



Oral presentation

Written submission from the Wolf Lake First Nation

In the Matter of the

Canadian Nuclear Laboratories (CNL)

Application from the CNL to amend its Chalk River Laboratories site licence to authorize the construction of a near surface disposal facility

Commission Public Hearing Part 2

May and June 2022

Exposé oral

Mémoire de la Première Nation de Wolf Lake

À l'égard des

Laboratoires Nucléaires Canadiens (LNC)

Demande des LNC visant à modifier le permis du site des Laboratoires de Chalk River pour autoriser la construction d'une installation de gestion des déchets près de la surface

Audience publique de la Commission Partie 2

Mai et juin 2022



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April 11, 2022

Senior Tribunal Officer, Secretary
Canadian Nuclear Safety Commission
via email: intervention@cnsccsn.gc.ca

Dear Commission Secretary:

RE: NSDF CNSC Hearing, Part 2: Preliminary written submissions of Wolf Lake First Nation

Wolf Lake First Nation wishes to intervene in Part 2 of the Canadian Nuclear Safety Commission (CNSC) hearing on the proposed Near Surface Disposal Facility (NSDF) project by way of written submission and oral presentation. For reasons which I elaborate on below, Wolf Lake First Nation is not currently in a position to provide a detailed written submission to the Commission. Please accept this as our preliminary written submission which we intend to supplement both in writing and orally at the hearing.

Lack of Consultation

Wolf Lake First Nation has not been adequately consulted on this project. When CNSC staff determined that the information provided in the Canadian Nuclear Laboratory's (CNL) submission was complete and deemed the final Environmental Impact Statement (EIS) acceptable, it did so despite the absence of any assessment of Wolf Lake First Nation's land use in the area and despite a lack of a social and cultural assessment of the area more generally.

Wolf Lake First Nation did not have an opportunity to review or provide feedback on the draft EIS before it was finalized and accepted by the CNSC. Wolf Lake First Nation has not been involved in the studies prepared by the proponent CNL, nor has it had an opportunity to conduct its own studies to better understand and assess the potential impacts of the project.

Wolf Lake First Nation has not had the opportunity to provide either the proponent or the Crown with a detailed list of its concerns.

The lack of consultation to date has also meant that the views of our membership have not been considered. At this point in time, I am unable to provide an exhaustive list of Wolf Lake First Nation concerns because my community has not been adequately consulted.

Given the impending hearing and tight timelines in CNSC's process, it is difficult to see how the duty to consult and accommodate could possibly be fulfilled in time for this project to be approved.

We intend to elaborate on this lack of consultation at the hearing and in our supplementary written submission.

Wolf Lake First Nation's interest in the proposed project and CNSC hearing

Wolf Lake First Nation's traditional territories include the site for the proposed NSDF at Chalk River. We are extremely concerned about the proposed project's potential impacts to our lands, waterways, rights, and way of life.

Wolf Lake First Nation enjoys constitutionally protected section 35 Aboriginal rights to harvest, gather, hunt, fish and engage in cultural and spiritual activities on the lands that surround the proposed project.

We intend to elaborate on our rights in the area and the proposed project's potential impacts to those rights at the hearing and in our supplementary written submission.

Supplemental information to be provided at the hearing

Wolf Lake First Nation has not received funding through the CNSC's Participant Funding Program for participation in the upcoming hearing.

Meegwetch,



Chief Lisa Robinson
Wolf Lake First Nation

cc.

The Honourable Jonathan Wilkinson, P.C., M.P., Minister of Natural Resources Canada
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