

What We Heard: SaskPower Small Modular Reactor

Red River Métis Citizen Engagement Summary Report

Manitoba Métis Federation

The National Government of the Red River Métis

December 13, 2024



1.0 Introduction

The Manitoba Métis Federation, the National Government of the Red River Métis (MMF) has been engaged by SaskPower to provide initial input on their proposed Small Modular Reactor (SMR) Project. The SMR is intended to produce electricity for the province of Saskatchewan from nuclear power. As one step in the multi-year planning process, SaskPower is currently exploring two candidate sites for the SMR within the National Homeland of the Red River Métis near Estevan, Saskatchewan. Both candidate sites are within the Souris River system, with the Boundary Site located along the Boundary Dam Reservoir, and the Rafferty Site located along the Rafferty Reservoir (Figure 1).

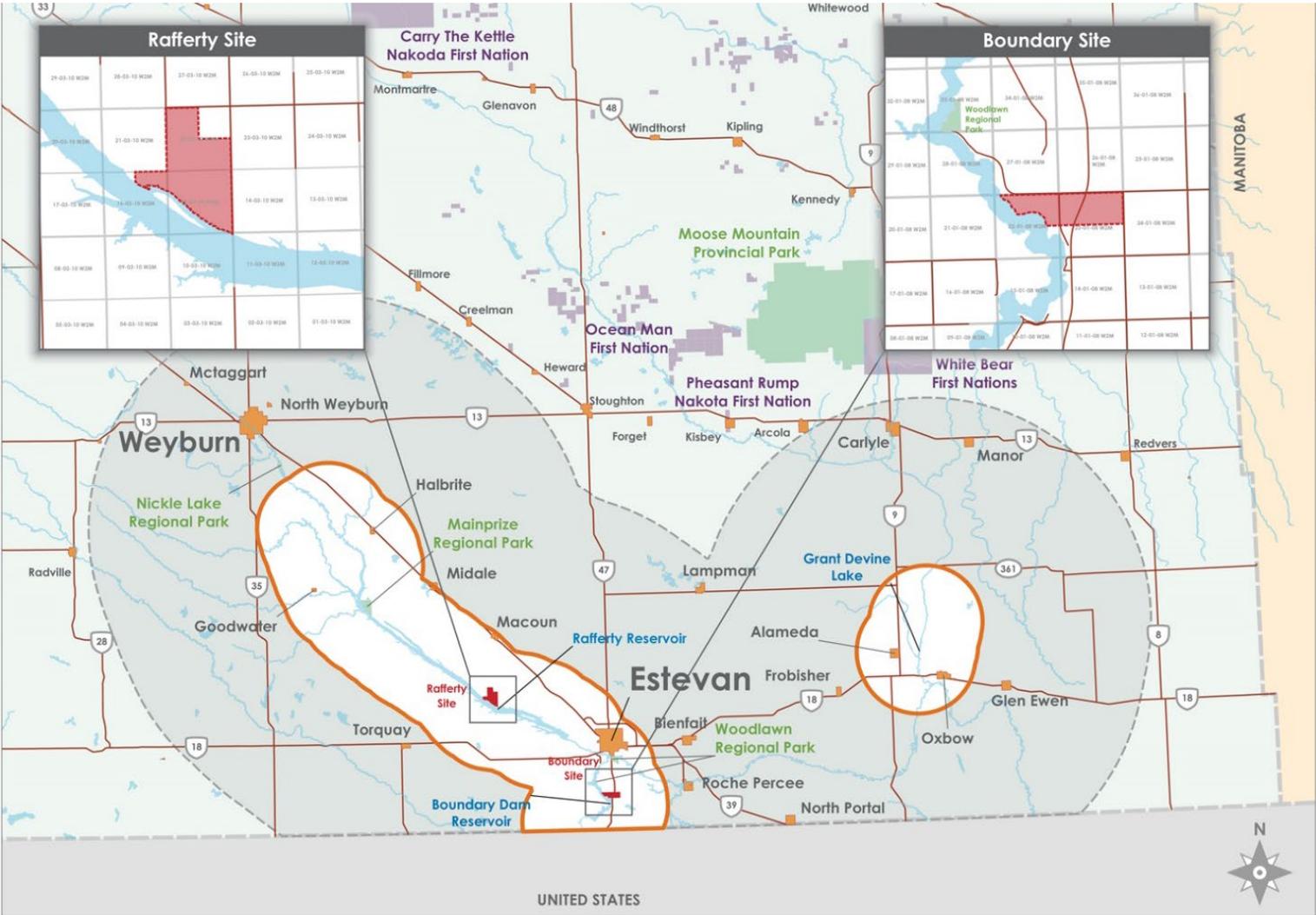


Figure 1: Map of SaskPower's candidate sites for the proposed SMR Project (SaskPower, 2024)



This report includes sensitive information shared with the MMF by Red River Métis Citizens, including areas of land use and occupancy. Red River Métis Citizens have entrusted the MMF, as the democratically elected National Government of the Red River Métis, to safeguard and appropriately use this information on their behalf. The information in this report is the property of the MMF and our Citizens and cannot be duplicated or distributed without the MMF's written consent. The information in this report is considered "high-level," meaning it is based on the data available at the time of writing and is a partial overview of the Red River Métis indicative of land and resource use within the subject Project areas.

1.1 Purpose and Objectives

The purpose of this report is to summarize what the MMF heard through engagement with Red River Métis Citizens surrounding SaskPower's proposed SMR project. The MMF views the engagement activities undertaken with Red River Métis Citizens summarized throughout this report as an important component of pre-consultation related to SaskPower's SMR project.

Though this does not constitute consultation, this work is critical in building a collective understanding of the questions, fears, and opportunities to be addressed as part of the consultation process and overall development and assessment of the SMR project.

In advancing pre-consultation, the MMF's objectives of this Red River Métis Citizen engagement were to:

1. Inform Red River Métis Citizens about the Project, including what is known and what remains to be developed
2. Identify the concerns and interests of Red River Métis Citizens based on the current understanding of the SMR Project as well as SaskPower's broader vision
3. Based on the concerns and interests identified by Red River Métis Citizens, determine what additional studies and assessments must be conducted by SaskPower in collaboration with the MMF to identify probable Project interactions and opportunities for avoidance, mitigation, or compensation measures

Input gathered from Red River Métis Citizens through Métis Knowledge and Land Use interviews is summarized in Red River Métis Knowledge and Land Use, Section 3.1. Discussions from the Citizen engagement meeting are summarized in Summary of Red River Métis Interests and Concerns, Section 3.2. Drawing on the information presented through this report, the MMF intends to continue to work with SaskPower to ensure that studies and assessments for the Project address the concerns raised by Red River Métis Citizens, and that Red River Métis input is fully incorporated into SaskPower's plans for



SMR development and ongoing programming. This will ensure that the SMR Project, if realized, will be mutually beneficial for Red River Métis Citizens.

2.0 The Red River Métis and the MMF

2.1 The Red River Métis

The Red River Métis is an Indigenous collectivity and Aboriginal People within the meaning of section 35 of *the Constitution Act, 1982*. Based on our emergence as a distinct Indigenous People in the Northwest prior to effective control by Canada and the creation of the province of Manitoba, the Red River Métis holds rights, interests, and claims throughout and beyond the Province of Manitoba.

Since 1982, Métis rights have been recognized and affirmed by section 35 and protected by section 25 of *the Constitution Act, 1982*. These rights were further confirmed and explained by the Supreme Court of Canada ("SCC") in *R. v. Powley*, 2003 SCC 43. Manitoba Courts also have recognized Red River Métis Rights in *R. v. Goodon*, 2008 MBPC 59. These decisions have affirmed that the Métis hold existing Aboriginal rights throughout their traditional territories. Our Citizens and harvesters rely on and use the lands, waters, and resources of our traditional territory throughout the Province of Manitoba and elsewhere within the historic Northwest, including in and around the area of the Project, to exercise their constitutionally protected rights and to maintain their distinct Red River Métis customs, traditions, and culture.

2.2 Red River Métis' Rights, Claims, and Interests

Based on its emergence as a distinct Indigenous People in the Northwest prior to effective control by Canada and the creation of the province of Manitoba, the Red River Métis holds rights, claims, and interests throughout and beyond the Province of Manitoba consistent with the United Nations Declaration on the Rights of Indigenous Peoples, including the right to self-determination.

The MMF is mandated to promote, protect, and advance the collectively held Aboriginal rights of the Red River Métis. Through this mandate, the MMF engages with governments, industry, and others about potential impacts of projects and activities on our community. In 2007, the MMF Annual General Assembly adopted Resolution No. 8, which provides the framework for engagement, consultation, and accommodation with the Red River Métis. Designed by Métis, for Métis, Resolution No. 8 sets out the process that is to be followed by governments, industry, and other proponents when developing plans or projects that have the potential to impact the section 35 rights, claims, and interests of the Red River



Métis. It was unanimously passed by MMF Citizens and mandates a “single-window” approach to consultation and engagement with the Red River Métis through the MMF Home Office.¹

In engaging the MMF, on behalf of the Red River Métis, the Resolution No. 8 Framework calls for the implementation of five phases:

- Phase I: Notice and Response;
- Phase II: Research and Capacity;
- Phase III: Engagement and Consultation;
- Phase IV: Partnership and Accommodation; and
- Phase V: Implementation.

SaskPower’s proposed SMR Project has the potential to impact Red River Métis Rights, claims, and interests and as such, engagement, and consultation with the MMF, through the process set out above, must be followed. The SMR Project is located within the National Homeland of the Red River Métis. The “postage stamp province” of Manitoba was the birthplace of the Red River Métis. We currently have an outstanding claim flowing from the Federal Crown's failure to diligently implement the land grant provision of 1.4 million acres of land promised to the Red River Métis as a condition for bringing Manitoba into Confederation and set out in section 31 of the *Manitoba Act, 1870* in accordance with the honour of the Crown.²

Red River Métis section 35 rights are distinct from First Nation’s rights and must be respected. The Manitoba Métis Federation is the National Government of the Red River Métis.

Prior to the creation of Manitoba, the Red River Métis had always exercised its inherent right of self-determination to develop its own self-government structures and institutions centred around the Red River Settlement and throughout the Northwest. As described by Louis Riel in his 1885 memoirs, Métis self-government was well-established and functioning when Canada came to the Red River Métis in the late 1800s:

When the Government of Canada presented itself at our doors it found us at peace. It found that the Métis people of the North-West could not only live well without it... but that it had a government of its own, free, peaceful, well-functioning, contributing to the work of civilization in a way that the Company from England could never have done without thousands of soldiers. It

¹ More information about Resolution No. 8 is available online at: http://www.mmfmb.ca/wcm-docs/docs/departments-engagement_and_consultation/engagement_consultation_resource_pamphlet.pdf

² *Manitoba Metis Federation Inc. v. Canada (Attorney General)*, 2013 SCC 14, [2013] 1 SCR 623 (“MMF Case”). The Supreme Court of Canada recognized that this outstanding promise represents “a constitutional grievance going back almost a century and a half. So long as the issue remains outstanding, the goal of reconciliation and constitutional harmony, recognized in s. 35 of the *Constitution Act, 1982* and underlying s. 31 of the *Manitoba Act*, remains unachieved. The ongoing rift in the national fabric that s. 31 was adopted to cure remains unremedied. The unfinished business of reconciliation of the Metis people with Canadian sovereignty is a matter of national and constitutional import” (para. 140).



was a government with an organized constitution whose junction was more legitimate and worthy of respect, because it was exercised over a country that belonged to it.

Métis self-government has evolved and changed over time to better meet the needs of the Red River Métis. Today, the MMF is the recognized, democratically elected, national self-government representative of the Red River Métis. On November 30, 2024, the Red River Métis and His Majesty the King signed the Red River Métis Self-Government Recognition and Implementation Treaty. The Treaty recognizes the Manitoba Métis Federation as the government of the Red River Métis.

Since 1967, the MMF has been authorized by the Red River Métis through a democratic governance structure at the Local, Regional, and national levels. As part of this governance structure, the MMF maintains a Registry of Red River Métis Citizens.³ By applying for Red River Métis Citizenship, individuals are confirming the MMF is their chosen and elected representative for the purposes clearly set out in its Constitution,⁴ including as related to the collective rights, claims, and interests of the Red River Métis.⁵

The MMF Constitution confirms that the MMF has been created to promote the political, social, cultural, and economic rights and interests of the Red River Métis. The MMF is authorized to represent the Red River Métis' collective rights, interests, and claims. This authorization is grounded in the MMF's democratic processes that ensures the MMF is responsible and accountable to the Red River Métis.

The MMF governance structure includes a centralized MMF President, Cabinet, Regions, and Locals. There are seven (7) Regions and approximately 135 Locals throughout Manitoba. There are more than three thousand Citizens who live outside of Manitoba. All MMF Citizens are Members of a Local. Locals and Regions work together to authorize and support the MMF Cabinet, and the MMF's various departments and offices. Through elections held every four years, Citizens choose and elect the MMF Cabinet consisting of the MMF President, who is the leader and spokesperson for the MMF, a Vice-President of each Region, and two Regional Executive Officers from each Region. The MMF Cabinet also includes the spokeswoman from the Infinity Women Secretariat.

The MMF, as the duly authorized government of the Red River Métis, has been recognized by both the federal and provincial governments in agreements, policies, and legislation. For example, in 2002, *The Child and Family Services Authorities Act* recognized the MMF for the devolution of child and family

³ MMF Constitution, Article III outlines the citizenship definition and application process. This definition ("Metis" is defined to mean "a person who self-identifies as Métis, is of historic Métis Nation Ancestry, is distinct from other Aboriginal Peoples and is accepted by the Métis Nation") aligns with the definition of what constitutes a section 35 rights-bearing Metis community as outlined by the Supreme Court of Canada in *Powley* at para. 30.

⁴ *Newfoundland and Labrador v. Labrador Metis Nation*, 2007 NLCA 75 at para 47: "Anyone becoming a member of the [Labrador Metis Nation] should be deemed to know they were authorizing the LMN to deal on their behalf to pursue the objects of the LMN, including those set out in the preamble to its articles of association. This is sufficient authorization to entitle the LMN to bring the suit to enforce the duty to consult in the present case."

⁵ *Behn v. Moulton Contracting Ltd.*, 2013 SCC 26 at para 30: "[A]n Aboriginal group can authorize an individual or an organization to represent it for the purpose of asserting its s.35 rights."



services to MMF institutions. This Act establishes a series of Child and Family Services Authorities to administer and provide the delivery of services to various distinct Indigenous communities in Manitoba. It creates a Métis Child and Family Services Authority, the directors of which are appointed by the MMF.

In 2008, the courts in Manitoba further recognized that “[t]he Métis community today in Manitoba is a well organized and vibrant community. Evidence was presented that the governing body of Métis people in Manitoba, the Manitoba Métis Federation, has a membership of approximately 40,000, most of which reside in southwestern Manitoba.”⁶ In 2010, the Manitoba Government adopted a Manitoba Métis Policy, and stated that:

*The Manitoba Métis Federation is a political representative of Métis people in Manitoba and represents in Manitoba the Métis who collectively refer to themselves as the Métis Nation.... Recognition of the Manitoba Métis Federation as the primary representative of the Métis people is an important part of formalizing relationships.*⁷

In 2012, the *MMF-Manitoba Harvesting Agreement (2012)* negotiated between the MMF and the Manitoba Government recognized some of the collective section 35 harvesting rights of the Red River Métis and relied on the Citizenship processes of the MMF as proof of belonging to a rights-holding Aboriginal community:

*For the purposes of these Points of Agreement, Manitoba will recognize as Métis Rights-Holders, individuals who are residents in Manitoba and who hold a valid MMF Harvesters Card, issued according to the MMF's Laws of the Hunt. [... and will] consult with the MMF prior to implementing any changes to the current regulatory regime that may infringe Métis Harvesting Rights.*⁸

In 2013, the SCC recognized the “collective claim for declaratory relief for the purposes of reconciliation between the descendants of the Métis people of the Red River Valley and Canada.” It went on to grant the MMF standing as the “body representing the collective Métis interest” in the *MMF Case*.⁹ Additionally, in 2016, the *MMF-Canada Framework Agreement* stated:

the Supreme Court of Canada recognized that the claim of the Manitoba Métis Community was “not a series of claims for individual relief” but a “collective claim for declaratory relief for the purposes of reconciliation between the descendants of the Métis people of the Red River Valley and Canada” and went on to grant the MMF standing by concluding “[t]his collective claim merits allowing the body representing the collective Métis interest to come before the court.

⁶ *R. v. Goodon*, 2008 MBPC 59 para 52. Note that the number of MMF Citizens (40,000) identified by the Court was as of 2007.

⁷ Manitoba Métis Policy, September 2010 at 4, 12, online (PDF): http://www.gov.mb.ca/imr/ir/major-initiatives/pubs/Metispolicy_en.pdf

⁸ *MMF-Manitoba Harvesting Points of Agreement* (September 29, 2012), ss. 3, 6-7.

⁹ *MMF Case*, *supra* note 6 at para 44.



[and that] Canada is committed to working, on a nation-to-nation, government-to-government basis, with the Métis Nation, through bilateral negotiations with the MMF.”¹⁰

The MMF signed the *Manitoba Métis Self-Government Recognition and Implementation Agreement* (MMSGRIA) on July 6, 2021. This marked a major step forward in reconciliation between the Red River Métis and Canada. The MMSGRIA, among other things, immediately recognized the MMF as the National Government of the Red River Métis and sets out a path forward towards the completion of a modern Treaty. As noted above, that Treaty was signed on November 30, 2024.

Consistent with the direction of our Citizens, MMF removed the arbitrary provincial borders from our Constitution that separated Red River Métis who live outside of Manitoba from those within. Today, the MMF represents over 125,000 Citizens within Manitoba, and thousands more across our National Homeland, and around the world. Because of this the MMF has a regional, provincial, national, and international mandate.

Our modern Treaty was ratified by thousands of Red River Métis Citizens in June 2023 and builds upon the important work of the MMSGRIA. The signing of the Treaty with His Majesty the King, and passage of its implementation legislation will enable the Red River Métis, acting through its National Government the MMF, to renew its partnership with Canada.

¹⁰ MMF-Canada Framework Agreement on Advancing Reconciliation, November 15, 2016, Preamble.



3.0 Engagement Summary

The MMF held a virtual engagement meeting with Red River Métis Citizens on Nov 13, 2024 (referred to for the purpose of this report as the "Citizen engagement meeting"). The objective of the meeting was to inform Red River Métis Citizens about SaskPower's proposed SMR Project, and to hear their initial thoughts, perceptions, concerns, and questions.

Staff from the MMF's Energy, Infrastructure, and Resource Management (EIRM) department facilitated the community meeting, which included a presentation giving an overview of what is known about the proposed SMR to date, and any areas of uncertainty or where more information is needed. The presentation was designed to both provide information and guide discussion to gather input from Red River Métis Citizens. EIRM staff also provided meeting attendees with a Project overview hand-out for more information. A total of 24 Red River Métis Citizens attended the meeting, and several contacted the MMF via email afterwards with questions, concerns, and comments that are also reflected in this report.

To gather additional input, the MMF also conducted two Red River Métis Knowledge and land use interviews with Red River Métis Citizens. These interviews allowed Red River Métis Citizens to identify and map locations where they practice traditional harvesting activities as identified in, and protected under, Section 35 of *the Constitution Act, 1982*. Citizens also identified areas that are culturally and historically significant to the Red River Métis. The interviews provided an opportunity for participants to share their initial thoughts and perspectives about the Project and ask questions or identify where they would like further information. MMF staff selected interview participants based on their use and knowledge of the area surrounding the candidate sites for SaskPower's proposed SMR.

Red River Métis Knowledge and land use data relevant to the study is summarized in Red River Métis Knowledge and Land Use, Section 3.1, and the thoughts and perspectives shared by Red River Métis Citizens are summarized in Summary of Red River Métis Interests and Concerns, Section 3.2. For these sections, where input is attributed to Red River Métis Citizens, it refers to those who participated in the Citizen engagement meeting or Métis Knowledge and Land Use interviews.

3.1 Red River Métis Knowledge and Land Use

SaskPower's proposed SMR Project is within the National Homeland of the Red River Métis (Figure 2). The Red River Métis have historically and continue to exercise their section 35 rights throughout the National Homeland of the Red River Métis, supporting traditional and contemporary ways of life through subsistence harvesting, commercial harvesting, accessing culturally and historically significant





Figure 2: Extent of the Red River Metis Homeland

sites, and passing Red River Métis Knowledge on to younger generations. Given these deep connections to the land, the Red River Métis also hold unique knowledge of the area, including knowledge of wildlife, plant populations and health, ecologically or culturally sensitive areas, and more.

This report is informed by the perspectives of two Red River Métis Citizens. Given that this is a very small proportion of Red River Métis Citizens when compared to the larger Red River Métis population, these results should

not be interpreted as providing a full picture of Red River Métis Knowledge and land use in the area. However, these results underscore the importance of including Red River Métis values in decision-making processes for the SMR Project.

For the purpose of this report, interview participants were asked to identify areas where they use and have knowledge of the lands and waters. This report summarizes the areas identified within 100 km of SaskPower's identified candidate sites. This study area was selected given the existing uncertainty surrounding the exact location of the Project at this stage, as well as the potential for impacts to areas downstream of the Project and to wildlife migrating throughout the region. Interview participants mapped the following types of land use activities, occupancy, and Red River Métis Ecological Knowledge within the study area:

- Access route
- Bird habitat (sandhill crane, whooping crane)
- Fish spawning areas (jackfish/northern pike, pickerel/walleye, sucker)
- Fishing locations (jackfish/northern pike, pickerel/walleye, sucker, yellow perch)
- Gathering locations (choke cherries, sage, cattails, wood/trees, diamond willow, mint, oak, red willow, wild asparagus, wild bergamot, echinacea)
- Hunting locations (white-tailed deer, pheasant, duck, grouse, partridge, goose)
- Mammal habitat (moose, coyote, fox, badger, deer, pronghorn)



- Overnight locations

In addition to the sites identified through the interviews, the MMF also conducted an initial review of possible impacts to Red River Métis archaeological heritage sites around the two candidate sites, presented in Appendix A (Supernant & Wambold, 2024). Based on the initial information provided about the candidate sites, this review found that there are existing known Red River Métis archaeological resources in the area, many of which have been previously impacted by development or other activity in the region (Supernant & Wambold, 2024). Given that the Souris River in particular is noted in scrip records and historical records as an important pathway for the Red River Métis, there is potential for more historic materials to be identified in the course of the SMR Project (Supernant & Wambold, 2024).

As initially outlined in the MMF's (2023) Review Report for SaskPower's Small Modular Reactor Siting, the MMF expects that SaskPower will provide capacity support for a more extensive Project-specific Red River Métis Knowledge and Land Use Study led by the MMF. This will allow for greater understanding of SMR Project interactions on Red River Métis Rights, claims, and interests related to the candidate sites, including areas of archaeological and cultural heritage.

Such a study should focus on collecting additional data from Red River Métis Citizens, and on potentially impacted areas downstream within the Souris and Assiniboine River basins. It is critical that this information be considered in the process of site selection, the Project's Impact Assessment, and more generally in the development of avoidance, mitigation, and accommodation measures.

3.2 Summary of Red River Métis Interests and Concerns

This section provides a summary of what the MMF has heard from Red River Métis Citizens with respect to SaskPower's proposed SMR Project through both the Citizen engagement meeting and two Red River Métis Knowledge and land use interviews. In general, Red River Métis Citizens emphasized that at this stage of the Project, there are many areas of uncertainty that need to be addressed before they can offer more input on their interests and concerns but provided their initial thoughts and perspectives. Topics discussed by Red River Métis Citizens are outlined in 3.2.1 through 3.2.5 below.



3.2.1 Impacts on the Environment and Harvesting

At the Citizen engagement meeting, Red River Métis Citizens raised concerns about how the SMR Project will impact the environment, including the land, water, plants, and wildlife. Specifically, participants discussed the following:

- Concerns related to water quality, levels, and temperature in the area directly adjacent to the Project as well as the surrounding watershed, including areas downstream.
- Concerns that the changes to water temperature as a result of the SMR have the potential to impact fishing areas and fish habitats. There is concern that water temperature changes will impact fish quality, quantity, and distribution. An interview participant explained that warmer waters could open up the area to invasive species, or drive out native species, given that different types of fish prefer warmer or cooler habitats.
- Concerns about changes to the quality of water draining from the Souris River into Lake Winnipeg, where there are well-documented existing issues with water quality.
- Concerns related to the Project's potential impact on wildlife habitats and populations.
- Concerns about Project impacts of the accumulating with impacts already being felt from other developments. For example, one participant explained that SaskPower's hydroelectric dams throughout the province and in the Saskatchewan River Delta in particular have already impacted the ability of the Red River Métis to hunt, fish, trap, and practice their ways of life.
- Concern about impacts to the quality and safety of wildlife harvested for subsistence. Several participants described noticing, in recent years, an increase in abnormalities in the animals they harvest, such as bumps or other signs of disease, making them unsafe to eat. One meeting attendee said that some of these changes could be a result of other ongoing developments throughout the National Homeland of the Red River Métis.
- Concerns about impacts to the quality and safety of plants and other natural materials harvested by Citizens for subsistence or medicinal purposes. Participants emphasized the importance of the SMR Project not adding additional strain on the environment and wildlife or compromising the safety of wild foods and medicines.
- Concern about Project impacts on the ability of Citizens to continue to use the lands and waters for harvesting and other activities that uphold Red River Métis ways of life.
- Concerns about species of interest to the Red River Métis that are already in decline throughout the region. For example, an interview participant noted there are burrowing owls in the area that should be protected. Other Citizens described the current health of moose populations,



noting that they are declining or have completely disappeared in certain areas. Citizens emphasized that these species need to be protected to prevent further impacts on populations as a result of the Project. One participant also explained that, on a larger scale, moose, caribou, and deer habitat ranges are changing because of climate change.

- Concern about the availability of areas to harvest, or having to change where Citizens harvest, because of actual or perceived risks related to harvesting near a nuclear development. Avoidance or loss of these areas because of uncertainty or feeling unsafe would impact Red River Métis Rights, claims, and interests in the area.

Citizens asked questions related to the environment and harvesting that will need to be answered by SaskPower. These questions were:

- What Red River Métis land use, cultural, or other values exist overlapping or around the candidate sites SaskPower is looking at? How would these be impacted?
- How will the SMR impact water? How will SaskPower ensure water used for cooling is safe?
- What are the potential impacts to the air, soil, and water, including areas downstream? How might these impacts affect plant and wildlife populations, safety, and quality?

3.2.2 Environmental Monitoring and Oversight

Participants were asked how their concerns might be mitigated or addressed and what would be needed for Citizens to feel safe using the lands and waters. The following suggestions were put forward through the Citizen engagement meeting and interviews:

- Participants emphasized the importance of strong environmental monitoring programs and protecting the lands and waters for future generations.
- Participants highlighted that the design, planning, and execution of all monitoring activities should be co-led by the MMF and involve Red River Métis Citizens, and that the results of these monitoring activities must be communicated back to Red River Métis Citizens through the MMF.

Some Citizens expressed their frustration and distrust with development projects and proponents, speaking to past experiences where monitoring programs reacted to impacts rather than preventing them. Instead, Citizens would prefer that monitoring activities be designed proactively and led by the MMF so that there is enhanced trust in the monitoring results. Citizens expressed the need for monitoring programs to be comprehensive to ensure the health of the whole ecosystem.

Citizens asked questions related to the environmental monitoring and oversight that will need to be answered by SaskPower. These questions were:



- What ecological considerations is SaskPower integrating into design, placement, monitoring, waste management, and other aspects of the Project?
- What monitoring programs will be in place over the lifecycle of the Project, and how will SaskPower ensure they are preventative rather than reactive? How will the Red River Métis and the MMF be involved? How does SaskPower plan to communicate their findings to the Red River Métis and the MMF?

3.2.3 Managing Radioactive Material

Red River Métis Citizens highlighted specific concerns about managing radioactive waste and material, especially as it relates to emergency planning and preparedness, transportation of materials, and where unsafe materials will be disposed of or stored. Specifically, Citizens raised the following:

- Concerns about what a malfunction or disaster looks like for the SMR Project and the relative safety of this Project compared to other well-noted disasters globally. It was noted that SaskPower should draw on lessons learned from other jurisdictions planning SMRs to see if there have been any issues or lessons learned they can implement.
- Uncertainty surrounding SMR technology given that it is relatively new and there are no examples of other similar projects within Saskatchewan. One Citizen described the project as being a “first generation project” and spoke about how this could result in more issues and unknowns over the lifecycle of the Project.
- Concerns related to emergency preparedness and management, including potential leaks and what SaskPower plans to do in the event of an accident or malfunction.
- Concern about the long-term health of the environment, particularly as it relates to how SaskPower would repair, reclaim, or remediate the environment after a disastrous event, leak, or spill.
- Uncertainty and concern related to how radioactive material and waste will be transported throughout the National Homeland of the Red River Métis. SaskPower will need to provide additional information on transportation routes and route selection methods as it becomes available. This includes both how SaskPower plans to transport fuel to the processing facilities and then to the reactor, as well as how radioactive waste would be transported from the reactor to a disposal facility.
- Concerns and questions about long-term storage and/or disposal of radioactive waste including where it will be stored, and how oversight and monitoring of transportation and storage would function.



Citizens asked questions related to the management of radioactive waste that will need to be answered by SaskPower. These questions were:

- What are SaskPower's plans for emergency preparedness and management? What if leaks or contamination are discovered?
- If there is an emergency, leak, or contamination, how will SaskPower recover or remediate what has been impacted?
- What are SaskPower's plans for maintenance of the reactor, and what does this look like?
- Where and how will fuel for the reactor and nuclear waste be transported across the National Homeland of the Red River Métis? How will SaskPower ensure its safety in transport?
- Where and how will radioactive waste be stored? What safety measures will be in place where the waste is disposed?
- What is SaskPower's plan for decommissioning the SMR? What will the land look like afterwards, and will it be safe to use?

More broadly, it is also important to note that the MMF has concerns about Project closure and reclamation, given previous experience with a lack of planning and engagement regarding the Whiteshell Laboratories facility, also located within the National Homeland of the Red River Métis. The Whiteshell facility was developed and operated without consultation with the Red River Métis and was ultimately developed without a closure plan, resulting in adverse impacts to the surrounding lands and waters, and potential for radioactive waste to be stored forever on site. Based on this experience, the MMF emphasizes the need for SaskPower to ensure that closure and end use planning is prioritized, ensuring that, at the end of the Project's life, the lands and waters surrounding the SMR can be returned to a productive and usable environment.

3.2.4 Socioeconomic Benefits and Concerns

Citizens were asked to provide their thoughts on any positive or negative socioeconomic impacts and how these could be mitigated or enhanced. Participants raised the following:

- Concern and caution about the impacts of boom-and-bust development cycles and the impacts these cycles have on communities. For example, it was noted there was a recent boom-and-bust cycle in the area surrounding the proposed Project related to oil development activities, the result being underemployment and negative impacts to the personal economy of workers.
- Concerns related to the potential for property value to decrease because of actual or perceived risks related to the proximity to the SMR.



- Concerns about the impact to local and regional infrastructure, such as increased traffic on roadways and the impacts that may follow. One participant recalled that, in times where there was lots of increased traffic and activity related to the oil industry, the roads and surrounding land were affected.
- Concerns about the cost of the proposed SMR and how that might impact energy costs. It was noted that the Project could have a positive impact of reducing current energy costs, but that more information is needed on what this would look like, the anticipated timeline, and how the project could positively impact current net-zero and greenhouse gas emission reduction targets.
- There is significant interest regarding economic benefits of the project through the creation of jobs, especially for Red River Métis Citizens, though more information about these opportunities is needed. Participants also noted that SaskPower should make efforts to hire Red River Métis Citizens at all levels of the Project and across SaskPower in general. Not solely for short-term employment opportunities, and that they will need to engage with the MMF early and intentionally on employment opportunities. SaskPower can support employee readiness programs to ensure Citizens are prepared with the necessary training and education be employed as the Project moves ahead. The MMF has existing employment and training programs for Red River Métis Citizens that can be leveraged for this purpose.

In general, Citizens who participated in the engagement activities agreed that another source of power is needed in Saskatchewan, especially given rapid population growth throughout the province in recent years but stated that the Project needs to be done in a way minimizes impacts and maximizes benefits. Citizens asked questions related to the socioeconomic aspects of the Project that will need to be answered by SaskPower. These questions were:

- What employment opportunities will be available, and how long-term are they? What kinds of expertise are needed for Red River Métis Citizens to realize these opportunities?
- How might the phasing out of coal, and introduction of the SMR, impact Red River Métis Citizens economically?

3.2.5 MMF and Red River Métis Involvement

Given its location, the MMF expects to be involved in all stages of the Project. Citizens were asked to provide guidance on how they would like the MMF to be involved in the Project and how they themselves would want to be involved. Citizens expressed the following:

- Early and meaningful engagement with the MMF is needed throughout the lifecycle of the Project so that Red River Métis Citizens have a voice throughout the whole Project.



- Ongoing communication and information sharing between the MMF and SaskPower will be essential, especially to provide information on outstanding questions and concerns. Information should be shared as it becomes available so that Citizens can more fully understand potential impacts.
- SaskPower should use local media channels to share general information. It was expressed by one participant that they had not heard of or received information about the Project despite staying informed of local news. Another participant said that transparent and appropriate media coverage, updates, and educational campaigns that are accessible to the general public would be needed.
- There are many programs administered and provided by the MMF that Citizens said would support and ensure the protection of their rights, claims, and interests. This included the potential for SaskPower to support the expansion of or draw on existing MMF environmental and cultural monitoring programs, partner with the MMF's employment and training initiatives to ensure Red River Métis Citizen readiness for jobs related to the Project and ensure involvement of the MMF in assessment and decision-making processes.

Citizens asked questions related to the involvement of the MMF that will need to be answered by SaskPower. These questions were:

- How will SaskPower report information to and communicate with Red River Métis Citizens and the MMF throughout the lifecycle of the Project?
- How will the Red River Métis and the MMF be involved in the Impact Assessment process?
- How will the Red River Métis and the MMF be involved over the lifecycle of the Project?

Other questions asked by Citizens not related to the MMF's involvement will also have to be answered. These include:

- How are other plans for SMRs across the country moving along? Have other provinces encountered issues or lessons learned that SaskPower could benefit from?
- What other developments and land use changes (e.g. agriculture) are happening in the area surrounding the candidate sites, and how would the SMR interact with impacts from these activities?
- Will the SMR reduce the need for hydroelectric power generation in other areas of the province, namely the Saskatchewan River Delta and Cumberland House area?
- What does SaskPower's plan to phase out coal look like, and what is the timeline?



3.3 Conclusions and Recommendations

The information provided by Citizens through the engagement sessions and interviews demonstrate that there is great interest from Red River Métis Citizens in the Project, particularly with respect to the potential impacts it may have on the social, economic, and natural environment. MMF staff have considered all information provided to date by SaskPower about the Project. This, in combination with the input and feedback from our engagement sessions with Citizens, has resulted in a number of comments and recommendations that will need to be considered moving forward. The MMF supports the approach of co-developing and designing various aspects of the Project activities to ensure all impacts to Citizens are appropriately considered and mitigated for.

Comment 1: The Red River Métis require more information regarding Project activities and plans. A variety of questions remained unanswered that will need to be followed-up on as the Project progresses.

Recommendation 1a: SaskPower will need to continually engage with the MMF and provide answers, as available, to questions and concerns raised through engagement processes with Red River Métis Citizens. Red River Métis Citizens requested that information about the Project and educational material about nuclear energy and associated activities be provided more widely, and in a plain language format that is accessible to the general public.

Recommendation 1b: SaskPower must continue to support the MMF in engagement and consultation activities with Red River Métis Citizens to gather additional input and questions as new information about the Project and potential impacts emerge. The MMF expects that new information will be provided by SaskPower in a timely manner to allow the MMF to undertake these activities on a reasonable timeline.

Comment 2: The MMF expects that SaskPower will enable meaningful, early, and ongoing Project engagement with the Red River Métis. The MMF's Resolution 8 mandates a "single-window" approach to all engagement and consultation activities that may impact rights, interests, and claims of Red River Métis.

Recommendation 2a: The MMF expects that all mandates outlined under Resolution 8 be followed by SaskPower. The goal of Resolution 8 is to ensure the Red River Métis are engaged, including full and meaningful consultation and accommodation as appropriate and necessary, on any projects or initiatives that may impact Red River Métis Rights, claims, and interests (MMF, 2024).

Recommendation 2b: A communication protocol and guidance document should be established between the MMF and SaskPower to ensure ongoing and transparent communication with the MMF and Red River Métis Citizens about the Project, especially as new information becomes



available. This communication protocol will also help to address outstanding questions and unknowns identified throughout this report.

Comment 3: Red River Métis Citizens are concerned about the potential impact of Project activities on Red River Métis Rights, claims, and interests. The MMF must be included in all aspects of the Impact Assessment to ensure that Project impacts are appropriately avoided or mitigated for, and that the long-term health of the environment is prioritized should the Project move ahead.

Recommendation 3a: Funding to complete a more comprehensive Red River Métis Knowledge and Land Use Study with Red River Métis Citizens once a site is selected. It is critical that the MMF gather additional information from Citizens who use and hold knowledge of the area to better understand potential impacts to Red River Métis Rights, claims, and interests and inform the development of appropriate avoidance, mitigation, or accommodation measures. While the MMF appreciates this initial step of SaskPower supporting two interviews, this is not a representative sample of Red River Métis Citizens in the area, and the presence of land use and occupancy supports the need for further research.

Recommendation 3b: SaskPower will need to meaningfully include the MMF in relevant future Project activities, including the Impact Assessment and licensing processes related to the proposed Project. Specific activities include but are not limited to the development of monitoring, emergency management, and closure plans to ensure they are consistent with and meaningfully integrate Red River Métis Knowledge and values, and effectively avoid or appropriately mitigate impacts to Red River Métis Rights, claims, and interests.

Recommendation 3c: SaskPower must work with the MMF to maximize Project benefits related to economic stability, employment, and training. This includes the employment of Red River Métis Citizens at all levels of the Project, not only for short-term contracts or construction work. The MMF are prepared to partner with SaskPower to leverage existing programs and initiatives designed to train Red River Métis Citizens for employment opportunities throughout the National Homeland of the Red River Métis. These partnerships should be initiated as early as possible to ensure Red River Métis Citizens have time to prepare for job readiness at all levels.

Recommendation 3d: SaskPower will need to work with the MMF to formalize a Long-Term Relationship Agreement applicable to this Project and others throughout the National Homeland of the Red River Métis.

The MMF looks forward to continuing to engage with SaskPower surrounding the proposed SMR Project, and on other projects planned for or occurring within the National Homeland of the Red River Métis.



4.0 References

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Appendix A: Red River Métis Heritage Concerns regarding SaskPower Small Modular Reactor Development



Report: Red River Métis Heritage Concerns regarding SaskPower Small Modular Reactor Development

Prepared by Dr. Kisha Supernant (PhD) and Dawn Wambold (MA)

Prepared for: Manitoba Métis Federation - National Government of the Red River Métis

Introduction

At the request of the Manitoba Métis Federation - National Government of the Red River Métis, Dr. Kisha Supernant (PhD) and Dawn Wambold (MA) were asked to review the possible impacts to Métis archaeological heritage in the two sites proposed for the Small Modular Reactor (SMR) Development Project by SaskPower. Information on the proposed areas was provided and formed the basis for the following evaluation and recommendations. Overall, potential adverse impacts were identified in both areas, but there is significantly more known archaeological materials in Area 1; therefore, Area 2 is preferred as there is lower potential for impacts to Métis archaeological heritage. In both locations, it is recommended to have Métis monitors on site for any ground disturbance and for any pre-homestead historical material culture be evaluated for possible Métis association.

Review of Existing Known Sites

Based on the information provided about the potential areas for the small modular reactor development, there are areas with Métis archaeological resources present, although most have been previously impacted. Historical documentation for the region was reviewed, including homestead records, to provide information regarding the Métis families who were connected to the heritage resources. Additional historical considerations that impact the potential for heritage resources in the study area are also presented. A full historical review of all potential documents was beyond the scope of this report, but note that the area is an important part of the Métis homeland, so any historical era materials encountered should be evaluated for potential Métis connections. For example, the initial research conducted prior to the dam construction noted other sites with Métis materials dating to the mid-1800s (Finnigan 1992, 60) in the original study area. This report also notes that “the Metis historically represent the most easily recognized ethnic group in the Souris River Valley” (Finnigan 1992, 81).

Area 1 (South of Macoun)

The identified area includes the entire section of 15-3-10 W2, the NE Quarter of 16-3-10 W2, and the NW, SW, and SE Quarters of 22-3-10 W2.

Known Archaeological Sites

Three archaeological sites related to the Métis have been previously identified in this area. After the construction of the Rafferty Dam in 1994, McDonald Lake flooded all of the sites.

These sites are:

- DhMt-41, the LaRoque Homestead, NE Quarter 16-3-10 W2
- DhMt-56, the Lagimodiere Homestead, NE Quarter 16-3-10 W2
- DhMt-72, the Nelson Boyer Homestead, SE Quarter 15-3-10 W2

Homestead History: 15-3-10 W2

Item Number	Names	Part	Section	Township	Range	Meridian
68827	Lisle Silver Norman B Steele	NE	15	3	10	W2
68842	Nelson Boyer	SE	15	3	10	W2
68853	John G Marion	SW	15	3	10	W2

Table 1: Land Grants of Western Canada Search Results, 15-3-10 W2, Library and Archives Canada.

No records for Lisle Silver were located. Norman Steele is reported as being Irish in the 1916 census.

An N. Boyer is reported to have settled in the area prior to 1910. He may have also gone by the name of Narcisse.¹ He was Married to Rosalie Gaudry in St. Boniface, MB.² The Boyer family is connected to the LaRoque family through the marriage of son Louis Boyer to Marie Rosalie LaRoque.³ Rosalie is shown living with a daughter at 3-10 W2 in the 1916 census. Narcisse and Rosalie are shown at the same location in the 1911

¹ <https://ancestors.familysearch.org/en/K1W2-VZF/narcisse-nelson-boyer-1848-1916>

² <https://www.wikitree.com/wiki/Boyer-5943>

³ <https://www.wikitree.com/wiki/Boyer-5939>

census. In the 1911 census they are listed as French Roman Catholics with Narcisse born in the USA and Rosalie in Manitoba. They are not present in the 1921 census.

John Marion, wife Alexina Laderoute and three children are listed in the 1911 and 1916 censuses. John and Alexina are reported to have been born in Manitoba. Two of the children were born in the USA and one in Saskatchewan. The family reportedly came to Canada permanently in 1910 and are listed as French Roman Catholics. They are not present in the 1921 census. John's parents homesteaded nearby at 16-3-10 W2 but the location is outside the scope of this area of interest. John's mother was Marie Elise MacDougall: daughter of John George MacDougall, Chief Factor of the HBC Edmonton district. His father was Edward Marion who was born at Norway House and traded furs between Edmonton, Wood Mountain, and North Dakota (Fifty and Over Club 1978:416).

Conclusion: 15-3-10 W2

No Métis scrip was located for these two households. However, their time spent in the United States may have impacted their eligibility to apply. The Boyer and Marion families have connections to the Red River and known Métis families. Although listed as French Roman Catholics on the census, they are likely Métis based on their connections to the HBC, Manitoba, and known Métis families.

Homestead History: 16-3-10 W2

Item Number	Names	Part	Section	Township	Range	Meridian
68865	Emily Lejemonier	NE	16	3	10	W2
68871	Harry D Smith	NW	16	3	10	W2
68895	Baptiste Klyne	SE	16	3	10	W2
68896	Edward Marion	SW	16	3	10	W2

Table 2: Land Grants of Western Canada Search Results, 16-3-10 W2, Library and Archives Canada.

Only the history of the NE quarter was within the scope of the project area.

The Lejemonier (aka Lagimodier, Legimondiere or Lajimondeerie) family is listed as living at 16-3-10 W2 on the 1911 and 1921 censuses. Emily (listed as Amelia in 1911) is listed as the widowed head of household and her daughter and two sons are living with her in 1911. In 1921, only her sons were listed. Her children were listed as having been born in the United States with both of their parents being born in Manitoba. The

household is reported as being French speaking Roman Catholics. Their arrival in Canada from North Dakota is reported as 1908 in the local history book, 1909 in the 1911 census, and 1912 in the 1921 census (Fifty and Over Club 1978:377-378). Emily's husband reportedly died before she came back to Canada.

The Vannes (Vennes)/La Roque (Larocque) family is listed as also living at 16-3-10 W2 on the 1911 census. The La Roque children are listed as stepchildren of Solomon or Louis Vannes. Solomon and his wife are listed as having been born in Manitoba and the children are all listed as having been born in the United States with both of their parents being born in Manitoba. The household is reported as being French speaking Roman Catholics who came to Canada in 1905. There is also a French Roman Catholic labourer listed in the household in 1911 but the name isn't clear (possibly John B. Lord). The local family history has confusing information regarding family names and connections but notes that they are also connected with the Boyer family (Fifty and Over Club 1978). A search of the Provincial Archives of Saskatchewan shows that they hold homestead records for John La Rocque for NE 16-03-10 W2. Peter Charles Larocque and Louise Ann Vennes are shown as having records associated with NW 16-03-10 W2.

Conclusion: 16-3-10 W2

No Métis scrip was located for these two households. However, their time spent in the United States may have impacted their eligibility to apply. All of the identified names are associated with Métis families. Although listed as French Roman Catholics on the census, they are likely Métis based on their connections to Manitoba and known Métis families.

Homestead History: 22-3-10 W2

Item Number ↑↓	Names ↑↓	Part ↑↓	Section ↑↓	Township ↑↓	Range ↑↓	Meridian ↑↓
69082	John Sawyer	NE	22	3	10	W2
69093	George Elwood Sawyer	NW	22	3	10	W2
69112	John Harvey Sawyer	SE	22	3	10	W2
69129	Ernest Robert Steele	SW	22	3	10	W2

Table 3: Land Grants of Western Canada Search Results, 22-3-10 W2, Library and Archives Canada.

Above are the search results for the land grants for this section. The 1911 census notes Ernest R. Steele and his wife were born in Ontario. James Sawyer and his family are listed in the 1911 census as living in the area (3-10 W2). The Sawyer family has Ontario and German origins listed in the census.

Conclusion: 22-3-10 W2

No Métis connections to this land section were identified through homestead records.

Additional Historical Considerations

All current known archaeological sites with potential Métis connections are associated with homesteads. However, there is potential for other historic materials from earlier use and occupation of this area to be identified in the project. The Souris River is noted in scrip records and historical records as an important pathway for Métis people. For example, there are scrip records which note the birthplace of various Métis people as the “Souris River,” although where along the Souris river is often unclear. Based on the location of Area 1, any historic-era materials predating the homesteads should be evaluated for possible Métis associations.

Previous archaeological research also notes an area of concentration of historic sites in an area around an old CPR Water Pump where Métis families (particularly the Blondeaus) created a community (Finnigan 1992; Klimko 1990). While it is not exactly clear from the scale of the map available where the area is located in relation to the current project Area 1, there appears to be overlap, although the actual water pump location is not within the boundaries of Area 1.

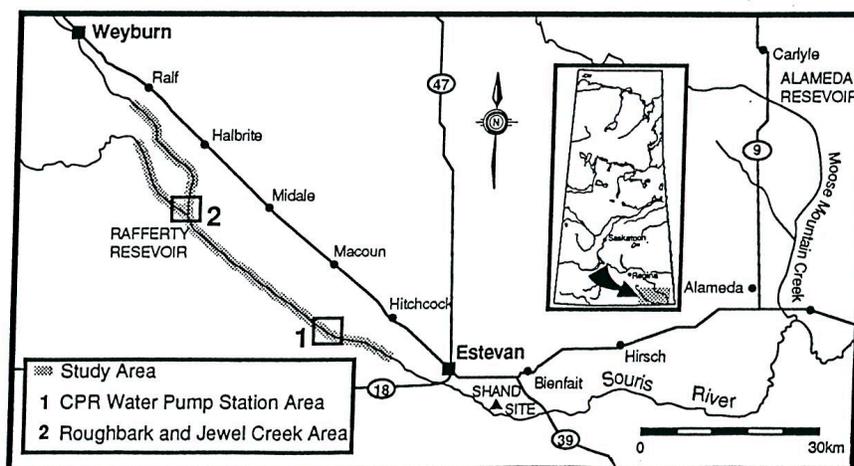


Figure 1a: Locations of historical archaeological site concentrations in the Souris River Valley. Adapted from Klimko 1990, Figure 1.2.

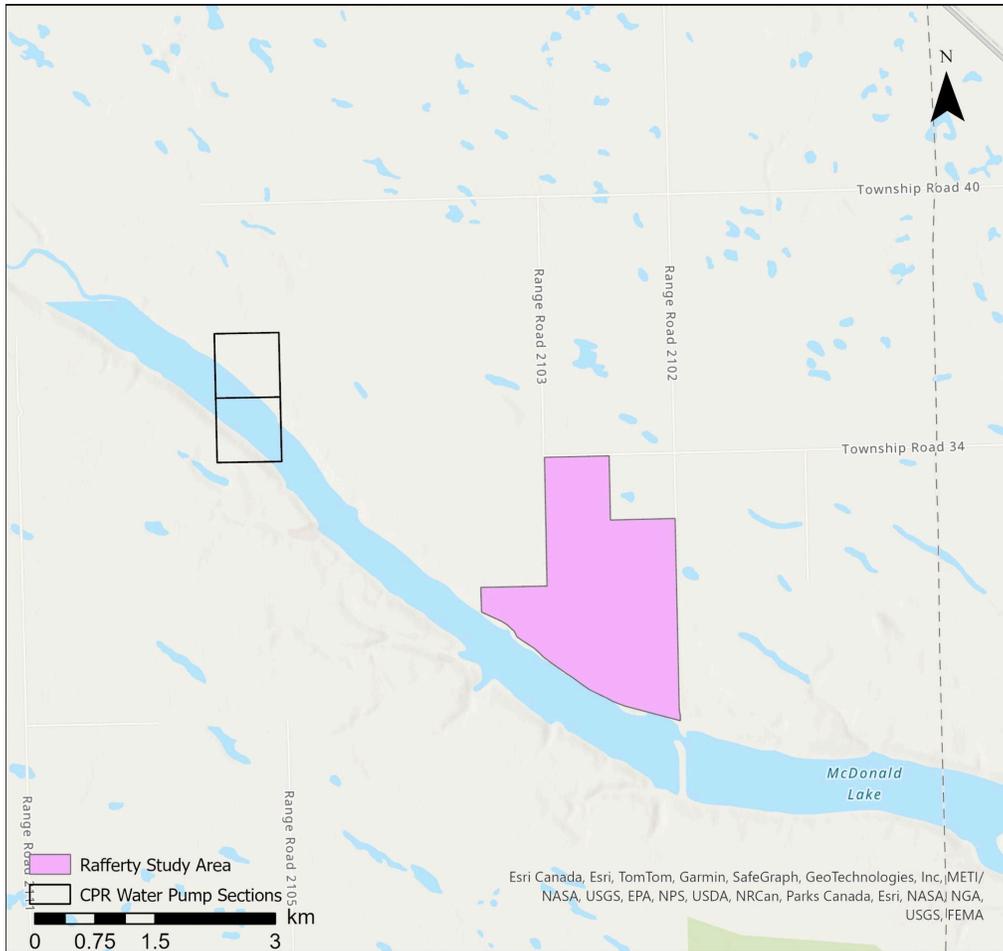


Figure 1b: Location of Rafferty Study Area showing sections where CRP Water Pump was located. Map created by Kisha Supernant, Nov 27, 2024.

The flooding from earlier projects appears to have had significant impacts on a concentration of Métis archaeological sites. Areas along both sides of the river had Métis homesteads (Klimko 1990, 17a) and the area around the CPR Water Pump had a settlement that “consisted of Métis, many of whom immigrated from North Dakota and were related to one another” (Finnigan 1992, 76). Most of these areas have been inundated. Therefore, all areas along the banks of the Souris in and around Area 1 need to be considered potential areas for Métis heritage resources that pre-date homesteading. Any draw down of existing water should involve an evaluation of the current state of known flooded Métis sites, such as those homesteads identified in above and other sites that have historic materials, including DhMt-42.

Area 2 (South of Estevan)

The identified area includes the NE and NW quarters of 22-1-8 W2 and 23-1-8 W2.

Known Archaeological Sites

No archaeological sites related to the Métis have been previously identified in this area.

Homestead History: 22-1-8 W2

Item Number	Names	Part	Section	Township	Range	Meridian
534951	Annie Akier	NE	22	1	8	W2
534952	Nicholas J Hagen	NW	22	1	8	W2
534953	Morris John Gummer	SE	22	1	8	W2
534954	Morris John Gummer	SW	22	1	8	W2

Table 4: Land Grants of Western Canada Search Results, 22-1-8 W2, Library and Archives Canada.

The Hagen family is Norwegian/American per the 1906 census.

The Gummer family is English/Norwegian per the 1906 census.

Annie Akier was not found in the census. Cross checking the Land Grants database at the Provincial Archives of Saskatchewan (PAS) revealed that Mallo Jordet and Phillip Cooke also had homestead claims on the NE Quarter. Mallo Jordet is on the section according to the 1906 census and is listed as an American. The only Phillip Cooke in the census was living at 22-8-1 W2 so there may be a transcription error at the PAS.

Conclusion: 22-1-8 W2

No Métis connections to this land section were identified through homestead records.

Homestead History: 23-1-8 W2

Item Number	Names	Part	Section	Township	Range	Meridian
534896	Manitoba Southwestern Col Ry Co		23	1	8	W2

Table 5: Land Grants of Western Canada Search Results, 23-1-8 W2, Library and Archives Canada.

In 1957, Canadian Pacific Railways absorbed Manitoba South-Western Colonization Railway.⁴ There are no homestead records associated with this land section in the PAS.

Conclusion: 23-1-8 W2

No Métis connections to this land section were identified through homestead records.

Additional historical considerations:

Like in Area 1, there is potential for other historic materials from earlier use and occupation of this area to be identified in the project. The Souris River is noted in scrip records and historical records as an important pathway for Métis people. For example, there are scrip records which note the birthplace of various Métis people as the “Souris River,” although where along the Souris river is often unclear. Therefore, out of an abundance of caution, areas along the banks of the Souris need to be considered potential areas for Métis heritage resources that pre-date homesteading. Based on the location of Area 2, any historic-era materials predating the homesteads should be evaluated for possible Métis association. However, this area appears to have somewhat lower potential for adverse impacts on Métis material heritage than Area 1.

Recommendations

1. Community Monitors for Ground Disturbance

Community monitors should be present on-site for any ground-disturbing activities exceeding 5 cm in depth. This measure would ensure Métis perspectives and oversight are integrated into archaeological practices, protecting cultural heritage and addressing community concerns.

2. Reassessment of Known Métis Sites During Drawdowns

In the event of a water drawdown, areas with known Métis archaeological sites should be revisited by a qualified archaeologist to assess their current condition. Regular monitoring will help identify any changes to site integrity and guide appropriate mitigation strategies.

3. Evaluation of Historic Era Material for Métis Connections

Any historic-era archaeological material predating the homestead era should be thoroughly evaluated for potential connections to Métis heritage. This process would help ensure that Métis material culture is recognized and treated appropriately.

⁴ https://www.wikitree.com/wiki/Category:Manitoba_South-Western_Colonization_Railway

4. Preference for Area 2

Area 2 is recommended over Area 1 for further activities, as there is less current evidence of Métis archaeological material in Area 2. This prioritization aligns with efforts to mitigate potential impacts on Métis cultural heritage.

These recommendations are intended to support the Manitoba Métis Foundation - National Government of the Red River Métis and their commitment to protecting and honoring Métis heritage while supporting responsible archaeological practices.

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