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**Written submission from the  
Kebaowek First Nation**

**Mémoire de la Première  
Nation Kebaowek**

**Regulatory Oversight Report  
for Uranium and Nuclear  
Substance Processing  
Facilities, Research Reactors,  
and Class 1B Accelerators in  
Canada: 2023**

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**Rapport de surveillance  
réglementaire des installations  
de traitement de l'uranium et  
des substances nucléaires, les  
accélérateurs de particules de  
catégorie IB au Canada: 2023**

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Commission Meeting

Réunion de la Commission

February 26, 2025

Le 26 février 2025

Canadian Nuclear Safety Commission  
280 Slater St.  
Ottawa, ON K1P 5S9

January 11, 2025

**Sent via email to:** [interventions@cnsccsn.gc.ca](mailto:interventions@cnsccsn.gc.ca)

**Re: Comments from Kebaowek First Nation on the Regulatory Oversight Report (“ROR”) for Uranium and Nuclear Substance Processing Facilities, Research Reactors and Class IB Accelerators in Canada: 2023**

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Kebaowek First Nation (KFN) welcomes the opportunity to provide its views and recommendations to the to the Canadian Nuclear Safety Commission (CNSC) in response to CNSC Staff’s “Regulatory Oversight Report for Uranium and Nuclear Substance Processing Facilities, Research Reactors and Class IB Accelerators in Canada: 2023.”<sup>1</sup> In providing these written comments, we also request the opportunity to address the Commission at the upcoming ROR meeting scheduled for February 26, 2025.

Kebaowek First Nation is an Algonquin Anishinabeg First Nation and one of the eleven communities that constitute the broader Algonquin Nation. For centuries, the Algonquin Nation occupied the length of the Kichi Sibì (Ottawa River) watershed, from its headwaters in north central Québec, all the way to its outlet in Montreal. Algonquin peoples have long exercised our customary laws and governance, known as Ona’ken’age’win, on our traditional territory. This law is based on Algonquin peoples’ mobility on the territory, to hunt, gather, and control the use of the lands and waterways for future generations. The Algonquin Nation has never ceded its traditional territory, and its rights and title have not been extinguished. As Algonquin peoples we regard ourselves as keepers of the land, with seven generations worth of responsibilities for livelihood security, cultural identity, territoriality, and biodiversity.

Our comments are based on our extensive experience with federal regulators and agencies, and involvement in regulatory matters including impact assessments, licensing hearings, project reviews and law reform initiatives. This submission is focused on ensuring that oversight, decision-making and regulatory processes are aligned with our ability to participate in decisions that impact our rights.

## **1. Improving Transparency and Accessibility of Information**

KFN actively participates in federal law reform processes and has contributed written and oral submissions to the Impact Assessment Agency of Canada and the former Canadian Environmental Assessment Agency, the Canada Energy Regulator and former National Energy Board, and standing committees. It is on this

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<sup>1</sup> CMD 25-M10 – Canadian Nuclear Safety Commission, “Regulatory Oversight Report for Uranium and Nuclear Substance Processing Facilities, Research Reactors and Class IB Accelerators in Canada: 2023” [ROR]

basis that we make the following recommendations to improve the general accessibility and transparency of information included in the ROR. Taking up the following recommendations would also further the purpose of the CNSC which per section 9 of the *Nuclear Safety and Control Act* (NSCA) is to:

[D]isseminate objective scientific, technical and regulatory information to the public concerning the activities of the Commission and the effects, on the environment and on the health and safety of persons.

**Kebaowek recommends:**

- **For each licensee and facility included in the ROR, new information be added noting the licence type, licence start and end dates, date of the most recent Environmental Risk Assessment and any ongoing/related assessment processes (i.e environmental or impact assessments). We also request links to the licence and Licence Condition Handbook to be included directly within the text of the ROR.**
- **New information be added to the ROR setting out the frequency of reporting going forward. For instance, when is the next reporting period for the ROR on uranium and nuclear substance processing facilities, Class 1B accelerators and research reactors, respectively? Currently, the ROR is backward looking and makes no commitment as to reporting periods and frequency going forward.**
- **Inspection reports be disclosed and hyperlinked as part of ‘Appendix B – CNSC Inspections.’ It would also be more helpful if the chart in Appendix B provided a summary of the nature of the inspection, findings and status of follow-up measures required of the licensee.**

**2. Reconciliation and Implementation of the *United Nations Declaration on the Rights of Indigenous Peoples***

On June 23, 2021, Canada’s *United Nations Declaration on the Rights of Indigenous Peoples Act* (UNDA), entered into force. This federal statute is a form of implementing legislation for the United Nations Declaration on the Rights of Indigenous People (UN Declaration).

The preamble of the UNDA states (emphasis added):

...[T]he *rights and principles affirmed in the Declaration* constitute the minimum standards for the survival, dignity and well-being of Indigenous peoples of the world, and *must be implemented in Canada*.

...[T]he Declaration is *affirmed as a source for the interpretation of Canadian law* ...

UNDA’s purposes are to “affirm the Declaration as a universal international human rights instrument *with application in Canadian law*” and to “provide a framework for the Government of Canada’s implementation of the Declaration”. The Government of Canada is now legally required under section 5 of the UNDA to “take all measures necessary to ensure that the laws of Canada are consistent with the

Declaration.” There are two other prescribed legal requirements at sections 6 and 7 in respect of developing and implementing an Action Plan and reporting on the legal requirements to implement UNDRIP in Canada.

Section 2 of the UNDA prescribes that “[n]othing in this Act is to be construed as delaying the application of the Declaration in Canadian law.” In other words, pursuant to UNDA, as of June 2021, the UNDA applies in Canadian law.

UNDA also requires the Government of Canada, in consultation and cooperation with Indigenous peoples, to take all measures necessary to ensure that federal laws are consistent with the UN Declaration. In order to uphold the UN Declaration and UNDA, new laws and regulations, or updates to existing laws and regulations, that impact the rights of First Nations need to be consistent with the UN Declaration.

The Declaration contains 46 articles. The articles are intended to have governments respect a number of significant principles including that Indigenous groups have rights to self-determination, which is broader than self-government, and rights to redress, which is broader than simply compensation.

In order to meet the standard set in the UN Declaration and UNDA, the ROR and the legislation and policies underlying the *NSCA*, should be reassessed to confirm consistency with the UN Declaration. There should be no limitations within the ROR or CNSC legislation. We suggest the following ROR preamble:

The Government of Canada has committed to achieving reconciliation with Indigenous peoples through a renewed nation-to-nation, government to government relationship between Canada and Indigenous peoples based on recognition of rights, respect, co-operation and partnership as the foundation for transformative change.

The UN Declaration includes provisions relating to the free, prior and informed consent of Indigenous peoples, serves as a foundation for the Government of Canada’s commitment to achieve reconciliation in Canada as set out in the *United Nations Declaration on the Rights of Indigenous Peoples Act*. One of the Government of Canada’s principles for its relationship with Indigenous peoples is to recognize that meaningful engagement with Indigenous peoples aims to secure their free, prior, and informed consent when Canada proposes to take actions which impact them and their rights, including their lands, territories and resources. This is current law and is not subject to forward regulatory UNDA direction by Parliament. The Supreme Court of Canada has ruled that the UN Declaration is binding, positive domestic law in Canada.

The UN Declaration sets the minimum international standards on the individual and collective rights of Indigenous peoples; it prescribes free, prior and informed consent. The relevant articles to this ROR and jurisdiction of the CNSC provide:

**Article 18**

Indigenous peoples have the right to participate in decision-making in matters which would affect their rights, through representatives chosen by themselves in accordance with their own procedures, as well as to maintain and develop their own indigenous decision-making institutions.

**Article 19**

States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free, prior and informed consent before adopting and implementing legislative or administrative measures that may affect them

**Article 23**

Indigenous peoples have the right to determine and develop priorities and strategies for exercising their right to development. In particular, indigenous peoples have the right to be actively involved in developing and determining health, housing and other economic and social programmes affecting them and, as far as possible, to administer such programmes through their own institutions.

**Article 25**

“Indigenous peoples have the right to maintain and strengthen their distinctive spiritual relationship with their traditionally owned or otherwise occupied and used lands, territories, waters and coastal seas and other resources and to uphold their responsibilities to future generations in this regard.” Article 29 goes further to highlight the rights of Indigenous peoples to the “conservation and protection of the environment.”

**Article 26**

1. Indigenous peoples have the right to the lands, territories and resources which they have traditionally owned, occupied or otherwise used or acquired.
2. Indigenous peoples have the right to own, use, develop and control the lands, territories and resources that they possess by reason of traditional ownership or other traditional occupation or use, as well as those which they have otherwise acquired.
3. States shall give legal recognition and protection to these lands, territories and resources. Such recognition shall be conducted with due respect to the customs, traditions and land tenure systems of the indigenous peoples concerned.

**Article 27**

States shall establish and implement, in conjunction with indigenous peoples concerned, a fair, independent, impartial, open and transparent process, giving due recognition to indigenous peoples' laws, traditions, customs and land tenure systems, to recognize and adjudicate the rights of indigenous peoples pertaining to their lands, territories and resources, including those which were traditionally owned or otherwise occupied or used. Indigenous peoples shall have the right to participate in this process.

**Articles 29.1 and 29.2**

1. Indigenous peoples have the right to the conservation and protection of the environment and the productive capacity of their lands or territories and resources.

States shall establish and implement assistance programmes for indigenous peoples for such conservation and protection, without discrimination.

2. States shall take effective measures to ensure that no storage or disposal of hazardous materials shall take place in the lands or territories of indigenous peoples without their free, prior and informed consent.

**Article 32**

1. Indigenous peoples have the right to determine and develop priorities and strategies for the development or use of their lands or territories and other resources.

2. States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources.

3. States shall provide effective mechanisms for just and fair redress for any such activities, and appropriate measures shall be taken to mitigate adverse environmental, economic, social, cultural or spiritual impact.

**Article 38**

States in consultation and cooperation with indigenous peoples, shall take the appropriate measures, including legislative measures, to achieve the ends of this Declaration.

Any negotiation and content of CNSC licences must be informed by and be consistent with the above articles and the following acknowledgement:

Recognition of Algonquin Anishinabeg First Nations' relationship to their territory

In keeping with the UN Declaration's acknowledgement of the nationhood and self-determination of Indigenous peoples, the Parties will conduct their engagement based on a shared recognition that:

- a. Algonquin peoples are keepers of the land with cultural and territorial stewardship obligations to the next seven generations.
- b. The First Nations assert that the Algonquin Anishinabeg Nation holds Aboriginal title and rights over their territory that straddles the Kichi Sibi (Ottawa River) basin on both sides of the Quebec-Ontario boundary and they enjoy the benefits of those asserted rights and title.
- c. The Kichi Sibi is of immense spiritual and cultural significance for the Algonquin Anishinabeg Nation and flows within the First Nations' territory.

The ROR provided the CNSC with an opportunity to be responsive to the realities and challenges of First Nation communities, including Kebaowek, with respect to participating in decision-making when activities are occurring in our lands or precedents being set (for instance, licensing decisions) which impact our self-determination and the health of our lands and water.

We were dismayed by the lack of mention of the UN Declaration and UNDA in the ROR and any commitment to ensure that oversight of nuclear substance processing facilities was done in alignment with the UN Declaration. This not only falls short of the obligation on the CNSC to implement the UN Declaration but also the CNSC's role as the Crown, in keeping with section 8(2) of the *NSCA*.

On countless occasions, KFN has asked the CNSC to review and assess how the UN Declaration has been upheld and to demonstrate how its principles are reflected in CNSC procedures, including the ROR. We continue to see this recommendation ignored. As a way forward, we suggest the ROR process be amended to engage "ethical space," that is, the space that is created when two societies with disparate worldviews engage with one another. We must recalibrate our ethical relations with each other, from an Indigenous earth jurisprudence point of view. Earth jurisprudence is a way of knowing the world is "sacred" that calls us all to the challenge of rethinking colonial government systems and laws to make something better, to do the long haul work.

While the ROR contains a chapter on Indigenous consultation and engagement, the list of 'engagement practices' does not empower a nation-to-nation approach,<sup>2</sup> that would enable KFN to mutually define outcomes and purposes of the ROR, such as the type and frequency of information shared and reported on, and weigh in on issues of general applicability across licenses (see section 5 below, for instance, where we discuss the ongoing need for cumulative effects and climate considerations within the ROR).

**Kebaowek recommends:**

- **The Commission develop a Reconciliation Framework to guide the CNSC's efforts to align its work with the objectives and spirit of the UN Declaration, which includes a commitment to maximize Indigenous leadership in impact assessments and to go beyond the Duty to Consult in impact assessment processes.**
- **To support the incorporation of the UN Declaration, the Commission share views and ideas relating to Canada's implementation of the UN Declaration with all licensees covered in this ROR.**
- **The Commission direct CNSC Staff to proactively work with Kebaowek on a framework for implementing free, prior, and informed consent decision making in relation to nuclear substance facilities and regularly share and seek feedback on its understanding of the First Nations' views of how potential recommendations and decisions relating to the nuclear facilities would align with the implementation of the objective and spirit of the UN Declaration.**
- **The Commission direct CNSC Staff to commit to implementing UNDIP and UNDA as binding, positive domestic law in Canada serving key Indigenous FPIC purposes within the ROR.**
- **The Commission direct CNSC Staff to amend the ROR procedure so that it actions our involvement and oversight. A new ROR process ought to be developed in consultation with KFN that creates space for FPIC and Indigenous-led regulatory reviews.**

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<sup>2</sup> ROR, p 44

- **The Commission recognize the UN Declaration pushes participation and engagement opportunities beyond old approaches rooted in “public participation” or the narrow application of the Duty to Consult.**
- **The Commission be intentional about the UN Declaration and its implementation.**

### **3. The Duty to Consult and Accommodate**

As noted above, Section 8(2) of the *NSCA* recognizes that the CNSC acts as an agent of the Crown. Therefore, it is the CNSC acting as the Crown that is entrusted with the responsibility of fulfilling the Honour of the Crown and obligated to consult.

We remain concerned, however, that the CNSC has unilaterally determined ‘the duty to consult is not engaged’ and thus, attempted to remove the onus on both itself, acting as the Crown, and licensees to meaningfully engage. For example, in the most recent BWXT medial licencing decision made October 8 2021, the Commission expressed in its Record of Decision:

CNSC staff expressed the opinion that the duty to consult is not engaged by this decision because the proposed licence, as it does not pose a change to the footprint of the existing Nordion nuclear substance processing facility or significantly change the operations of the existing facility, would not cause any adverse impacts to any established or potential Indigenous and/or treaty rights. Therefore, BWXT Medical’s licence application does not raise the formal requirements of REGDOC-3.2.2, Indigenous Engagement, Version 1.1.<sup>3</sup>

The CNSC’s *carte blanche* opinion statement that “the duty to consult is not engaged by this decision” actively discourages meaningful engagement between BWXT and KFN that is necessary in building positive relationships, advancing community trust and environmental reconciliation with First Nations. We also submit that the above statement by the Commission is not supportable in law. The Commission must provide a forum for Indigenous participation and accommodation and ensure our concerns can be substantially addressed. By waiving the need to consult, the Commission is making it difficult for us to participate, have access to capacity supports including funding, and accessible information.

Kebaowek requires the CNSC to provide direction and oversight to BWXT / Nordion to resource and coordinate:

- i. working groups, if deemed necessary by the Parties, to address specific issues;
- ii. regularly scheduled meetings;
- iii. exchange information, including reports and presentations, about their respective interests and concerns, and including all expert advice provided to the technical committee;
- iv. seek to reach a shared understanding about the nature of potential effects of the Project and the First Nations’ position regarding their free, prior and informed consent;

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<sup>3</sup> CNSC, BWXT Medical Ltd - Record of Decision, 8 Oct 2021, para 139



- v. work with an agreed upon work plan and schedule in accordance with legislative timeline requirements; and
- vi. develop, through consultation and collaboration, measures to guide Canada's CNSC implementation of the UN Declaration, including principles of free, prior and informed consent, into decision-making at the facilities

**Kebaowek recommends:**

- **The Commission not minimize or otherwise attempt to nullify its constitutional obligations to consult and accommodate. We ask that the Commission amend its 2021 BWXT decision, recognizing that the duty to consult is an *ongoing* responsibility borne by Crown and industry to fulfill, and not one that we must trigger or justify.**
- **The Commission direct CNSC Staff to develop with Kebaowek consultation and collaboration measures to guide Canada's implementation of the UN Declaration, including principles of free, prior and informed consent, into decision-making.**
- **The Parties recognize that consultation and collaboration will have an explicit dimension around (i) understanding the conditions needed for the First Nations to make their the free, prior and informed consent decision and (ii) understanding how the First Nations' position on FPIC will inform the ROR reports, licensing and decision-making.**

#### **4. Compliance with Recent Legal and Policy Changes**

Appendix D of the ROR sets out the status of the licensee's regulatory document (RegDoc) implementation. While the chart sets out the version (by year) to which licensees comply, KFN submits the ROR ought to simply state whether licensees are complying with *current* RegDocs. This would allow intervenors, like KFN, to more succinctly understand which licensees are in compliance with current RegDocs and which are working to come into compliance.

**Kebaowek recommends:**

- **The CNSC set out timelines within which compliance must be achieved. This would be in addition to the current approach, requiring licensees to 'conduct a gap analysis and provide an implementation plan' for coming into compliance with RegDocs. This would ensure all licensees are being held to the same standard and not relying on a RegDoc which is out of date.**
- **The CNSC assess and report on any impacts to licensees resulting from amendments to the *Nuclear Security Regulations***
- **The ROR assess, for each licensee, to what extent their licensed activities will advance or inhibit Canada's ability to meet obligations under:**
  - **The recently passed *National Strategy Respecting Environmental Racism and Environmental Justice Act*. This Act recognizes that environmentally hazardous activities primarily occur in areas inhabited by Indigenous people and these activities could be considered a form of racial discrimination. The ROR ought to assess and report any:**

- Increase in health inequities faced by Indigenous people due to exposure to harmful emissions
- Increase in Indigenous people’s vulnerability to environmental risk due to the intersection of health inequities from environmental exposures with structural inequities including poor housing conditions and infrastructure, water insecurity, reduced access to healthcare services, unemployment, gender-based violence and other ongoing impacts of colonization; and
- Opportunity to capitalize on the lack of capacity held by Indigenous people to resist the establishment of environmentally hazardous activities
- The *UN Declaration and UNDA* and the corresponding 2023-2028 Action Plan, recognizing that complicity with UNDRIP requires:
  - Respecting Indigenous people’s right to determine and develop priorities and strategies for the proposed development or use of their lands or territories and other resources (Article 32(1))
  - Obtaining the free, prior and informed consent of Indigenous peoples before approving any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources (Article 32(2))
- Kunming-Montreal Global Biodiversity Framework, specifically Target 3 (to conserve 30% of land, waters and seas) and Target 22 (to enable the active involvement of Indigenous peoples in decision-making)

## 5. Assessing Climate and Cumulative Effects

Key to the CNSC’s ability to protect the environment and human health from the suite of uranium and nuclear substance processing facilities reviewed in this report is to assess cumulative effects. KFN submits any assessment of the cumulative effect of nuclear activities on our lands, water and health are being left behind because of the licensee-specific or facility-specific approach adopted by the CNSC, that this ROR reflects.

Broader watershed and ecosystem-level would be most helpful in understanding the interaction among licences and their activities. Environmental sustainability is central Ona’ken’age’win our system of customary law and governance and therefore recommend the Commission to direct staff to undertake a cumulative effects review of the nuclear substances class of licences.

On a related note, there is no direct mention of climate impacts in this ROR, despite its impacts being felt by licensees. For instance, higher groundwater volumes due to rainfall events at CFM led to overflow and releases into Lake Ontario.<sup>4</sup>

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<sup>4</sup> ROR, p 52

**Kebaowek recommends:**

- **New chapters be drafted capturing broader environmental considerations, including an analysis of cumulative effects on Indigenous territories.**
- **The Commission direct CNSC Staff to report on climate change impacts to a licensees' ability to protect human health and the environment, as required by section 24(4) of the NSCA, and the adequacy of measures in place to adapt to and mitigate climate impacts. This is directly relevant to the CNSC's oversight and ought to be reported in the ROR.**

**6. Information Requests**

In keeping with the UN Declaration, including Articles, 1, 7, 29 and 32, KFN seeks confirmation and documentation of waste transfers from any of the uranium and nuclear substance facilities included in the ROR to CNL's Chalk River site. We make this request on the basis that Chalk River is located on lands included within KFN's Statement of Asserted Rights and Title Territory.<sup>5</sup>

We also ask the CNSC review and inform of us potential waste transfers, whether from operations or eventual decommissioning, that could result at Chalk River from the licensed uranium and nuclear substance processing facilities.

**Kebaowek recommends:**

- **For each waste transfer to Chalk River, the CNSC to provide the following information:**
  - **Facility of Origin**
  - **Substance name**
  - **Units/weight/volume**
  - **Method of disposal and location**
  - **Percentage change in quantity from previous years**

**7. Regional Information and Monitoring Network for the Ottawa River Watershed (RIMNet) Initiative**

In response to the update provided in the ROR regarding RIMNet, we provide the following background context and update.

Background Context

A coordinated regional monitoring network for radionuclides in the Kichi Sibi watershed is of great importance to Kebaowek First Nation. Chief Lance Haymond raised this issue in March 2024 to the House of Commons' Standing Committee on Environment and Sustainable Development Threat of Nuclear Poisoning of Ottawa River Waters, highlighting the Threat of Nuclear Poisoning of Ottawa River

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<sup>5</sup> Timiskaming, Wolf Lake and Eagle Village Members of the Algonquin Nation Statement of Assertion of Aboriginal Rights & Title, (11 Jan 2023)

Waters. This was during the time of the unreported untreated sewage leak from Chalk River Nuclear Laboratories Site.

Dr. Frederick Wrona Professor and Sware Research Chair in Integrated Watershed Processes notes quantifying, understanding, predicting the changes in water quantity, quality, and aquatic biota in response to multiple stressors requires a coordinated, integrated, credible monitoring evaluation reporting system (MER system), to inform what actions are necessary to ensure the conservation, protection, security and sustainability of our water resources. Effective design and implementation of an integrated system requires the acquisition and timely reporting of relevant environmental information. Moreover, integrated watershed management requires the ability to define appropriate baseline conditions against which to assess change, as well as identifying tracking environmental impacts and the capacity to assess and predict numerous effects. In addition, a critical and ongoing gap has been associated with the recognition and the need to use multiple knowledge systems and ways of knowing and monitoring evaluation recording design and integrating indigenous knowledge holders in the RIMNET program.

#### Our Experience to Date and Current Status

Since Kebaowek engagement began with CNSC and ECCC on RIMNET, our engagement has been limited. We have also requested an engagement protocol and a coordinated approach engaging Algonquin communities in the watershed under the same engagement and protocol standard power sharing design and implementation of such a program.

Dr. Wrona (2024) offers the Athabasca River Basin as a case example, to highlight some of the challenges and possible solutions associated with implementing an integrated and effective monitoring program. The Athabasca River Basin and associated larger Mackenzie River basin have become one of the most monitored and studied freshwater systems in Canada. However, substantial knowledge gaps and uncertainties and how the basin and downstream ecosystems are changing in relation to increasing environmental stressors associated with regional development and population growth. Coupled with economic growth are increasing indigenous community concerns living in and downstream of these developments.

Similarly, Kebaowek identifies growing concerns regarding whether the current environmental regulatory frameworks for nuclear contaminants are adequate and protecting the environment upon which their way of life depends.

Currently, we are waiting to implement a coordinated protocol for engagement. If we examine previous government-led independent expert reviews of regional oil sands monitoring in the Athabasca basin, we find despite long term and long-standing commitments to implement integrated monitoring and related cumulative effects assessment, there was little tangible progress in advancing assessment and related regulatory policies. After decades and hundreds of millions of dollars spent on environmental monitoring and research in the Athabasca basin, significant challenges remain in providing open, transparent

accessible data, which are only used to a fraction of their potential to inform state and condition of environment reporting and relevant environmental management decision making and actions.

**Kebaowek recommends:**

- **We do not need another website collating fragmented data. We need a systematic change in how we design and implement an effective monitoring evaluation reporting system.**
- **A coordinated approach engagement protocol and Indigenous working committee representing Algonquin communities.**