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**Written submission from the  
Hiawatha First Nation**

**Mémoire de la  
Première Nation de Hiawatha**

**Regulatory Oversight Report for  
Uranium and Nuclear Substance  
Processing Facilities in Canada: 2022**

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**Rapport de surveillance réglementaire  
des installations de traitement de  
l'uranium et des substances nucléaires  
au Canada : 2022**

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Commission Meeting

Réunion de la Commission

December 13-14, 2023

13-14 décembre 2023



# HIAWATHA FIRST NATION

MISSISSAUGAS OF RICE LAKE

Commission Registry and Registrar  
Canadian Nuclear Safety Commission  
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November 6, 2023

**(Submitted by Email)**

**RE: Hiawatha FN's comments on Regulatory Oversight Report for Uranium and Nuclear Processing Facilities: 2022 (CMD:23-M35)**

Dear Registrar,

On behalf of our Consultation Department at Hiawatha First Nation (FN), we are writing to submit to you Hiawatha FN's review and comments on the Regulatory Oversight Report for Uranium and Nuclear Processing Facilities: 2022. We wish to thank Canadian Nuclear Safety Commission (CNSC) for proactively providing Hiawatha FN the opportunity to review this Regulatory Oversight Report (ROR).

*Hiawatha FN's Core Consultation and Land Resource Development office was established to address the Crown's (Federal and Provincial Governments) "Duty to Consult." This is in response to the Supreme Court of Canada decision relating to the Crown's "Duty to Consult" aboriginal communities regarding proposed land development when their treaty and traditional lands are impacted.*

*Our mandate is to engage with governments and private sector proponents on land and resource matters that may affect the Treaty and inherent rights of our First Nation. Hiawatha First Nation's traditional territory has been affected by numerous and various developments, which have impacted our traditional territory, way of life, and sustainability of Hiawatha. Our traditional ways are derived from the land. Hiawatha is not opposed to development. We would*

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*"We, the Mississaugi of Hiawatha First Nation, are a vibrant, proud, independent and health people balanced on the richness of our cultural and traditional ways of life."* 1

*like to be reassured that wildlife, habitat, air, and water tributaries would be adequately protected from contamination for 7 generations without upsetting the balanced eco-system/relationship we have with our Mother Shka-ki-mi-kwe (Mother Earth).*

*Our values grow from the culture from which we are born into and live with and our beliefs and attitudes emerge from our values. As Mississaugi people from the Mississauga Nation, we try to live a healthy way of life “Mino Bimaadiziwin” through the teachings passed down from ancestors. These teachings include Seven Grandfathers teaching that was given to us by the Creator. This story has been passed down many generations. These foundational teachings include; wisdom, love, respect, bravery, honesty, humility, and truth.*

*All of the above combined create a balance of spiritual, emotional, physical and mental being. They are the cornerstones of our belief system and the formula for maintaining the delicate balance between Shka-ki-mi-kwe (Mother Earth) and all her inhabitants. We have a strong connection to Shka-ki-mi-kwe and only use what is necessary from her. We believe that all things are connected and are taught that if we look after our Mother she will look after us. With all decisions made we always consider the effects our choices will make on the next seven generations just as our ancestors have done for us. We often turn to our Elders who hold great knowledge of Shka-ki-mi-kwe that no one else possesses. Their knowledge is held in their hearts and minds to be passed by oral tradition for the next generations.*

Hiawatha FN would like to acknowledge the changes that have been made to this year’s ROR, such as adding a description of environmental protection review (EPR) reports, including Indigenous Nations and communities’ Terms of Reference, as well as summarizing the number of issues, concerns and recommendation submitted by Indigenous Nations and communities on the ROR.

While Hiawatha FN recognizes that this ROR has improved, we found that the level of information provided was often insufficient for Hiawatha FN to fully assess the oversight activities that CNSC staff has contemplated on UNSPF in 2022. Therefore, Hiawatha FN could not conclude whether or not UNSPF remained safe or what specific concerns the Nation may have in relation to the UNSPF activities. For instance, information provided on inspections and Notices of Non-Compliances (NNCs) throughout the report are minimal and do not provide contextual data. In order to understand an NNC, Hiawatha FN would need information on why a NNC was given, what follow up action occurred, as well as why the non-compliance had no impact on the health and the environment. Here are some examples of NNCs seen throughout the document:

- p. 7 section 2.2. In 2022, CNSC staff conducted 4 inspections at PHCF that covered 10 SCAs, as well as compliance verification activities associated with the Vision in Motion (VIM) project (discussed below). Table B-2 in appendix B lists these inspections and the 4 resulting NNCs.
- p. 8, section 2.3. In 2022, CNSC staff conducted 4 inspections at CFM that covered 9 SCAs. Table B-3 of appendix B lists these inspections and the 8 resulting NNCs.

- p. 20 section 5.5. One NNC from an inspection related to the physical design SCA was issued for the following licensee over the reporting period:
- CFM – 1 NNC related to obtaining pressure vessel certificates of inspection from authorized inspection agency after inspections are completed.
- p. 25 section 5.9. NNCs from 1 inspection related to the environmental protection SCA were issued for the following licensee over the reporting period:
- PHCF – 2 NNCs related to the calibration of fluoride monitors and Hi-Vol air samplers.
- p. 28, section 5.10. NNCs from inspections related to the emergency management and fire protection SCA were issued for the following licensees over the reporting period.
- CFM – 2 NNCs associated with qualification of emergency response team members, and the completion/maintenance of fire extinguisher inspection records.
- BWXT NEC (Toronto) – 5 NNCs related to transfer of command, alarms and PA systems, training, and documentation.
- p. 29, section 5.11: ▪ PHCF – 2 NNCs related to following proper waste segregation practices and documenting waste management records.

With these minimal descriptions, HFN cannot fully understand the rationale behind CNSC staff being satisfied to conclude that proponents operated safely in 2022.

The level of information was also insufficient in the Soil monitoring subsection on pages 82 and 83 when discussing Table I-23:

*“In 2022, the uranium in soil concentrations ranged from 0.3 µg/g to 28.1 µg/g on industrial/commercial lands. Of the 41 soils sampled, 35 soil samples were below Ontario’s background concentrations for uranium of up to 2.5 µg/g [21] and well below the applicable CCME, Canadian Soil Quality Guidelines for the Protection of Environmental and Human Health [18] for uranium for industrial, commercial, and residential/parkland land use.”*

In this passage, the 28,1 µg/g result on industrial/commercial lands is not explained even though past results showed in Table I-23 were much lower (in 2021, maximum uranium concentration was 1,0 µg/g), and no explanation is provided regarding the 6 remaining soil samples that were apparently not below Ontario’s background concentrations for uranium. Hiawatha FN would appreciate more details and explanations when data presented seems to stand out from others, even if this data remains safe for the health and the environment.

Hiawatha FN is of the view that other sections in the report provided enough information to understand the context, the problems and the actions undertaken. For instance, section 5.9 had sufficient information on action levels. The fact that Cameco is also sharing environmental action level exceedances with us improves our understanding as well as transparency, because we are already familiar with the incidents described. Section 7.1 also provides a satisfactory level of details on reportable events which allow Hiawatha FN to understand what happened and why, if there was an impact on the environment and what has been done to avoid the problem from reoccurring.

Most of table descriptions provided valuable information, such as table H-1. Information provided in the footnote helped us understand table H-1 results. Tables I-14 and I-16 also had descriptions that helped us understand some of the results, like maximum uranium concentrations, which were all above standards. Knowing that *“Concentrations of uranium in groundwater exceeded the MOE Table 3 Standard in 1 of the 70 monitoring wells sampled [ , that ] this exceedance relates to historic waste management practices”*, and that *“the risk to the environment from an exceedance of a CCME guidance is expected to be minimal due to the conservative assumptions and safety factors that were used to derive the guideline”*, HFN did not have concerns over the results.

Hiawatha FN also wishes to bring attention to other areas of concern. The ROR continues to demonstrate a lack of understanding of the history and Indigenous presence on the lands and waters where CNSC regulated activities are occurring. The language used within the report diminishes the rights of Indigenous Peoples and the roles, responsibilities, and obligations of the Crown in relation to these rights. The report blurs critical distinctions between Indigenous rights and interests and includes language which serves to historicize and erase First Nations’ presence and legitimacy while omitting the ongoing legacy of colonialism, including the legacy of the nuclear industry, on cultural and spiritual activities.

Hiawatha FN has reviewed and accepted recommendations and requests provided by 4 Directions of Conservation Consulting Services (4 Directions) for the ROR for UNSPFs: 2022, which can be found in detail at **Appendix A**. We trust that you will review these detailed comments and provide responses. We hope to discuss these comments with you further as part of the ongoing discussions and broader relationship building that is occurring between the CNSC and Hiawatha FN.

Sincerely,

Sean Davison  
Lands & Resource Consultation  
Consultation and Land Resource Development Office  
Hiawatha First Nation

Francis Chua  
Support to Hiawatha First Nation

cc:

Chief Laurie Carr, Hiawatha First Nation  
Trisha Shearer, Director of Operations, Hiawatha First Nation  
Tom Cowie, Lands & Resource Consultation, Hiawatha First Nation  
Mandy McGonigle, Archaeology, Hiawatha First Nation  
Gary Pritchard, CEO & Indigenous Conservation Ecologist, 4 Directions of Conservation Consulting Services

## **Appendix A**

4 Directions of Conservation Consulting Services Review of CNSC *Regulatory Oversight Report for Uranium and Nuclear Processing Facilities: 2022.*



October 23, 2023

Attn: **Consultation Department**

Hiawatha First Nation

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Hiawatha, ON. K9J 0E6

P: (705) 295-4421

RE: CMD: 23-M35 CNSC Regulatory Oversight Report for Uranium and Nuclear Substance Processing Facilities: 2022

4 Directions File No: 23-141

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4 Directions of Conservation Consulting Services (4 Directions) is pleased to present our review and recommendations regarding the Regulatory Oversight Report (ROR) prepared by the Canadian Nuclear Safety Commission (CNSC) with respect to Uranium and Nuclear Substance Processing Facilities during 2022. These documents were presented to Hiawatha First Nation (HFN) from the CNSC under their Duty to Consult and Accommodate.

## 1.0 General Comments

4 Directions reviewed the CNSC's ROR titled *CNSC Regulatory Oversight Report for Uranium and Nuclear Substance Processing Facilities:2022* (the Report). In doing so, the below high-level concerns were identified.

### 1.1 Comment & Concern

Across Canada, it has become best practice for settler organizations and government entities to include an acknowledgement at the beginning of formal documents which recognize the lands and treaties impacted by their activities and offer meaningful comments which include reflection on reconciliation effort in Canada and commitments and/or actions being made by the particular organization to such endeavours.

Under the intention of supporting further education and relationship building regarding understanding of Treaties and Indigenous Rights, 4 Directions sees that constructing and ensuring collective understanding of a meaningful land acknowledgement could be a useful starting point. Land acknowledgements, when engaged with meaningfully, can serve as impactful political tools to address and resist dominant narratives that often seek to diminish and/or erase Indigenous presence and





colonial violence from the collective storyline (Robinson et al., 2019). As Treaty people, we must begin relationship building with contextual understandings that are “accurate representations of Indigenous territorial claims, languages, and governance systems” (Wark, 2021: pp. 202).

Further research is required to better understand the purpose of a territorial acknowledgement. It is essential that individuals structuring land acknowledgements are purposive with their language and make clear there is an understanding of the specific history and current relation to the discussed land. Specifically, given that the overview of this report offers a list of facility sites, it is unclear why the subsequent specific treaties for these regions could not be identified.

Meaningful territorial acknowledgements should aim to be specific and purposeful; not generalized or vague. To move forward with a journey of reconciliation, it is important that space is created to come to terms with the truth of why this journey is needed. An effective territorial acknowledgement illustrates authors’ understanding of the legacies, and at times unsettling truths, intertwined with the land and peoples being acknowledged.

#### 1.1.1 Question

How will CNSC include such reconciliatory and land acknowledgments at the forefront of the Report?

#### 1.1.2 Recommendation

4 Directions staff recommend that CNSC work collaboratively with First Nation Rights-holders to develop a respectful and meaningful acknowledgement, including a reconciliatory reflection that could be included in CNSC documents.

#### 1.2 Comment & Concern

Throughout the Report, CNSC utilizes problematic terminology and literary styles which, purposefully or not, diminish and obscure the distinct rights of Indigenous Peoples and the responsibilities of the Crown, as well as historicize the presence of First Nations. The information provided in the Report demonstrates a lack of understanding regarding Indigenous Rights, and CNSC’s obligations, which could be viewed as disrespectful.

Examples include:

- a lack of demonstrated understanding regarding the distinctions between:
  - territories or lands and treaties;
  - First Nations, Indigenous communities, and Indigenous organizations;
  - First Nation Rights-holders and Indigenous Interest-holders.
- problematic terms, misspellings and literary devices utilized such as:
  - “and/or”;







- inconsistencies in naming of First Nations or Indigenous communities.

#### 1.2.1 Question

It is of 4 Directions staff's understanding that several First Nations have raised concerns and provided feedback regarding CNSC's continued use of problematic language. How will CNSC staff address these concerns in the Report?

#### 1.2.2 Recommendation

4 Directions staff recommend CNSC ensure that staff are educated on the distinctions between the terms outlined above and that written documents, such as the Report, make these distinctions known by using clear descriptions and by avoiding language that obscures such distinctions. For example, CNSC could employ "the lands, waters and treaty territories of..." rather than "traditional territories and/or treaty lands."

4 Directions staff recommends CNSC include language that reflects not only a mere interest by First Nations and Indigenous communities in CNSC activities, but rather expounds on the obligations that CNSC has to meaningfully consult and engage with First Nation Rights-holders, and its commitment and intent to engage with Indigenous Interest-holders meaningfully.

4 Directions staff recommends that CNSC ensure community names are spelled correctly and consistently throughout its written documents.

#### 1.3 Comment & Concern

Throughout the Report, CNSC uses the term "traditional," but fails to provide any context as to what is meant by this term. Without such context, the average settler reader is left with the Western connotation of 'traditional' which erroneously historicizes the presence of First Nations. While First Nations often refer to "traditional territories", it is within the context of describing a cultural and spiritual presence within and relationship to their territories and lands, which continues to this day. Another example referenced within the Report is "traditional activities." Indigenous Peoples continue to exercise their treaty and Aboriginal rights to harvest, hunt and fish, and partake in cultural and spiritual activities. Such activities are not simply rooted in "tradition" but continue to evolve and take place on the lands and waters in a modern form.

#### 1.3.1 Recommendation

4 Directions staff recommends CNSC work with First Nation Rights-holders and Indigenous communities to collaboratively define the context around the use of the term "traditional" throughout the document to avoid erroneously historicizing Indigenous presence, Indigenous Knowledge Systems, and the exercising of Indigenous rights, and Indigenous cultural and spiritual activities.





## 1.4 Comment & Concern

CNSC has not clearly defined its obligations to consult with First Nation Rights-holders. For example, the sentence *“The CNSC is committed to building relationships and trust with Indigenous Nations and communities interested in CNSC regulated facilities”* removes the responsibility that the CNSC has in this regard due to its role as a Crown entity vis-à-vis First Nations regulations, consultation protocols, the Canadian Constitution, the Williams Treaties Settlement of 2018, Canadian Legislation, and Supreme Court decisions.

Consultation refers to the legal obligations of the Crown (Government) when Indigenous rights and title may be adversely affected by a Crown decision. The consultation process consists of information sharing between the government and affected First Nations and seeks to resolve potential adverse impacts on Indigenous rights. Under these parameters, First Nations are considered Rights Holders, a title with specific and nuanced connotations that differ greatly from those of interest or stakeholders.

### 1.4.1 Questions

How will the CNSC clearly describe its roles, responsibilities, and obligations to Hiawatha First Nation within the Report vis-à-vis First Nations regulations, consultation protocols, the Canadian Constitution, the Williams Treaties Settlement of 2018, Canadian Legislation, and Supreme Court decisions?

### 1.4.2 Recommendation

4 Directions staff recommends that the CNSC include language that reflects its obligations under First Nation and Canadian legislation, Treaty, regulation, and policies to consult and engage with First Nation Rights-holders meaningfully. The CNSC must be accountable by being specific when describing these responsibilities and obligations in the Report.

The supreme court of Canada has stated that it is not up to First Nations to educate the Crown on their own responsibilities; it is 4 Directions’ recommendation that the CNSC critically reflects on how First Nations regulations, consultation protocols, the Canadian Constitution, the Williams Treaties Settlement of 2018, Canadian Legislation and Supreme Court decisions are being centred and prioritized in identified areas such as:

- a. Report writing;
- b. Project monitoring;
- c. Environmental procedures and assessments; and,
- d. Future project planning.





## 2.0 Specific Feedback by Section

4 Directions staff have created the following table (**Table 1**) based on their review of the Report. For clarity, specific comments, concerns, requests, and recommendations are organized in correlation with the various sections of the Report to which they are relevant.

<b>Table 1: Specific Feedback by Section</b>		
<b>Section</b>	<b>Comments &amp; Concerns</b>	<b>Requests &amp; Recommendations</b>
<b>Plain language summary</b>	<p>This section states <i>“This report is based on work done by the Canadian Nuclear Safety Commission (CNSC) staff to ensure the protection of the environment and the health and safety of the people around licensed uranium and nuclear substance processing facilities (UNSPFs) listed above.”</i></p> <p>4 Directions staff wishes to raise concerns with this statement as it fails to address the protection of the rights of Indigenous Peoples which should also be a stated goal of the CNSC as part of its duty as the Crown. Additionally, CNSC should recognize that Indigenous Peoples living, harvesting, and hunting around the facilities are disproportionately impacted by any effects to the environment and human health.</p>	<p>It is 4 Directions staff recommendation that CNSC acknowledge protection of the rights of Indigenous Peoples as part of its overall goals and activities.</p> <p>4 Directions staff recommends that CNSC acknowledge, recognize and incorporate the disproportionate effects of nuclear activities, including uranium and nuclear substance processing on Indigenous Peoples who live, hunt and harvest around such facilities into its analysis. (Chong &amp; Basu, 2022; Folkers &amp; Gunter, 2022).</p>
<b>Plain language summary</b>	<p>This section states <i>“The facilities discussed in this report lie within the traditional and/or treaty territories of many Indigenous Nations and communities.”</i></p> <p>4 Directions staff finds such a statement concerning as it is inaccurate; the facilities lie within both traditional lands as well as sometimes overlapping treaty territories. This statement makes use of problematic terminology and literary styles which diminish the rights of Indigenous Peoples, the responsibilities</p>	<p>CNSC must continue to educate itself regarding the history of Indigenous Peoples, the history of treaty making to be able to more accurately reflect the lands and treaties without the use of harmful language within its written documents.</p> <p>CNSC should ensure that staff understand and communicate about treaty lands and traditional territories with the relevant context. CNSC should work with First Nation</p>





	<p>of the Crown, and historicizes the presence of First Nations. For example, the use of “and/or” when discussing treaty lands and traditional territories obscures the context and distinction between traditional territories and treaty lands, which often overlap.</p> <p>Without such context, the average settler reader is left with the western connotation of ‘traditional’ which erroneously historicizes the presence of First Nations. While First Nations often refer to “traditional territories”, it is within the context of describing a cultural and spiritual presence and relationship on their territories and lands, which continues to this day.</p>	<p>Rights-holders to collaboratively define the context around the use of the term “traditional” so as to avoid erroneously historicizing Indigenous presence, Indigenous Knowledge Systems, and the exercising of Indigenous rights, and Indigenous cultural and spiritual activities.</p>
<p><b>Plain language summary</b></p>	<p>This section states <i>“In 2022, CNSC staff undertook ongoing and meaningful engagement activities with Indigenous Nations and communities in relation to the facilities covered by this ROR. These engagement activities support the CNSC’s commitment to meeting its consultation responsibilities and to continuing to build and strengthen positive relationships with Indigenous Nations and communities and respond to their issues and concerns.”</i></p> <p>While 4 Directions staff are generally supportive of CNSC’s intention to engage meaningfully with First Nation Rights-holders and Indigenous Interest-holders, there remains concern with this statement.</p> <p>Specifically, it is not clear how it was determined that the activities CNSC undertook were indeed meaningful. Was this determined collaboratively with the</p>	<p>4 Directions staff requests that CNSC provide clarity on how it determined that the activities it undertook were meaningful.</p> <p>If this was not determined collaboratively with First Nations and Indigenous communities, 4 Directions staff recommends CNSC refine the statement to indicate that meaningful engagement has been its goals and intended outcome, rather than characterizing interactions in a paternalistic fashion.</p> <p>4 Directions staff recommends CNSC include a section that reflects the role, responsibilities, and obligations that CNSC has under First Nation and Canadian legislation, Treaty, regulations and policies to meaningfully consult with First Nation Rights-holders. CNSC must be</p>





	<p>First Nations and Indigenous communities who were engaged or by CNSC unilaterally?</p> <p>Whether or not engagement activities are meaningful is a qualification to be made by First Nations and/or Indigenous communities being engaged.</p> <p>Without clarity, the statement that CNSC has undertaken meaningful engagement could be considered paternalistic.</p> <p>Further, while engagement activities can often inform consultation, engagement alone does not fulfil consultation responsibilities. CNSC has a responsibility to consult First Nation Rights-holders, a distinction which is not clear in this statement. Whether or not engagement activities support consultation is a qualification to be made by individual First Nation Rights-holders.</p> <p>These are qualifications that CNSC, as the proponent, cannot ethically make alone.</p>	<p>accountable by being specific about what these responsibilities and obligations are, as well as what specific activities are undertaken to fulfil these duties and obligations.</p>
<p><b>PLAIN LANGUAGE SUMMARY</b></p>	<p>4 Directions staff is concerned that a high-level summary of engagement activities with First Nations and Indigenous communities are not included within the Plain language summary, as is the case with other RORs.</p> <p>4 Directions staff note that this exclusion contributes to the devaluation of the rights of Indigenous Peoples as well as the diminishment of the role, responsibilities, and obligations of the Crown to First Nation Rights-holders.</p>	<p>4 Directions staff recommend that CNSC ensure that engagement with First Nations and Indigenous communities is highlighted as an item of importance which deserves inclusion within the Plain language summary.</p>
<p><b>INTRODUCTION</b></p>	<p>Within this section it is stated that the CNSC is subject to the <i>Nuclear Safety and</i></p>	<p>4 Directions staff recommends CNSC include language that reflects the</p>





	<p><i>Control Act</i> and its regulations yet omits its obligation and Duty to Consult and Accommodate First Nation Rights-holders. Legislation such as the <i>Nuclear Safety and Control Act</i> and its associated regulations are only possible because of Treaty. Treaties are separate from and supersede settler regulations and must be acknowledged as such.</p> <p>4 Directions staff finds it concerning that CNSC demonstrates a limited view of its role, responsibilities, and obligations, as the Crown, towards First Nation Rights-holders.</p>	<p>role, responsibilities, and obligations that CNSC has under First Nation and Canadian legislation, Treaty, regulations and policies to meaningfully consult and engage with First Nation Rights-holders. CNSC must be accountable by being specific about what these responsibilities and obligations are, and how they will be fulfilled.</p>
<p><b>2.2 Cameco Port Hope Conversion Facility</b></p>	<p>In this section, CNSC provides a description of Cameco Port Hope Conversion Facility as follows: "<i>Cameco Corporation owns and operates the Port Hope Conversion Facility (PHCF), which is located in Port Hope, Ontario, and is in the traditional territory of the Michi Saagiig Anishinaabe people. These lands are covered by the Williams Treaty between Canada and the Mississauga and Chippewa Nations.</i>"</p> <p>4 Directions staff find this statement erroneous because it is not an accurate depiction of the cultural lands, territories or treaties that cover the PHCF site. It also does not include the waters, which are utilized by the facility and are of great importance to the Michi Saagiig.</p>	<p>4 Directions staff recommends CNSC refine this description to include an accurate description of the lands, waters, and treaties.</p> <p>To that end, 4 Directions staff recommend as follows: "The PHCF is situated on Michi Saagiig Anishinaabeg lands and waters. The lands are covered by the Gunshot Treaty (1787-88), the Williams Treaties (1923), and the Williams Treaties Settlement (2018)."</p>
<p><b>2.3 Cameco Fuel Manufacturing Inc.</b></p>	<p>In this section, CNSC describes Cameco Fuel Manufacturing Inc as "<i>in the traditional territory of the Michi Saagiig Anishinaabe people. These lands are covered by the Williams Treaty between Canada and the Mississauga and</i></p>	<p>4 Directions staff recommends CNSC refine this description to include an accurate description of the lands and treaties.</p> <p>To that end, 4 Directions staff recommend as follows: "The Cameco</p>





	<p><i>Chippewa Nations.”</i></p> <p>4 Directions staff find this statement erroneous because it is not an accurate depiction of the cultural lands, waters, territories or treaties that cover the Cameco Fuel Manufacturing site.</p>	<p>Fuel Manufacturing site is situated on Michi Saagiig Anishinaabeg lands and waters. The lands are covered by the Gunshot Treaty (1787-88), the Williams Treaties (1923), and the Williams Treaties Settlement (2018).</p>
<p><b>2.4 BWXT Nuclear Energy Canada Inc.</b></p>	<p>In this section, CNSC provides a description of BWXT Nuclear Energy Canada Inc. sites in Toronto Ontario as follows: <i>“The Toronto facility is located within the traditional territory of many nations, including the Mississaugas of the Credit, the Anishnabeg, the Chippewa, the Haudenosaunee and the Wendat peoples, and now home to many diverse First Nations, Inuit and Métis peoples.”</i></p> <p>4 Directions staff finds such a statement concerning as it is inaccurate; the statement omits treaty and does not present an accurate socio-political picture of land use by Indigenous peoples.</p> <p>It is evident to 4 Directions staff that CNSC utilized a generic land acknowledgement that was produced by the City of Toronto. 4 Directions staff finds the use of this generic acknowledgement concerning, as it calls CNSC’s commitment to meaningful engagement and reconciliation into question. It is clear CNSC did not conduct its own research or engage with First Nation Rights-holders to develop an appropriate statement.</p> <p>The facilities in Toronto lie within both traditional lands as well as treaty territories. This statement diminishes the</p>	<p>CNSC should ensure that staff undertake their own research and engagement with First Nation Rights-holders when attempting to communicate about specific locations. CNSC staff should understand and communicate about treaty lands and traditional territories with the relevant context and in an appropriate manner. CNSC should work with First Nation Rights-holders to collaboratively refine the statement to accurately represent the lands including the treaties and unique history of First Nations presence and governance of the lands related to the Toronto facility.</p>





	<p>rights of the Michi Saagiig, the responsibilities of the Crown, and historicizes the presence of First Nations. Further this statement is erroneous inasmuch that it ignores the context through which the Wendat and Haudenosaunee came to live on the lands through treaty making with the Michi Saagiig which is an important distinction. Without such context, the average settler reader is left with a simplified view which homogenizes the presence of distinct cultural groups with unique histories of presence and specific governance over the lands. The statement is erroneous when discussing the Métis, who did not have a traditional or historical presence in the Toronto area.</p>	
<p><b>2.4 BWXT Nuclear Energy Canada Inc.</b></p>	<p>In this section, CNSC provides a description of BWXT Nuclear Energy Canada Inc. sites in Peterborough Ontario as follows: <i>“The Peterborough facility resides in the traditional territory of the Michi Saagiig Anishinaabe people. These lands are covered by the Williams Treaty between Canada and the Mississauga and Chippewa Nations.”</i></p> <p>4 Directions staff find this statement erroneous because it is not an accurate depiction of the cultural lands, waters, territories, or treaties that cover the Peterborough facility.</p>	<p>4 Directions staff recommends CNSC refine this description to include an accurate description of the lands, waters, and treaties, including the Michi Saagiig and the Williams Treaties of 1923 where applicable. (recommended resource: Williams, 2018).</p> <p>CNSC should ensure that staff undertake their own research and engagement with First Nation Rights-holders when attempting to communicate about specific locations. CNSC staff should understand and communicate about treaty lands and traditional territories with the relevant context and in an appropriate manner. CNSC should work with First Nation Rights-holders to collaboratively refine the</p>







		<p>statement to accurately represent the lands including the treaties and unique history of First Nations presence and governance of the lands related to each facility.</p>
<p><b>3. Nuclear substance processing facilities</b></p>	<p>Within this section, CNSC staff state <i>“All of the facilities are located within the traditional unceded territory of the Algonquin Anishinaabeg peoples.”</i></p> <p>4 Directions staff finds this statement concerning and inaccurate.</p> <p>Utilization of a blanket statement for a broad geographic location obscures the complexity and distinctiveness of specific territories, First Nations’ rights, Indigenous interests, treaties, and agreements into a single homogenous notion.</p> <p>Without context, the average settler reader is left with a simplified view which homogenizes the presence of distinct cultural groups with unique histories of presence and specific governance over the lands.</p> <p>While CNSC acknowledges that all the nuclear substance processing facilities are located within the unceded territory of the Algonquin Anishinaabeg peoples, CNSC omits acknowledging the Michi Saagiig Nishnaabeg and Treaty 27 and Treaty 27 ¼ which are applicable to some of the facility locations.</p> <p>4 Directions staff note that this homogenization and exclusion contributes to the devaluation and diminishment of the rights of Indigenous</p>	<p>4 Directions staff recommend that CNSC ensure that lands, waters and treaties are appropriately acknowledged in each facility description so as to ensure that treaty lands and traditional territories are communicated and expressed with the relevant context.</p> <p>CNSC should work with First Nation Rights-holders to collaboratively define the context of each facility.</p> <p>4 Directions staff recommends CNSC include language that reflects the role, responsibilities, and obligations that CNSC has under First Nation and Canadian legislation, Treaty, regulations and policies to meaningfully consult and engage with First Nation Rights-holders. CNSC must be accountable by being specific about what these responsibilities and obligations are, and how they will be fulfilled.</p>





	Peoples as well as the ignores the role, responsibilities, and obligations of the Crown to First Nation Rights-holders.	
<b>3.1 SRB Technologies (Canada) Inc.</b>	<p>Within this section, CNSC does not acknowledge the Michi Saagiig lands, waters, or the Williams Treaties of 1923.</p> <p>4 Directions staff note that this exclusion contributes to the devaluation of the rights of Indigenous Peoples as well as the diminishment of the role, responsibilities, and obligations of the Crown to First Nation Rights-holders.</p>	4 Directions staff recommends that CNSC work with First Nation Rights-holders to collaboratively define the context of each facility.
<b>4. CNSC regulatory oversight</b>	<p>Within this section CNSC states that it <i>“performs regulatory oversight of licensed facilities to verify compliance with the requirements of the NSCA and the associated regulations made under it, each site’s licence and licence conditions, and any other applicable standards and regulatory documents.”</i></p> <p>4 Directions staff identifies that within this section, CNSC should include oversight that occurs related to engagement and consultation with Indigenous Peoples, and there is an opportunity to highlight the protection of the rights of Indigenous Peoples.</p>	<p>4 Directions staff recommend that CNSC include language that reflects the role, responsibilities and obligations that CNSC has under First Nation and Canadian legislation, Treaty, and relevant regulations and policies to oversee meaningful consultation and engagement with First Nation Rights-holders.</p> <p>4 Directions recommends referencing HFN’s <u>Consultation and Accommodation Standards (2017)</u> as part of this process.</p>
<b>5.9 Environmental Protection</b>	<p>Within this section CNSC Staff state that, <i>“Protection of the environment and the public are linked in the environmental protection SCA. This SCA covers programs that identify, control, and monitor all releases of radioactive and hazardous substances, and the effects on the environment and people from facilities or as a result of the licensed activities. Based on regulatory oversight activities, CNSC staff rated the environmental</i></p>	<p>The UNDRIP Act (2021) <i>“emphasizes the urgent need to <b>respect and promote the inherent rights of Indigenous peoples [...] which derive from their political, economic and social structures and from their cultures, spiritual traditions, histories, philosophies and legal systems, especially their rights to their lands, territories and resources;</b>”</i></p>





	<p><i>protection SCA at all UNSPFs as 'satisfactory'.</i>"</p> <p>4 Directions staff find this statement concerning as protection of Indigenous Peoples and their rights is completely omitted. Further, it is not clear that First Nation Right-holders have been involved in the evaluation of the environmental protection SCA.</p> <p>As sovereign Nations and protectors and care-takers of the lands and waters, with Inherent, Aboriginal and Treaty Rights, First Nation Rights-holders should be included in the evaluation of the environmental protection SCA in accordance with the Duty to Consult and the <i>United Nations Declaration on the Rights of Indigenous Peoples</i> (including the principles of Free, Prior and Informed Consent)</p> <p>All of the Environmental Protection activities including Environmental Management Systems and their evaluation, assessments and monitoring should be informed by engagement and consultation with First Nation Rights-holders to ensure the protection of rights and values as well as the revitalization of Indigenous cultural activities and spiritualities.</p>	<p>What's more, within the Truth and Reconciliation Commissions (TRC) 94 Calls to Action (<a href="#">2015</a>), Call to Action 92 specifically calls "<i>upon the corporate sector in Canada to adopt the United Nations Declaration on the Rights of Indigenous Peoples as a reconciliation framework and to apply its principles, norms, and standards to corporate policy and core operation activities involving Indigenous peoples and their lands and resources.</i>" This includes but is not limited to meaningful consultation, respectful relationships, and free, prior, and informed consent (FPIC) on regulatory oversight activities such as the evaluation of the environmental protection SCA.</p> <p>4 Directions staff recommends CNSC make space for Indigenous inclusion, contexts and knowledges within commission member documents including but not limited to regulatory oversight reports and regulatory activities with a more balanced approach, such as involving Indigenous participation in evaluation activities, and incorporating Indigenous Knowledge Systems, values and culture broadly into (but not limited to):</p> <ul style="list-style-type: none"> <li>• CNSC activities,</li> <li>• Assessments,</li> <li>• Monitoring, and,</li> <li>• Relevant REGDOCS.</li> </ul>
<p><b>6. Indigenous consultation and engagement</b></p>	<p>4 Directions staff notes that despite the title, this section omits a description of the role, responsibilities, and obligations</p>	<p>4 Directions staff recommend that CNSC include language that reflects the role, responsibilities, and</p>





	<p>of CNSC to consult with First Nation Rights-holders. No consultation activities are described within.</p>	<p>obligations that CNSC has under First Nation and Canadian legislation, Treaty, and relevant regulations and policies to meaningfully consult and engage with First Nation Rights-holders. CNSC must be accountable by being specific about what these responsibilities and obligations are as well as provide a description of consultation activities. 4 Directions recommends referencing HFN's <u>Consultation and Accommodation Standards (2017)</u> as part of this process.</p>
<p><b>6.1 CNSC staff engagement activities</b></p>	<p>Within this section CNSC states <i>"The CNSC is committed to building long-term relationships and conducting ongoing engagement with Indigenous Nations and communities who have an interest in CNSC-regulated facilities within their traditional and/or treaty territories."</i></p> <p>Within the provided quotation, and throughout the entirety of the Report, CNSC has not clearly defined its obligations to consult with First Nation Rights-holders. For example, the sentence <i>"CNSC staff's efforts in 2022 supported the CNSC's ongoing commitment to meet its consultation obligations and build positive relationships with Indigenous peoples with interests in Canada's UNSDPFs."</i> removes the responsibility that the CNSC has in this regard due to its role as a Crown entity vis-à-vis First Nations regulations, consultation protocols, the Canadian Constitution, the Williams Treaties Settlement of 2018, Canadian Legislation, and Supreme Court decisions.</p>	<p>4 Directions staff recommends CNSC include language that reflects not only a mere interest by First Nations and Indigenous communities in CNSC regulated facilities, but rather expounds on the obligations that CNSC, and by extension each facility, has to meaningfully consult and engage with First Nation Rights-holders, and its commitment and intent to meaningfully engage with Indigenous Interest-holders.</p> <p>4 Directions staff recommend that CNSC ensure that staff are educated on the distinctions between First Nations Rights-holder and Indigenous Interest-holders, as well as between engagement and consultation activities, and that CNSC clearly distinguish between First Nation Rights-holders and Indigenous Interest-holders and make clear the varying depth of engagement required within its documents. Consultation activities should only occur with First Nations Rights-</p>





	<p>Further, CNSC mentions its consultation obligations without expounding on what exactly they are. Erroneously, within this statement, these obligations are limited to those Indigenous peoples with interests in UNSDPFs.</p> <p>4 Directions staff finds these statements lack distinguishment between First Nation Rights-holders and Indigenous Interest-holders as well as between engagement and consultation activities and how they apply to each group, respectfully. This approach risks creating a false equivalency between non-rights and rights-holding communities.</p> <p>4 Directions staff note the lack of distinction between First Nation Rights-holder and Indigenous interest-holders and a limitation to only “interest” in UNSPFs is problematic. Each demonstrates a lack of understanding and contributes to the devaluation of the rights of Indigenous Peoples as well as the diminishment of the role, responsibilities, and obligations of the Crown to First Nation Rights-holders.</p> <p>Throughout these statements CNSC makes use of problematic terminology and literary styles which diminish the rights of Indigenous Peoples, the responsibilities of the Crown, and historicizes the presence of First Nations. Further the specific lands, waters, and treaties are not clearly defined.</p> <p>For example, the use of “and/or” when discussing treaty lands and traditional territories obscures the context and distinction between traditional territories and treaty lands, which often overlap.</p>	<p>holders.</p> <p>4 Directions staff recommend that CNSC ensure that lands, waters and treaties are appropriately acknowledged in each facility description so as to ensure that treaty lands and traditional territories are communicated and expressed with the relevant context.</p>
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<p><b>6.1 CNSC staff engagement activities</b></p>	<p>Within this section, CNSC relegates First Nations and Indigenous communities to an Appendix.</p> <p>4 Directions finds this practice concerning as it is a clear example of omitting the presence of First Nations, Indigenous lands, Treaties, and rights. Such omissions risk diminishing the role, responsibilities, and obligations of the Crown in relation to First Nation Rights-holders. Moreover, such omissions can serve to devalue and erase First Nations' rights, cultures, histories and continued presence from the land in narrative form.</p>	<p>4 Directions staff recommends CNSC list the First Nations and Indigenous communities relevant to each site within the main body of the Report as location are listed, and not simply as an Appendix. This would provide further consistency and transparency in the Report.</p> <p>4 Directions recommends that CNSC provide a map alongside the site map which depicts First Nations communities delineated by having rights or interests. This map should also depict treaty territories.</p> <p>A more thorough and accurate acknowledgement section is required. Within this acknowledgement, CNSC staff should state the relevant Indigenous Nations that have Inherent, Aboriginal and Treaty rights to the lands and waters as well as the communities that have 'interests' to the land and waters.</p>
<p><b>6.1 CNSC staff engagement activities</b></p>	<p>Within this section CNSC staff state <i>"The CNSC awarded participant funding to assist Indigenous Nations and communities, members of the public and stakeholders in reviewing this ROR and in submitting comments to the Commission. Participant funding recipients are listed in appendix O."</i></p> <p>4 Directions staff finds this statement concerning for several reasons. Stating that First Nations and Indigenous communities are 'awarded' funding is another example of harmful language which devalues the rights of Indigenous Peoples and diminishes the role,</p>	<p>4 Directions staff recommend that CNSC be clear about its obligations and responsibilities as the Crown to provided funding to First Nation Rights-holder in order to ensure a balanced approach to consultation in keeping with the Duty to Consult and Honour of the Crown.</p> <p>4 Directions staff recommend that CNSC ensure that public and stakeholder engagement are not conflated with Indigenous consultation and engagement activities.</p>





	<p>obligations, and responsibility of the CNSC to meaningfully consult with First Nation Rights-holders.</p> <p>As determined by caselaw, appropriate funding is to be provided consistent with the Honour of the Crown, to ensure a fair and balanced consultation process. Thus, while CNSC chooses to utilize the PFP as a mechanism of providing funding, it is as a result of CNSC's obligations to support a balanced approach to supporting participation of First Nation Rights-holders' in consultation and engagement processes rather than an 'award' which connotes a voluntary gesture. Describing it as a 'award' may perpetuate negative stereotype of First Nations to being incapable or as receiving 'hand-outs'.</p> <p>The distinct rights of Indigenous Peoples and the obligations and responsibilities of the CNSC as the Crown are further obscured by the inclusion of the public and other stakeholders within this bullet. 4 Directions staff note that this homogenization is problematic as it demonstrates a lack of understanding of the rights of Indigenous Peoples and creates a false equivalency between members of the public and First Nation Rights-holders. This contributes to the devaluation of the rights of Indigenous Peoples as well as the diminishment of the role, responsibilities, and obligations of the Crown to First Nation Rights-holders.</p>	
<p><b>6.1 CNSC staff engagement activities</b></p>	<p>Within the subsection <i>Tracking of ROR Issues, Concerns and Recommendations</i> CNSC states "<i>Additionally, appendix P</i></p>	<p>4 Directions staff requests that CNSC provide clarity regarding how</p>





	<p><i>presents the number of issues and concerns for which CNSC staff have either responded directly or provided an approach to meaningfully address and close out specific requests, concerns and recommendations where possible."</i></p> <p>While 4 Directions staff are supportive of CNSC's transparency regarding feedback and requests received from First Nations and Indigenous communities, there remains concern with this statement. Specifically, it is not clear how approaches, responses and/or closeouts were determined. Was this determined collaboratively or by CNSC unilaterally?</p> <p>Without clarity, the statement that CNSC has provided approaches to meaningfully address concerns, issues and requests could be considered paternalistic.</p>	<p>responses, approaches and closeouts were determined.</p>
<p><b>6.1 CNSC staff engagement activities</b></p>	<p>Within the subsection <i>CNSC Terms of Reference for Long-Term Engagement with Indigenous Nations and Communities</i>, CNSC describes the formalized long-term engagement relationships with First Nations and Indigenous communities.</p> <p>CNSC states "<i>CNSC staff continue to remain open to developing ToRs for long-term engagement with other interested Nations and communities with nuclear facilities in their territories upon request."</i></p> <p>While 4 Directions staff are supportive of CNSC's efforts to establish formal relationship agreements, we note that the need for and purpose of the ToR vis-à-vis CNSC's obligations and responsibility to First Nation Rights-</p>	<p>4 Directions staff recommends CNSC refines this section to appropriately contextualize the need for and purpose of the TORs. CNSC should include language that reflects the role, responsibilities, and obligations that CNSC has under First Nation and Canadian legislation, Treaty, regulations and policies to meaningfully consult and engage with First Nation Rights-holders. CNSC must be accountable by being specific about what these responsibilities and obligations are.</p> <p>CNSC should ensure that staff are educated on the distinctions between traditional and treaty territories as well as between First Nations, Indigenous communities</p>







	<p>holders, or context regarding CNSC’s broader commitments to reconciliation are omitted. Additionally, not all First Nations, Indigenous communities, and organizations that CNSC engages with have territories.</p>	<p>and Indigenous organizations. CNSC staff should understand and communicate about treaty lands and traditional territories with the relevant context and in an appropriate manner.</p>
<p><b>6.2 Licensee engagement activities</b></p>	<p>Within this section CNSC states <i>“In 2022, CNSC staff continued to monitor the engagement work conducted by the UNSPFs licensees to ensure that there was active engagement and communication with Indigenous Nations and communities interested in their facilities, and that activities were carried out in relation to the relevant licensing and Commission hearing processes that occurred in 2022.”</i></p> <p>4 Directions finds this statement concerning based on qualifying engagement as ‘active’ without demonstrating that this evaluation was made with input from the First Nations and Indigenous communities.</p> <p>Without clarity, qualifying engagement as ‘active’ could be considered paternalistic.</p> <p>Additionally, this section makes no evaluation of CNSC’s role in fulfilling the Duty to Consult and Accommodate. Throughout this section CNSC continues to characterize First Nations and Indigenous communities as having ‘interest’ in CNSC regulated facilities.</p> <p>As outlined in other sections of this submission, 4 Directions staff finds this mischaracterization concerning as it devalues the rights of Indigenous</p>	<p>4 Directions staff request that CNSC provide information regarding its definition for terms such as “active” or “meaningful” engagement and how these definitions were informed by First Nations and Indigenous communities.</p>





	<p>Peoples, demonstrates a lack of understanding by the CNSC on the differences between First Nation Rights-holders and Indigenous Interest-holders, and omits the CNSC's role to consult with First Nation Rights-holders.</p>	
<p><b>6.2 Licensee engagement activities</b></p>	<p>In this section, CNSC staff state they are satisfied with the level and quality of Indigenous engagement conducted by UNSPFs licensees with regards to their operations and proposed projects at different sites in 2022. CNSC indicates that in response to feedback from First Nations and Indigenous communities they have included opportunities for Indigenous feedback in the evaluation of licensees.</p> <p>While 4 Directions is in support of Indigenous inclusion in the evaluation process of licensees, this section raises some concerns.</p> <p>For example, it is not clear within this section what methodology was used for evaluation. There is an example of feedback provided by Curve Lake First Nation, however, the feedback does not make any evaluation of the UNSPFs but provides a factual description of activities that have been undertaken.</p> <p>CNSC presents the inclusion of Indigenous feedback as part of licensee evaluation as a programmatic approach with broad participation, yet it is not clear that any other First Nations or Indigenous communities provided feedback.</p>	<p>4 Directions staff requests that CNSC provide Hiawatha First Nation with information regarding the methodology used for evaluation of Licensee engagement activities for review and consideration.</p> <p>4 Directions staff recommends that CNSC work with First Nation Rights-holders to define what effective engagement looks like, with an understanding that each First Nation may have different criteria. In addition, CNSC should work with First Nation Rights-holders to develop an appropriate methodology and process for evaluation that moves beyond confirmation that an outreach or engagement program exists and a description of information sharing activities.</p>





	<p>Utilization of a single First Nation’s feedback within the Report raises additional concerns, as this represents the view of one First Nation regarding two facilities, whereas CNSC is obliged to engage and consult with several communities and evaluate five facilities. Feedback from CLFN on two facilities does not constitute an effective evaluation.</p> <p>Such actions could be viewed as tokenistic as there is not a pan-Indigenous voice, and CLFN’s views are their own and should not be utilized by CNSC to represent “Indigenous feedback” over such a broad area and a number of facilities.</p> <p>Further, within this section CSNC states “CNSC staff confirmed that the licensees have Indigenous engagement and outreach programs.” and the paragraph goes on to describe various outreach or information sharing initiatives. 4 Directions staff find this concerning as there is no qualification given to these activities to determine if they were effective or not. Having a program does not indicate that engagement was effective.</p> <p>This leaves the reader unclear about whether CNSC and UNSPF licensees have worked with First Nations and Indigenous communities to clearly define what meaningful and effective engagement looks like in order for it to be properly evaluated.</p>	
<p><b>6.6 Overall conclusions</b></p>	<p>Within this section CNSC states that <i>“the performance in all SCAs was rated as</i></p>	<p>4 Directions staff recommend that a discussion be held between CNSC</p>





	<p><i>satisfactory with the exception of [...] security SCA at CRL, which rated as low expectations.”</i></p> <p>4 Directions staff note that there was a total of 73 NNCs and a total of 59 reportable events communicated in 2022, among which approximately 65% of NNCs come from the CRL site and approximately 70% of reportable events are associated with the CRL. Even though all NNCs and reportable events were considered low risk, 4 Directions staff suggest that there is still reason to be concerned over the high number of NNCs and reportable events that happened at the CRL when compared with the 6 other sites.</p>	<p>and Hiawatha First Nation regarding a threshold of NNCs and reportable events in a year, above which actions must be undertaken. This discussion should focus on how many, if any, NNCs and reportable events are acceptable.</p> <p>If so, is there a threshold for all SCAs performance above which actions would be made? How many SCAs must be below expectation to conclude that the overall performance is not satisfactory?</p> <p>If not 4 Directions recommends that CNSC hold discussions with Hiawatha First Nation to develop such thresholds.</p>
<p><b>Appendix A INDIGENOUS NATIONS AND COMMUNITIES THAT HAVE TRADITIONAL AND/OR TREATY TERRITORIES WITHIN PROXIMITY TO CNL SITES</b></p>	<p>4 Directions staff note several areas of concern throughout Appendix A, including the concerns outlined throughout this review (specifically section 1.2 of this review). There also remain inconsistencies in the names of First Nations used throughout.</p>	<p>4 Directions staff recommend that the Report be revised in accordance with the comments provided regarding terminology and the need for distinguishment between First Nation Rights-holders and Indigenous Interest-holders. 4 Directions staff recommend that CNSC must incorporate this information throughout the report rather than relegating it to an appendix. When highlighting this information throughout the report, 4 Directions recommends that CNSC use proper terminology and relevant distinctions between Indigenous Rights-holders and Indigenous Interest-holders. Indigenous Interest-holders should be further delineated by Nation/community vs. Organizations. 4 Directions also recommends that</p>





		CNSC check the accuracy of names and avoid inconsistencies.
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### 3.0 Closing Remarks

4 Directions staff note that more information should be provided within the *CNSC Regulatory Oversight Report for Uranium and Nuclear Processing Facilities: 2022*, especially as it relates to Non-Compliance Notices. 4 Directions staff remain concerned regarding the demonstrated lack of understanding of Michi Saagiig lands, rights, and treaties. Moreover, we have highlighted instances where the proponent has used harmful language and styles throughout the provided documents. For example, the decision to relegate First Nations, Indigenous communities, and organizations to specific sections or appendices of reports risks diminishing Indigenous Peoples rights, interests, values, cultures and spiritualities.

4 Directions wishes to reiterate its concern over the lack of responsibility, accountability, and transparency that the CNSC has demonstrated within this report regarding its role, responsibilities, and obligations as the Crown to First Nations Rights-holders, including Hiawatha First Nation.

We trust that this information aids in your engagement process and the next steps forward. If you have any questions, please do not hesitate to contact us.

Miigwetch,

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