the dose criteria. This is demonstrated by a Sensitivity Case in the Post SA [21] where it is assumed that institutional controls fail at only 100 years after closure. The results of this sensitivity case demonstrate that the safety of the NSDF and surrounding environment are not reliant on long periods of institutional control.

While CNL is confident that the final NSDF EIS [7] satisfies western regulatory and science-based criteria related to design longevity, we acknowledge that the KZA may have additional data, knowledge, or strategies that may address concerns. CNL remains committed to continue conversations with the KZA regarding these concerns as the NSDF Project progresses.

### **Precautionary approach**

The KZA advocated in their written submission for a precautionary approach over assumptions based on scientific understanding and modelling.

Based on western scientific frameworks, the precautionary principle has been taken into consideration throughout all aspects of the NSDF Project, including project design (construction through to post-closure and beyond), development of mitigation measures, assessment of environmental effects, design and implementation of follow-up, and monitoring programs.

As described in Section 5.1 of the final NSDF EIS [7], a precautionary approach has been applied at multiple steps, for example:

- Thorough identification of potential interactions and changes,
- Advancing potential effects for further consideration if unsure,
- Assessing multiple scenarios,
- Informing identification of follow-up monitoring,
- Uncertainty described and characterized.

The assessment of each discipline in the EA provides a how evaluation of potential residual effects of the NSDF Project and aims to overestimate potential effects where uncertainty is present. Where possible, methods are used to reduce uncertainty and increase the level of confidence in effects predictions. In addition, a conservative approach was implemented when information is limited so that effects are typically overestimated (e.g., defining the key input variables so that the results predict effects conservatively).

The NSDF builds on the large base of experience for similar facilities that exist in the US, Europe and Canada. The objective of the design of a NSDF is to ensure that the facility can be built and waste received, handled, and disposed of without undue risk to human health and the environment, both during the facility operation and after facility closure. Section 3.1.1.1 of the final NSDF EIS [7] provides a discussion regarding how the NSDF aligns with Canadian regulatory and International Atomic Energy Agency (IAEA) guidelines. The key safety features of the NSDF Project have addressed the IAEA design principles for radioactive waste disposal by incorporating: multiple safety functions, containment of radioactive waste, isolation of radioactive waste and surveillance and control of passive safety features into the facility design.

The following fundamental design principles incorporate the precautionary principle and were considered in the NSDF Project design in accordance with the IAEA:

- Protection of human health – radioactive waste shall be managed in such a way as to secure an acceptable level of protection for human health.
- Protection of the environment – radioactive waste shall be managed in such a way as to provide an acceptable level of protection of the environment.
- Protection of future generations – radioactive waste shall be managed in such a way that predicted effects on the health of future generations will not be greater than relevant levels of effects that are acceptable today.
- Burdens on future generations – radioactive waste shall be managed in such a way that will not impose undue burdens on future generations.
- Safety of facilities – the safety of facilities for radioactive waste management shall be appropriately assured during their lifetime.

CNL remains open to discussing precautionary values and perspectives of the KZA and how that might inform the NSDF Project as it progresses.

### **NSDF EA Commitments**

During meetings with the KZA, the KZA expressed concern regarding how the EA commitments were developed and next steps with EA commitments.

The current commitment table summarizes the key interests and concerns from the AANTC, including the KZA and KFN on the NSDF Project up to May 2021, the time of the final NSDF EIS [7] submission. While CNL believes that we have captured the feedback we have heard from the AANTC, we recognize that this list will evolve now that we have established a relationship and direct engagement with the First Nation. As discussed with the KZA, this list provides a starting point for further engagement and discussion with the KZA to on their interests and concerns and new commitments can be added and /or current ones deleted.

CNL is committed to working with the KZA to understand and find approaches to alleviate concerns as part of the NSDF Project engagement. Where there are differences of opinion or concerns that need to be addressed, CNL is willing to explore mitigation measures and formulate commitments with the KZA with the intention of trying to remove or lessen the concern.

#### **2.1.2.4 Verification**

As outlined in Section 4.4.6.4 of the NSDF IER ([CMD-22-H7.1C](#)) [4] CNL has sought to validate assumptions CNL made in the EIS including those with respect to traditional activities that may be occurring within proximity to the NSDF Project. While the KZA have not to date provided information, we understand that some preliminary studies and data have been completed and anticipate receiving information in the near future. CNL provided the executive summary and Section 2.1.2 of this submission to the KZA for review in 2023 March to verify engagement, and any issues and concerns have been accurately documented. As a result of this review, additional interests and concerns were included in this submission. The KZA did state in writing that comments were preliminary and do not imply consent to the drafts.

#### **2.1.2.5 Next Steps**

CNL is committed to the development of next steps on the NSDF Project activities based on feedback from the KZA and outstanding issues and concerns. CNL is pleased to learn that the KZA is interested in proceeding with a long-term relationship agreement, and we look forward to commencing these discussions in order to facilitate meaningful engagement with the KZA.

### 3. Conclusions

The NSDF Project will be located entirely within the CRL site boundary where, aside from the operations and activities undertaken by CNL, other land uses are prohibited due to restricted public access. It is our understanding that the project does not pose any potential limitation on the exercise of Aboriginal and/or treaty rights within the project study area. Based on CNL's findings the NSDF Project is not predicted to have significant terrestrial or aquatic effects beyond the CRL site. CNL recognizes that additional data and input from KZA and KFN, or other Indigenous Nations, communities and organizations, may augment these findings and lead to a need to work collaboratively to address any identified impacts.

During the extended time provided by the Procedural Direction, CNL and KFN worked collaboratively to conduct fieldwork activities to address some of KFN's concerns and will continue to build on this approach as the project moves forwards, for example with future environmental monitoring. As a result of resource and capacity limitations, we agree with the KZA that while this process has taken longer than perhaps hoped, further engagement is necessary to ensure it is in fact meaningful and accords the KZA the ability to ensure its concerns are addressed and properly understood. CNL remains committed to continuing to seek engagement with all Indigenous Nations and communities that hold Aboriginal and treaty rights on the lands of the CRL site, as well as engaging with all interested Indigenous Nations, communities and organizations. As a living document, the NSDF IER will continue to document outstanding concerns and will provide updates on the progress and completion of the NSDF Project commitments made in response to interest and concerns from Indigenous Nations, communities and organizations.

CNL acknowledges the concerns that have been raised by the KZA and KFN. CNL remains open to continuing to work with the KZA and KFN to address concerns and issues that are within its scope by supporting participation in the NSDF Project through capacity funding for engagement activities, review of materials, incorporating Indigenous Knowledge Systems, values and perspective, and data collection as the project continues. CNL remains open to additional mitigation strategies and offering opportunities to participate in long term monitoring.

The time provided by the Procedural Direction has offered the opportunity for more meaningful, collaborative engagement with both KFN and the KZA. Under KFN's guidance, CNL has increased knowledge of biodiversity at the CRL site as well as within the project study area. Data collected through studies initiated by KFN has been supplementary to findings in baseline studies and assessments previously conducted, however, in CNL's view none of the additional information collected have changed CNL's conclusions within the final NSDF EIS [7].

CNL is appreciative of the learnings gained during interactions with KFN and the KZA. These relationships are still in early stages, but we look forward to developing a strong, trusted, collaborative relationship with KFN, the KZA and their communities.

CNL remains committed to advancing environmental protection and remediation of the CRL site and we believe that the NSDF is a responsible western science-based solution. We acknowledge, however, that this solution can become even more effective when it is informed

by Indigenous Knowledge Systems, values and perspectives and as such we are committed to collaboratively developing and implementing additional measures, mitigations and solutions throughout the NSDF Project with Indigenous peoples including the KZA and KFN. The work done to date is the start of a long journey of engagement and consultation and an overarching goal of building stronger relationships with Indigenous Nations, communities and organizations.

#### 4. References

- [1] Canadian Nuclear Safety Commission, *Nuclear Research and Test Establishment Operating Licence, Chalk Laboratories*, NRTEOL-01.00/2028, Expiry Date: 2028 March 31.
- [2] Letter from P. Boyle (CNL) to M. Leblanc (CNSC), "[Updated Application for Licence Amendment to add the Near Surface Disposal Facility to the Chalk River Laboratories Licensing Basis](#)", 232-CNNO-21-0004-L, 2021 March 26.
- [3] *Procedural Direction In the Matter of Canadian Nuclear Laboratories Application to amend the Nuclear Research and Test Establishment Operating Licence for the Chalk River Laboratories site to authorize the construction of a Near Surface Disposal Facility- NSDF-22-H7-e*, 2022 July 05.
- [4] [Near Surface Disposal Facility Project Indigenous Engagement Report](#), 232-513130-REPT-001, Revision 6, 2022 January.
- [5] Nuclear Safety and Control Act, S.C. 1997.
- [6] *Canadian Environmental Assessment Act*, 2012.
- [7] [Near Surface Disposal Facility Environmental Impact Statement](#), 232-509220-REPT-004, Revision 3, 2021 May.
- [8] Morrison, James. 2005. "Algonquin History in the Ottawa River Watershed". Chapter in: A Background Study for Nomination of the Ottawa River Under the Canadian Heritage Rivers System (2005). Ottawa River Heritage Designation Committee. Produced by QLF Canada
- [9] KFN (Eagle Village). 2020. Community website. <http://kebaowek.ca/>. Accessed 2020 March 06.
- [10] KFN (Eagle Village). 2019. CNSC's Regulatory Oversight Report for Canadian Nuclear Laboratories Sites: 2018 KFN Comments. Canadian Nuclear Safety Commission Meeting (presentation from KFN). November 7, 2019.
- [11] Government of Canada. 2020. Aboriginal and Treaty Rights Information System (ATRIS). [http://sidait-atris.aadnc-aandc.gc.ca/ATRIS ONLINE/home-accueil.aspx](http://sidait-atris.aadnc-aandc.gc.ca/ATRIS_ONLINE/home-accueil.aspx). Accessed 2020 August 26
- [12] [Draft Environmental Assessment Follow-Up Monitoring Program for the Near Surface Disposal](#), 232-509220-PLA-001, Revision 0, 2021 February.
- [13] [Near Surface Disposal Facility Safety Case](#), 232-03610-SAR-001, Revision 2, 2021 January.
- [14] [Near Surface Disposal Facility Waste Acceptance Criteria](#), 232-508600-WAC-003, Revision 2, 2022 November.
- [15] [NSDF Reference Inventory Report](#), 232-508600-REPT-003, Revision 0, 2017 December.
- [16] Holt, R.A., *Forest Roost Use by Little Brown Bats (Myotis lucifugus) in Ontario*, M. Sc. Thesis – Trent University.

- [17] Morrison, James. 2005. *“Algonquin History in the Ottawa River Watershed”*. Chapter in: A Background Study for Nomination of the Ottawa River Under the Canadian Heritage Rivers System (2005). Ottawa River Heritage Designation Committee. Produced by QLF Canada
- [18] Kitigan Zibi Anishinabeg. 2020. Community website. <http://kzadmin.com/Home.aspx>. Accessed 2020 March 06
- [19] Ontario Regulation 347 - GENERAL - WASTE MANAGEMENT, under the Environmental Protection Act, R.S.O. 1990, c. E.19. <https://www.ontario.ca/laws/regulation/900347>
- [20] Rowe, R. K. 2019. *Near Surface Disposal Facility Geomembrane Relative Performance Report – Public Version (Redacted)*. Canadian Nuclear Laboratories (CNL) 232-503212-REPT-024.
- [21] [\*Post-Closure Safety Assessment 3<sup>rd</sup> Iteration to the NSDF Project\*](#), 232-509240-ASD-004
- [22] *Management of Land, Habitat and Wildlife*, 900-509200-STD-006, Revision 0, 2018 April.



**Appendix A Detailed Record of Engagement – Kebaowek First Nation 2022 January 01 to 2023 April 14**

This table provides a detailed record of engagement activities that have occurred with Kebaowek First Nation (KFN) on the NSDF Project from 2022 January 01 to 2023 April 14.

Date	Event / Activity	Involved Parties	Details
2022 January 26	Email from Kebaowek First Nation to CNL	KFN Legal Counsel CNL Legal Counsel ERM Stakeholder Relations	Email sent from KFN to CNL regarding the negotiation of the Letter of Intent (LOI).
2022 February 08	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email sent from CNL to KFN suggesting a meeting to discuss next steps following the signing of the LOI.
2022 February 08	Email from Kebaowek First Nation to CNL	KFN Consultant ERM Stakeholder Relations	Email sent from KFN to CNL provided the names of the KFN members to include in the upcoming meetings and asked CNL to coordinate a date.
2022 February 08	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Councillor ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation with a link to the NSDF “Virtual Visitor Centre” platform.

Date	Event / Activity	Involved Parties	Details
2022 February 18	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Councillor KFN Legal Counsel CNL Legal Counsel CNL Corporate Communications ERM Stakeholder Relations AECL	Email from CNL to coordinate meeting dates.
2022 February 25	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Councillor KFN Legal Counsel CNL Legal Counsel CNL Corporate Communications ERM Stakeholder Relations AECL	Email from CNL to Kebaowek First Nation proposing a meeting date of 2022 March 10 from 3:00 p.m. to 4:00 p.m.  CNL welcomed agenda items from KFN.
2023 March 03	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Councillor ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation to encourage Indigenous participation in Part 2 of the NSDF Commission hearing and reiterated the offer of capacity to reduce any barriers to participate.

Date	Event / Activity	Involved Parties	Details
2023 March 09	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Councillor KFN Legal Counsel CNL Legal Counsel CNL Corporate Communications ERM Stakeholder Relations AECL	Email invitation sent to KFN for a 2022 March 10 meeting to discuss engagement on the NSDF and NPD Projects, the Framework Agreement and next steps.
2023 March 10	Meeting between KFN and CNL	KFN Consultant KFN Councillor KFN Legal Counsel ERM Stakeholder Relations CNL, Director Corporate Communications AECL	Meeting between KFN and CNL to discuss the engagement opportunities and requests related to the NSDF Project and NPD Closure Project and the next steps to develop a Framework Agreement.
2022 March 10	Email from Kebaowek First Nation to CNL	KFN Consultant KFN Councillor KFN Legal Counsel CNL Legal Counsel CNL Corporate Communications ERM Stakeholder Relations AECL	Email from Kebaowek First Nation to CNL sharing a news story about Combining Malacology and Underwater Cave Diving in the Ottawa River and a video about the Algonquin Aki Sibi Project. Both items were mentioned during the 2022 March 10 meeting.

Date	Event / Activity	Involved Parties	Details
2022 March 14	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Councillor ERM Stakeholder Relations	Email invitation sent to KFN to a webinar on Participating in the NSDF Part 2 Hearing on 2022 March 22 which included an opportunity for questions.
2022 April 5	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Councillor ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation to remind of the deadline to submit a request to intervene in the final NSDF Commission hearing and encouraged the signing of the Parliamentary E-Petition 3929, in support of the proposed project launched by Mayor D'Eon (Town of Deep River). CNL again provided a link to the new NSDF Virtual Visitor Centre.
2022 April 14	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Councillor KFN Legal Counsel CNL Legal Counsel CNL Corporate Communications ERM Stakeholder Relations AECL	Email invitation sent to KFN for the 2022 April 14 meeting to discuss engagement on the NSDF and NPD Closure Projects, the Framework Agreement and next steps.
2022 April 14	Meeting between KFN and CNL	KFN Consultant KFN Councillor KFN Legal Counsel ERM Stakeholder Relations CNL, Director Corporate Communications	Meeting between KFN and CNL to discuss the engagement opportunities and requests related to the NSDF Project and NPD Closure Project.

Date	Event / Activity	Involved Parties	Details
2022 April 18	Email from CNL to Kebaowek First Nation	KFN Land Management & Resources ERM Stakeholder Relations	Email invitation to KFN to the CNL Industry Day at the Chalk River Laboratories on 2022 June 02 to promote the broader engagement between CNL's nuclear industry partners and our local supply chain.
2022 April 18	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Councillor ERM Stakeholder Relations	Email invitation to KFN to the CNL Industry Day at the Chalk River Laboratories on 2022 June 02 to promote the broader engagement between CNL's nuclear industry partners and our local supply chain.
2022 April 20	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Councillor ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation enclosing links to the updated NSDF Indigenous Engagement Report.
2022 May 05	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Councillor KFN Legal Counsel CNL Legal Counsel CNL Corporate Communications ERM Stakeholder Relations AECL	Email from CNL to Kebaowek First Nation requesting to change the upcoming meeting from 2022 May 12 to 2022 May 19.
2022 May 06	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Councillor ERM Stakeholder Relations	Email invitation to KFN to the CNL Industry Day at the Chalk River Laboratories on 2022 June 02 to promote the broader engagement between CNL's nuclear industry partners and our local supply chain.

Date	Event / Activity	Involved Parties	Details
2022 May 09	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Councillor ERM Stakeholder Relations	Email invitation sent to KFN to webinars on NPD/WR-1: Overview of the Environmental Impact Statements and Chalk River Laboratories: Decommissioning and Demolishing Legacy Facilities on 2022 May 10 which included an opportunity for questions.
2022 May 20	Email from Kebaowek First Nation to CNL	KFN Legal Counsel KFN Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL to share the proposed Framework Agreement, to be discussed at the next meeting. KFN requested to postpone the 2022 May 24 meeting.
2022 May 20	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Councillor KFN Legal Counsel CNL Legal Counsel CNL Corporate Communications ERM Stakeholder Relations AECL	Email from CNL to Kebaowek First Nation to cancel the 2022 May 24 meeting due to scheduling conflicts.
2022 June 08	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Councillor KFN Legal Counsel CNL Legal Counsel CNL Corporate Communications ERM Stakeholder Relations AECL	Email from CNL to Kebaowek First Nation to share a draft agenda for the 2022 June 09 meeting. The agenda included: <ul style="list-style-type: none"> <li>• Opening and introductions</li> <li>• Reflections from KFN and CNL on the NSDF part 2 Hearing</li> <li>• Discussion on the draft Framework Agreement provided by KFN</li> <li>• Next steps – principles for engagement and alignment with Framework Agreement</li> </ul>

Date	Event / Activity	Involved Parties	Details
2022 June 08	Email from Kebaowek First Nation to CNL	KFN Consultant KFN Councillor KFN Legal Counsel CNL Legal Counsel CNL Corporate Communications ERM Stakeholder Relations AECL	Email from Kebaowek First Nation to CNL confirming KFN's legal counsel will be present at the 2022 June 09 meeting.
2022 July 07	Email from CNL to Kebaowek First Nation	KFN Councillor ERM Stakeholder Relations	Email sent from CNL to KFN regarding the Procedural Direction issued by the CNSC on 2022 July 05. CNL invited KFN to meet with CNL and share information, concerns or questions they may have with respect to the NSDF Project in addition to the Framework Agreement discussions being have already.
2022 July 08	Email from Kebaowek First Nation to CNL	KFN Councillor ERM Stakeholder Relations	Email sent from KFN to CNL welcoming the Procedural Direction from the Commission and looks forward to working with CNSC and CNL. KFN requested CNL add the Procedural Direction to the agenda at the next KFN, AECL, CNL meeting.
2022 June 09	Meeting between CNL and Kebaowek First Nation	KFN Consultant KFN Councillor KFN Legal Counsel CNL Legal Counsel ERM Stakeholder Relations AECL NSDF Project staff	Meeting between CNL and Kebaowek First Nation. CNL and KFN discussed the status of the relationship between CNL and KFN and work done by other proponents that could be used as a good example. CNL and KFN then discussed the draft framework agreement provided by KFN.

Date	Event / Activity	Involved Parties	Details
2022 July 13	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Councillor KFN Legal Counsel CNL Legal Counsel CNL Corporate Communications ERM Stakeholder Relations AECL	Email invitation sent to KFN for the 2022 July 14 meeting to discuss the CNSC Procedural Direction, a leadership meeting and priorities over the next six months.
2022 July 14	Meeting between KFN and CNL	KFN Consultant KFN Councillor KFN Legal Counsel KFN Cultural Coordinator AECL CNL Legal Counsel ERM Stakeholder Relations CNL Director, Corporate Communications NSDF Project staff NPD Closure Project staff	Meeting between KFN and CNL to discuss the CNSC Procedural Direction, discuss priorities over next 6 months and plan a leadership meeting.  CNL and KFN agreed to weekly meeting on the Framework Agreement.
2022 July 17	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Councillor ERM Stakeholder Relations	Email invitation to KFN to register and attend the Chalk River Open House on 2022 August 06.



Date	Event / Activity	Involved Parties	Details
2022 July 18	Email from Kebaowek First Nation to CNL	KFN Legal Counsel CNL Legal Counsel	Email from Kebaowek First Nation to CNL proposing a meeting regarding the Framework Agreement.
2022 July 18	Email from Kebaowek First Nation to CNL	KFN Legal Counsel CNL Legal Counsel	Email from CNL to Kebaowek First Nation confirming 2022 July 21 for a meeting.
2022 July 19	Letter from CNL to KFN	KFN Chief AECL ERM Stakeholder Relations	Letter emailed from CNL to KFN Chief proposing a meeting between KFN, CNL and AECL following the Procedural Direction issued by the CNSC.
2022 July 20	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Councillor KFN Legal Counsel ERM Stakeholder Relations CNL Legal Counsel	Email from CNL to Kebaowek First Nation requesting to move the 2022 July 28 meeting due to scheduling conflicts.
2022 July 20	Email from CNL to Kebaowek First Nation	KFN Legal Counsel CNL Director, Indigenous Relations CNL Legal Counsel	Email from CNL to Kebaowek First Nation sharing the agenda for the 2022 July 21 meeting.
2022 July 21	Meeting between CNL and Kebaowek First Nation	KFN Legal Counsel CNL Director, Indigenous Relations CNL Legal Counsel	Meeting between CNL and Kebaowek First Nation regarding the Framework Agreement.

Date	Event / Activity	Involved Parties	Details
2022 July 21	Email from Kebaowek First Nation to CNL	KFN Consultant KFN Councillor KFN Legal Counsel ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL confirming a date change for the next meeting from 2022 July 28 to 2022 July 26.
2022 July 25	Email from CNL to Kebaowek First Nation	KFN Chief KFN Consultant KFN Councillor KFN Legal Counsel CNL Legal Counsel AECL ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation sharing a revised draft of the Framework Agreement, for consideration in advance of the 2022 July 26 meeting.
2022 July 27	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Councillor KFN Legal Counsel CNL Legal Counsel AECL ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation rescheduling the upcoming meeting to 2022 July 29 due to a network outage in the area.

Date	Event / Activity	Involved Parties	Details
2022 July 29	Meeting between KFN and CNL	KFN Consultant KFN Councillor KFN Legal Counsel CNL Legal Counsel AECL ERM Stakeholder Relations NSDF Project Staff	Meeting between KFN and CNL to discuss the CNSC Procedural Direction, legal update on Framework Agreement, plan a leadership meeting.
2022 August 06	Canadian Nuclear Laboratories Open House	KFN Consultant KFN Chief	KFN attended the open house at the CRL site. The open house featured booths for each project and bus tours of the proposed NSDF site.
2022 August 08	Email from CNL to Kebaowek First Nation	KFN Chief KFN Consultant KFN Councillor KFN Legal Counsel AECL ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation to begin scheduling a leadership meeting for the end of September. CNL proposed dates and a draft agenda for KFN comments.

Date	Event / Activity	Involved Parties	Details
2022 August 09	Email from Kebaowek First Nation to CNL	KFN Chief KFN Consultant KFN Councillor KFN Legal Counsel AECL ERM Stakeholder Relations CNL Legal Counsel	Email from Kebaowek First Nation to CNL sharing KFN's revisions to the latest draft Framework Agreement.
2022 August 11	Meeting between KFN and CNL	KFN Consultant KFN Councillor KFN Legal Counsel AECL ERM Stakeholder Relations CNL Legal Counsel NSDF Project Staff	Meeting between KFN and CNL to discuss legal update on Framework Agreement, provide updates on an activities schedule and further plan a leadership meeting.
2022 August 18	Email from Kebaowek First Nation to CNL	KFN Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL to propose a leadership meeting for CNL, AECL and KFN to 2022 August 31 at Fitzpatrick Island.
2022 August 18	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation sharing the preliminary NSDF engagement schedule for review. CNL requested feedback at the next meeting and indicated that following acceptance, CNL will populate the budget associated with each activity.
2022 August 18	Email from Kebaowek First Nation to CNL	KFN Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL to provide comments on the preliminary NSDF engagement schedule.

Date	Event / Activity	Involved Parties	Details
2022 August 23	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation to accept the invitation at CNL leadership to Fitzpatrick Island on 2022 August 31.
2022 August 25	Email from Kebaowek First Nation to CNL	KFN Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL requesting studies. KFN requested site visits the first week of 2022 September for a waste separation storage discussion, walk down of the proposed NSDF site and a bat survey.
2022 August 26	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation to share an updated NSDF engagement schedule incorporating KFN input.
2022 August 26	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation to share documents and studies related to the NSDF Project, as per line item 7 of the engagement schedule.
2022 August 26	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation to share the Bat Telemetry Field Study: Forest Roost Use by Little Brown Bats ( <i>Myotis lucifugus</i> ) in Ontario, as per line 8 of the engagement schedule.
2022 August 29	Email from CNL to Kebaowek First Nation	KFN Consultant CNL Legal Counsel ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation to share copies of the applicable GoCo contracts, as per line 4 of the engagement schedule.
2022 August 30	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation in response to KFN's 2022 August 25 request for studies and site visits. CNL proposed dates for each visit and requested additional information about the request to conduct bat surveys.

Date	Event / Activity	Involved Parties	Details
2022 August 31	Meeting with KFN	KFN Chief KFN Councillor KFN Consultant KFN Legal Counsel CNL Legal Counsel CNL Leadership AECL Leadership ERM Stakeholder Relations	KFN Chief and Council hosted CNL leadership at Fitzpatrick Island.  This first leadership meeting was a valuable learning opportunity for CNL as well as an occasion to strengthen our relationship by breaking bread with no formal agenda to contend with. Commitments were made to work together to decrease gaps in views and create common understanding. Chief Haymond also extended an invitation for CNL and AECL leaders to come visit the KFN community.
2022 September 01	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation addressing line item 6 of the engagement schedule. CNL shared a list of upcoming CNL biodiversity activities. CNL request that KFN indicate which activities are of interest to participate in.
2022 September 07	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation to follow up on the Tuesday, 2022 August 30 email sent to coordinate site visits for the beginning of September.
2022 September 07	Email from Kebaowek First Nation to CNL	KFN Legal Counsel CNL Legal Counsel	Email from Kebaowek First Nation to CNL requesting CNL's changes or comments to the draft that KFN sent on 2022 August 09. KFN requested a copy before the planned 2022 September 08 meeting.
2022 September 07	Emails (2) between KFN and CNL	KFN Councillor KFN Legal Counsel CNL Legal Counsel ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL requesting the 2022 September 08 meeting be rescheduled due to a conflict.  CNL acknowledged and agreed to reschedule.

Date	Event / Activity	Involved Parties	Details
2022 September 07	Email from Kebaowek First Nation to CNL	KFN Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL providing dates for on-site field research as requested. KFN also provided an update on the waste sorting list of participants. KFN indicated that they would send CNL a work plan shortly. KFN ask a technical question about hibernaculum at CRL.
2022 September 08	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation rescheduling the monthly KFN, CNL and AECL. KFN confirmed the new meeting time.
2022 September 08	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation confirming dates for the on-site field research. CNL also proposed a tentative date for the tour of CRL, including the proposed NSDF site, waste characterization and sort and segregation facilities. CNL requested KFN confirm the date. CNL provided information about bats request 2022 September 07.
2022 September 08	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation providing more information related to the 2022 September 01 email sent. CNL confirmed the turtle trapping/tracking dates.
2022 September 09	Email from Kebaowek First Nation to CNL	KFN Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL acknowledging the dates for the on-site field research. KFN requested the shape file and baseline ecological data for the proposed NSDF site. KFN committed to following up about the bat study details at a later date.
2022 September 12	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation sending the shapefiles for NSDF Wildlife, Survey Locations and the NSDF Footprint.
2022 September 12	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation sharing that CNL will be sending the link to register for the on-site field research. CNL requested that each person attending register in advance.  CNL asked KFN to confirm 2022 September 15 for the tour of the CRL site.

Date	Event / Activity	Involved Parties	Details
2022 September 12	Phone call from CNL to KFN	KFN Consultant ERM Stakeholder Relations	CNL phoned KFN confirming details for the on-site field research, discussed a half day tour of the waste sort and segregation facility and planned a call with CNL's Biodiversity lead.
2022 September 12	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation sharing the link to register for the on-site field research. CNL also listed the required safety equipment needed.
2022 September 13	Email from Kebaowek First Nation to CNL	KFN Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL requesting shapefiles related to the NSDF site mapping. KFN asked about any fences on the site that might impact the on-site field research.
2022 September 13	Emails between CNL and KFN	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation stating that the requested shapefiles were sent on Monday, 2022 September 12. CNL request KFN confirm the number of people that would be attending the field research as well as the expected arrival time.  KFN confirmed receipt of the files and committed to having number for on-site field research at the upcoming meeting.
2022 September 13	Email from Kebaowek First Nation to CNL	KFN Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL requested CNL coordinate a meeting with CNL's Biodiversity lead to discuss bat research. KFN requested the meeting in advance of the 2022 September 16 on-site field research. CNL replied with a proposed time for a meeting.
2022 September 13	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation including a meeting invitation to discuss bat research.
2022 September 13	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation resending the 2022 September 12 email with the requested shapefiles. KFN confirmed receipt.



Date	Event / Activity	Involved Parties	Details
2022 September 13	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation requesting KFN confirmed 2022 September 15 for the waste tour.
2022 September 13	Email from Kebaowek First Nation to CNL	KFN Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL requesting the waste tour be moved to late October. CNL confirmed receipt.
2022 September 13	Email from CNL to Kebaowek First Nation	KFN Chief KFN Consultant KFN Councillor KFN Legal Counsel AECL ERM Stakeholder Relations CNL Legal Counsel	Email from CNL to Kebaowek First Nation sharing the revised draft of the Framework Agreement for review.
2022 September 13	Email from Kebaowek First Nation to CNL	KFN Legal Counsel CNL Legal Counsel	Email from Kebaowek First Nation to CNL requesting a Word version of the “compare” PDF of the Framework Agreement.  CNL sent the version requested.
2022 September 14	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation asking KFN to confirm the list of registered people for the on-site field research.
2022 September 14	Meeting between KFN and CNL	ERM Stakeholder Relations KFN Consultant KFN Consultant, FRI Ecological Services CNL, Acting Manager Natural Resource Management	Meeting between KFN and CNL to discuss bat research on site.

Date	Event / Activity	Involved Parties	Details
2022 September 15	Meeting between KFN and CNL	KFN Consultant KFN Councillor KFN Legal Counsel ERM Stakeholder Relations CNL, Director Corporate Communications CNL, Director of Indigenous Relations AECL CNL Legal Counsel	Meeting between KFN, AECL and CNL to discuss the NSDF engagement and activity schedule, the Framework Agreement and a leadership meeting. The meeting agenda included: <ul style="list-style-type: none"> <li>• NSDF engagement/activity schedule</li> <li>• Procedural direction 4.5-month window</li> <li>• Critical work (plan and budget)</li> <li>• Indigenous Engagement Report as a living document</li> <li>• Development of project commitments and CNL commitments</li> <li>• Framework agreement discussion</li> <li>• Leadership meeting dates</li> </ul>
2022 September 15	Email from Kebaowek First Nation to CNL	KFN Land Management ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL asking CNL to confirm if an individual had been registered for the on-site field research. CNL confirmed they had been.
2022 September 15	Email from CNL to Kebaowek First Nation	KFN Land Management KFN Consultant, FRI Ecological Services ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation sharing a series of layers and 11 documents requested at the 2022 September 14 meeting. CNL sent the larger files in a separate email via SFTP link.
2022 September 15	Email from Kebaowek First Nation to CNL	KFN Consultant, Firelight Group ERM Stakeholder Relations	Email from KFN Consultant to CNL sharing a change in staff who will be participating in the on-site field research. CNL confirmed that the change was possible.

Date	Event / Activity	Involved Parties	Details
2022 September 15	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Councillor KFN Legal Counsel ERM Stakeholder Relations CNL, Director Corporate Communications CNL, Director of Indigenous Relations AECL	Email from CNL to Kebaowek First Nation requesting the 2022 October 13 working group meeting date be moved due to conflicts.
2022 September 16	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Councillor KFN Legal Counsel ERM Stakeholder Relations CNL, Director Corporate Communications CNL, Director of Indigenous Relations CNL Legal Counsel AECL	<p>Email from CNL to Kebaowek First Nation to express gratitude to KFN for establishing a positive, collaborative working relationship. CNL expressed that it expects the relationship with KFN to extend well into the future but acknowledged that the parties must achieve some defined progress as part of the CNSC Procedural Direction.</p> <p>CNL wanted to ensure KFN has the information they need and capacity to conduct the activities needed to engage on and support the rights impact assessment for the NSDF Project.</p> <p>CNL explained that the NSDF Indigenous Engagement Report is a living document that can capture all engagement activities, progress, issues and commitments between CNL and KFN. This report will reflect the interests and concerns of KFN related to the NSDF and will define the commitments for ongoing work between the parties that will extend beyond the deadline included in the Procedural Direction.</p>

Date	Event / Activity	Involved Parties	Details
2022 September 16	Email from CNL to Kebaowek First Nation	ERM Stakeholder Relations KFN Consultant KFN Consultant, FRI Ecological Services	Email from CNL to Kebaowek First Nation Consultant to send the shapefile of the bat activity level of data collected in the NSDF footprint.
2022 September 16	On-site field research	KFN Consultant KFN community members CNL Environmental Staff	KFN was on site with CNL staff to conduct on-site field research. The group took part in a field tour of the CRL site biodiversity work. They also deployed acoustic bat recorders and carried out site inventory efforts within the NSDF footprint.
2022 September 19	Email from Kebaowek First Nation to CNL	ERM Stakeholder Relations KFN Consultant	Email from Kebaowek First Nation to CNL in response to CNL's 2022 September 16 email about the relationship. KFN thanked CNL for the email and hosting the technical team on site. KFN provided an update on the work plan, study and review costs.
2022 September 19	On-site field research	KFN Consultant KFN community members CNL Environmental Staff	KFN was on site with CNL staff to conduct on-site field research. The group carried out site inventory efforts within the NSDF footprint and CNL Environmental staff provided information on the biodiversity program by data and maps available in the Environmental Data Management System (EDMS).
2022 September 19	Email from CNL to Kebaowek First Nation	ERM Stakeholder Relations KFN Consultant	Email invitation sent to KFN to a webinar on Construction Sequencing Planning for the Proposed Near Surface Disposal Facility on 2022 September 28, which included an opportunity for questions.
2022 September 20	Emails (12) between KFN and CNL	ERM Stakeholder Relations KFN Consultant	Emails between KFN and CNL coordinating additional people attending the 2022 September 20 on-site field research.

Date	Event / Activity	Involved Parties	Details
2022 September 20	On-site field research	KFN Consultant KFN community members CNL Environmental Staff	KFN was on site with CNL staff to conduct on-site field research. The group carried out site inventory efforts within the NSDF footprint.
2022 September 22	Email from Kebaowek First Nation to CNL	CNL Legal Counsel ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL in response to the 2022 September 16 request to move the October working group meeting. CNL confirmed the date.
2022 September 23	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Councillor KFN Legal Counsel ERM Stakeholder Relations CNL, Director Corporate Communications CNL, Director of Indigenous Relations AECL	Email meeting invitation from CNL to KFN.
2022 September 28	Email from CNL to Kebaowek First Nation	ERM Stakeholder Relations KFN Consultant	Email from CNL to Kebaowek First Nation requesting an update on the NSDF work plan and schedule/budget related to the Procedural Direction. CNL offered support to complete the work.
2022 September 29	Email from Kebaowek First Nation to CNL	ERM Stakeholder Relations KFN Consultant	Email from Kebaowek First Nation to CNL stating that KFN will be finalizing costs related to the NSDF work plan and schedule/budget.  KFN requested support in the form of more on-site field research days in 2022 October and a tour of the waste sorting facility.

Date	Event / Activity	Involved Parties	Details
2022 September 29	Email from CNL to Kebaowek First Nation	KFN Legal Counsel CNL Legal Counsel	Email from CNL to Kebaowek First Nation following up on review of the draft Agreement. CNL offered a separate discussion from the larger group if needed.
2022 October 01	Email from CNL to Kebaowek First Nation	ERM Stakeholder Relations KFN Consultant	Email from CNL to Kebaowek First Nation to completed action items noted during the on-site field research at the NSDF site on 2022 September 16, 19 and 20. CNL sent eight documents and three images requested.
2022 October 01	Email from CNL to Kebaowek First Nation	ERM Stakeholder Relations KFN Consultant	Email from CNL to Kebaowek First Nation requesting KFN send additional dates for the completion of the ecological site survey and the number of people who will be attending. CNL also requested proposed dates for the waste sorting facilities tour and discussion.
2022 October 06	Emails between KFN and CNL	KFN Legal Counsel CNL Legal Counsel	Email from Kebaowek First Nation to CNL sharing the latest edits to the Framework Agreement. KFN requested a separate meeting 2022 October 11 to discuss the edits.  CNL proposed an alternative date to disc edits.
2022 October 07	Meeting between CNL and KFN	KFN Legal Counsel CNL Legal Counsel	Meeting between CNL and KFN to discuss the Framework Agreement.
2022 October 07	Emails between KFN and CNL	KFN Legal Counsel CNL Legal Counsel	Email from Kebaowek First Nation to CNL sharing the updated draft agreement.

Date	Event / Activity	Involved Parties	Details
2022 October 12	Meeting between KFN and CNL	KFN Consultant KFN Councillor KFN Legal Counsel ERM Stakeholder Relations CNL Legal Counsel CNL, Director Corporate Communications CNL, Director of Indigenous Relations AECL	Working group meeting between KFN and CNL to discuss any follow up from the on-site, NSDF engagement and activity schedule, the Framework Agreement, a leadership meeting, a tripartite meeting and Procedural Direction progress.  During the meeting CNL noted that to safely have KFN come to site CNL required 24 hour's notice, CNL vehicles were to be used and everyone should dress appropriately for the weather.
2022 October 12	Email from Kebaowek First Nation to CNL	ERM Stakeholder Relations KFN Legal Counsel	Email from KFN's Legal Counsel to CNL sending KFN's budget (Schedule B to the Framework Agreement).
2022 October 12	Email from Kebaowek First Nation to CNL	ERM Stakeholder Relations KFN Consultant	Email from Kebaowek First Nation to CNL responding to CNL's 2022 October 07 email about dates for the ecological site survey. KFN proposed dates and requested activities for the survey.  KFN also sent preferred dates for the tour of the waste sorting facility.
2022 October 14	Email from Kebaowek First Nation to CNL	ERM Stakeholder Relations KFN Consultant	Email from Kebaowek First Nation to CNL requesting 165 EIS references.
2022 October 14	Meeting between KFN and CNL	ERM Stakeholder Relations KFN Consultant	Meeting between KFN and CNL to discuss the activities requested during the upcoming ecological site survey.

Date	Event / Activity	Involved Parties	Details
2022 October 24	Email from CNL to Kebaowek First Nation	KFN Chief KFN Consultant KFN Councillor KFN Legal Counsel CNL Legal Counsel AECL ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation sharing the revised draft of the Framework Agreement for review. CNL offered to meet with KFN Legal Counsel to discuss the framework.
2022 October 25	Email from CNL to Kebaowek First Nation	ERM Stakeholder Relations KFN Consultant	Email from CNL to Kebaowek First Nation providing responses to KFN activity request for the upcoming ecological site survey. CNL proposed two days for the work.  CNL requested dates for the waste facility tour.
2022 October 25	Email from CNL to Kebaowek First Nation	ERM Stakeholder Relations KFN Councillor	Email from CNL to Kebaowek First Nation sending date options for a leadership meeting. CNL requested KFN vote on the date options. CNL later revised the dates based on availability.  KFN confirmed receipt.
2022 October 25	Email from CNL to Kebaowek First Nation	ERM Stakeholder Relations KFN Consultant	Email from CNL to Kebaowek First Nation providing many of the references requested 2022 October 14. CNL committed to sending the outstanding items as soon as possible.
2022 October 25	Email from Kebaowek First Nation to CNL	ERM Stakeholder Relations KFN Consultant	Email from Kebaowek First Nation to CNL in response to CNL's 2022 October 25 email related to the ecological site survey. KFN requested additional days to complete the survey.  KFN provided date options for the waste sorting facilities tour.



Date	Event / Activity	Involved Parties	Details
2022 October 26	Meeting between CNL and KFN	KFN Legal Counsel CNL Legal Counsel	Meeting between CNL and KFN to discuss the Framework Agreement.
2022 October 26	Email from CNL to Kebaowek First Nation	ERM Stakeholder Relations KFN Consultant	Email from CNL to Kebaowek First Nation sending CNL's comments on Schedule B for discussion at the 2022 October 27 working group meeting.
2022 October 26	Email from CNL to Kebaowek First Nation	CNL Legal Counsel KFN Consultant	Email from CNL to Kebaowek First Nation sending an updated Schedule B for discussion at the 2022 October 27 working group meeting.
2022 October 26	Email from CNL to Kebaowek First Nation	ERM Stakeholder Relations KFN Consultant	Email from CNL to Kebaowek First Nation requesting additional information for the waste sorting facilities tour.
2022 October 26	Email from CNL to Kebaowek First Nation	ERM Stakeholder Relations KFN Consultant	Email from CNL to Kebaowek First Nation in response to the 2022 October 26 ecological site survey email. CNL confirmed that it would provide support during the whole week for KFN and requested information to register participants. CNL proposed a path forward for each request, taking into account KFN's perspective on each request.
2022 October 26	Email from CNL to Kebaowek First Nation	ERM Stakeholder Relations KFN Consultant	Email from CNL to Kebaowek First Nation requesting confirmation of a date for the waste sorting facilities tour.

Date	Event / Activity	Involved Parties	Details
2022 October 27	Meeting between KFN and CNL	KFN Consultant KFN Councillor KFN Legal Counsel ERM Stakeholder Relations CNL Legal Counsel CNL, Director Corporate Communications CNL, Director of Indigenous Relations AECL	Working group meeting between KFN, AECL and CNL to discuss the ecological site survey, NSDF engagement and activity schedule, the Framework Agreement and a leadership meeting.
2022 October 31	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Councillor KFN Legal Counsel ERM Stakeholder Relations CNL Legal Counsel CNL, Director Corporate Communications CNL, Director of Indigenous Relations AECL	Email from CNL to Kebaowek First Nation sharing the revised draft of the Schedules to the Agreement and a revised draft of the Framework Agreement in clean and compare. CNL offered to coordinate a meeting to discuss if needed.
2022 November 01	Email from Kebaowek First Nation to CNL	KFN Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL providing information on who will be at the CRL site 2022 November 01 for on-site- work. KFN also requested the use of cell phones.

Date	Event / Activity	Involved Parties	Details
2022 November 01	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Councillor KFN Legal Counsel ERM Stakeholder Relations CNL Legal Counsel CNL, Director Corporate Communications CNL, Director of Indigenous Relations AECL	Email from CNL to Kebaowek First Nation proposing dates for the waste tour and discussion. Citing concerns about coming to site.
2022 November 01	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Councillor KFN Legal Counsel ERM Stakeholder Relations CNL Legal Counsel CNL, Director Corporate Communications CNL, Director of Indigenous Relations AECL	Email from CNL to Kebaowek First Nation regarding the Doodle Poll, used for selecting the leadership meeting dates.  KFN indicated that it was fine to close the poll if enough people had responded.

Date	Event / Activity	Involved Parties	Details
2022 November 01	Email from Kebaowek First Nation to CNL	KFN Consultant KFN Councillor KFN Legal Counsel ERM Stakeholder Relations CNL Legal Counsel CNL, Director Corporate Communications CNL, Director of Indigenous Relations AECL	Email from Kebaowek First Nation to CNL expressing concern with the waste tour and discussion. KFN asked for detailed radiation protection information and indicated that the tour would need to be postponed.
2022 November 01	On-site field research	KFN Consultant CNL Environmental staff	KFN was on site with CNL staff to conduct on-site field research. CNL staff and the KFN consultant walked the footprint of the NSDF to carry out site inventory work, which included recording forest composition and wildlife markings.
2022 November 02	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation to provide an update on the status of KFN's document request related to the NSDF EIS reference documents. CNL noted the outstanding documents.
2022 November 02	On-site field research	KFN Consultant KFN community members CNL Environmental staff	KFN was on site with CNL staff to conduct on-site field research. The work included a survey of the shore of Perch Lake to identify mammals such as beaver's dams and muskrat huts.
2022 November 03	On-site field research	KFN Consultant CNL Environmental staff	KFN was on site with CNL staff to conduct on-site field research. CNL staff and the KFN consultants walked the footprint of the NSDF to carry out site inventory work.

Date	Event / Activity	Involved Parties	Details
2022 November 03	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation to provide an update on the status of KFN's document request related to the NSDF EIS reference documents. CNL provided two additional documents.
2022 November 03	Email from Kebaowek First Nation to CNL	KFN Consultant ERM Stakeholder Relations KFN Legal Counsel	Email from Kebaowek First Nation to CNL requesting a list of EIS reference documents already updated and sent to KFN. KFN also requested assistance in downloading documents in PDF form.
2022 November 04	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation requesting confirmation of the plans for on-site activities the week of November 07-11, 2022.
2022 November 04	Email from KFN to CNL	KFN Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL providing details for the planned on-site activities for the week of November 07-11. KFN indicated interest in a bait drop 2022 November 08 at Pointe au Baptême.
2022 November 04	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation restating information provided 2022 October 25. CNL does not support baiting for the purpose of attracting wolves to support the collection of wolf scats for DNA analysis.  CNL provided alternative for the collection of wolf DNA samples.
2022 November 04	On-site field research	KFN Consultant CNL Environmental Staff	KFN was on site with CNL staff to conduct on-site field research. CNL staff and the KFN consultants walked the footprint of the NSDF to carry out site inventory work.
2022 November 05	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations KFN Legal Counsel	Email from CNL to Kebaowek First Nation sharing the updated version list of EIS reference documents KFN requested. CNL indicated the web link files and the SFTP site files and if the file is a Word document or a PDF.

Date	Event / Activity	Involved Parties	Details
2022 November 07	Email from Kebaowek First Nation to CNL	KFN Consultant ERM Stakeholder Relations KFN Legal Counsel	Email from Kebaowek First Nation to CNL indicating the issue with downloading the EIS reference documents was still occurring. KFN requested CNL upload the documents to a different location.
2022 November 07	Email from CNL to Kebaowek First Nation	KFN Chief KFN Councillor KFN Consultant CNL Director of Indigenous Relations ERM Stakeholder Relations KFN Legal Counsel	Email from CNL to Kebaowek First Nation Chief raising CNL's concern with respect to a carcass potentially being brought to the Chalk River Laboratories site in Chalk River on, 2022 November 08, without proper authority, or CNL's knowledge. CNL proposed alternative means to work together to collect wolf DNA.
2022 November 07	Meeting between CNL and KFN	KFN Legal Counsel CNL Legal Counsel	Meeting between CNL and KFN to discuss the Framework Agreement.
2022 November 07	On-site field research	KFN Consultant CNL Environmental staff	KFN was on site with CNL staff to conduct on-site field research. CNL staff and the KFN consultants walked the footprint of the NSDF to carry out site inventory work.
2022 November 08	Email from Kebaowek First Nation to CNL	KFN Chief KFN Councillor KFN Consultant CNL Director of Indigenous Relations ERM Stakeholder Relations KFN Legal Counsel	Email from Kebaowek First Nation to CNL responding to CNL's concerns related to bating at Pointe au Baptême. KFN's Consultant indicated approval from the Chief to proceed with baiting. KFN explained the rationale for conducting the work- supporting Indigenous led studies. KFN expressed interest in the possibility of on-site scat DNA sampling.

Date	Event / Activity	Involved Parties	Details
2022 November 08	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Councillor KFN Legal Counsel ERM Stakeholder Relations CNL Legal Counsel CNL, Director Corporate Communications CNL, Director of Indigenous Relations AECL	Email from CNL to Kebaowek First Nation requesting KFN complete the Doodle poll to plan the leadership meeting.  KFN agreed to pass along the request to complete.
2022 November 08	Email from CNL to Kebaowek First Nation	KFN Legal Counsel ERM Stakeholder Relations KFN Consultant	Email from CNL to Kebaowek First Nation indicating that as per KFN's request the EIS reference documents had been uploaded to OneDrive.  KFN confirmed receipt of the 96 files from CNL.
2022 November 08	Email from Kebaowek First Nation to CNL	KFN Legal Counsel ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL requesting a new poll to plan for the leadership meeting that included suggested times.
2022 November 08	On-site field research	KFN Consultant KFN community members CNL Environmental staff	KFN was on-site with CNL staff to conduct on-site field research. The work included walking the footprint of the NSDF to carry out site inventory work.

Date	Event / Activity	Involved Parties	Details
2022 November 09	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Councillor KFN Legal Counsel ERM Stakeholder Relations CNL Legal Counsel CNL, Director Corporate Communications CNL, Director of Indigenous Relations AECL	Email from CNL to Kebaowek First Nation in response to KFN's email on 2022 November 08 about live bating and developing a collaborative relationship. CNL suggested two alternatives for the collection for wolf DNA and stated that CNL is supportive of Indigenous-led studies and wants to continue to collaborate on these studies as part of our positive relationship building, and also to maintain safety and security of the Chalk River Laboratories site.  CNL addressed the fact that a bait drop had occurred by boat onto CNL property and trail cameras were placed without CNL's knowledge or consent. CNL referenced the occasions CNL staff stated that CNL does not support baiting (2022 October 25, and 2022 November 04, 2022). CNL, provided alternatives to KFN, whereby, CNL staff would join KFN representatives to walk the CRL site to find fresh wolf scat samples for study or CNL could offer KFN to use scat samples CNL had previously collected.
2022 November 09	Letter from CNL to KFN	KFN Consultant KFN Chief CNL, Vice president Corporate Affairs CNL, Director Corporate Communications CNL, Director of Indigenous Relations AECL	CNL sent KFN a formal letter regarding the actions that lead to a CNSC reportable event at the CRL site. CNL informed KFN that the reportable event is a result of the KFN field team accessing the CNL property without proper security clearance or a CNL escort, setting up trail cameras and placing a deer carcass within CNL property. CNL outlined the health, safety and security implications and asked that the deer remains, cameras and equipment be removed from CNL property immediately.  CNL expressed its commitment to working with KFN and thanked KFN for its continued cooperation.



Date	Event / Activity	Involved Parties	Details
2022 November 09	Telephone call from KFN to CNL	KFN Consultant CNL, Director of Indigenous Relations	KFN Consultant returned a call from CNL. KFN shared plans to conduct on-site activities on 2022 November 11. CNL provided a summary of the 2022 November 09 letter detailing the reportable event. CNL and KFN discussed the ownership and management of Pointe au Baptême.
2022 November 11	Meeting between KFN and CNL	KFN Consultant KFN Councillor KFN Legal Counsel ERM Stakeholder Relations CNL Legal Counsel CNL, Director Corporate Communications CNL, Director of Indigenous Relations AECL	Working group meeting between KFN, AECL and CNL to discuss the Reportable event resulting from accessing CNL's site, NSDF engagement and activity schedule, the Framework Agreement and a leadership meeting.  CNL shared that the site is a secure, nuclear site and highly regulated by the CNSC. When the KFN team came and dropped off the carcass they were within the property of CRL and that is a reportable event to the CNSC. KFN in turn explained that agreeing upon methodology had not occurred fully because of the tight deadlines. KFN respects the safety of the site and the staff aspect and also explained the importance of completing their work. Both parties agreed that better communication would help mitigate future reportable events.
2022 November 10	Emails from KFN to CNL	KFN Consultant KFN Field Team Email from CNL to Kebaowek First Nation	Email from Kebaowek First Nation to CNL providing the names of the KFN field team coming to the CRL site on 2022 November 11.  CNL acknowledged receipt.
2022 November 10	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Field Team ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation confirming plans for the 2022 November 11 on-site activities. The activities included retrieving the cameras and carcass.  KFN confirmed.

Date	Event / Activity	Involved Parties	Details
2022 November 11	On-site field research	KFN Consultant KFN community members CNL Environmental staff	KFN was on site with CNL staff to conduct on-site field research. The work focused on collaborative wolf survey efforts.
2022 November 14	On-site field research	KFN Consultant CNL Environmental staff	KFN was on site with CNL staff to conduct on-site field research. The work focused on collaborative wolf survey efforts.
2022 November 15	On-site field research	KFN Consultant CNL Environmental staff	KFN was on site with CNL staff to conduct on-site field research. The work focused on collaborative wolf survey efforts.
2022 November 16	On-site field research	KFN Consultant CNL Environmental staff	KFN was on site with CNL staff to conduct on-site field research. The work focused on collaborative wolf survey efforts.
2022 November 16	Email from CNL to Kebaowek First Nation	KFN Councillor ERM Stakeholder Relations	Email invitation sent to KFN to webinars on The Overview Decommissioning and Cleanup Plan and Whiteshell Laboratories: Past, Present & Future on 2022 November 22 which included an opportunity for questions.
2022 November 16	Emails from CNL to KFN	KFN Councillor ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation proposing new dates for a leadership meeting. CNL shared the date options via online survey.  KFN confirmed receipt of the dates and agreed to share with the appropriate people.
2022 November 16	Email from Kebaowek First Nation to CNL	KFN Legal Counsel CNL Legal Counsel	Email from Kebaowek First Nation to CNL sending a sample invoice for the purpose of funding under the Framework Agreement.

Date	Event / Activity	Involved Parties	Details
2022 November 16	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Chief CNL, Vice president Corporate Affairs CNL, Director Corporate Communications ERM Stakeholder Relations CNL, Director of Indigenous Relations AECL	Email from CNL to Kebaowek First Nation in response to KFN's 2022 November 01 email. CNL provided more information on the safety measures related to radiation protection CNL has in place to ensure the safety off all staff and visitors to the site.  CNL offered a meeting in advance of the tour to discuss radiation with a CNL Health Physicist.
2022 November 16	Email from Kebaowek First Nation to CNL	KFN Consultant KFN Chief CNL, Vice president Corporate Affairs ERM Stakeholder Relations CNL, Director Corporate Communications CNL, Director of Indigenous Relations AECL	Email from Kebaowek First Nation to CNL suggesting 2022 December 01 for the Waste Sorting Facilities tour and discussion.
2022 November 17	On-site field research	KFN Consultant CNL Environmental Staff	KFN was on site with CNL staff to conduct on-site field research. The work focused on collaborative wolf survey efforts.

Date	Event / Activity	Involved Parties	Details
2022 November 16	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Chief ERM Stakeholder Relations CNL, Director Corporate Communications CNL, Director of Indigenous Relations AECL	Email from CNL to Kebaowek First Nation confirming 2022 December 01 for the Waste Sorting Facilities tour and discussion. CNL asked for additional details regarding the tour.
2022 November 18	On-site field research	KFN Consultant CNL Environmental staff	KFN was on site with CNL staff to conduct on-site field research. The work focused on collaborative wolf survey efforts.
2022 November 18	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Chief KFN Legal Counsel ERM Stakeholder Relations CNL, Director Corporate Communications CNL, Director of Indigenous Relations AECL CNL Legal Counsel	Email from CNL to Kebaowek First Nation sharing the revised draft of the Framework Agreement as well as Schedules B and C to the Agreement.
2022 November 22	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation following up on the 2022 November 01 email asking for confirmation of the 2022 December 01 meeting and tour of Waste Facilities.

Date	Event / Activity	Involved Parties	Details
2022 November 23	Email from CNL to Kebaowek First Nation	KFN Consultant KFN Chief KFN Legal Counsel ERM Stakeholder Relations CNL, Director Corporate Communications CNL, Director of Indigenous Relations AECL CNL Legal Counsel	Email from CNL to Kebaowek First Nation to follow up on the status of the KFN review of the revised draft of the Framework Agreement as well as Schedules B and C to the Agreement shared 2022 November 17. CNL offered to coordinate a separate meeting before the 2022 December 08 working group meeting.
2022 November 24	Email from Kebaowek First Nation to CNL	KFN Legal Counsel CNL Legal Counsel	Email from Kebaowek First Nation to CNL providing comments on the Framework Agreement as well as Schedules B and C.
2022 November 24	Email from CNL to Kebaowek First Nation	KFN Legal Counsel CNL Legal Counsel	Email from CNL to Kebaowek First Nation confirming receipt of the comments on the Framework Agreement as well as Schedules B and C.
2022 November 24	Email from CNL to Kebaowek First Nation	KFN Councillor ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation sharing that the results of the poll indicate the preferred date for the leadership meeting in KFN is 2022 December 15. CNL asked who to work with to confirm the invitation list as well as logistics for the meeting. CNL suggested signing the Framework Agreement at the same meeting.
2022 November 25	Email from Kebaowek First Nation to CNL	KFN Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL informing CNL that Kitigan Zibi Anishinabeg would also like to participate in the meeting and tour of the Waste Sorting Facilities. KFN to provide alternative dates to CNL.

Date	Event / Activity	Involved Parties	Details
2022 November 25	Email from Kebaowek First Nation to CNL	KFN Councillor ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL providing the administrative contact to work with to plan the leadership meeting.
2022 November 27	Email from Kebaowek First Nation to CNL	KFN Consultant ERM Stakeholder Relations AECL	Email from Kebaowek First Nation to CNL asking for clarification on who is attending the leadership meeting. KFN noted the change from 2022 December 15 to the 2022 December 16, and reminded CNL that the band office closes at noon.
2022 November 28	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations AECL	Email from CNL to Kebaowek First Nation confirming the correct contact for the leadership meeting, scheduled for 2022 December 16.
2022 November 28	Email from CNL to Kebaowek First Nation	KFN Councillors ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation advising of an upcoming CNL supply chain event in Pembroke and provided a flyer with details.
2022 November 28	Email from CNL to Kebaowek First Nation	KFN Legal Counsel CNL Legal Counsel	Email from CNL to Kebaowek First Nation noting the correct contact information and confirming the upcoming meeting on 2022 December 16.
2022 November 29	Email from CNL to Kebaowek First Nation	KFN Legal Counsel CNL Legal Counsel	Email from CNL to Kebaowek First Nation requesting a phone call to discuss comments on the Framework Agreement as well as Schedules B and C.
2022 November 29	Phone call from CNL to KFN	KFN Legal Counsel CNL Legal Counsel	CNL telephoned KFN to discuss comments on the Framework Agreement as well as Schedules B and C.
2022 November 30	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation requesting an update on a date for the Waste Facility tour.

Date	Event / Activity	Involved Parties	Details
2022 November 30	Emails from KFN to CNL	KFN Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL informing CNL that no date with Kitigan Zibi Anishinabeg had been selected for the Waste Facility Tour. KFN proposed the week of 2022 December 12.  CNL confirmed receipt.
2022 November 30	Email from CNL to Kebaowek First Nation	KFN Administrative Assistant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation offering assistance with the KFN/CNL/AECL leadership meeting logistics. CNL asked a few preliminary questions.
2022 December 01	Emails between KFN and CNL	KFN Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL confirming that KFN and Kitigan Zibi Anishinabeg are available to visit the CRL site for the Waste Tour and discussion 2022 December 16 at 1:00 p.m.  CNL confirmed receipt and requested a list of attendees.
2022 December 02	Emails between KFN and CNL	KFN Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL providing a list of attendees for the 2022 December 16 Waste Tour and Discussion.  CNL confirmed receipt and noted an agenda would be shared next week.
2022 December 05	Email from Kebaowek First Nation to CNL	KFN Consultant ERM Stakeholder Relations AECL	Email from Kebaowek First Nation to CNL sharing that 2022 December 16 leadership meeting was set for 10:00 a.m. or 11:00 a.m.  CNL confirmed that 11:00 a.m. works for both CNL and AECL.
2022 December 05	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations AECL	Email from CNL to Kebaowek First Nation confirming that 11:00 a.m. works for both CNL and AECL for the 2022 December 16 leadership meeting.  CNL asked KFN to confirm if the intent is to sign the Framework Agreement on this date.

Date	Event / Activity	Involved Parties	Details
2022 December 05	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation providing the registration link for the 2022 December 15 Waste Tour and discussion. CNL shared the other tour requirements.
2022 December 06	Phone call from CNL to KFN	ERM Stakeholder Relations KFN Councillor	CNL phoned KFN to confirm logistics for the 2022 December 16 leadership meeting.
2022 December 06	Emails between CNL to KFN	ERM Stakeholder Relations KFN Councillor	Email from CNL to Kebaowek First Nation asking who will be attending the 2022 December 16 leadership meeting.  KFN provided a list of participants for the meeting.
2022 December 07	Emails between CNL and KFN	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation asking for an address for the 2022 December 16 leadership meeting.  KFN provided the address of the meeting.
2022 December 07	Email from CNL to Kebaowek First Nation	KFN Chief KFN Consultant KFN Councillor KFN Legal Counsel ERM Stakeholder Relations CNL Legal Counsel CNL, Director Corporate Communications CNL, Director of Indigenous Relations AECL	CNL sent the proposed agenda for the 2022 December 08 working group meeting.  Proposed agenda: <ul style="list-style-type: none"> <li>• Land acknowledgement</li> <li>• Opening / introductions</li> <li>• Framework Agreement</li> <li>• Leadership Meeting Logistics</li> <li>• Waste Management Tour Logistics</li> <li>• Extension letter sent by KFN to CNSC re date to submit response to Procedural Direction</li> </ul>



Date	Event / Activity	Involved Parties	Details
2022 December 07	Email from CNL to Kebaowek First Nation	KFN Legal Counsel CNL Legal Counsel	Email from CNL to Kebaowek First Nation legal counsel sharing the Framework Agreement, Engagement Schedule and CNL's proposal to address the outstanding points. CNL offered a meeting separate of the working group meeting to discuss the drafts.
2022 December 08	Meeting between CNL and Kebaowek First Nation	KFN Consultant KFN Councillor KFN Legal Counsel ERM Stakeholder Relations CNL, NSDF CNL Legal Counsel CNL, Director of Indigenous Relations	Working group meeting between KFN, AECL and CNL. CNL and KFN discussed the Framework Agreement, specifically the budget. Logistics for the leadership meeting and Waste Management Tour were discussed and agreed upon.  CNL confirmed receipt of KFN's Extension letter from KFN legal counsel. KFN informed CNL that more on-site work is needed during the winter of 2023. CNL offered to assist in any way possible to facilitate the work.
2022 December 08	Email from Kebaowek First Nation to CNL	KFN Legal Counsel CNL Legal Counsel	Email from Kebaowek First Nation to CNL requesting a call to finalize any outstanding issues with the Framework Agreement.  CNL provided date and time options for a discussion.
2022 December 08	Meeting between CNL and Kebaowek First Nation	KFN Legal Counsel CNL Legal Counsel	Meeting between CNL and KFN legal counsels to discuss outstanding issues in the Framework Agreement.
2022 December 08	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation sharing the proposed agenda for the waste facilities tour. CNL requested KFN to advise of any changes needed.

Date	Event / Activity	Involved Parties	Details
2022 December 09	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations KFN Legal Counsel	Email from CNL to Kebaowek First Nation sending the last of the outstanding documents from the EIS reference document request.  CNL noted that one document request was from a conference, CNL shared the abstract.
2022 December 12	Email from Kebaowek First Nation to CNL	KFN Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL asking for boot covers for the Waste Facility tour.  CNL replied that there were none available.
2022 December 12	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation reminding KFN that anyone planning to attend the tour needed to register by the end of the day.
2022 December 12	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation confirming two individuals for the Waste Facility tour.  KFN confirmed they were to be included on the list.
2022 December 12	Emails between Kebaowek First Nation and CNL	KFN Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL requesting CNL to register a participant for the Waste Facility tour.  CNL confirmed and requested an updated list of attendees.  KFN confirmed that there could be other participants for the tour and that KFN would confirm with CNL on Thursday.
2022 December 12	Email from Kebaowek First Nation to CNL	Kebaowek First Nation legal counsel  CNL legal counsel	Email from Kebaowek First Nation to CNL sharing information to be added as Schedule A to the framework agreement.

Date	Event / Activity	Involved Parties	Details
2022 December 12	Email from CNL to Kebaowek First Nation	Kebaowek First Nation legal counsel CNL legal counsel	Email from CNL to Kebaowek First Nation sent the updated Agreement. CNL proposed that if no further edits were need CNL would prepare the execution version for execution at the 2022 December 15meeting.
2022 December 13	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Councillor ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation regarding a joint press release and/or photo permissions for the signing of the framework agreement.  KFN requested that there would be no joint press release or photos.
2022 December 14	Email from Kebaowek First Nation to CNL	KFN Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL requesting to cancel Friday's (December 16) waste tour due to the predicted snowstorm and reschedule the tour for the new year.  CNL confirmed.
2022 December 15	Leadership meeting between Kebaowek First Nation and CNL	Kebaowek First Nation Chief Kebaowek First Nation Councillor KFN Consultant CNL President and CEO AECL President and CEO CNL Director of Indigenous Relations ERM Manager of Stakeholder Relations	The AECL and CNL Senior Leadership met with the Chief of KFN in person at KFN's band office to continue the discussion on KFN's request to extend the submission date for the Procedural Direction.  At KFN's request, signing of the Framework Agreement was to be postponed until at least the new year in light of the CNSC held Case Conference.

Date	Event / Activity	Involved Parties	Details
2022 December 15	Letter from CNL to CSNC	Kebaowek First Nation Chief Kitigan Zibi Anishinabeg Chief CNL President and CEO AECL President and CEO CNSC	CNL sent a letter to the CNSC Commission confirming that AECL and CNL support KFN's request to extend the submission date to 2023 April 30, and support KFN's intent to request an oral hearing.
2022 December 21	Letter from Kebaowek First Nation to CNL	Kebaowek First Nation Chief KFN Consultant CNL, Vice President Corporate Affairs	Letter from KFN to CNL in response to the 2022 November 09 formal letter regarding actions that lead to a CNSC reportable event at the CRL site. In the response KFN shared information about Indigenous-led work methodologies and how it can be used to conduct KFN's Rights Impact Assessment and on-site activities.
2023 January 09	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation to follow up on new dates for the waste tour.
2023 January 09	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation to follow up on new dates for the waste tour.
2023 January 09	Email from Kebaowek First Nation to CNL	KFN Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL sharing that no date had been selected yet for the waste tour.  CNL confirmed receipt.
2023 January 11	Email from Kebaowek First Nation to CNL	Kebaowek First Nation legal counsel CNL legal counsel	Email from Kebaowek First Nation to CNL informing CNL that KFN was ready to sign the Framework Agreement.  CNL confirmed receipt.

Date	Event / Activity	Involved Parties	Details
2023 January 12	Meeting between CNL and Kebaowek First Nation	<p>Kebaowek First Nation Consultant</p> <p>Kebaowek First Nation Councillor</p> <p>Kebaowek First Nation Legal Counsel</p> <p>ERM Stakeholder Relations</p> <p>CNL, NSDF</p> <p>CNL Legal Counsel</p> <p>CNL, Director of Indigenous Relations</p> <p>AECL</p>	<p>Working group meeting between Kebaowek First Nation, AECL and CNL. CNL and Kebaowek First Nation discussed the Procedural Direction update, the Framework Agreement updates, and KFN's 2022 December 21 letter. CNL listened to KFN's explanation of the main points from the letter and thanked KFN for sharing more information.</p> <p>CNL and KFN both expressed positive thoughts about the 2022 December 15 leadership meeting.</p> <p>CNL requested KFN send any invoices to date.</p>
2023 January 12	Meeting between CNL and Kebaowek First Nation	<p>Kebaowek First Nation legal counsel</p> <p>CNL legal counsel</p>	CNL and KFN legal counsel meeting virtually to discuss updates to the Framework Agreement.
2023 January 12	Email from CNL to Kebaowek First Nation	<p>Kebaowek First Nation legal counsel</p> <p>CNL legal counsel</p>	Email from CNL to Kebaowek First Nation sharing the updated Framework Agreement. CNL noted two items to finalize before the signing.
2023 January 12	Email from Kebaowek First Nation to CNL	<p>Kebaowek First Nation legal counsel</p> <p>CNL legal counsel</p>	<p>Email from Kebaowek First Nation to CNL accepting the proposed changed to the Framework Agreement.</p> <p>CNL confirmed receipt.</p>

Date	Event / Activity	Involved Parties	Details
2023 January 12	Framework Agreement Signing	Kebaowek First Nation Chief AECL President and CEO CNL, Director of Indigenous Relations	CNL and KFN leadership signed the Framework Agreement at AECL's Ottawa, ON office.  During the meeting KFN and CNL discussed the relationship and KFN's methodology for on-site activities.
2023 January 16	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation requesting meeting date options for a meeting with CNL's Environmental Protection team.
2023 January 16	Email from Kebaowek First Nation to CNL	KFN Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL providing two date options for the meeting with CNL's Environmental Protection team.  CNL and KFN confirmed the meeting would be virtual.
2023 January 16	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations  CNL, Section Head Natural Resource Management	Email invitation to a virtual meeting.
2023 January 18	Emails between CNL and Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Emails between CNL and Kebaowek First Nation to reschedule the meeting with CNL's Environmental Protection team.

Date	Event / Activity	Involved Parties	Details
2023 January 18	Email from CNL and Kebaowek First Nation	<p>Kebaowek First Nation Chief</p> <p>Kebaowek First Nation Councillor</p> <p>KFN Consultant</p> <p>CNL President and CEO</p> <p>AECL President and CEO</p> <p>AECL Vice president Corporate Affairs</p> <p>CNL Director of Indigenous Relations</p> <p>ERM Manager of Stakeholder Relations</p>	Email from CNL to Kebaowek First Nation sharing the executed Framework Agreement.
2023 January 20	Meeting between CNL and Kebaowek First Nation	<p>KFN Consultant</p> <p>ERM Stakeholder Relations</p> <p>CNL, NSDF</p> <p>CNL, Director of Indigenous Relations</p> <p>CNL, Natural Resource Management</p>	<p>Meeting between Kebaowek First Nation and CNL. CNL and Kebaowek First Nation discussed upcoming field requirements and methodology for sampling wolf DNA. CNL and KFN discussed the use of trail cameras on site.</p> <p>CNL confirmed that KFN would like 10-15 more cameras on the footprint and will be supplying the real time cameras (pending a check with CNL security). CNL will supplement with existing inventory. CNL and KFN agreed to share some existing images from trail cameras.</p> <p>KFN shared the cultural and tradition importance of Eastern Wolves and that they want to verify the purity of the pack. KFN stated their preference to bait rather than using scat samples. CNL again stated its position on baiting.</p> <p>KFN emailed information related to trail cameras.</p>

Date	Event / Activity	Involved Parties	Details
2023 January 20	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation sharing the meeting notes from the 2023 January 20 meeting.
2023 January 24	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation asking if a date for the waste tour has been selected yet.
2023 January 24	Email from Kebaowek First Nation to CNL	KFN Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL sharing that no date had been selected on for the waste tour. KFN asked if CNL Security had approved the use of trail cameras for use the next week.  CNL requested a call to discuss.
2023 January 24	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation requesting KFN to provide a work plan for on-site activities. CNL also asked for information related to who will be conducting the work.
2023 January 24	Email from Kebaowek First Nation to CNL	KFN Consultant Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL sent the product information for trail cameras. KFN requested CNL follow up with a KFN consultant for the requested work plan.  CNL followed up with the KFN Consultant for require on-site work information.
2023 January 24	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation Consultant requesting a phone call to discuss the use of trail cameras.
2023 January 24	Email from Kebaowek First Nation to CNL	KFN Consultant Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL providing the work plan for the on-site activities.  CNL confirmed receipt.



Date	Event / Activity	Involved Parties	Details
2023 January 26	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation Consultant requesting a phone call to discuss trail cameras.
2023 January 26	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation asking for details for the on-site activities.
2023 January 26	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation advising that the software component for the stealth camera proposed to be used will require approval for CNL, which may take longer than the time available. CNL proposed an alternative solution to use CNL's existing real-time cameras and share information with KFN, as these are already approved, as well as for CNL to purchase additional cameras to support KFN's field work. CNL further offered to move or place cameras KFN's desired locations and that they can be checked daily to secure the information for KFN.
2023 January 26	Telephone call between CNL and Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	CNL telephoned the Kebaowek First Nation Consultant to determine game camera capabilities. Learning that the camera required an app CNL committed to follow-up on the outcome of internal discussion related to use of this type of camera.
2023 January 27	Telephone call between CNL and Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	CNL telephoned the Kebaowek First Nation Consultant to provide a summary of the internal discussion about the use of the trail cameras.
2023 January 28	Email from Kebaowek First Nation to CNL	KFN Consultant Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL stating that CNL's 2023 January 26 proposal was not in line with KFN's methodology for winter wildlife survey. KFN put the on-site activities in hold until the issue was resolved with the Chief.

Date	Event / Activity	Involved Parties	Details
2023 January 29	Email from Kebaowek First Nation to CNL	KFN Consultant Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL sharing that the work plan had changed and KFN would not be coming to site the next day 2023 January 30.  CNL confirmed receipt.
2023 January 30	Email from CNL to Kebaowek First Nation	KFN Consultant Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation sent modelling maps of moose and deer winter habitats, deer browse, as well as NSDF forest inventory polygons and wildlife habitats via an FTP.  KFN confirmed receipt and requested that new email subject be used to avoid confusion.
2023 January 31	Email from CNL to Kebaowek First Nation	KFN Consultant Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation provided clear instructions on the purchase and use of real-time trail cameras at the CRL site. CNL proposed purchasing 15 real-time trail cameras for KFN use at the CRL site, these cameras will only have the ability to capture still photographs (no video or sound).  CNL confirmed that KFN could install the cameras with a member of the security team and environmental protection team at the CRL site.  CNL noted that the notifications of images would be going to both CNL and KFN simultaneously, the photos cannot be disclosed publicly, except in connection with disclosure to the CNSC, and notwithstanding that, CNL reserve the right to label certain photos and data as not for disclosure.  While the cameras are being shipped CNL has more than 10 trail-cams (memory card photos) that could be set-up in the field immediately, with KFN advising on preferred locations.  CNL requested KFN confirmed this approach.

Date	Event / Activity	Involved Parties	Details
2023 February 01	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation requesting to move the 2023 February 09 meeting due to scheduling conflicts.
2023 February 01	Email from Kebaowek First Nation to CNL	KFN Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL asking for rational as to why CNL needs to purchase the trail cameras. KFN requested to bring their own security approved cameras.
2023 February 01	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation stating that CNL would like to purchase the cameras in order to ensure capabilities of the camera align with CNL's security requirements. CNL would be ordering 15 cameras to facilitate KFN's studies.  CNL asked KFN to confirm if they would be coming to site for on-site activities the following week.
2023 February 01	Email from Kebaowek First Nation to CNL	KFN Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL confirming it was okay for CNL to purchase the trail cameras as proposed.  KFN confirmed coming to the CRL site 2023 February 07.  CNL confirmed and ordered the cameras.
2023 February 02	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation requesting to keep the 2023 February 09 meeting date.
2023 February 02	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation sharing wolf rendezvous pictures via FTP link.

Date	Event / Activity	Involved Parties	Details
2023 February 02	Email from Kebaowek First Nation to CNL	KFN Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL requesting the GPS locations of the wolf rendezvous cameras, the recent kill site GPS location and previous location where wolves were alerting staff not to enter.  KFN also shared that they had been advised that no permit required Federally or Provincially was required for baiting and requested to proceed with that on-site activity.
2023 February 02	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation sent the requested GPS locations.
2023 February 02	Email from CNL to Kebaowek First Nation	KFN Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation stating that CNL is not in alignment with KFN baiting methodology. CNL proposed using the trail cameras and walk downs to collect the DNA required for sampling.
2023 February 02	Email from Kebaowek First Nation to CNL	KFN Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL requesting that a methodology for baiting be agreed to fulfil the EA requirements on baseline information on wolf species at risk. KFN shared an environmental review on the NSDF EIS by Dr. Lauren Gallant at Carleton University commissioned by the AANTC in 2021, which was not previously provided to CNL by the AANTC.  KFN explained the importance of the Indigenous knowledge-led field-proven surveys and methodologies to expedite the DNA collection to determine if in fact there is an Eastern wolf population on the CNL site.  KFN referenced Brent Patterson's recommendations (scientific paper) on the best approaches to collecting wolf DNA. KFN also stated that no permitting would be required for the work.  KFN requested access to the kill site on CNL beginning 2023 February 08 for baiting.

Date	Event / Activity	Involved Parties	Details
2023 February 03	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation requesting contact information for KFN representation coming to the CRL the following week.
2023 February 02	Email from Kebaowek First Nation to CNL	KFN Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL providing the contact information for the KFN representatives who will be on the CRL site 2023 February 07 and 08.
2023 February 02	Emails between Kebaowek First Nation and CNL	KFN Consultant Kebaowek First Nation Representatives ERM Stakeholder Relations	Emails between CNL and Kebaowek First Nation requesting contact information and coordinating logistics for coming onto the CRL site.
2023 February 03	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL requesting access to the pileated woodpecker nesting tree data.
2023 February 06	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation providing the requested pileated woodpecker nesting tree data.
2023 February 07	On-site activities	Kebaowek First Nation Representatives CNL Natural Resource Management	Pileated woodpecker nesting tree data collection with five KFN representatives.
2023 February 08	On-site activities	Kebaowek First Nation Representatives CNL Natural Resource Management	Pileated woodpecker nesting tree data collection with five KFN representatives.

Date	Event / Activity	Involved Parties	Details
2023 February 08	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Councillor ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL requesting confirmation on the 2023 February 02.  CNL confirmed the meeting date.
2023 February 08	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation providing the requested pileated woodpecker nesting tree data.
2023 February 08	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation sharing trail camera pictures and camera locations. These cameras were deployed in the fall of 2022.
2023 February 08	Emails between Kebaowek First Nation and CNL	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL requesting the establishment of protocol for camera trap photo recovery /cards/ battery swaps/ camera installations.  CNL confirmed this as an agenda item for 2023 February 09.
2023 February 08	Emails between Kebaowek First Nation and CNL	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL expressing concern with CNL having downloaded images from KFN cameras. KFN's concern is the reliability of data.  KFN also requested the images sent February 08th to be resent.  CNL confirmed this would be an agenda item at the meeting 2023 February 09.

Date	Event / Activity	Involved Parties	Details
2023 February 09	Meeting between CNL and Kebaowek First Nation	<p>Kebaowek First Nation Chief</p> <p>Kebaowek First Nation Councillor</p> <p>Kebaowek First Nation Consultant</p> <p>Kebaowek First Nation Legal Counsel</p> <p>AECL Vice president Corporate Affairs</p> <p>ERM Manager of Stakeholder Relations</p> <p>CNL Legal Counsel</p>	<p>Working group meeting between Kebaowek First Nation, AECL and CNL. The parties discussed the framework agreement, invoicing, NSDF engagement schedule, Dr. Gallant paper and provided an update on the NPD Closure Project.</p> <p>During the meeting CNL and KFN agreed on the importance of a data sharing protocol to maintain results of the on-site activities. CNL offered to prepare the first draft.</p> <p>KFN expressed their interest, again, in baiting on site. CNL shared that the decision was with the CNL executive team. The KFN Chief expressed interest in a collaborative relationship and the impact the baiting decision might have on the relationship.</p> <p>During the meeting CNL asked again about a Waste Tour. KFN expressed concern about the safety during a tour. CNL took actions related to ensuring KFN's safety during the tour- including providing information beforehand.</p>
2023 February 09	Email from CNL to Kebaowek First Nation	<p>Kebaowek First Nation Consultant</p> <p>ERM Stakeholder Relations</p>	Email from CNL to Kebaowek First Nation re-sharing the game camera images via Zilla File.
2023 February 09	Email from CNL to Kebaowek First Nation	<p>Kebaowek First Nation Consultant</p> <p>Kebaowek First Nation Representatives</p> <p>ERM Stakeholder Relations</p>	Email from CNL to Kebaowek First Nation regarding 2023 February 08, fieldwork.

Date	Event / Activity	Involved Parties	Details
2023 February 09	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation to follow-up on action items from the 2023 February 09 meeting. CNL sent the Information Request from 2020 October and CNL's responses to Dr. Gallants Draft EIS comments and the NSDF press kit. CNL also offered to provide KFN high resolution images from the EIS for a community brochure.
2023 February 09	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Representative ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation requesting the location of a TLD used on site.
2023 February 10	Emails between Kebaowek First Nation and CNL	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL providing the list of representatives for 2023 February 13 on-site work.  CNL confirmed receipt.
2023 February 10	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL requesting an update on the cameras ordered.  KFN requested a data sharing protocol in advance of deployment, expressing concern that the cameras already deployed were accessed without KFN consent.  KFN addressed safety concerns CNL has with baiting. KFN shared their stance on permitting need.
2023 February 10	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation sharing that the cameras are expected to arrive on site 2023 February 14.  CNL also shared that KFN's request to bait was with the executive level for a decision.



Date	Event / Activity	Involved Parties	Details
2023 February 13	On-site activities	Kebaowek First Nation Representatives  CNL Natural Resource Management	Bird study fieldwork with two KFN representatives.
2023 February 13	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant  ERM Stakeholder Relations  CNL Natural Resource Management	Email from CNL to Kebaowek First Nation inviting KFN to participate in the third edition of the Ontario Breeding Bird Atlas (OBBA) owl survey.
2023 February 13	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant  ERM Stakeholder Relations  CNL Natural Resource Management	Email from Kebaowek First Nation to CNL expressing interest in the owl survey and requested installing acoustic recorders in the NSDF footprint.
2023 February 13	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant  ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL requesting site access 2023 February 14 to configure the cameras with CNL's Natural Resource Management members before deploying the cameras.
2023 February 14	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant  ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation requesting 24-hour notice of who will be accessing site to deploy the camera. CNL asked for dates for that work.

Date	Event / Activity	Involved Parties	Details
2023 February 14	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations CNL Natural Resource Management	Email from CNL to Kebaowek First Nation providing additional information on the owl study and deploying Automatic Recorder Units (ARUs) in the NSDF footprint for the collection of owl calls. CNL requested KFN's desired recording program to setup prior to deployment.
2023 February 14	On-site activities	Kebaowek First Nation Representatives CNL Natural Resource Management	Kebaowek First Nation Representatives and CNL spent time learning how to use the cameras to be deployed.
2023 February 15	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL sharing comments related to the proposed owl study.
2023 February 16	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Legal Counsel CNL Legal Counsel ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL sending the names of the representatives to the Management Forum under the Framework Agreement.  CNL confirmed receipt.
2023 February 16	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant CNL Legal Counsel ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation sharing the draft information sharing protocol for review and comment.

Date	Event / Activity	Involved Parties	Details
2023 February 16	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations CNL Natural Resource Management	Email from CNL to Kebaowek First Nation related to ARUs within the NSDF footprint. CNL asked KFN to clarify a few points to help plan for the work.
2023 February 17	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Legal Counsel ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL requesting site access 2023 February 21 to deploy the new trail cameras. CNL confirmed.
2023 February 17	Email from CNL to Kebaowek First Nation	ERM Stakeholder Relations Kebaowek First Nation Representative	Email from CNL to Kebaowek First Nation following-up on the 2023 February 9 email related to the location of a TLD.
2023 February 21	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL requesting assistance to join the 2023 February 21 webinars. CNL provided assistance.
2023 February 21	Webinar	Kebaowek First Nation Consultant ERM Stakeholder Relations	Kebaowek First Nation attended the 2023 February 21 ERM bi-monthly webinars. The topics were: <ul style="list-style-type: none"> <li>• CNL's Integrate Waste Strategy: NSDF as a Key Enabling Facility</li> <li>• Decommissioning of Building 250 at Chalk River Laboratories</li> <li>• Nuclear Power Demonstration (NPD) Closure Project: Changes to the EIS Resulting from Feedback</li> </ul>

Date	Event / Activity	Involved Parties	Details
2023 February 21	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Chief Kebaowek First Nation Councillor Kebaowek First Nation Legal Counsel Kebaowek First Nation Consultant CNL Legal Counsel ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation requesting a status update on KFN's review of the data sharing protocol.
2023 February 21	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant CNL Legal Counsel  ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL confirming that KFN is still reviewing the data sharing protocol. KFN requested the agreement take into account Indigenous models for data sovereignty. KFN referenced some models and examples.  Kebaowek First Nation noted the legal teams will need to work together, and possibly Kitigan Zibi Anishinabeg.
2023 February 21	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL requesting site access for on-site work on 2023 February 22.  CNL confirmed.
2023 February 21	On-site activities	Kebaowek First Nation Representatives CNL Natural Resource Management	Kebaowek First Nation representatives and CNL deployed the trail cameras at CRL locations selected by KFN.

Date	Event / Activity	Involved Parties	Details
2023 February 21	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Legal Counsel CNL Legal Counsel	Email from CNL to Kebaowek First Nation legal counsel requesting a call to discuss the data sharing protocol.
2023 February 22	On-site activities	Kebaowek First Nation Representatives CNL Natural Resource Management	Kebaowek First Nation representatives and CNL deployed the trail cameras at CRL locations selected by KFN.
2023 February 27	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant CNL Natural Resource Management	Email from CNL to Kebaowek First Nation sharing wolf photos taken at the 'Twin Lakes eco-passage'.
2023 February 27	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant CNL Natural Resource Management ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL thanking CNL for sharing the wolf pictures. KFN asked if a CNL employee could adjust a camera on site.  KFN requested site access 2023 March 02.  CNL confirmed attendance.
2023 February 28	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation confirming that the camera adjustment requested on 2023 February 27 will be made.
2023 March 01	Emails between CNL and Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations CNL Corporate Affairs AECL	Emails between CNL, AECL and Kebaowek First Nation related to the use of snowmobiles on-site for the following two weeks.  As requested, on a rush basis, CNL arranged for two snowmobiles with CNL operators from 2023 March 07 – 2023 March 10.  Note: KFN did not end up using the snowmobiles.

Date	Event / Activity	Involved Parties	Details
2023 March 02	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation sharing the draft Forest Management Plan after the Petawawa Research Forest (PRF) contacted to CNL to advise that KFN contacted the PRF directly to request the plan. KFN had not asked CNL for the document.  CNL offered to coordinate a meeting between the PRF and KFN to discuss the plan.  KFN acknowledged and indicated they would provide dates for a meeting.
2023 March 02	On-site activities	Kebaowek First Nation Representatives CNL Natural Resource Management	Kebaowek First Nation representatives and CNL deployed the trail cameras.
2023 March 03	Meeting between CNL and Kebaowek First Nation	Kebaowek First Nation Consultant CNL, General Manager of Waste Services CNL Natural Resource Management	Meeting between CNL and Kebaowek First Nation to discuss bating alternatives. CNL and KFN agreed on a methodology.  CNL noted the importance of ensuring the safety of its employees, the KFN team - as well as the wolves.
2023 March 03	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation requesting information on planned on-site activities for the week.
2023 March 06	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL indicating when KFN representatives would be on-site that week.

Date	Event / Activity	Involved Parties	Details
2023 March 06	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation clarifying the number of KFN representatives each day on site 2023 March 06 – 10. CNL reminded KFN that there were only two snowmobiles for use.  KFN confirmed the information.
2023 March 06	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation asking if there would be on-site work planned for 2023 March 13 – 17, noting it is March Break, there may be CNL staff that are unavailable at that time.  KFN confirmed that they would be waiting for information from the cameras before coming back to site.
2023 March 06	On-site activities	Kebaowek First Nation Representatives CNL Natural Resource Management	Kebaowek First Nation representatives and CNL prepared to deploy scent stations per the agreement reached at the 2023 March 03 meeting.
2023 March 07	On-site activities	Kebaowek First Nation Representatives CNL Natural Resource Management	Kebaowek First Nation representatives and CNL deployed six scent stations in two concentrated areas.

Date	Event / Activity	Involved Parties	Details
2023 March 08	Email from CNL to Kebaowek First Nation	<p>Kebaowek First Nation Chief</p> <p>Kebaowek First Nation Councillor</p> <p>Kebaowek First Nation Legal Counsel</p> <p>Kebaowek First Nation Consultant</p> <p>CNL Legal Counsel</p> <p>CNL NSDF Project staff</p> <p>ERM Stakeholder Relations</p>	<p>Email from CNL to Kebaowek First Nation sharing the proposed agenda for the 2023 March 09 meeting.</p> <p>Proposed agenda:</p> <ul style="list-style-type: none"> <li>• Update on Data Sharing Protocol</li> <li>• Open Q&amp;A session to address concerns of touring the CRL site <ul style="list-style-type: none"> <li>○ Include invitations to subject matter experts (Cobalt 60 etc.), CNSC, local resident</li> <li>○ Date options</li> </ul> </li> <li>• Update on Schedule B activities <ul style="list-style-type: none"> <li>○ Results of the survey</li> <li>○ Community meeting and/or community brochure</li> <li>○ Sustainable Forest Management Plan (meeting date)</li> </ul> </li> <li>• Sharing the Procedural Direction submission with KFN (late March)</li> </ul>
2023 March 09	On-site activities	<p>Kebaowek First Nation Representatives</p> <p>CNL Natural Resource Management</p>	Kebaowek First Nation representatives and CNL deployed sent stations.



Date	Event / Activity	Involved Parties	Details
2023 March 09	Meeting between CNL and Kebaowek First Nation	Kebaowek First Nation Chief Kebaowek First Nation Councillor Kebaowek First Nation Legal Counsel Kebaowek First Nation Consultant CNL Legal Counsel CNL NSDF Project staff ERM Stakeholder Relations CNL GM of Waste Services	<p>This was the monthly meeting between CNL, AECL and Kebaowek First Nation.</p> <p>When discussing the waste facilities tour, to help alleviate the fear of coming to the site CNL proposed an open Q&amp;A session, including SMEs, CNSC, and a local resident. KFN liked this idea and proposed it be planned soon.</p> <p>KFN provided CNL an update on Schedule B activities. The updates included baseline survey completed with a larger one planned, using the over 300 data point from site and that the draft Rights Impact Assessment is with the CNSC. CNL requested the baseline survey results which KFN agreed to share.</p> <p>The meeting ended with KFN thanking CNL for the partnership in data gather and requested the OCAP principals be applied to the data sharing protocol. KFN undertook to provide CNL with other information in this regard.</p>
2023 March 09	Telephone call from CNL to Kebaowek First Nation	Kebaowek First Nation Legal Counsel CNL Legal Counsel	Telephone call from CNL to Kebaowek First Nation to discuss comments on the Data Sharing Protocol.
2023 March 09	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation requesting date option for the open Q&A as discussed during the 2023 March 09 meeting.
2023 March 13	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation informing that CNL has some work scheduled near Sturgeon Lake where one of the scent stations was established. CNL noted that the CNL team agreed to postpone the work requiring heavy equipment to later this year to avoid disturbing the area and KFN's studies.

Date	Event / Activity	Involved Parties	Details
2023 March 14	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant CNL Legal Counsel ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL requesting information on the IAA posting on the Section 82 project for the centralized waste laydown area. KFN was alerted to the posting by Northwatch.  KFN requested that the parties discuss notification related to IAA Registry postings.
2023 March 14	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Chief Kebaowek First Nation Councillor ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation sharing CNL's Indigenous Relations Procurement Strategy (IRPS).  CNL noted that while the Strategy is effective as of 2023 April, there will be ongoing opportunities to enhance its approach to reflect feedback from First Nations. CNL offered a meeting to discuss.
2023 March 14	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation requesting date options for the open Q&A session.
2023 March 14	Emails (8) between CNL and Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Emails from CNL to Kebaowek First Nation booking a date for the open Q&A session.  CNL sent an invitation for 2023 March 21 and asked KFN to confirm.
2023 March 15	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations CNL Legal Counsel	Email from CNL to Kebaowek First Nation responding to the request related to IAA postings. CNL noted notification is one of the action items for the management forum to discuss and decide upon in accordance with the Agreement. CNL also noted that CNL understood KFN's focus was on the NSDF engagement activities. CNL offered a session with other CNL SMEs related to IAA postings and provided a description of the laydown area.  CNL suggested convening a meeting of the management forum/working group prior to the next scheduled meeting in order to have a discussion and create an understanding or protocol or adding the discussion to the next working group meeting.

Date	Event / Activity	Involved Parties	Details
2023 March 16	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation confirming the 2023 March 21 meeting date for the open Q&A session. CNL requested KFN send their questions in advance to appropriately staff the session.
2023 March 16	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL sharing that Kitigan Zibi Anishinabeg would also attend the 2023 March 21 open Q&A session. KFN and KZA were working to provide a list of questions.  KFN requested changing the meeting time and that the meeting be recorded.  CNL acknowledged receipt.
2023 March 17	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL sending the 28 questions for the 2023 March 21 meeting. KFN noted that more time might be needed to answer all of the questions.  CNL acknowledged receipt.
2023 March 17	Telephone call from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Telephone call from CNL to Kebaowek First Nation to clarify the intent of the 2023 March 21 meeting. KFN indicated they cannot complete their RIA submission to the CNSC until they have met and discussed the following list of questions with CNL subject matter experts.

Date	Event / Activity	Involved Parties	Details
2023 March 17	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation following up from the earlier telephone call. CNL confirmed that they would be providing written responses to the 28 questions followed by a meeting. CNL committed to sending the responses by 2023 March 22. CNL suggested dates for the meeting.  CNL cancel the 2023 March 21 meeting as the priority is responding to the questions.  CNL asked KFN to confirm if there was still interest in touring the waste management areas and if a meeting was necessary to address concerns about coming to the site.
2023 March 20	Emails between Kebaowek First Nation (4) and CNL	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL notifying CNL of the intent to come to site that morning.  CNL and KFN corresponded to accommodate the same day access request.
2023 March 20	On-site activities	Kebaowek First Nation Representatives CNL Natural Resource Management	Possible wolf DNA data collection with one KFN representative.  During the day the KFN representative informed CNL that he would be back the next day. CNL made arrangements.
2023 March 21	On-site activities	Kebaowek First Nation Representative CNL Natural Resource Management	Camera adjustment and viewing photos with one KFN representative.

Date	Event / Activity	Involved Parties	Details
2023 March 21	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL responding to the 2023 March 17 email about the priority list of questions. KFN indicated they will provide date options for the follow up meeting with CNL.  KFN noted that they will decide on the need for a waste management area tour after the meeting.
2023 March 21	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation following up on date options for a meeting on CNL's Draft Forest Management Plan.
2023 March 21	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL stating that they had requested a meeting with the CNSC on the Draft Forest Management Plan. After learning that the plan remains a draft KFN noted they had some EA regulatory and Indigenous consultation concerns, though none were expressly stated at this time.
2023 March 21	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL requesting the meeting on the waste questions be held 2023 March 28.

Date	Event / Activity	Involved Parties	Details
2023 March 22	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations Kitigan Zibi Anishinabeg Consultation	Email from CNL to Kebaowek First Nation sending CNL's dispositions to KFN questions on waste submitted on 2023 March 17.  CNL noted that the majority of these topics were covered during the Part 1 and Part 2 NSDF hearings, giving specific examples, and shared that the transcripts are publicly available.  To facilitate a productive meeting, CNL requested KFN indicate which comments to focus the discussion on prior to the meeting.
2023 March 22	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations Kitigan Zibi Anishinabeg Consultation	Invitation from CNL to Kebaowek First Nation and KZA for a 2023 March 28 meeting to discuss KFN and the Kitigan Zibi Anishinabeg questions.
2023 March 27	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL confirming receipt of CNL's dispositions to KFN questions on waste, send on 2023 March 22.  KFN noted that they would provide CNL information on what questions to focus on for the 2023 March 28 meeting.
2023 March 27	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL providing an additional list of 13 question for discussion at the March 28 meeting.  CNL confirmed receipt.
2023 March 27	On-site activities	Kebaowek First Nation Representative CNL Natural Resource Management	Kebaowek First Nation and CNL replaced batteries in the trail cameras, moved and re-positioned cameras and with one KFN representative.

Date	Event / Activity	Involved Parties	Details
2023 March 28	Meeting between CNL, Kebaowek First Nation, Kitigan Zibi Anishinabeg and AECL	<p>Kebaowek First Nation Chief</p> <p>Kebaowek First Nation Councillor</p> <p>Kebaowek First Nation Consultants</p> <p>Kitigan Zibi Anishinabeg Consultants</p> <p>CNL NSDF Project staff</p> <p>ERM Stakeholder Relations</p> <p>CNL GM of Waste Services</p> <p>CNL, Director, Corporate Environment</p> <p>AECL</p>	<p>Meeting between CNL, Kebaowek First Nation, Kitigan Zibi Anishinabeg and AECL to discuss the questions related to the NSDF Waste Inventory. Kebaowek First Nation and Kitigan Zibi Anishinabeg invited consultants who are known to CNL, all of whom were intervenors at the Part 2 Hearing. The consultants included representatives from the Canadian Coalition for Nuclear Responsibility and the Concerned Citizens of Renfrew County.</p> <p>CNL responded to the written questions provided by KFN on 2023 March 27, and additional questions that came up during the meeting.</p> <p>KFN thanked CNL for taking the time to answer the questions. CNL took an action to respond to the questions provided 2023 March 27.</p>
2023 March 29	On-site activities	<p>Kebaowek First Nation Representatives</p> <p>CNL Natural Resource Management</p>	Kebaowek First Nation and CNL changed the SD cards in some of the trail cameras. One KFN representative was on site.
2023 March 29	Letter	<p>Kebaowek First Nation</p> <p>CNSC</p> <p>ERM Stakeholder Relations</p>	<p>Kebaowek First Nation copied CNL on a letter sent to the CNSC Commission. KFN requested an in-person oral hearing for the final submission, as they requested 2022 December.</p> <p>In the letter KFN shared their concerns about a virtual hearing.</p>
2023 March 29	Email from Kebaowek First Nation to CNL	<p>Kebaowek First Nation Consultant</p> <p>ERM Stakeholder Relations</p>	Email from Kebaowek First Nation to CNL requesting on-site access for 2023 March 30.

Date	Event / Activity	Involved Parties	Details
2023 March 30	On-site activities	Kebaowek First Nation Representatives CNL Natural Resource Management	Kebaowek First Nation and CNL conducted on-site work related to viewing pictures from the trail cameras, collecting bat recorders and refreshing three scent stations, two KFN representatives were on site.
2023 March 30	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL requesting responses to comments from Dr. Gallant on CNL's dispositions to her EIS review. CNL confirmed receipt of the request.
2023 March 30	Emails (4) between Kebaowek First Nation, CNL, Consultant	Kebaowek First Nation Consultant ERM Stakeholder Relations FRI Ecological Services, Species at Risk Biologist	Emails coordinating the return of bat recorders from the CNL site. Kebaowek First Nation confirmed they would return the recorders to FRI Ecological Services.
2023 March 31	On-site activities	Kebaowek First Nation Representatives CNL Natural Resource Management	Kebaowek First Nation and CNL conducted on-site work related to viewing pictures from the trail cameras. One KFN representative was on site.



Date	Event / Activity	Involved Parties	Details
2023 March 31	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	<p>Email from CNL to Kebaowek First Nation sending the draft summary and the KFN engagement sections of CNL's DRAFT Procedural Direction submission. CNL acknowledged that KFN may have a different position and perspective and that CNL would work collaboratively with KFN to understand any additional matters that are raised after the date of the submission.</p> <p><i>Summary – DRAFT CNL Procedural Direction Written Submission 2023 March 31</i></p> <p><i>KFN Engagement – DRAFT CNL Procedural Direction Submission 2023 March 31</i></p> <p>CNL noted the draft was subject to change and requested feedback by 2023 April 14.</p>
2023 March 31	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	<p>Email from CNL to Kebaowek First Nation sharing in good faith the genotype results for the wolf DNA collected by CNL and analysed by Trent University. CNL advised that the results were being shared on condition that the report not be distributed further by KFN, as they report is confidential information of Trent University.</p>
2023 March 31	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	<p>Email from CNL to Kebaowek First Nation sharing, in good faith, the genotype results for the wolf DNA collected by CNL and analysed by Trent University.</p> <p>CNL requested that the report not be distributed and shared for information only.</p>

Date	Event / Activity	Involved Parties	Details
2023 April 03	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL thanking CNL for sharing the report from Trent University.  KFN requested CNL share the dates and locations of the samples used in the report.  KFN shared that they would be sending their scat samples to the Trent lab the week of 2023 April 10.  CNL acknowledged the data request.
2023 April 03	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL requesting photos from the trail cameras on site.  KFN also noted that two cameras were not programmed correctly, resulting in no pictures being taken. They also noted issues with the micro-SD card cameras deployed at the Perch Creek outflow to the Ottawa River.
2023 April 03	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation acknowledging the request for photos and committing to follow up regarding the camera programming issues.
2023 April 03	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation sharing a list of questions / comments to help facilitate the discussion on fieldwork and progress on related schedule B (agreement) activities planned for 2023 April 4.
2023 April 04	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL providing edits to the list of questions / comments to help facilitate the discussion on fieldwork and progress on related schedule B (agreement) activities.  CNL acknowledged receipt.

Date	Event / Activity	Involved Parties	Details
2023 April 04	Meeting between Kebaowek First Nation and CNL	<p>Kebaowek First Nation Councillor</p> <p>Kebaowek First Nation Consultant</p> <p>Kebaowek First Nation Representatives</p> <p>ERM Stakeholder Relations</p> <p>CNL Natural Resource Management</p>	<p>Meeting between Kebaowek First Nation and CNL to discuss fieldwork and progress on related schedule B (agreement) activities.</p> <p>To open the meeting CNL clarified that the Trent University report shared with KFN 2023 March 31 was not to be shared. Following that CNL and KFN had a Q&amp;A session related to the report. KFN requested the location and date stamp of the scat sampling from the report. CNL restated that some of the samples were second swabs, with KFN taking the first swab. KFN shared that their DNA result report will be included in their CNSC submission.</p> <p>CNL and KFN then discussed the list of questions agreed to before the meeting. The topics discussed included:</p> <ul style="list-style-type: none"> <li>• Results and status of the KFN community surveys</li> <li>• Status update of supplemental KFN led studies including the future of camera deployment on the CRL site. KFN would like to move camera locations, KFN is going to provide CNL will locations on a map.</li> </ul> <p>CNL and KFN agreed to develop a protocol for fieldwork i.e., roles and responsibilities and that the remaining cameras could be collected at the end of 2023 April.</p>
2023 April 04	Email from CNL to Kebaowek First Nation	<p>Kebaowek First Nation Representative</p> <p>ERM Stakeholder Relations</p>	Email from CNL to Kebaowek First Nation sharing trail camera photos via SFTP link. CNL indicated the camera numbers and that a file with GPS coordinates (and ownership) for the cameras would be shared shortly.

Date	Event / Activity	Involved Parties	Details
2023 April 04	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation requesting clarification on items brought up at the meeting earlier that day. Items of note from the email: <ul style="list-style-type: none"> <li>• CNL asked KFN to confirm areas of study will also be part of the Procedural Direction submission and if the report on the Eastern Wolf study would be shared in advance.</li> <li>• Summarized the path forward on NSDF fieldwork activities and the cameras.</li> </ul> <p>Confirmation the CNL would provide information on existing study /work plan on a contaminant dredging project for the Ottawa River.</p> <p>Reminder that the Tent University report is not to be distributed further.</p>
2023 April 04	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Representative ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL confirming receipt of pictures via SFTP link and requesting a new link for each camera folder to facilitate easier organization for KFN.  CNL acknowledged the request.
2023 April 05	Emails from CNL to Kebaowek First Nation	Kebaowek First Nation Representative ERM Stakeholder Relations	Eleven emails from CNL to Kebaowek First Nation sharing trail camera photos by camera via SFTP link.
2023 April 05	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL responding the 2023 April 04 email requesting KFN's clarification on items brought up at the 2023 April 04 meeting.  KFN provided responses to each of CNL's questions. KFN noted that KFN will complete their consultation contract arrangements as per the NSDF procedural order and then stop all CNL NSDF site research work.

Date	Event / Activity	Involved Parties	Details
2023 April 05	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Representative CNL Natural Resource Management	Email from Kebaowek First Nation to CNL requesting the dates when the SD cards were collected from the cameras and the real-time trail camera locations.
2023 April 05	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant Kebaowek First Nation Representative ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation confirming that all the requested photos from March and the bear photos has been shared. CNL committed to sharing the camera locations shortly.  CNL requested that KFN to confirm they were able to download all of the photos.
2023 April 05	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant Kebaowek First Nation Representative ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL asking for photos that remain outstanding from the bear den.  CNL acknowledged the request.
2023 April 05	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation providing the 2023 April 04 request for information related to a dredging project for the Ottawa River.  CNL included two documents in the response.  <i>2016 July 19 letter and memo, 2016 Annual Update to the CNSC on the Ottawa Riverbed Remediation Project</i>  <i>Sediment Management Options Assessment for the Ottawa Riverbed Remediation Project, Chalk River Laboratories Site, 175-509420-REPT-001</i>

Date	Event / Activity	Involved Parties	Details
2023 April 06	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Councillor ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL sharing the Statement by Davis Cooper from the April World Health Day, <i>Acting Executive Secretary of the Convention on Biological Diversity</i> .
2023 April 12	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant CNL Legal Counsel	Email from Kebaowek First Nation to CNL in response to CNL's 2023 March 15 email related to the IAA Section 82 Project posting- specifically the proposed Centralized Laydown Area. KFN requested the posting be added to the monthly meeting agenda. KFN is interested in being consulted on the project.
2023 April 12	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL requesting site access for the same day to check for scat after being alerted to wolf movement on a trail camera. KFN also requested to reset the scent lure at that location.  KFN also requested moving the location of two of the real-time trail cameras to the den site with protective coverings.  CNL acknowledged the request and would follow-up when staff have confirmed availability.
2023 April 12	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL providing comments on the CNL 2023 March Genotyping Report Final report. The comments included the request for the date and location of the CNL samples tested by Trent University and that KFN led its own sampling program and methodology for their samples taken with CNL staff in the field.  <i>Attachment: CNL 2023 March Genotyping Report Final (KFN comments)</i>  CNL confirmed receipt.

Date	Event / Activity	Involved Parties	Details
2023 April 12	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation confirming staff were available for the request to access site to collect scat samples.
2023 April 12	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL confirming the time the KFN representative would be on site for the work.  KFN informed CNL that they were looking to install metal lock boxes on the cameras to be installed at the den site.
2023 April 12	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant Kebaowek First Nation Representative ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation informing KFN that KFN would not be allowed to reset the scent station as requested at the den site. CNL suspects there is a pregnant female and does not want to disrupt her denning habitat.  CNL also provided information related to the on-site activities requested: <ul style="list-style-type: none"> <li>Two of the live-feed trail cameras can be moved to the den site. CNL does not have protective boxes and reassured KFN that the cameras are weather resistant and can be repositioned if an animal interferes with its placement. CNL noted that after the cameras are placed at the den site there could be no future visits to the site due to the pregnant female.</li> <li>CNL sent a map for KFN to indicate where they would like the live-feed trail cameras placed. This was discussed at the 2023 April 04 meeting.</li> </ul>
2023 April 12	On-site activities	Kebaowek First Nation Representative  CNL Natural Resource Management	Kebaowek First Nation and CNL conducted on-site work to look for scat and move two cameras. One KFN representative was on site.

Date	Event / Activity	Involved Parties	Details
2023 April 12	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	<p>Email from CNL to Kebaowek First Nation confirming the centralized laydown area could be added as an agenda item at the next monthly meeting, as requested by KFN.</p> <p>CNL noted that if KFN would like a detailed discussion CNL would arrange a separate meeting with the appropriate CNL representatives.</p> <p>CNL suggested adding an agenda item for a discussion on how to move forward on creating an understanding or protocol for the parties as to the activities which KFN wishes to be engaged on in accordance with the Consultation and Engagement Framework Agreement.</p>
2023 April 12	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant ERM Stakeholder Relations	<p>Email from Kebaowek First Nation to CNL thanking CNL for coordinating the site access for that day.</p> <p>KFN requested being able to carry out the wolf study with their own methodologies and practices to ensure the best study results within the procedural order timeframe. KFN explained the reason for wanting to use protective boxes on the cameras. KFN agreed to not returning to the den site once the camera was moved.</p> <p>KFN also provided information related to the request to rescent the stations at the Sturgeon Lake area.</p>
2023 April 12	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	<p>Email from CNL to Kebaowek First Nation sharing that CNL has developed dispositions to Dr. Gallant's comments. CNL sent AANTC <i>Dr. Gallant review of EIS, EAFMP – Dec 2021 (April 2023 sorted)</i>.</p> <p>After CNL received the additional list of comments from Dr. Gallant on 2023 March 30, CNL proposed a meeting with KFN and Dr. Gallant on the 2023 March comments in light of the dispositions being provided from her 2021 review. CNL suggest this as a topic for the 2023 April 13 working group meeting.</p>



Date	Event / Activity	Involved Parties	Details
2023 April 12	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation sharing the agenda for the 2023 April 13 working group agenda.  Agenda items included: <ul style="list-style-type: none"> <li>• Update on review of CNL's Procedural Direction submission (due 2023 April 14)</li> <li>• Update on KFN invoicing</li> <li>• Discussion on continuing field work</li> <li>• Update on Data Sharing Protocol</li> <li>• Discuss protocol for sharing Impact Assessment Agency Section 82 postings</li> <li>• Schedule a meeting to discuss the centralized laydown area posting</li> <li>• Follow-up on Dr. Gallant comments</li> <li>• Schedule a meeting to further discuss Dr. Gallant's comments</li> <li>• Extend monthly working group meetings</li> <li>• NPD Closure Project upcoming meeting – 2023 April 19</li> </ul>
2023 April 13	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL requesting site access that same day to look for scat/tracks and rescent the area.  CNL confirmed the request.
2023 April 13	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation stating that it is CNL's understanding that the data proposed to be collected by continuing to maintain scent stations at CRL will not significantly increase our collective knowledge of the genetic composition of the wolf population at the CRL site in the spring of 2023. Therefore, CNL does not feel it is beneficial to carry out given the potential risk of the pack changing their landscape use and movement patterns in the sensitive denning period of 2023.  CNL requested that this information be passed along to the KFN representative coming to site the same day.

Date	Event / Activity	Involved Parties	Details
2023 April 13	Meeting between Kebaowek First Nation and CNL	<p>Kebaowek First Nation Consultant</p> <p>ERM Stakeholder Relations</p> <p>CNL Natural Resource Management</p> <p>CNL Legal Counsel</p> <p>AECL</p> <p>CNL NSDF and NPD Project Staff</p>	<p>This was the April monthly meeting between CNL, AECL and KFN.</p> <p>CNL, KFN and AECL discussed CNL's position on scent stations after KFN's comments during the meeting that CNL was obstructing their methodology. In CNL's opinion, we were not obstructing their study. CNL's Director, Corporate Environmental Services explained CNL's rational and asked KFN to explain what information they are looking for. KFN shared that they looking to DNA profile the wolves and track the patterns of the pack. KFN indicated that the Chief would be reaching out to AECL.</p> <p>CNL requested an estimated timeline for KFN's review of CNL's draft Procedural Direction submission. KFN requested that the submission be sent to KFN's legal counsel as it had not yet been reviewed.</p> <p>As agreed to in advance of the meeting, CNL, KFN and AECL discussed IAA Section 82 postings. KFN requested a list of the Section 82 postings from 2016 to present, including a description, status and the dates of the applicable comment period. CNL and KFN agreed to a separate meeting on the proposed centralized laydown area and convening the Management Forum to determine a path forward regarding IAA postings.</p> <p>Other topics discussed at the meeting were invoicing, the data sharing protocol, continued fieldwork to the end of April and planning a meeting to respond to Dr. Gallants comments, extending the monthly meetings for another year and finally the NPD Closure Project.</p> <p>The meeting concluded with KFN sharing their thoughts on how CNL was negatively impacting their methodology related to the wolf study, while acknowledging that the study to date has gone well so far. CNL again expressed that they are protecting the safety of the animal.</p>

Date	Event / Activity	Involved Parties	Details
2023 April 13	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation sharing the draft summary and the full KFN engagement section of CNL's Draft Procedural Direction submission to KFN's legal counsel. This was an action from the working group meeting.
2023 April 13	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation confirming that KFN can install the protective camera boxes when the cameras are being moved.  CNL stated again that it does not feel it is beneficial to carry out scent stations given the potential risk of the pack changing their landscape use and movement patterns in the sensitive denning period of 2023.
2023 April 13	Emails (2) from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL asking CNL to confirm the genetic sample for a male wolf at Pointe au Baptême.  KFN later responded that they had matched the wolf to scat at Pointe au Baptême at KFN's camera that morning. KFN noted that this was direct benefit of the scent stations.
2023 April 13	On-site activities	Kebaowek First Nation Representatives CNL Natural Resource Management	Kebaowek First Nation and CNL conducted on-site work looking for scat and tracks at Pointe au Baptême.
2023 April 13	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Representative ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation sharing the requested bear den camera location from 2022 September 24 – October 25, via SFTP link.

Date	Event / Activity	Involved Parties	Details
2023 April 13	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation sharing the requested date and location data of the samples collected. CNL included a map with the locations of the samples. CNL sent the data related to the second swab (after KFN conducted a first swab) of scats swabbed in the field with KFN representatives.
2023 April 13	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation requested proposed meeting dates for the meeting with KFN and Dr. Gallant to discuss the comments and dispositions.
2023 April 14	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Legal Counsel CNL Legal Counsel	Email from CNL to Kebaowek First Nation requesting material on the OCAP principles. This was a topic of discussed at the working group meeting on 2023 April 13.
2023 April 14	On-site activities	Kebaowek First Nation Representative CNL Natural Resource Management	Kebaowek First Nation and CNL conducted on-site work related to the placement of live-feed trail cameras and placing cameras in a protective box. One KFN representative was on site.

**Appendix B Detailed Record of Engagement – Kitigan Zibi Anishinabeg – 2022 January 01 to 2023 April 14**

This table provides a detailed record of engagement activities that have occurred with Kitigan Zibi Anishinabeg (KZA) on the NSDF Project from 2022 January 01 to 2023 April 14.

Date	Event / Activity	Involved Parties	Details
2023 February 08	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Forestry Kitigan Zibi Anishinabeg Council ERM Stakeholder Relations	This email from CNL to Kitigan Zibi Anishinabeg enclosed a link to the NSDF “Virtual Visitor Centre” platform.
2023 March 03	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Forestry Kitigan Zibi Anishinabeg Council ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg to encourage Indigenous participation in Part 2 of the NSDF Commission hearing and reiterated the offer of capacity to reduce any barriers to participate.
2022 March 14	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Forestry Kitigan Zibi Anishinabeg Council ERM Stakeholder Relations	Email invitation sent to Kitigan Zibi Anishinabeg to a webinar on Participating in the NSDF Part 2 Hearing on 2022 March 22, which included an opportunity for questions.
2022 April 5	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Forestry Kitigan Zibi Anishinabeg Council ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg to remind of the deadline to submit a request to intervene in the final NSDF Commission hearing and encouraged the signing of the Parliamentary E-Petition 3929, in support of the proposed project launched by Mayor D’Eon (Town of Deep River). CNL also provided a link to the new NSDF Virtual Visitor Centre.

Date	Event / Activity	Involved Parties	Details
2022 April 18	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Forestry Kitigan Zibi Anishinabeg Council ERM Stakeholder Relations	Email invitation to Kitigan Zibi Anishinabeg to the CNL Industry Day at the Chalk River Laboratories on 2022 June 02, to promote the broader engagement between CNL's nuclear industry partners and our local supply chain.
2022 April 20	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Forestry Kitigan Zibi Anishinabeg Council ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg enclosing links to the updated NSDF Indigenous Engagement Report.
2022 May 06	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Forestry Kitigan Zibi Anishinabeg Council ERM Stakeholder Relations	Email invitation to Kitigan Zibi Anishinabeg to the CNL Industry Day at the Chalk River Laboratories on 2022 June 02 to promote the broader engagement between CNL's nuclear industry partners and our local supply chain.
2022 May 09	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Forestry Kitigan Zibi Anishinabeg Council ERM Stakeholder Relations	Email invitation sent to KZA to webinars on NPD/WR-1: Overview of the Environmental Impact Statements and Chalk River Laboratories: Decommissioning and Demolishing Legacy Facilities on 2022 May 10 which included an opportunity for questions.

Date	Event / Activity	Involved Parties	Details
2022 July 07	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Forestry Kitigan Zibi Anishinabeg Council ERM Stakeholder Relations	Email sent from CNL to Kitigan Zibi Anishinabeg regarding the Procedural Direction issued by the CNSC on 2022 July 05. CNL invited Kitigan Zibi Anishinabeg to meet with CNL and share information, concerns or questions they may have with respect to the NSDF Project.
2022 July 09	Letter from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Chief Atomic Energy of Canada Limited (AECL) ERM Stakeholder Relations	Letter emailed from CNL to Kitigan Zibi Anishinabeg Chief proposing a meeting between the Kitigan Zibi Anishinabeg, CNL and AECL Leadership following the Procedural Direction issued by the CNSC.
2022 July 15	Email from Kitigan Zibi Anishinabeg to CNL	Kitigan Zibi Anishinabeg Forestry CNL Corporate Communications	Email from Kitigan Zibi Anishinabeg to CNL expressing interest in participating in the Environmental Stewardship Council on 2022 July 28.
2022 July 17	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Forestry Kitigan Zibi Anishinabeg Council ERM Stakeholder Relations	Email invitation to Kitigan Zibi Anishinabeg to register and attend the Chalk River Open House on 2022 August 06.
2022 July 19	Telephone call between Kitigan Zibi Anishinabeg and CNL	Kitigan Zibi Anishinabeg Forestry ERM Stakeholder Relations	Call from CNL to Kitigan Zibi Anishinabeg to discuss participating in the Environmental Stewardship Council on 2022 July 28.

Date	Event / Activity	Involved Parties	Details
2022 July 21	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Forestry ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg to suggest a tour of the Chalk River Laboratories, including the proposed Near Surface Disposal Facility (NSDF) site, and the Nuclear Power Demonstration (NPD) site. CNL requested Kitigan Zibi Anishinabeg propose dates for the tour.
2022 July 21	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Forestry CNL Corporate Communications	Email from CNL to Kitigan Zibi Anishinabeg requesting the Visitor Information forms for the community members attending the Environmental Stewardship Council on 2022 July 28.
2022 July 26	Email from Kitigan Zibi Anishinabeg to CNL	Kitigan Zibi Anishinabeg Forestry ERM Stakeholder Relations	Email from Kitigan Zibi Anishinabeg to CNL informing CNL Kitigan Zibi Anishinabeg is looking at dates for a visit to the CRL site.
2022 July 26	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Forestry ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg suggest a one-day tour during the week of 2022 August 08 – 12. CNL asked Kitigan Zibi Anishinabeg to confirm the date and if they would like to visit CRL and the NSDF and the Nuclear Power Demonstration (NPD) site- including brief project updates. CNL offered to create a proposed agenda and share for review.
2022 July 28	Meeting	Kitigan Zibi Anishinabeg Forestry Kitigan Zibi Anishinabeg Consultation CNL Corporate Communications ERM Stakeholder Relations	Kitigan Zibi Anishinabeg Forestry and consultation representatives attended CNL's Environmental Stewardship Council meeting that was held at CRL and included a site tour of the proposed NSDF site.



Date	Event / Activity	Involved Parties	Details
2022 August 04	Email from Kitigan Zibi Anishinabeg to CNL	Kitigan Zibi Anishinabeg Forestry ERM Stakeholder Relations	Email from Kitigan Zibi Anishinabeg to CNL to suggest dates the week of 2022 August 08 for a visit to site.
2022 August 04	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Forestry ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg confirming 2022 August 10 as the date for the site tour.
2022 August 04	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Forestry Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg requesting information on what Kitigan Zibi Anishinabeg would like to see and discuss on the 2022 August 10 tour.
2022 August 04	Email from Kitigan Zibi Anishinabeg to CNL	Kitigan Zibi Anishinabeg Consultation ERM Stakeholder	Email from Kitigan Zibi Anishinabeg to CNL sharing areas of interest for the Wednesday, 2022 August 10 tour.  Areas of interest included the NSDF site, information on low-level waste and how it is sorted, activities related to water and the water cycle on site: pumping, use, water plant treatment, basin, release in the environment, monitoring on site and on the Ottawa River and the turtle culverts.
2022 August 08	Telephone call between Kitigan Zibi Anishinabeg and CNL	Kitigan Zibi Anishinabeg Forestry ERM Stakeholder Relations	Call from CNL to Kitigan Zibi Anishinabeg to discuss what Kitigan Zibi Anishinabeg would like to see and discuss on the 2022 August 10 tour.  Kitigan Zibi Anishinabeg also shared information on a community consultation for NSDF and possible CNL involvement and the potential of a CNL, AECL and Kitigan Zibi Anishinabeg leadership meeting.

Date	Event / Activity	Involved Parties	Details
2022 August 08	Telephone call between Kitigan Zibi Anishinabeg and CNL	Kitigan Zibi Anishinabeg Forestry CNL Director, Indigenous Relations	<p>Call from CNL to Kitigan Zibi Anishinabeg. During the call CNL and the Kitigan Zibi Anishinabeg discussed the CNL, AECL and Kitigan Zibi Anishinabeg leadership meeting, the potential and benefits of regularly scheduled meetings. Kitigan Zibi Anishinabeg suggested that CNL propose monthly meeting dates for consideration.</p> <p>Kitigan Zibi Anishinabeg informed CNL of the intent to start a committee of some kind in the community to comment on projects. Kitigan Zibi Anishinabeg expressed interest in the development of a Consultation Framework Agreement and becoming a member of the Environmental Stewardship Council.</p>
2022 August 10	Meeting with Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Forestry Kitigan Zibi Anishinabeg Consultation CNL Environmental Protection staff NSDF Project staff ERM Stakeholder Relations Atomic Energy of Canada Ltd (AECL)	<p>This meeting was held at the Chalk River Laboratories site with the Kitigan Zibi Anishinabeg and CNL with an opportunity for open discussion on the Project with NSDF Project team members as well as Environmental Protection staff.</p> <p>CNL provided an overview presentation and shared information on the revitalization at Chalk River Laboratories, environmental protection, effluent monitoring and water treatment and the NSDF Project.</p> <p>The meeting included a tours of the Waste Management Area (WMA) A, the site of the proposed NSDF and Perch Creek and storm water management pond.</p> <p>Kitigan Zibi Anishinabeg indicated interest in a tour of the NPD site and the Chimney Swifts. There was a discussion about the Kitigan Zibi Anishinabeg community consultation about the NSDF and CNL expressed interest in being involved.</p> <p>All action items were noted and follow-up up by email on 2022 August 16.</p>

Date	Event / Activity	Involved Parties	Details
2022 August 16	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Forestry Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg to follow-up items committed during the 2022 August 10 meeting. The items included the presentations and links to webpages and reports mentioned during the meeting.
2022 August 16	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations CNL Director, Indigenous Relations	Email from CNL to Kitigan Zibi Anishinabeg providing information requested regarding the NSDF Final Environmental Impact Statement, deadline for additional comments to the CNSC and next steps with regards to a decision from the CNSC Commission.
2022 September 15	Letter from CNL to Kitigan Zibi Anishinabeg	CNL President and CEO Kitigan Zibi Anishinabeg Chief	Letter from CNL's President and CEO to Kitigan Zibi Anishinabeg's Chief congratulating him on his re-election.
2022 September 16	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Forestry Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg sharing a list of upcoming biodiversity activities that are happening at the Chalk River Laboratories site. CNL invited Kitigan Zibi Anishinabeg to accompany CNL environmental protection staff on any activities that may be of interest.
2022 September 19	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Forestry Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	Email invitation sent to Kitigan Zibi Anishinabeg to a webinar on Construction Sequencing Planning for the Proposed Near Surface Disposal Facility on 2022 September 28, which included an opportunity for questions.

Date	Event / Activity	Involved Parties	Details
2022 September 28	Webinar	Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	Consultation staff from Kitigan Zibi Anishinabeg attended the webinar on Construction Sequencing Planning for the Proposed Near Surface Disposal Facility on 2022 September 28, which included an opportunity for questions.
2022 September 28	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Forestry Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg First following up on the 2022 August 16 email. CNL offered to support a community consultation and any other support needed.
2022 September 28	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Forestry Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg First following up on the 2022 September 16 email related to biodiversity activities. CNL referenced that Kitigan Zibi Anishinabeg had previously indicated an interest in the Blanding's Turtle and that there is a turtle tracking ate scheduled for 2022 October 21.
2022 October 04	Phone call from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation CNL, Director Indigenous Relations	CNL called Kitigan Zibi Anishinabeg to discuss a meeting between CNL and Kitigan Zibi Anishinabeg. CNL provide date options.  CNL follow-up with a summary email.
2022 October 06	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor CNL, Director Indigenous Relations	Email from CNL to Kitigan Zibi Anishinabeg to follow-up on CNL's request for a meeting.

Date	Event / Activity	Involved Parties	Details
2022 October 11	Email from Kitigan Zibi Anishinabeg to CNL	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor CNL, Director Indigenous Relations	Email from Kitigan Zibi Anishinabeg to CNL proposing a meeting the week of 2022 October 24 Kitigan Zibi Anishinabeg suggested the following topics for discussion: <ul style="list-style-type: none"> <li>• A meeting to go over the commitments list that CNL has submitted as part of the impact assessment</li> <li>• Schedule a community outreach session where representatives from CNL come to the community, present the NSDF and answer questions that community members may have about NSDF and Chalk River</li> <li>• Suggestions from CNL on how to improve the relationship between CNL and KZA</li> <li>• Developing a long-term Framework Agreement</li> <li>• Funding for related activities</li> </ul>
2022 October 12	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor CNL, Director Indigenous Relations	Email from CNL to Kitigan Zibi Anishinabeg confirming the week of 2022 October 24 for a meeting and provided several date options for that week.
2022 October 12	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Forestry Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg sharing that CNL has posted a position for an Indigenous Engagement Coordinator.
2022 October 19	Email from Kitigan Zibi Anishinabeg to CNL	Kitigan Zibi Anishinabeg Forestry ERM Stakeholder Relations	Email from Kitigan Zibi Anishinabeg to CNL requesting more information on the Indigenous Engagement Coordinator position posted.

Date	Event / Activity	Involved Parties	Details
2022 October 24	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Forestry ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg sharing more information about the Indigenous Engagement Coordinator position posted.
2022 October 24	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor CNL, Director Indigenous Relations	Email from CNL to Kitigan Zibi Anishinabeg requesting meeting dates.
2022 October 25	Email from Kitigan Zibi Anishinabeg to CNL	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor CNL, Director Indigenous Relations	Email from Kitigan Zibi Anishinabeg to CNL confirming a meeting with CNL and the CNSC on 2022 October 27.
2022 October 25	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor CNL, Director Indigenous Relations	Email from CNL to Kitigan Zibi Anishinabeg requesting that CNL and Kitigan Zibi Anishinabeg meet separately from the CNSC initially.

Date	Event / Activity	Involved Parties	Details
2022 October 25	Email from Kitigan Zibi Anishinabeg to CNL	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor CNL, Director Indigenous Relations	Email from Kitigan Zibi Anishinabeg to CNL agreeing the meeting with CNL separately from the CNSC.
2022 October 26	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg confirming the 2022 October 27 meeting and expressing interest a meeting with all parties following the meeting.
2022 October 27	Meeting between Kitigan Zibi Anishinabeg and CNL	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor CNL, Director Indigenous Relations ERM Stakeholder Relations	Meeting between Kitigan Zibi Anishinabeg and CNL. CNL and Kitigan Zibi Anishinabeg discussed the commitments list and next steps for the list, CNL's support for a community outreach session, the development of a contribution agreement and a Framework Agreement. CNL and Kitigan Zibi Anishinabeg discussed at length the relationship and how it can be improved.
2022 October 28	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations CNL Director of Indigenous Relations	CNL from CNL to Kitigan Zibi Anishinabeg thanking the First Nation for the meeting on 2022 October 27 and sharing a template for a Capacity Agreement. CNL also confirmed the interest in planning a leadership meeting.

Date	Event / Activity	Involved Parties	Details
2022 November 01	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations CNL Director of Indigenous Relations	Email from CNL to Kitigan Zibi Anishinabeg sharing a one-page fact sheet requested through the CNSC, CNL also sent the most recent press kit. CNL confirmed this information could be used in the community flyer.
2022 November 01	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations CNL Director of Indigenous Relations	Email from CNL to Kitigan Zibi Anishinabeg suggesting dates for a Leadership meeting in 2022 December.
2022 November 08	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations CNL Director of Indigenous Relations	Email from CNL to Kitigan Zibi Anishinabeg confirming the number of representatives from CNL and AECL that will be attending the 2022 November 17 Community Information Session. CNL requested the address of the meeting.



Date	Event / Activity	Involved Parties	Details
2022 November 08	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations CNL Director of Indigenous Relations	Email from CNL to Kitigan Zibi Anishinabeg suggesting alternative dates for a leadership meeting.
2022 November 08	Email from Kitigan Zibi Anishinabeg to CNL	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations CNL Director of Indigenous Relations	Email from Kitigan Zibi Anishinabeg to CNL confirming that leadership meeting dates will be reviewed by Chief and council.
2022 November 08	Email from Kitigan Zibi Anishinabeg to CNL	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations CNL Director of Indigenous Relations	Email from Kitigan Zibi Anishinabeg to CNL providing details for the 2022 November 17 Community Information Session and requesting the CNL/AECL attendee names and digital copies of the posters. CNL indicated a follow-up would be sent by 2022 November 11.

Date	Event / Activity	Involved Parties	Details
2022 November 11	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations CNL Director of Indigenous Relations	Email from CNL to Kitigan Zibi Anishinabeg sharing the list of attendees for the 2022 November 17 Community Information Session and attached the posters. CNL sent three emails in total due to file size of the posters.
2022 November 14	Email from Kitigan Zibi Anishinabeg to CNL	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations CNL Director of Indigenous Relations	Email from Kitigan Zibi Anishinabeg to CNL confirming receipt of the posters for the 2022 November 17 Community Information Session.
2022 November 14	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations CNL Director of Indigenous Relations	Email from CNL to Kitigan Zibi Anishinabeg requesting an update on suggested dates for a leadership meeting.

Date	Event / Activity	Involved Parties	Details
2022 November 14	Email from Kitigan Zibi Anishinabeg to CNL	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations CNL Director of Indigenous Relations	Email from Kitigan Zibi Anishinabeg to CNL indicating that no date had been selected yet for a leadership meeting. KZA first wanted to discuss with their consultant.
2022 November 16	Email from Kitigan Zibi Anishinabeg to CNL	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations CNL Director of Indigenous Relations	Email from Kitigan Zibi Anishinabeg to CNL clarifying points before the 2022 November 17 Community Information Session. KZA described the format of the session and CNL's role. KZA also noted that while they appreciated the intent of inviting an AECL representative, they found it inappropriate for invite them. KZA asked that CNL uninvited AECL from the session.  KZA also stated that they do not consider the event consultation.
2022 November 16	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations CNL Director of Indigenous Relations	Email from CNL to Kitigan Zibi Anishinabeg apologising for the misunderstanding regarding the invitation to the AECL representative at the 2022 November 17 Community Information Session.
2022 November 16	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	Email invitation sent to KZA to webinars on The Overview Decommissioning and Cleanup Plan and Whiteshell Laboratories: Past, Present & Future on 2022 November 22, which included an opportunity for questions.

Date	Event / Activity	Involved Parties	Details
2022 November 17	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations CNL Director of Indigenous Relations	Email from CNL to Kitigan Zibi Anishinabeg providing the names of the CNL attendees for the 2022 November 17 Community Information Session.
2022 November 17	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations CNL Director of Indigenous Relations	Email from CNL to Kitigan Zibi Anishinabeg requesting that CNL's legal representation be allowed to listen to the 2022 November 17 Community Information Session by Zoom.
2022 November 17	Kitigan Zibi Anishinabeg Community Information Session	Kitigan Zibi Anishinabeg ERM Stakeholder Relations CNL Director of Indigenous Relations CNL GM of Waste Services CNL Director Corporate Environmental Protection	CNL staff participated in a Kitigan Zibi Anishinabeg Community Information Session.

Date	Event / Activity	Involved Parties	Details
2022 November 18	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations CNL Director of Indigenous Relations	Email from CNL to Kitigan Zibi Anishinabeg inquiring about availability to discuss the 2022 November 17 Community Information Session.
2022 November 18	Email from Kitigan Zibi Anishinabeg to CNL	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations CNL Legal Counsel	Email from Kitigan Zibi Anishinabeg to CNL noting that KZA did not have legal representation listening at the 2022 November 17 Community Information Session.  CNL legal counsel did not attend the session in light of the fact that KZA had not responded earlier to CNL's question.
2022 November 22	Emails from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg to follow-up on CNL's 2022 November 18 request to discuss the 2022 November 17 Community Information Session.  Kitigan Zibi Anishinabeg confirmed they would provide CNL with availability.
2022 November 25	Email from Kitigan Zibi Anishinabeg to CNL	Kitigan Zibi Anishinabeg Consultant ERM Stakeholder Relations	Email from Kitigan Zibi Anishinabeg to CNL noting KZA's interest in joining KFN on a tour of the Waste Sorting Facilities. Noting that the date selected was no longer available. KZA committed to providing a date that worked for both communities.

Date	Event / Activity	Involved Parties	Details
2022 November 28	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg advising if an upcoming CNL supply chain event in Pembroke and provided a flyer with details.
2022 November 28	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg further requesting a meeting to discuss the 2022 November 17 community information meeting and next steps on the contribution agreement.
2022 November 28	Emails from Kitigan Zibi Anishinabeg to CNL	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations	Email from Kitigan Zibi Anishinabeg to CNL providing CNL with a set of dates and times for the previously requested meeting.  CNL proposed a time and date based on the information provided.  KZA proposed an alternative time. CNL was in agreement.
2022 November 28	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations	Email invitation from CNL to Kitigan Zibi Anishinabeg for a 2022 November 30 meeting to discuss the community information meeting feedback / discussion, confirm a leadership meeting date and next steps on contribution agreement and engagement activities.
2022 November 30	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg proposing to move the date of the 2022 November 30 meeting after a KZA Councillor declined the meeting invitation.

Date	Event / Activity	Involved Parties	Details
2022 November 30	Email from Kitigan Zibi Anishinabeg to CNL	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations	Email from Kitigan Zibi Anishinabeg to CNL informing CNL that no council or chief representation from KZA was available for the 2022 November 30 meeting.  KZA asked that CNL continue to share information as it does with other First Nations and municipalities but noted that information sharing is not considered consultation.
2022 November 30	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg proposing to move the 2022 November 30 meeting to 2022 December 01.
2022 November 30	Email from Kitigan Zibi Anishinabeg to CNL	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations	Email from Kitigan Zibi Anishinabeg to CNL sharing that Chief and Council were busy and could not meet. KZA asked to be provided information on activities.
2022 November 30	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg cancelling the 2022 November 30 meeting.

Date	Event / Activity	Involved Parties	Details
2022 November 30	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg confirming receipt of the information shared about Chief and Councils' availability.  CNL noted the meeting was a request from KZA to schedule the follow-up meeting on the community information session and asked if the Consultation staff still wished to have that meeting.  CNL confirmed that the leadership meeting and contribution agreement discussion can wait until the new year, as requested by KFN.
2022 December 01	Email from Kitigan Zibi Anishinabeg to CNL	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations	Email from Kitigan Zibi Anishinabeg to CNL responded to CNL's 2022 November 28 request for a meeting and noted that Chief and Council need to be present. KZA asked to move the meeting to the new year.  CNL confirmed receipt and committed to follow up in the new year.
2022 December 15	Letter from CNL to CSNC	Kitigan Zibi Anishinabeg Chief Kebaowek First Nation Chief CNL President and CEO AECL President and CEO CNSC	CNL sent a letter to the CNSC Commission confirming that AECL and CNL support KZA's request to extend the submission date to 2023 April 30 and support KZA's intent to request an oral hearing
2023 January 04	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg requesting dates to continue the discussion on establishing a contribution agreement and plan a leadership meeting.



Date	Event / Activity	Involved Parties	Details
2023 January 09	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg requesting dates to continue the discussion on establishing a contribution agreement and plan a leadership meeting.
2023 January 20	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations CNL's Director of Indigenous Relations	Email from CNL to Kitigan Zibi Anishinabeg following up on CNL's attempts continue the discussion on establishing a contribution agreement and plan a leadership meeting.
2023 January 26	Telephone call from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation CNL's Director of Indigenous Relations	Telephone call from CNL to Kitigan Zibi Anishinabeg to discuss meeting. KZA informed CNL that there had been no decision made related to a contribution agreement.
2023 February 17	Letter from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Chief CNL, President and CEO AECL, President and CEO	Letter from CNL and AECL to Kitigan Zibi Anishinabeg expressing gratitude for the opportunity to engage with the community.  The letter acknowledged the joint letter to the CSNC on 2022 December 15 to support the request to extend the submission date to 2023 April 30.  CNL and AECL requested a leadership meeting to understand Kitigan Zibi's objectives during the Procedural Direction extension period.

Date	Event / Activity	Involved Parties	Details
2023 February 21	Webinar	Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	Kitigan Zibi Anishinabeg attended the 2023 February 21 ERM bi-monthly webinars. The topics were: <ul style="list-style-type: none"> <li>• CNL's Integrate Waste Strategy: NSDF as a Key Enabling Facility</li> <li>• Decommissioning of Building 250 at Chalk River Laboratories</li> <li>• Nuclear Power Demonstration (NPD) Closure Project: Changes to the EIS Resulting from Feedback</li> </ul>
2023 February 22	Email from Kitigan Zibi Anishinabeg to CNL	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations	Email from Kitigan Zibi Anishinabeg to CNL informing that KZA Leadership has been looking into the NSDF Consultation and Leadership would be interested in looking at a long-term agreement with CNL. KZA asked for an agreement template.  Once the community has reviewed the template then a leadership meeting could be planned.  KZA asked for a technical staff meeting.
2023 February 23	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg sharing a template for a short-term agreement and explained the purpose of a short versus long term agreement in CNL's view, what may be an appropriate first step. CNL asked for a proposed agenda items for the technical staff meeting and if the preference was to have a virtual or in-person meeting. CNL suggested discussing the agreement template, commitments and project information at the meeting.
2023 February 24	Email from Kitigan Zibi Anishinabeg to CNL	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations	Email from Kitigan Zibi Anishinabeg to CNL confirming a virtual technical staff meeting.  KZA requested adding a summary of the changes done to the project following comments from First Nations and the public, in addition to the agreement and commitments list.  KZA requested a copy of the commitments list prior to the meeting.

Date	Event / Activity	Involved Parties	Details
2023 February 27	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg providing dates for a technical staff meeting.
2023 February 28	Email from Kitigan Zibi Anishinabeg to CNL	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations	Email from Kitigan Zibi Anishinabeg to CNL confirming a date of 2023 March 08 for the technical staff meeting.  KZA requested a copy of the commitments prior to the meeting.
2023 February 28	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg asking KZA to confirm if they would like both the NSDF Project and the NPD Closure Project commitments or strictly the NSDF commitments at this time.
2023 February 28	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations	Email invitation from CNL to Kitigan Zibi Anishinabeg for the 2023 March 08 meeting.  Proposed agenda: <ul style="list-style-type: none"> <li>• Changes to the final NSDF Environmental Impact Statement (EIS)</li> <li>• NSDF Project Commitments</li> <li>• Discuss potential agreement with KZA</li> </ul>

Date	Event / Activity	Involved Parties	Details
2023 February 28	Email from Kitigan Zibi Anishinabeg to CNL	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations	Email from Kitigan Zibi Anishinabeg to CNL confirming that KZA only has the capacity for the NSDF Project at the moment but asked for NPD commitments to have for future use.  CNL acknowledged receipt.
2023 March 07	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg sharing the NSDF Consolidated Commitment List document. CNL highlighted the Kitigan Zibi Anishinabeg table (B.4) and noted the list is evergreen, meaning that any commitments agreed to by CNL and KZA would be added to the document, no matter when agreed to.
2023 March 07	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg sending the proposed agenda for the 2023 March 08 meeting.  Proposed agenda: <ul style="list-style-type: none"> <li>• Feedback from the community meeting (2022 November)</li> <li>• Changes to the final NSDF Environmental Impact Statement (EIS)</li> <li>• NSDF Project Commitments</li> <li>• Leadership meeting date</li> <li>• Discuss potential agreement with KZA</li> </ul>

Date	Event / Activity	Involved Parties	Details
2023 March 08	Meeting between CNL and Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Consultants Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations AECL CNL, NSDF and NPD Closure Project Representatives	<p>Meeting between CNL and Kitigan Zibi Anishinabeg. The meeting began with CNL and KZA First Nation providing their thoughts on the 2022 November Community Information Session. KZA First Nation expressed that it was an important step for the community and highlighted that the main concerns are the location and lack of trust related to scientific evidence provided by CNL.</p> <p>KZA First Nation advised they were working with KFN on a survey to include in the KFN Rights Impact Assessment.</p> <p>CNL presented on the changes to the EIS resulting from feedback and answer questions from KZA First Nation.</p> <p>KZA First Nation requested another meeting to discuss the Commitments list in detail.</p> <p>Before a leadership meeting can be planned KZA First Nation wants more information on the type of contribution agreements and an outline of an LTRA.</p> <p>CNL was not aware that KZA First Nation had invited Ole Hendrickson and Pippa Feinstein (Consultants) to the meeting in advance. These consultants are known to CNL and participated in the NSDF Part 2 Hearing as intervenors.</p>
2023 March 09	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg sharing the action items list from the 2023 March 08 meeting.
2023 March 09	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg following up on the 2023 March 08 meeting action items to set up a monthly meeting, plan a leadership meeting and provide printed copies of the EIS to the community.

Date	Event / Activity	Involved Parties	Details
2023 March 11	Email from Kitigan Zibi Anishinabeg to CNL	Kitigan Zibi Anishinabeg Elder ERM Stakeholder Relations	Email from Kitigan Zibi Anishinabeg to CNL sharing thoughts on the 2023 March 08 meeting, notably her experience working with the public service in different capacities and the duty to consult as it relates to waste storage projects.
2023 March 14	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg sharing CNL's Indigenous Relations Procurement Strategy (IRPS).  CNL noted that while the Strategy is effective as of 2023 April there will be ongoing opportunities to enhance its approach to reflect feedback from First Nations. CNL offered a meeting to discuss.
2023 March 15	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg requesting a Kitigan Zibi Anishinabeg territory map.
2023 March 15	Email from Kitigan Zibi Anishinabeg to CNL	Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	Email from Kitigan Zibi Anishinabeg to CNL thanking CNL for the 2023 March 08 meeting. KZA provided dates for a monthly reoccurring meeting.  KZA requested to discuss the NSDF Commitments at the next meeting and a hard copy of the EIS.  CNL acknowledged the requests.
2023 March 16	Email from Kebaowek First Nation to CNL	Kebaowek First Nation Consultant Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL sharing that Kitigan Zibi Anishinabeg would also attend the 2023 March 21 open Q&A session. KFN and KZA were working to provide a list of questions.  KFN requested changing the meeting time and that the meeting be recorded.  CNL acknowledged receipt.

Date	Event / Activity	Involved Parties	Details
2023 March 17	Email from CNL to Kebaowek First Nation and Kitigan Zibi Anishinabeg	Kebaowek First Nation Consultant Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	Email from CNL to Kebaowek First Nation following up from an earlier telephone call. CNL confirmed that they would be providing written responses to the 28 questions followed by a meeting. CNL committed to sending the responses by 2023 March 22. CNL suggested dates for the meeting.  CNL cancelled the 2023 March 21 meeting as the priority is responding to the questions.  CNL asked KFN to confirm if there was still interest in touring the waste management areas and if a meeting was necessary to address concerns about coming to the site.
2023 March 21	Email from Kebaowek First Nation to CNL and Kitigan Zibi Anishinabeg	Kebaowek First Nation Consultant Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	Email from Kebaowek First Nation to CNL responding to the 2023 March 17 email about the priority list of questions. KFN indicated they will provide date options for the follow up meeting with CNL.  KFN noted that they will decide on the need for a waste management area tour after the meeting.
2023 March 22	Email from CNL to Kebaowek First Nation and Kitigan Zibi Anishinabeg	Kebaowek First Nation Consultant ERM Stakeholder Relations Kitigan Zibi Anishinabeg Consultation	Email from CNL to Kebaowek First Nation sending CNL's dispositions to the KFN questions on waste submitted on 2023 March 17.  CNL noted that the majority of these topics were covered during the Part 2 NSDF Hearing, giving specific examples, and shared that the transcripts are publicly available.  To facilitate a productive meeting, CNL requested KFN indicate which comments to focus the discussion on prior to the meeting.

Date	Event / Activity	Involved Parties	Details
2023 March 22	Email from CNL to Kebaowek First Nation	Kebaowek First Nation Consultant ERM Stakeholder Relations Kitigan Zibi Anishinabeg Consultation	Invitation from CNL to Kebaowek First Nation for a 2023 March 28 meeting to discuss KFN and Kitigan Zibi Anishinabeg questions.
2023 March 28	Email from Kitigan Zibi Anishinabeg to CNL	ERM Stakeholder Relations Kitigan Zibi Anishinabeg Consultation	Email from Kitigan Zibi Anishinabeg to CNL informing that they had been working closely with Kebaowek First Nation on the waste inventory questions. KZA shared that they would be sending two representatives to the meeting on 2023 March 29.  CNL acknowledged.
2023 March 28	Meeting between CNL, Kebaowek First Nation, Kitigan Zibi Anishinabeg and AECL	Kebaowek First Nation Chief Kebaowek First Nation Councillor Kebaowek First Nation Consultants Kitigan Zibi Anishinabeg Consultants CNL NSDF Project staff ERM Stakeholder Relations CNL GM of Waste Services CNL, Director, Corporate Environment AECL	Meeting between CNL, Kebaowek First Nation, Kitigan Zibi Anishinabeg and AECL to discuss the questions related to the NSDF Waste Inventory. Kebaowek First Nation and Kitigan Zibi Anishinabeg invited consultants who are known to CNL, all of whom were intervenors at the Part 2 Hearing. The consultants included representatives from the Canadian Coalition for Nuclear Responsibility and the Concerned Citizens of Renfrew County.  CNL responded to the written questions provided by KFN on 2023 March 27 and additional questions that came up during the meeting.  KFN thanked CNL for taking the time to answer the questions. CNL took an action to respond to the questions provided 2023 March 27.



Date	Event / Activity	Involved Parties	Details
2023 March 31	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	<p>Email from CNL to Kitigan Zibi Anishinabeg sending the draft summary and the KZA engagement sections of CNL's DRAFT Procedural Direction submission. CNL acknowledged that KZA may have a different position and perspective and that CNL would work collaboratively with KZA to understand any additional matters that are raised after the date of the submission.</p> <p><i>Summary – DRAFT CNL Procedural Direction Written Submission 2023 March 31</i></p> <p><i>KZA Engagement – DRAFT CNL Procedural Direction Submission 2023 March 31</i></p> <p>CNL noted the draft was subject to change and requested feedback by 2023 April 14.</p>
2023 April 11	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	<p>Email from CNL to Kitigan Zibi Anishinabeg sharing the proposed agenda for the 2023 April 12 working group meeting.</p> <p>Proposed agenda:</p> <ul style="list-style-type: none"> <li>• Discuss set-up of the monthly meeting structure</li> <li>• Update on review of CNL's Procedural Direction submission (due 2023 April 14)</li> <li>• Leadership meeting date</li> <li>• Discuss next steps on activities for the NSDF Project and NPD Closure Project (if time permits)</li> </ul>

Date	Event / Activity	Involved Parties	Details
2023 April 12	Meeting between CNL and Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation Kitigan Zibi Anishinabeg Councillors Kitigan Zibi Anishinabeg Natural Resources and Lands Dept. ERM Stakeholder Relations CNL, NSDF Project staff AECL	<p>This was the first monthly meeting between CNL, AECL and Kitigan Zibi Anishinabeg. Following introductions KZA stated that they do not consider the meeting to be consultation.</p> <p>KZA members expressed concerns about the project, mainly the location, proximity to the river, alternatives considered, security of the site, transportation of waste and CNL's plan for the disposal of intermediate-level waste and high-level waste. KZA raised the issue that they felt they were not consulted early in the project and disagreed that CNL shared the same concerns about the project.</p> <p>CNL asked for an update on the review of the draft summary and the KZA engagement sections of CNL's Draft Procedural Direction submission. KZA requested more time to review and information on the plan for high-level waste referring to the federal government's Radioactive Waste Policy Framework.</p>
2023 April 12	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Councillor ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg providing a brief explanation of the proposed disposal path for both high-level radioactive and intermediate-level radioactive waste at the CRL site generally. This was an action item from the 2023 April 12 working group meeting.
2023 April 13	Email from CNL to Kitigan Zibi Anishinabeg	Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	Email from CNL to Kitigan Zibi Anishinabeg proving a general outline of a long term relationship agreement with timelines. This was an action item from the 2023 April 12 working group meeting.
2023 April 14	Email from Kitigan Zibi Anishinabeg to CNL	Kitigan Zibi Anishinabeg Consultation ERM Stakeholder Relations	<p>Email from Kitigan Zibi Anishinabeg to CNL providing comments on CNL's draft summary and the full KZA engagement sections of CNL's DRAFT Procedural Direction submission- sent on 2023 March 31.</p> <p>KZA noted that due to the short comment timeline the comments are preliminary and do not imply KZA's consent to the drafts.</p>

**Appendix C Letter from Kebaowek First Nation to the Canadian Nuclear Safety Commission - Re: CNSC Kebaowek First Nation (KFN) Request for Stop of NSDF Hearing Schedule**

TEL: (819) 627-3455

**KEBAOWEK FIRST NATION**  
110 OGIMA STREET  
KEBAOWEK (QUEBEC)  
J0Z 3R1

FAX: (819) 627-9428

January 31, 2022

**BY EMAIL**Canadian Nuclear Safety Commission  
c/o Mme Rumina Velshi, President  
280 Slater Street  
Ottawa, ON K1P 5S9**VIA EMAIL** [cnscc.eopresident-pdpresident.ccsn@canada.ca](mailto:cnscc.eopresident-pdpresident.ccsn@canada.ca)

Dear Mme. Velshi,

**Re: CNSC Kebaowek First Nation (KFN) Request for Stop of NSDF Hearing Schedule**

First, I hope this letter finds you and your family well during these trying times.

Second, and for the record I would like to address Kebaowek First Nation's concerns about the notice of hearing that was received January 14, 2022 from CNSC staff that a mail drop to our community members would be carried out by Canada Post January 24, 2022 (attached to this letter as Appendix 1). This type of unilateral unstructured notification to our community members from CNSC staff about the upcoming Commission Hearings for Canadian Nuclear Laboratories' proposal to construct a Near Surface Disposal Facility (NSDF)<sup>1</sup> on Algonquin Rights and Title land is unacceptable and goes against the CNSC's statements of reconciliation and working together with open dialogue for this project. We remind you that Kebaowek First Nation's section 35 rights are held collectively and, as such, you should be consulting with Kebaowek First Nation leadership as the elected representative of the rights holding group.

In our view, hearing notices mailed to our community members do not make up for the lack of meaningful consultation by CNSC and the Proponent CNL with Kebaowek First Nation and other left out Algonquin communities since review of the project began in 2016. Nor does it negate the unresolved issue of the CNSC Commission decision to accept the NSDF EIS as complete and proceed to hearings without the required Indigenous engagement with KFN and other Algonquin communities necessary to

<sup>1</sup> Notice of Hearing: <http://nuclearsafety.gc.ca/eng/the-commission/pdf/Notice-PublicHearing-CNL-NSDF-22-H7-e.pdf>

uphold the Honour of the Crown. We have raised this issue on numerous occasions including most recently at the CNL Regulatory Oversight Review Hearing November 25, 2021.<sup>2</sup>

We continue to bring to your attention the ways in which the CNSC has impaired our ability to fully participate, in a meaningful way, and our increasing concern given:

- A hearing has been scheduled to consider the licence application and federal environmental assessment (EA) under the *Canadian Environmental Assessment Act, 2012* ("CEAA 2012") for the NSDF, and decisions anticipated on these matters in respect of lands which overlap with Kebaowek's unceded lands and traditional territory;
- The licensing and environmental assessment decisions rendered by the CNSC, in its role as nuclear regulator and authority for environmental assessment, pose significant and long-term impacts Kebaowek's constitutionally protected Aboriginal rights; and
- The CNSC as yet, has not discharged its duty to consult nor undertaken consultation with Kebaowek before deciding to proceed with the licensing and EA hearing for the NSDF.

Thirdly, there has been the assumption by CNSC staff that the Algonquin Anishinaabeg Nation Tribal Council (AANTC) was representing its members communities in the NSDF consultation when in fact they had a funding agreement with CNSC to review environmental studies but had no mandate or resolution from the Chiefs to represent the community Rights and Title holders in the NSDF consultation. As you are aware the AANTC has withdrawn from the CNSC funding agreement because of this confusion. As noted in *R v. Adams, 1996* government "may not simply adopt an unstructured discretionary administrative regime which risks infringing Aboriginal rights in a substantial number of applications in the absence of some explicit guidance." KFN remains seriously concerned about the CNSC administrative tribunals unstructured discretion in consultation activities with KFN and the Algonquin Nation members.

As a comparison Kebaowek, Wolf Lake and Temiskaming First Nations are currently engaged in an environmental assessment under CEAA 2012 at the Temiskaming Dam Complex on the Ottawa River. Here the Federal proponent Public Services and Procurement Canada (PSPC) and the communities have developed a consultation framework agreement in advance of carrying out the assessment. Furthermore, UNDRIP principles are incorporated in the review as part of this rights based environmental assessment. It appears that the TDQRP Federal Consultation is much more robust on Indigenous consultation and engagement than the CNSC regulatory scheme. It is for these reasons that for some time KFN has been seeking to provide some structure to the exercise of the NSDF consultation requesting the CNSC funding of an over arching Consultation Framework Agreement.

In conclusion, we provide this letter as a follow up noting we are just now beginning to work on the Consultation Framework Agreement with Kebaowek to be established jointly with the CNSC and the federal Ministry of Natural Resources (NRCan). This is a process KFN has repeatedly called for and only now, once the hearing dates have been set, are CNSC Staff pushing to meet with us on a frequent basis.

We are once again requesting that the CNSC suspend hearings on the NSDF under Rule 14 of the CNSC's [Rules of Procedure](#), noting Rule 3 allows the Commission to vary their rules for "considerations of fairness". This will provide the time for a mutually agreeable Consultation Framework Agreement

<sup>2</sup> <https://nuclearsafety.gc.ca/eng/the-commission/pdf/Transcript-2021-11-25-Meeting-a.pdf> p.153



and workplan for the NSDF is in place with KFN, which respects and upholds the Honour and Duty of the Crown.

Given the time sensitive nature of our request, we respectfully ask for a decision of the Commission on our request to suspend the hearing timeline by February 15, 2022. Our requests herein do not mean Kebaowek recognizes the CNSC's authority to have issued decision on the Chalk River NSDF EIS being complete and calling the hearings. This correspondence including our requests do not constitute a waiver nor fulfillment of our s. 35 constitutional rights and the Crown's ongoing duty to consult and accommodate.

Meegwetch,



Chief Lance Haymond  
Kebaowek First Nation

CCs/

The Honourable Jonathan Wilkinson, P.C., M.P., Minister of Natural Resources Canada  
[jonathan.wilkinson@parl.gc.ca](mailto:jonathan.wilkinson@parl.gc.ca)

The Honourable Steven Guilbeault, P.C., M.P., Minister of Environment and Climate Change  
[Steven.Guilbeault@parl.gc.ca](mailto:Steven.Guilbeault@parl.gc.ca)

Ms. Candida Cianci, CNSC, [candida.cianci@canada.ca](mailto:candida.cianci@canada.ca)

Mr. Adam Levine, CNSC, [adam.levine@canada.ca](mailto:adam.levine@canada.ca)

Ms. Diane Cameron, Director, Nuclear Energy Division, NRCAN, [diane.cameron@canada.ca](mailto:diane.cameron@canada.ca)

Ms. Maude-Émilie Page, Atomic Energy of Canada Limited, [mpage@aecl.ca](mailto:mpage@aecl.ca)

Mr. Pat Quinn, Director Corporate Communications, Canadian Nuclear Laboratories  
[pat.quinn@cnl.ca](mailto:pat.quinn@cnl.ca)

Global First Power, [info@globalfirstpower.com](mailto:info@globalfirstpower.com)

Chief Adrienne Jérôme, Nation Anishnabe du Lac-Simon, [adrienne.jerome@lacsimon.ca](mailto:adrienne.jerome@lacsimon.ca)

Chief Monik Kistabish, Abitibiwinini First Nation, [monik.kistabish@pikogan.com](mailto:monik.kistabish@pikogan.com)

Chief Régis Pénosway, Anicinape Community of Kitcisakik, [regis.penosway@kitcisakik.ca](mailto:regis.penosway@kitcisakik.ca)

Chief Arden McBride, Timiskaming First Nation, [chief@parolink.net](mailto:chief@parolink.net)

Chief Steve Mathias, Long Point First Nation, [steevemathias@lpfn-aki.ca](mailto:steevemathias@lpfn-aki.ca)

Chief Tony Wawatie, Algonquins of Barriere Lake, [wawatie.tony@gmail.com](mailto:wawatie.tony@gmail.com)

Chief Lisa Robinson, Wolf Lake First Nation, [lisarobinson@wolflakefirstnation.com](mailto:lisarobinson@wolflakefirstnation.com)

Chief Dylan Whiteduck, Kitigan Zibi Anishinabeg, [Dylan.whiteduck@kza.qc.ca](mailto:Dylan.whiteduck@kza.qc.ca)

Chief Wendy Jocko, Algonquins of Pikwakanagan, [chiefcouncil@pikwakanagan.ca](mailto:chiefcouncil@pikwakanagan.ca)

Chief June Black, Wahgoshig First Nation, [wfnchief@wahgoshigfirstnation.com](mailto:wfnchief@wahgoshigfirstnation.com)

Honourable Minister Seamus O'Regan, Minister of Natural Resources

[Seamus.OREgan@parl.gc.ca](mailto:Seamus.OREgan@parl.gc.ca)

Ms. Lynn Moreau, Iroquois Anishinabek Nuclear Alliance, [lynn.moreau@anishinabek.ca](mailto:lynn.moreau@anishinabek.ca)

Ontario Regional Chief RoseAnne Archibald, [ORCRoseAnne@afn.ca](mailto:ORCRoseAnne@afn.ca)

Quebec Regional Chief Ghislain Picard, [gpicard@apnql.com](mailto:gpicard@apnql.com)

Norm Odjick, Director General, Algonquin Anishinabeg Nation Tribal Council

[dg@aatnc-ctnaa.ca](mailto:dg@aatnc-ctnaa.ca)

Ms. Kerrie Blaise, Canadian Environmental Law Association, [Kerrie@ccla.ca](mailto:Kerrie@ccla.ca)

Mr. Emerson Vandenberg, Policy Advisor, Office of the Minister of Natural Resources

[emerson.vandenberg@canada.ca](mailto:emerson.vandenberg@canada.ca)

Mr. Andrew Bisson, Office of the Minister of Natural Resources, [andrew.bisson@canada.ca](mailto:andrew.bisson@canada.ca)

Ms. Clare Cattrysse, Director, Policy Aboriginal and International Relations

[clare.cattrysse@canada.ca](mailto:clare.cattrysse@canada.ca)

Mr. Jim Delaney, Director, Uranium and Radioactive Waste, [jim.delaney@canada.ca](mailto:jim.delaney@canada.ca)

Joel Hardin, MPP Ottawa Centre, [JHarden-QP@ndp.on.ca](mailto:JHarden-QP@ndp.on.ca)

Ottawa City Councillor Theresa Kavanagh, [BayWard@ottawa.ca](mailto:BayWard@ottawa.ca)

Ottawa City Councillor Catherine McKenney, [Catherine.Mckenney@ottawa.ca](mailto:Catherine.Mckenney@ottawa.ca)

Mayor of Montreal Mme Valerie Plante, [maireesse@ville.montreal.qc](mailto:maireesse@ville.montreal.qc)

**Appendix D Letter from CNL and AECL to Kebaowek First Nation - RE: Proposed meeting between Kebaowek First Nation, AECL and CNL**UNRESTRICTED  
PAGE 1 OF 2

July 19, 2022

File #: 145-CNXX-22-0012-L

Chief Lance Haymond  
Kebaowek First Nation  
110 Ogima Street  
Kebaowek, Quebec J0Z 3R1

**RE: Proposed meeting between Kebaowek First Nation, AECL and CNL**

Dear Chief Haymond,

On behalf of Atomic Energy of Canada Limited (AECL) and Canadian Nuclear Laboratories (CNL), we are writing to extend our thanks and appreciation to you and Kebaowek First Nation (KFN) for the kindness and grace that you have shown us throughout our ongoing engagement and outreach, and KFN's willingness to explore additional opportunities to grow our relationship.

During the recent regulatory hearings on the Near Surface Disposal Facility (NSDF), we voiced our commitment to meaningful engagement with you and other Indigenous nations and organizations as our largest executive priority. As the two companies collectively responsible for the operation of Canada's national nuclear laboratories, we place a high value on improving and growing relationships with KFN. We understand the importance of developing a strong relationship with you and your community, cultivated through ongoing dialogue and participation, and built on trust and a shared commitment to work together.

With that in mind, we would welcome the opportunity to meet with you in person, Chief Haymond, at your earliest convenience, to continue our dialogue with KFN, and to personally see and learn more about your community's unique culture, history, needs and challenges. Our teams at both AECL and CNL are much richer in wisdom and experience thanks to the engagements in which we have been fortunate to participate with KFN. Through the continued sharing of knowledge with KFN, it is our hope that we can further discuss matters of mutual interest, but also create the necessary conditions to advance positive social change, and serve as an active participant on Canada's journey towards healing and reconciliation.

In addition to this proposed meeting, I also want to assure you that AECL and CNL both respect the procedural directive that was recently issued by the Canadian Nuclear Safety Commission (CNSC) on July 5, 2022, related to the NSDF Project. The signing of the Letter of Intent (January 2022) and the imminent signing of the framework agreement between CNL, AECL and KFN gives us the opportunity to further engage with you and your consultation team to ensure KFN's understanding and involvement on the NSDF Project.



UNRESTRICTED

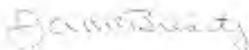
PAGE 2 OF 2

As you are aware, we have monthly meetings scheduled with Justin Roy and other KFN representatives related to the NSDF project. We would also be pleased to bring our teams to meet with you and the KFN community to share information about the project and respond to any questions or concerns there may be about the proposed facility. We have instructed our teams to reach out to your office to determine whether there is interest in these engagements, and they will be happy to set up these meetings at a date and location that is convenient to KFN.

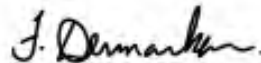
Thank you, once again, for the opportunity to engage with you and Kebaowek First Nation. These recent experiences have been a significant journey of learning for both AECL and CNL, and we look forward to deepening our relationship.

We hope to hear from you soon and, if agreeable to you, look forward to the opportunity to visit your community to meet with you in person.

Sincerely,



Joe McBrearty  
President and CEO  
Canadian Nuclear Laboratories



Fred Dermarkar  
President and CEO  
Atomic Energy of Canada Limited

Cc.

Justin Roy, Kebaowek First Nation  
Norm Odjick, Algonquin Anishinabeg Nation Tribal Council  
Jason Cameron, Atomic Energy of Canada Limited  
Patricia Stirbys, Canadian Nuclear Laboratories  
Pat Quinn, Canadian Nuclear Laboratories  
Mitch MacKay, Canadian Nuclear Laboratories  
Nicole LeBlanc, Canadian Nuclear Laboratories



**Appendix E Letter from CNL to KFN - RE: CNSC Reportable Event at Chalk River Laboratories**Canadian Nuclear  
Laboratories | Laboratoires Nucléaires  
Canadiens

OFFICIAL USE ONLY

Page 1 of 2

2022 November 09

Ms. Rosanne Van Schie  
Project Manager, Kebaowek First Nation Field Team  
Kebaowek First Nation,  
110 Ogima Street,  
Kebaowek, Quebec J0Z 3R1  
Room 6-39, 131 Queen St Ottawa, ON K1A 0A6  
[vanschie3@gmail.com](mailto:vanschie3@gmail.com)

Ms. Van Schie,

Since 2022 July, Canadian Nuclear Laboratories (CNL) and Kebaowek First Nation representatives have been participating in frequent and effective engagements; building relationships, advancing discussions and sharing project and community information related to the proposed Near Surface Disposal Facility (NSDF). These concentrated efforts came about in response to the Canadian Nuclear Safety Commission's (CNSC) procedural direction, related to the NSDF project, providing more time for engagement and consultation between CNSC, Atomic Energy of Canada Limited, CNL and Kebaowek First Nation.

CNL values the opportunity to grow this important relationship with the Kebaowek First Nation and believes that together we have been making progress in this undertaking.

Recent events, however, have caused a strain on this relationship and led to a CNSC reportable event at the Chalk River Site. This reportable event is a direct result of Kebaowek First Nation field team members accessing CNL property without proper security clearance or CNL escort, setting up of trail camera(s) and placing of a deer carcass within CNL property for the purpose of baiting wolf.

While the Field Team's desire to set up a baiting station to attract wolf and collect wolf scat was communicated to CNL, CNL representatives were very clear that this was not an approved approach for collecting scat samples at the CNL site, and it would not be permitted on CNL property.

The action taken by the Kebaowek First Nation field team has serious health, safety, and security implications that put at risk Kebaowek First Nation field team members, CNL staff and the general public. CNL has a legal mandate and responsibility to ensure that our employees are provided a safe and healthful workplace in all areas where they are required to work on our sites. We have employees routinely required to access the areas where you have placed your baiting and we are specifically concerned that the animals being baited could attack our workers in an attempt to guard the baited area. We expect that the deer remains, camera(s) and equipment be removed from our property immediately. Removal activities will require escorts. Your CNL contact will reach out to you to make necessary arrangements.

CNL remains committed to working with the Kebaowek First Nation and its field staff so that necessary information and material can be gathered. Less intrusive, safer and reliable methods to collect scat exist. CNL continues to offer access to available wolf scat samples from the CNL freezer (17 samples + one sample collected with a Kebaowek First Nation representative). All specimens were collected fresh, have geographical locations and could be made available for sampling with a 24-hour notice. CNL also welcomes continued escorted Field Team searches for additional new fresh scats, where estimates, based on field experience, indicate that for every 5 person-hour search one fresh scat sample could be collected.

Canadian Nuclear  
Laboratories | Laboratoires Nucléaires  
Canadiens

OFFICIAL USE ONLY

Page 2 of 2

It is through our collaboration with Kebaowek First Nation, and that with other Indigenous Nations, that we have better informed our project, and have been able to include Indigenous traditional knowledge and environmental value components.

We thoroughly believe the NSDF is the science-based and responsible solution for the safe and secure disposal of the low-level wastes currently on AECL sites, and that the project should proceed, thereby, ensuring a safe environment for future generations.

I would like to thank the Kebaowek First Nation Team for its continuing cooperation, and look forward to our ongoing working relationship.

Please do not hesitate to reach out with any further follow up questions.

Sincerely,

Lou Riccoboni,  
Vice President, Corporate Affairs  
Canadian Nuclear Laboratories

cc:

Chief Lance Haymond, Kebaowek First Nation ([lhaymond@kebaowek.ca](mailto:lhaymond@kebaowek.ca))

Brett Legree, CNL Nuclear Facility Site Office Supervisor, CNSC

Joseph McBrearty, President & CEO, Canadian Nuclear Laboratories

Jeff Willman, Vice-President, Health, Safety, Security & Environmental, CNL

George Dolinar, Director of Corporate Environmental Protection, CNL

Patricia Stirbys, Director Indigenous Relations, Canadian Nuclear Laboratories, CNL

Fred Dermarkar, President & CEO, Atomic Energy of Canada Limited

Jason Cameron, Vice-President, Communications and Public Affairs, AECL

**Appendix F Letter from CNL and AECL to the CNSC - Subject: Kebaowek First Nation's (KFN's) Request to Extend Submission Date for Procedural Directive Re: CNL's Application to Construct a Near Surface Disposal Facility**UNRESTRICTED  
PAGE 1 OF 2

2022 December 15

File #: 145-CNNO-22-0058-L

Rumina Velshi  
President and Chief Executive Officer  
Canadian Nuclear Safety Commission  
280 Slater Street, PO Box 1046, Stn B  
Ottawa, ON K1P 5S9

**Subject: Kebaowek First Nation's (KFN's) Request to Extend Submission Date for Procedural Directive Re: CNL's Application to Construct a Near Surface Disposal Facility**

Dear President Velshi,

On 2022 December 14, the CNSC Registrar hosted a case management conference to have affected parties express their views on KFN's request to extend the submission date for the Procedural Directive. On 2022 December 15, the CEOs of AECL and CNL met with the Chief of the KFN in person at KFN's office in Kebaowek to continue the discussion on KFN's request. The purpose of this letter is to confirm that AECL and CNL support KFN's request to extend the submission date to 2023 April 30, and support KFN's request for an oral hearing.

During the case management conference, Kitigan Zibi Anishinabeg First Nation (KZA) expressed a similar intent to submit a formal request to extend their submission date to 2023 April 30. If KZA does submit a request for extension to 2023 April 30, AECL and CNL would also support such a request.

We appreciate your consideration of our position when reviewing KFN's and KZA's requests for extension.

Best Regards,

Joe McBrearty  
President and CEO  
Canadian Nuclear Laboratories

Fred Dermarkar  
President and CEO  
Atomic Energy of Canada Limited

Cc.  
Chief L. Haymond - Kebaowek First Nation  
Chief D. Whiteduck - Kitigan Zibi First Nation

Chalk River Laboratories 286 Plant Road Chalk River, Ontario Canada K0J 1J0 Telephone: 613-584-3311 Toll Free: 1-866-513-2325	Laboratoires de Chalk River 286, chemin Plant Chalk River (Ontario) K0J 1J0 Canada Téléphone: 613-584-3311 Sans frais: 1-866-513-2325
--	--

UNRESTRICTED  
PAGE 2 OF 2

---

D. Saumure – CNSC Registrar  
Registry / Greffe (CNSC/CCSN) <registry-greffe@cnscccsn.gc.ca>  
K. Murthy – CNSC DG Nuclear Fuel Cycle Facilities



**Appendix G Letter from KFN to CNL in Response to CNSC Reportable Event**

**KEBAOWEK FIRST NATION**  
**110 OGIMA STREET**  
**KEBAOWEK (QUEBEC)**  
**J0Z 3R1**

**TEL: (819) 627-3455**

**FAX: (819) 627-9428**

December 20, 2022

Mr. Lou Riccoboni  
Vice President Corporate Affairs  
Canadian Nuclear Laboratories

Dear Mr. Riccoboni,

Thank you for your letter November 09, 2022 concerning Kebaowek First Nation site access and activities in response to the CNSC July 3, 2022 procedural order regarding consultation on the CNL NSDF project with the community. As project manager of the Kebaowek FN rights impact assessment I have taken the time to review your letter and concerns and am open to further questions and discussion with your team and Kebaowek First Nation as to how we might work to usefully recalibrate our ethical relations with each other in carrying out Kebaowek's necessary rights impact assessment work on-site.

I will suggest that "Ethical space" is created when two societies with disparate worldviews engage with one another. Unfortunately, the current timeframe of the CNSC procedural order has not provided adequate time to discuss our Indigenous-led work methodologies in detail with your corporation. I will approach your reportable event from this context. Firstly, thank you for your request for dialogue within your letter concerning the CNSC reportable event. It is evident from my on-site experience as well as our field crews that our research will require our developing a framework for dialogue between Indigenous led assessment and CNL site rules that requires a deep understanding of our diverse cultures and the space between us.

The past several years have seen an increasing emphasis on recognizing and applying traditional Indigenous led environmental research methodologies in Canada. The Supreme Court of Canada is on the cusp of a 'paradigm shift' in reconciling the history of Canadian law and specifically how it has been used to dispossess Indigenous peoples from their lands, children and legal traditions. In the final report of the Truth and Reconciliation Commission (2015), it was stated that the reconciliation of Canada must involve the revitalization and recognition of Indigenous laws.

This is something we introduced to your team on Fitzpatrick Island August 31, 2022. Call to Action #50 specifically supports the creation of Indigenous law institutions. Internationally, the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP, 2007) is about respecting and recognizing the rights of Indigenous Peoples'. In concert with these objectives Kebaowek's Rights Impact Assessment will provide for the resurgence of Indigenous methodologies through Anishinaabeg law and land activities. This effort requires both self-determination and ethical space.

Kebaowek's Rights Impact Assessment fieldwork adopts a decolonizing approach that challenges traditional member document approaches by CNSC who have been reporting for First Nation communities like Kebaowek on your NSDF project as 'subjects' rather than participants. Decolonized research is entirely participatory and in this case, directed by specific Algonquin Anishinaabeg community laws, interests, values and needs.

I will suggest our work now is how Indigenous led research approaches might work to usefully recalibrate our ethical relations with each other, and with other ecosystem elements at the Chalk River site from and Indigenous earth jurisprudence point of view. Earth jurisprudence is a way of knowing the world is "sacred" that calls us all to the challenge of rethinking colonial government systems and laws to make something better, to do the long haul work.

Our work is structured to operationalize socio-scientific perspective taking including one's ability to recognize and consider the diverse cognitive and emotional viewpoints of others. These include, scientific and engineering driven argumentation but also Anishinaabeg conventions of discourse as well as Algonquin ways of knowing and being. In this way, the work embraces all forms of knowledge exchange by bringing together Indigenous, scientific, and ecological knowledge systems. Here, we draw on knowledge exchanges with community elders, youth, residential school survivors, lands and resource technicians and leadership as well as your environmental team and existing NSDF EIS documentation.

Since Crown sovereignty, Canadian provinces and territories advanced natural resource management programs that profoundly uprooted and/or eradicated Anishinaabeg Peoples and wildlife off their lands while accelerating state land development and lands and resource extraction. Colonial histories have suppressed and overwritten Indigenous legal orders but one cannot assume they have disappeared.

To this day Algonquin Anishinaabeg regard non-humans on the territory as Nations. For the Algonquins of Barriere Lake, Mukwa (bear) remains leader of the animal nation, Miginzii (eagle) remains leader of bird nation and Neme (sturgeon) remains leader of the fish nation (Decoursey, 2022). They also continue to practice reciprocity on the landscape. Algonquin Anishinaabeg Peoples historically left food offerings of bones in the trees for birds and animals as well as fellow Anishinaabeg travelers (McGregor, 2019). Upon arrival on Algonquin lands the Oblate missionaries did not hesitate to cut down these trees with bones and skulls perched in them as they considered this practice superstitious (Bouchard, 1980). Joseph H. Guinard who devoted his life as an Oblate missionary on Algonquin lands from 1892 to 1943 noted, "the Indians are more respectful of animals than animals are of them. The forest is dotted with the meals of wolves who have no respect for their victims" (Bouchard, 1980: 120). What the Oblates did not understand was that the Algonquin Peoples' and wolves made offerings as sacred payments as part of their original instructions and interrelations.

Not unlike many Indigenous Nations across North America Algonquin Anishinaabeg continue to recognize wolves under customary law as important teachers who share cooperative relationships hunting and caring for each other. In 2021, I conducted interviews on Anishinaabeg post-colonial relations with Mahingan. These interviews continue to demonstrate the close nature of Anishinaabeg relations with Mahingan on the landscape, supporting legal orders and resiliency in the face of extirpation. In Anishinaabeg law wolves are "considered equivalent to humans" (Chartrand, 2021; Chevrier, 2021; Danard, 2021).

The wolf research and baiting at Chalk River is particular interest to Kebaowek as this area represents an important portal to past relationships on the land that both Mahingan (wolf) and Anishinaabeg Peoples are struggling to reclaim. Kebaowek First Nation has worked on the Mahingan Wolf Stewardship Project for many years on the identification and protection of Eastern Wolf *canis c. lyacaon*. Wolf and prey protection and conservation are of interest not only because they support common Anishinaabeg food security issues related to hunting and trapping,



but also for the potential of introducing the delegation of Indigenous law within regulatory powers under the Canadian Federal Species at Risk Act (SARA 2002).

Once again, we look forward to our further discourse in carrying out an Indigenous led framework and methodologies for our continued research at CNL in the near future. Wishing you and your family a happy holiday season.

Sincerely,



Rosanne Van Schie

Cc/

Chief Lance Haymond

Councilor Justin Roy

Councilor Verna Polson

Joseph McBrearty, President & CEO, Canadian Nuclear Laboratories

Jeff Willman, Vice-President, health, Safety, Security & Environmental, CNL

George Dolinar, Director of Corporate Environmental Protection, CNL

Patricia Stirbys, Director Indigenous Relations, Canadian Nuclear Laboratories, CNL

Fred Dermarker, President & CEO, Atomic Energy of Canada Limited

Jason Cameron, Vice-President, Communication and Public Affairs, AECL

**Appendix H Letter from KFN to CNSC - RE: Request for In-Person Hearing (Hearing Ref. 2022-H-07)**

**KEBAOWEK FIRST NATION  
110 OGIMA STREET  
KEBAOWEK (QUEBEC)  
J0Z 3R1**

**TEL: (819) 627-3455**

**FAX: (819) 627-9428**

March 29, 2023

**VIA EMAIL:** [denis.samure@cncsc-ccsn.gc.ca](mailto:denis.samure@cncsc-ccsn.gc.ca)

**RE: Request for In-Person Hearing (Hearing Ref. 2022-H-07)**

Dear Mr. Samure

In response to the Canadian Nuclear Safety Commission's *Revised Notice of Public Hearing and Procedural Guidance for Final Submissions* dated March 23, 2023, Kebaowek First Nation respectfully requests the Commission reconsider its decision to hold the public hearing virtually.

As KFN shared with the Commission during the hearings that took place in June 2022, as the near surface disposal facility is proposed on our unceded Algonquin territory, we invited you to come to our communities, see our people and meet together, so that we may discuss how the hearing process should proceed. Unfortunately, KFN was not consulted on the forum that would allow for us to fully and meaningfully articulate our concerns to the Commission.

Our community has significant cultural, environment and social concerns because of the nature of the long-term effects that will accompany the nuclear waste project proposed by the Canadian Nuclear Laboratories. A duty of fairness is owed to the affected communities, including KFN, whose rights, interests and privileges stand to be affected by this environmental assessment and licensing matter.

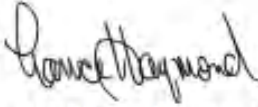
Critically, those who stand to be directly affected – and those whose lands have already been forever altered by decisions to site nuclear projects without our free, prior and informed consent – must be provided the strongest of procedural rights allowing them to effectively participate in the proceeding.

A virtual hearing impedes our right to be heard and prejudices KFN's participation in a process where we have already raised significant concerns about procedural and consultation deficiencies. A virtual hearing is not a sufficient nor equivalent alternative to an in-person hearing, and we ask that you revisit this decision and instead, schedule an in-person hearing. In closing, we ask that you accept our request for an in-person hearing, or offer a more suitable



option other than a virtual forum that would allow KFN to be heard in a venue best suited to this situation.

Sincerely



Chief Lance Haymond

Cc:	Councilor Justin Roy	<a href="mailto:jroy@kebaowek.ca">jroy@kebaowek.ca</a>
	Councilor Verna Polson	<a href="mailto:vpolson@kebaowek.ca">vpolson@kebaowek.ca</a>
	Rosanne Van Schie	<a href="mailto:vanschie3@gmail.com">vanschie3@gmail.com</a>
	Chief Casey Ratt	<a href="mailto:rattcasey@gmail.com">rattcasey@gmail.com</a>
	Chief Regis Penosway	<a href="mailto:regis.penosway@kicisakik.ca">regis.penosway@kicisakik.ca</a>
	Chief Dylan Whiteduck	<a href="mailto:dylan.whiteduck@kza.qc.ca">dylan.whiteduck@kza.qc.ca</a>
	Chief Henry Rogers	<a href="mailto:henryrogers@lpfn-aki.ca">henryrogers@lpfn-aki.ca</a>
	Chief Vicky Chief	<a href="mailto:chief@parolink.net">chief@parolink.net</a>
	Chief Lisa Robinson	<a href="mailto:lisarobinson@wolflakefirstnation.com">lisarobinson@wolflakefirstnation.com</a>
	Kerrie Blaise	<a href="mailto:kerrie@blaiselegal.com">kerrie@blaiselegal.com</a>
	Interventions CNSC/CCSN	<a href="mailto:Interventions@cnscccsn.gc.ca">Interventions@cnscccsn.gc.ca</a>
	Fred Dermarkar	<a href="mailto:fdermarkar@aecl.ca">fdermarkar@aecl.ca</a>
	Victoria Wicks	<a href="mailto:vwicks@oktlaw.com">vwicks@oktlaw.com</a>
	Mitch McKay	<a href="mailto:mitch.mackay@cnl.ca">mitch.mackay@cnl.ca</a>
	Jason Cameron	<a href="mailto:jcameron@aecl.ca">jcameron@aecl.ca</a>
	ERM Stakeholder Relations	<a href="mailto:ERMStakeholder@cnl.ca">ERMStakeholder@cnl.ca</a>
	Danielle Waldman	<a href="mailto:Danielle.waldman@cnl.ca">Danielle.waldman@cnl.ca</a>

**Appendix I Letter from CNL to KZA - RE: Proposed meeting between Kitigan Zibi Anishinabeg, AECL and CNL**UNRESTRICTED  
PAGE 1 OF 2

July 19, 2022

File #: 145-CNXX-22-0013-L

Chief Dylan Whiteduck  
Kitigan Zibi Anishinabeg First Nation  
P.O. Box 309  
1 Paganokamin Mikan  
Maniwaki, Quebec J9E 3C9

**RE: Proposed meeting between Kitigan Zibi Anishinabeg First Nation, AECL and CNL**

Dear Chief Whiteduck,

On behalf of Atomic Energy of Canada Limited (AECL) and Canadian Nuclear Laboratories (CNL), we are writing to extend our thanks and appreciation to you and Kitigan Zibi Anishinabeg First Nation (Kitigan Zibi) for the opportunity to engage you in discussions and dialogue about our ongoing program of work, and for your willingness to explore additional opportunities to grow our relationship.

During the recent regulatory hearings on the Near Surface Disposal Facility (NSDF), we voiced our commitment to meaningful engagement with you and other Indigenous nations and organizations as our largest executive priority. As the two companies collectively responsible for the operation of Canada's national nuclear laboratories, we place a high value on improving and growing relationships with Kitigan Zibi. We understand the importance of developing a strong relationship with you and your community, cultivated through ongoing dialogue and participation, and built on trust and a shared commitment to work together.

With that in mind, we would welcome the opportunity to meet with you in person, Chief Whiteduck, at your earliest convenience, to establish an ongoing dialogue with Kitigan Zibi, and to personally see and learn more about your community's unique culture, history, needs and challenges. Our teams at both AECL and CNL are much richer in wisdom and experience thanks to the engagements in which we have been fortunate to participate with Kitigan Zibi and other First Nation communities. Through the continued sharing of knowledge with you, it is our hope that we can further discuss matters of mutual interest, but also create the necessary conditions to advance positive social change, and serve as an active participant on Canada's journey towards healing and reconciliation.

In addition to this proposed meeting, I also want to assure you that AECL and CNL both respect the procedural directive that was recently issued by the Canadian Nuclear Safety Commission (CNSC) on July 5, 2022, related to the NSDF Project. This directive presents AECL and CNL with the opportunity to further engage with you and your consultation team to ensure Kitigan Zibi's understanding and involvement on the NSDF Project.

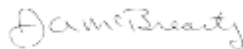
UNRESTRICTED  
PAGE 2 OF 2

As you know, we have been engaging with Kitigan Zibi since 2016, and most recently met with Pierre-Luc Bastien and Erik Higgins in November 2021, who we continue to correspond with. Looking forward, we would be pleased to bring our teams to meet with you and your community to share information about the NSDF Project. We can also respond to any concerns or questions you or your community members may have as we seek to ensure Kitigan Zibi's understanding and involvement in the NSDF Project. If there is interest, kindly let us know which date and meeting location would be preferable and we will be happy to set this up.

Thank you, once again, for the opportunity to engage with you and Kitigan Zibi Anishinabeg First Nation. These recent experiences have been a significant journey of learning for both AECL and CNL, and we look forward to deepening our relationship.

We hope to hear from you soon and, if agreeable to you, look forward to the opportunity to visit your community to meet with you in person.

Sincerely,



Joe McBrearty  
President and CEO  
Canadian Nuclear Laboratories



Fred Dermarkar  
President and CEO  
Atomic Energy of Canada Limited

Cc.  
Darhlene Twenish, Kitigan Zibi Anishinabeg First Nation  
Pierre-Luc Bastien, Kitigan Zibi Anishinabeg First Nation  
Erik Higgins, Kitigan Zibi Anishinabeg First Nation  
Norm Odjick, Algonquin Anishinabeg Nation Tribal Council  
Jason Cameron, Atomic Energy of Canada Limited  
Patricia Stirbys, Canadian Nuclear Laboratories  
Pat Quinn, Canadian Nuclear Laboratories  
Mitch MacKay, Canadian Nuclear Laboratories  
Nicole LeBlanc, Canadian Nuclear Laboratories

**Appendix J Letter from CNL to KZA**Canadian Nuclear  
Laboratories | Laboratoires Nucléaires  
Canadiens

UNRESTRICTED

2022 September 15

Attention: Chief Dylan Whiteduck

Kitigan Zibi Anishinabeg First Nation  
P.O. Box 309  
1 Paganokamin Mikan  
Maniwaki, QC  
J9E 3C9

Dear Chief Whiteduck,

On behalf of Canadian Nuclear Laboratories (CNL), we extend our congratulations on your re-election as Chief for the Kitigan Zibi Anishinabeg First Nation (Kitigan Zibi). We look forward to continuing to grow the relationship between Kitigan Zibi and CNL.

We appreciate your ongoing interest in CNL's activities and projects and the recent visits of Kitigan Zibi staff to Chalk River Laboratories. In particular, we recognize the value of your Nation's involvement in the environmental assessments for the Near Surface Disposal Facility (NSDF) and the Nuclear Power Demonstration (NPD) Closure Project.

As mentioned in our letter of July 19, 2022, we would welcome the opportunity to coordinate a meeting with you, Chief Whiteduck, in person, to share dialogue and learn more about your community's unique culture, history, needs and challenges.

We wish you the best of success in your continued role as Chief for the Kitigan Zibi Anishinabeg First Nation. We look forward to working with you and your Nation over the coming years.

Sincerely,

Joe McBrearty  
President and CEO  
Canadian Nuclear LaboratoriesPatricia Stirbys  
Director, Indigenous Relations  
Canadian Nuclear Laboratories

cc: Valérie Brazeau, Pierre-Luc Bastien, Erik Higgins, Kitigan Zibi Anishinabeg First Nation  
Norm Odjick, Algonquin Anishinabeg Nation Tribal Council  
Fred Dermarkar, Jason Cameron, Atomic Energy of Canada Limited  
Pat Quinn, Mitch MacKay, Nicole LeBlanc, Canadian Nuclear Laboratories

Canadian Nuclear Laboratories

Chalk River Laboratories  
286 Plant Road  
Chalk River, Ontario  
Canada K0J 1J0  
Telephone: 613-584-3311  
Toll Free: 1-866-513-3325

Laboratoires Nucléaires Canadiens

Laboratoires de Chalk River  
286, rue Plant  
Chalk River (Ontario)  
Canada K0J 1J0  
Téléphone: 613-584-3311  
Sans frais: 1-866-513-3325



**Appendix K Letter from CNL to KZA - Reference: Federal Environmental Assessments, NSDF project**OFFICIAL USE ONLY  
PAGE 1 OF 1

2023 February 17

File #: 145-CNXX-23-0004-L

Chief Dylan Whiteduck  
Kitigan Zibi Anishinabeg First Nation  
P.O. Box 309, 1 Paganokamin Mikan  
Maniwaki, QC J9E 3C9

Dear Chief Whiteduck,

**Reference:** Federal Environmental Assessments, NSDF project

On behalf of Atomic Energy of Canada Limited (AECL) and Canadian Nuclear Laboratories (CNL), we are writing to extend thanks and appreciation to you and Kitigan Zibi Anishinabeg First Nation (Kitigan Zibi) for the opportunity to engage your community in discussions and dialogue about the proposed Near Surface Disposal Facility (NSDF) Project.

As stated in a joint letter from AECL and CNL to the Canadian Nuclear Safety Commission (CNSC) on 2022 December 15, we supported Kitigan Zibi's request to extend the submission date to 2023 April 30. We are also pleased to see that the CNSC has confirmed in writing a decision to allow final submissions orally by Indigenous Nations and communities on 2023 June 27 during Part 2 of the public hearing.

Since the CNSC held Part 2 of the public hearing in June 2022, AECL and CNL have welcomed the opportunity to further engage with Kitigan Zibi, we have also expressed an interest in coordinating a leadership meeting. We would like to extend that invitation once again and hope that you may reply with some suggested dates and locations.

This would be an opportunity for leadership to understand Kitigan Zibi's objectives during the Procedural Directive extension period and how we may collaborate in support. Our teams have been reaching out and will continue to do so. We recognize the value of your Nation's involvement in the NSDF Environmental Assessment and the issues and concerns raised during the hearing.

Thank you, and we hope to hear from you soon.

Best Regards,

Joe McBrearty  
President and CEO  
Canadian Nuclear Laboratories

Fred Dermarkar  
President and CEO  
Atomic Energy of Canada Limited

Appendix L
CNL memo – Subject: Appendix L: Summary of the work conducted on the Eastern Wolf at Chalk River Laboratories

MEMO
OFFICIAL USE ONLY

File No.:	ENVP	509200	021	000
	Doc. Collection ID	Subject Index	Doc. Code	Serial No.
Health, Safety, Security & Environment		Non-Standard ID: ENVP-23-030		
Natural Resources Management		Date: 2023/04/24		

**To:** George Dolinar

**From:** Annie Morin

**Cc:** Sandra Faight, Mitch Mackay, Pat Quinn, Meggan Vickerd, Steve Innes, Nicole Leblanc, Meghan Murrant, Emily Hawkins, Bill Buttle

**Subject:** Appendix L: Summary of the work conducted on the Eastern Wolf at Chalk River Laboratories

### 1. Purpose

The purpose of this appendix is to summarize the work conducted at the Chalk River Laboratories (CRL) on the Eastern Wolf (*Canis lupus lycaon*) in terms of data gathering, methodology used and collaboration with other federal land owners. This memo also summarizes the approach taken for the protection of the species, upcoming collaborations and the next steps.

In addition, to serve as a communication of all the initiatives undertaken to date, CNL will continue and further enhance our initiatives on the species while ensuring compliance with the Species at Risk Act and also ensure CNL is actively contributing to the management and recovery of the species.

### 2. Background information

This section provides general information on the species ecology, major threats and regulatory context around the species.

#### 2.1 Definition

For the purpose of this appendix, CNL defines the words “Wolf/wolf/Wolves/wolves” as referencing the taxa of large canines and their hybrids that could be present at the CRL site, inclusive of the following: Grey Wolf (*Canis lupus*), Eastern Wolf (*Canis lupus lycaon*), Coyote (*Canis latrans*), the Gray Wolf-Eastern Wolf hybrid called the “Great Lakes-Boreal Wolf” (*C. lupus* x *C. sp. cf. lycaon*), and the Eastern Wolf–Coyote hybrid called the “Eastern Coyote” (*C. latrans* x *C. sp. cf. lycaon*).

## 2.2 Species habitat description

Historically, the Eastern Wolf inhabited the deciduous forests of the eastern United States and southeastern Canada. According to current knowledge, the Eastern Wolf is present in certain parts of central Ontario with a concentration in the Algonquin Provincial Park and southern Quebec.

Over the course of its life, Eastern Wolf uses various types of habitats. It is generally found in extensive forested areas (e.g., over 100 km<sup>2</sup>). Eastern Wolf populations are limited by prey availability, and higher densities are observed in areas with high prey abundance, particularly White-tailed Deer (*Odocoileus virginianus*), Moose (*Alces alces*) and Beaver (*Castor canadensis*). Hybridization of the Eastern Wolf with the Grey Wolf and Eastern Coyote is also considered a limiting factor, as is the territoriality of large canid packs, which reduces the potential expansion of the Eastern Wolf population beyond already occupied sites 1.

### 2.2.1 Residence definition

The Eastern Wolf residence is comprised of maternal dens and traditional rendezvous dens.

Wolves use dens as sites for whelping and rearing pups. Wolves may use natural structures such as caves or hollow logs and stumps as dens, or may excavate their own dens or take over and enlarge dens constructed by other mammals. One pack may use several dens during a year. The Ontario Ministry of Natural Resources Stand and Site Scales Guide 2 defines the denning period for wolves as April 01 to June 30 for the Great Lakes St. Lawrence forest. Local knowledge of denning chronology must also be considered when available 2.

When wolf pups are about two months of age, they are moved from maternal dens to a series of rendezvous sites where they remain while the pack hunts. Individual sites may be occupied for a period of days to weeks. By early fall, pups begin to hunt with the pack and use of rendezvous sites decreases. Rendezvous sites may be found in a variety of habitats such as open bogs, burns, clearcuts, beaver meadows, and open forest. Rendezvous sites are often used by wolf packs during multiple years. Areas used as rendezvous sites one year may be used as den sites in a subsequent year. Wolves in remote areas, or where prone to harvest by humans, appear to have a low tolerance for human activity near rendezvous sites 2.

## 2.3 Major threats to the species

The main known threats for the species include hunting, trapping and poaching, road development, and hybridization with the Eastern Coyote. Environment and Climate Change Canada (ECCC) in the species status report 1 suggests that the impact of other threats such as commercial development is considered low to negligible.

## 2.4 Species at risk status

In 1999, the Eastern Grey Wolf was considered a subspecies of the Grey Wolf and was placed in the Data Deficient category. The status was re-examined (as Eastern Wolf) and resulted in the designation as a Special Concern species in May 2001 by the Committee on the Status of

Endangered Wildlife in Canada (COSEWIC) 3 and added to Schedule 1 of the Species at Risk Act (SARA) 4 in 2003. New genetic analyses indicated that the Eastern Wolf is not a subspecies of Grey Wolf and in 2015, COSEWIC reviewed the classification of the status of the Eastern Wolf previously assessed and proposed a new classification for the species under Schedule 1 of SARA as a Threatened species 5.

## **2.5 Regulatory consideration**

The purpose of the Species at Risk Act (SARA) is to: prevent wildlife species in Canada from disappearing; provide for the recovery of wildlife species that are extirpated (no longer exist in the wild in Canada), endangered, or threatened as a result of human activity; and to manage species of special concern to prevent them from becoming endangered or threatened.

Specifically, the SARA lays out prohibitions around harming or harassing species at risk of a threatened, endangered or extirpated status under section 32, and damaging or destroying residences or critical habitat under section 33. Species of special concern, such as the Eastern Wolf, must be managed in accordance with the species Management Plan document 1.

The Eastern Wolf is now up for consideration to be up listed as a threatened species. Once the species is up listed to a threatened species, as published in Canada Gazette Part II, then the prohibitions of sections 32 and 33 will be applicable. CNL is following closely the regulatory development around the uplifting of the species 3 and is working closely with ECCC to ensure its protection.

## **3. The Chalk River Laboratories site description**

The CRL site is a Federal Government property owned by Atomic Energy of Canada Limited (AECL) and managed by CNL. It is located in the Province of Ontario, 190 km northwest of Ottawa. The CRL site comprises 3,700 hectares along the Ottawa River and it represents the largest single complex within Canada's science and technology infrastructure. The site contains a campus area of approximately 50 hectares (ha) with buildings and nuclear facilities built between the late 1940s up to the present day, several of which are scheduled for decommissioning. There are also Waste Management Areas located along the main site access road representing another 25 ha. The remainder of the site, greater than 90% of the CRL land, is mainly undisturbed except for a large network of roads and service corridors.

### **3.1 Presence of the Eastern Wolf at CRL**

The CRL property is located within the extent of occurrence of Eastern Wolves and there have been several sightings within the boundaries of CRL, including sightings of pups in 2012 captured from game cameras providing good indication that some portion of the CRL is likely used as a rendezvous site.

Most recently, previously used excavations were observed in the field and game cameras installed to identify occupancy in specific locations. During the summer of 2022, game cameras revealed a pair Eastern Wolf mix with 5 pups. This area meets the definition of a rendezvous site as defined in 2, assuming that the individuals present are composed of a genetic cluster unique to *C. lupus* and *C. lycaon* that is  $Q \geq 0.8$ .



#### **4. Genetic assignment of the Eastern Wolf**

To date, the most definitive assignments of individuals to the Eastern Wolf population have been based on population genetic data. Researchers have used these data, typically microsatellite allele and genotype frequencies to first identify the most plausible number of genetic clusters within any given data set. In this context, clusters represent groups of potentially interbreeding individuals that each conform to parameters such as Hardy-Weinberg equilibrium and linkage equilibrium. Once such clusters have been identified, membership to each cluster can be estimated by inferred ancestry to each cluster. COSEWIC (2015) 2 used an inferred ancestry coefficient (Q) of 0.8 or higher as the threshold for identifying animals as Eastern Wolves. There is no known 'pure' Eastern Wolf individual or population that can be used as a genetic reference, and it is therefore most accurate to say that the Q value of 0.8 or higher can be used to identify wolves with a high level of inferred ancestry to the Eastern Wolf population.

##### **4.1 Available survey methodology to collect DNA material**

Wolf deoxyribonucleic acid (DNA) nuclear material is required to obtain a genetic assignment to the Eastern Wolf species. DNA can be obtained through blood samples, hair follicles, scats and urine. Each types of samples will yield a different amount and quality of DNA nuclear material to support the genetic analysis; blood being the media that yield the most quality target nuclear DNA, followed by hair follicles, scats and urine. A study conducted by Rutledge et al. (2009) 7, concluded that sampling of fresh feces for genetic studies of Eastern Wolf was an appropriate methodology to provide genetic information on individuals.

A wolf pack generally consists of 2 to 10 individuals and the estimated average territory size is estimated at 190 km<sup>2</sup> in Algonquin Park 1. In a large territory such as that, the collection of DNA material could represent an intensive search effort. Several methodologies, with varied search efforts and different level of disturbance to wolf individuals could be used to support DNA material collection. Alternatives such as creating a simulated kill site, deploying scent stations as attractants to collect DNA material opportunistically.

##### **4.1.1 Simulated kill sites**

A bait station could be used to simulate a kill site using carcasses such as beavers. A bait station would attract the local wolves into one area for an extended period of time. The wolves would then become accustomed to the area and stay near the bait as long as the food source remains available.

The use of a bait site has the benefit to support an expedited DNA material collection and reduce the search effort as the pack will remain near the station as long as the food source remain. Using a bait site also increases the potential to collect a variety of DNA material such as blood (female in estrus), hair follicles from bedding sites and scats from a large number of individuals congregating around the site.

The disadvantages of using a bait site is that it would disrupt natural behaviours of the pack as their movement patterns is normally dictated by prey availabilities. A bait site would yield to

the congregation of individuals in an area that may not normally see wolves in the area at the time of baiting. The timing of baiting is also very important. If it is used during the most sensitive season of the species, the denning season, it has the potential to change the denning habit, with the potential in resulting in a maternal den location that may not be optimal for the success of the litter. In addition, the use of bait will change the travel patterns of the wolf and non-targeted species such as bears increasing the inter-species competition for a food source and putting the wolves at risk of predation. Furthermore, the maintenance of a bait site will leave human scent behind with the risk for the wolves to get habituated to humans. This could lead to near fatal interactions between the wolves and humans as detailed in the Cameco event 8 where a worker was attacked by a wolf at a remote location. The wolf was being fed and became accustomed to human presence resulting in a near fatal interaction 8. Finally, an increase in disturbance resulting from human interactions while visiting the bait site and looking for bedding sites have the potential to force the wolf to abandon the site. At the CRL site, with 3,000 workers present working in a variety of locations and performing field work, baiting represents unacceptable risks. Furthermore this methodology would be inconsistent with precautions identified in CNL's Management of Land and Habitat procedure to minimize the potential of interactions between employees and animals which may reside on site 9.

#### **4.1.2 Scent stations**

Scent station surveys have been used for decades to monitor the distribution and abundance of carnivores. Many carnivores are particularly sensitive to olfactory cues; and, as such, the quality and quantity of odor attractant used during surveys can significantly affect the accuracy and precision of the survey. Scents such as species-specific urine, commercially produced fermented egg, fish oil and synthetic fatty acid tablets have been used as attractants 10.

One benefit of using scent stations is that it will attract individuals responding to a scent allowing the capture of data, such as pictures, if placed appropriately. Wolves are known to be territorial and will respond strongly to a scent left by an individual not part of the pack or a competitive species. Wolf will respond to a scent by leaving markings and scent behind in the form of urine or feces. Using scent stations has the benefit to collect information on individuals' physical traits, abundance and facilitating the collection of DNA material from markings left behind.

The down side of using scent stations when conducting an abundance survey is that it may influence the ranging behaviour of individuals from the local and neighbouring packs 11. Wolves use scent marking to demarcate territory, communicate among the members of a pack and to minimize encounters with neighbouring packs 1. For this reason, using scent stations may result in an overestimate of the canid population and also result in an unnecessary territorial behaviour that would keep the pack on high alert. Especially, if used during the denning season of the Eastern Wolf, similar to the use of a bait site, the use of scent stations can results in a change of denning habit. Finally, if using natural scent markers from other canid species such as feces, there is an enhanced risk of pathogen transmission. For this reason, the use of scent station is not CNL's preferred methodology as it is fairly invasive and affecting natural behaviour.

#### **4.1.3 Opportunistic searches**

Opportunistic searches consist of collecting DNA nuclear material as encountered in the field without any attractants. It could be from a targeted survey for scat by conducting road searches by foot or by car or it could be an opportunistic collection of scats as encountered while conducting other type of work in the field.

Opportunistic scat collection has the benefit of being non-invasive and not interfering with the pack movements or denning behaviour. The risk of encounters of individuals is very low and this methodology won't lead to habituation of the wolves to human scent.

One challenge with conducting of opportunistic searches is that with a home range of close to 200 km<sup>2</sup>, it require a bit more search effort to find DNA material.

### **5. CNL methodology and targeted studies conducted at CRL**

The opportunistic scat sample collection is CNL's preferred methodology as it is the least intrusive method to obtain genetic information on the wolves present at the CRL site. With the knowledge gathered at CRL on the local wolf pack movement pattern, targeted searches have been proven effective at collection scat samples up to one sample per day. In addition, to increase the search effort, more than a dozen of employees were trained in the identification of wolf scats and collection methods. This has been implemented in the day to day operations of different employees.

#### **5.1 DNA Collection**

In 2021, CNL initiated the opportunistic collection of wolf genetic samples in the form of scat within the CRL site boundaries. In 2022, CNL entered into a contract with Trent University, in collaboration with Dr. Linda Rutledge, where Trent University analysed CNL's scat samples providing genetic assignments to individual animals. This work is being conducted in collaboration with the Department of National Defense, Garrison Petawawa Environmental team and the Natural Resources Canada - Petawawa Research Forest team. A total of 27 scat swabs have been sent to Trent University for laboratory analysis and genetic assignment.

##### **5.1.1 Eastern Wolf confirmed at CRL**

From the 27 samples sent to the Trent laboratory 15 provided sufficient nuclear DNA reliable for genotyping. The 15 good samples were associated to three distinct individuals; two females and one males.

Of importance to conservation, the male was assigned with very high ancestry (Q=0.97) Eastern Wolf, suggesting that this individual meet the COSEWIC definition. One female individual was assigned with high ancestry (Q=0.99) to Eastern Coyote and the other female was identified as an Eastern Wolf x Eastern Coyote hybrid (Q=0.3; 0.62, respectively) 12.

#### **5.2 Habitat identification**

In the Fall of 2021, trail cameras were installed at a suspected denning/rendezvous site and additional trail cameras were deployed around the CRL site. The game cameras revealed a period of occupancy by a wolf family group in 2022. The male was the first wolf observed at the

site on 2022 April 15. The rendezvous site was occupied between 2022 May 05 and 2022 July 28 where the female was clearly observed to be lactating for the first time on 2022 May 05. The male returned on 2022 May 18 and the pups were observed for the first time on 2022 June 12 with an estimated age of 6-7 weeks.



### **Pictures of the breeding pair and the pups from a known denning/rendezvous site**

Packs may use one or more dens in the first 4-15 weeks of the pups' lives 1. Using the dates of occupancy for the suspected denning/rendezvous site at CRL, it confirms that the site was not the natal den in 2022 but rather the first relocation of the pups, therefore meeting the rendezvous site definition. The denning period for wolves is described as April 01 to June 30 in the Great Lakes–St. Lawrence forest, and Eastern wolf pups are typically moved to rendezvous sites around 8 weeks of age 2. Rendezvous sites may also be used as denning sites in subsequent years 2. The area of this rendezvous is a beaver meadow with sandy banks showing evidence of multiple excavations along their length. Therefore, this area is suspected to be reused by the pack from year to year and will continue to be monitored using trail cameras.

## **6. Species protection at CRL**

At CNL, regardless of the DNA results, the Natural Resources Management Branch adopts the precautionary approach and consider all canid observations as being Eastern Wolf individuals. Although the recent DNA analysis provide a representation of three individuals of the current pack, the CRL site will always be host to transient individuals not previously genetically

characterized. In addition, according to the COSEWIC report (2015) 1, yearlings and adults have a life expectancy of 6.2 years and pups have a life expectancy of 0.7 to 3.5 years. It would be reasonable to assume a pack turnover of approximately 7 years as a maximum.

### **6.1 Routine operations**

In terms of protection of the Eastern Wolf, the presence of human and large equipment, used for site maintenance for example, are expected to deter the general presence of wolves in active work locations as the species is known to display an avoidance behavior to humans. Although the species is known to relocate newborn pups following a disturbance of their den or rendezvous site, routine and non-routine activities in proximity of these sites shall be timed to avoid disturbances while being used by the species.

Another known threat to the Eastern Wolf individuals is the hunting and trapping pressure. Since the CNL sites are secured sites where hunting and trapping are prohibited activities and site access is controlled, CNL and the adjoining properties, i.e. Garrison Petawawa, the Petawawa Research Forest, the undisturbed area in the Province of Quebec and the Algonquin Park all contribute to the protection of the Eastern Wolf in protecting the species from harvesting and allowing free safe movement.

### **6.2 Proposed Near Surface Disposal Facility**

The Eastern Wolf management plan 1 states that large development resulting in changes at the landscape scale could have an impact on prey population. At the CRL site, it is suspected that the wolf pack is mainly feeding on the healthy beaver and white tail deer populations. As part of the Near Surface Disposal Facility (NSDF) project, CNL is proposing to implement a Sustainable Forest Management Plan that will increase the deer preferred browsing habitat and deer wintering sites compared to a status quo situation, which in turn will be favorable to the maintenance of the local deer population. The NSDF Final Environmental Impact Statement (EIS) also concludes no significant adverse impact on beavers 13. For this reason, the NSDF project is not expected to impact individuals by causing a decline in Eastern Wolf prey populations.

Large development projects are often paired with road development activities which can have adverse impacts on wolf populations and individuals. An increase in road network density is known to increase the presence and activity of humans in an area. This may also facilitate the presence of the Eastern Coyotes, which more easily establish in disturbed areas. For the NSDF Project, no new road development is proposed. For this reason, road development is not considered a risk to Eastern Wolf with regard to the proposed this project.

At this time, there are no known dens or rendezvous sites within the proposed NSDF footprint. Although old dens from unknown species were observed while conducting opportunistic surveys, it has not been confirmed if they were used by Eastern Wolf individuals. Game cameras are currently installed to investigate if the dens will be used by the species in the future. Recent data suggests that the one locations may be used by a hibernating bear. The game cameras installed within the NSDF footprint does not demonstrate a significant use of the footprint by the species. Although the Eastern Wolf may reuse dens from year to year, a study

in Algonquin Park has shown a low rate of reuse 14. As a precautionary approach, since the proposed timing of the tree removal of the NSDF project could start as early as 2023 September and be completed by 2024 April 01, this period would avoid the Eastern Wolf denning period, and therefore wouldn't affect the species.

Rendezvous sites are where the pups spend most of the summer once they leave the natal den. These sites are usually located near a permanent water source, often on the edges of lakes, ponds, streams, peatlands, beaver meadows, and may be found in various open and forested habitats.

The proposed NSDF footprint is heavily forested and not directly adjacent to a permanent source of water. Evidence of rendezvous sites have been collected at the CRL site and these are located three kilometers away from the proposed NSDF footprint.

As part of the NSDF Project, employee awareness training on the potential for species at risk presence and identification of these species will be required. As part of the process, if employees or contractors observe a species at risk, including an Eastern Wolf, they are to report the sighting immediately to the Natural Resources Management Branch biologists. The observation will be assessed and extra steps taken as required.

The Eastern Wolf management plan 1 identifies site development as having a low and negligible impact on the species. With the additional proposed measures as listed above, the NSDF Project will not impact individuals of Eastern Wolf or damage or destroy a residence.

### **6.3 Further work contributing to the species recovery**

Survey types conducted to the date of this document by CNL employees are exhaustive: passive trail camera surveys, driving and hiking surveys targeting observations of wolf signs (e.g. paw prints, kill sites), howl surveys and collection of genetic samples (e.g. scat, and urine).

These efforts are being undertaken to:

- Confirm extent of the presence of Eastern wolves at the CRL site;
- Confirm suspected rendezvous site and its use by Eastern wolves at the CRL site;
- Identify additional denning and/or rendezvous sites within the CRL site boundary;
- Describe the current reproductive status (population size) of Eastern wolves using the CRL site;
- Describe the current genetic make-up of the wolves using the CRL site; and,
- Describe the level of hybridization occurring between Eastern wolves using the CRL site with other *Canis* species.

CNL will also continue to monitor the unused dens and rendezvous site areas identified at CRL for occupancy of the Eastern Wolf.

Howl surveys are to be conducted in 2023 to confirm the extent of the known rendezvous site.

### 6.3.1 Collaboration DND/PRF

CNL will continue to share data on wolf individuals, habitat and genetics with both Federal Land owners neighbouring the CRL site: Garrison Petawawa and the Petawawa Research Forest – Natural Resources Canada.

### 6.3.2 Trent University

Work with Trent University on DNA sampling and analysis is to continue in the foreseeable future.

CNL also provided a Letter of Support for the following project proposal, “*Ancient hybrid origins of eastern wolves*” presented in response to a recent Natural Sciences and Engineering Research Council of Canada (NSERC) Alliance Grant call for proposals. The project goal is to resolve a 30-year debate on the origin of the Eastern Wolf in. It is expected that the data supporting an ancient hybrid origin of the species would be widely accepted, such that research could focus more on conservation of this species at risk and less debating their ancestry.

Finally, additional work on the potential to support a facial recognition system for *Canis* individuals is currently being discussed. This would support the work to confirm that the pack currently present at CRL is reusing the site year after year and identify the potential adoption of transients into the pack. Fracturing of packs due to increases in human-caused mortality of Eastern Wolf are associated with a higher prevalence of hybridization with Eastern Coyote 5. The potential work on facial recognition could be used to infer changes in disturbance to the population by CNL activities and may be used as a method of predicting Eastern Wolf hybridization into the future.

## 7. Conclusion

This concludes the work conducted at CRL to date and proposed future collaboration to support the recovery of the Eastern Wolf in Canada as mandated by the federal Government. All initiatives underway and data collected on the Eastern Wolf is shared with ECCC to contribute to the recovery of the species.

CNL would be happy to work collaboratively with any First Nations expressing an interest in participating in a joint effort with CNL to collect samples, share data and results for the protection of the species.

## 8. References

1. Environment and Climate Change Canada. 2021. [\*Management Plan for the Eastern Wolf \(Canis lupus lycaon\) in Canada\*](#). Species at Risk Act Management Plan Series. Environment and Climate Change Canada. Ottawa. vii + 57 p.
2. OMNR. 2010. [\*Forest Management Guide for Conserving Biodiversity at the Stand and Site Scales\*](#). Toronto: Queen’s Printer for Ontario. 211 pp.
3. COSEWIC. 2001. *COSEWIC assessment and update status report on the eastern wolf Canis lupus lycaon in Canada*. Committee on the Status of Endangered Wildlife in Canada. Ottawa. Vi + 19 pp.



4. *Species at Risk Act*, 2002, C-29
5. COSEWIC. 2015. [COSEWIC assessment and status report on the Eastern Wolf \*Canis sp. cf. lycaon\* in Canada](#). Committee on the Status of Endangered Wildlife in Canada. Ottawa. Xii + 67 pp.
6. COSSARO. 2016. [Ontario Species at Risk Evaluation Report for Algonquin Wolf \(\*Canis sp.\*\), an evolutionarily significant and distinct hybrid with \*Canis lycaon\*, \*C. latrans\*, and \*C. lupus\* ancestry](#). Committee on the Status of Species at Risk in Ontario. 18 pp.
7. Rutledge, L.Y, J.J. Holloway, B.R. Patterson and B.N. White. 2008. *An Improved Field Method to Obtain DNA for Individual Identification From Wolf Scat*. *The Journal of Wildlife Management*. 73(8): 1430-1435.
8. OHS Canada. 2016. [Wolf attacks worker at Cameco mine site](#).
9. *Management of Land, Habitat and Wildlife*. 900-509200-STD-006. 2018 45 pp, [40811284](#)
10. Barea-Azcon, J.M., Virgos, E., Ballesteros-Depuron, E. Moleon, M., and Chiroso, M. 2007. *Surveying carnivores at large spatial scales: a comparison of four broad-applied methods*. *Vertebrate conservation and biodiversity*, 387-404.
11. Sargeant, G.A., Johnson, D.H., and Berg, W.E. 2003. *Sampling Designs for Carnivore Scent-Station Surveys*. *USGS Norther Prairie Wildlife Research Center*. 231
12. Rutledge, L.Y. 2023. *Final Summary Report for Canadian Nuclear Labs Canis Genotyping Collaborative Research Project*. Trent University. 8 pp.
13. *Near Surface Disposal Facility Environmental Impact Statement*, 232-509220-REPT-004, Revision 3, 2021 May, [54584715](#)
14. Benson, J.F., K.J. Mills and B.R. Patterson. 2015. *Resource selection by wolves at dens and rendezvous sites in Algonquin Park, Canada*. *Biological Conservation*. 182:223-232.