



CMD 26-H3.72

Date: 2026-10-07

**Written Submission from the
Curve Lake First Nation**

**Mémoire de la
Première Nation de Curve Lake**

In the matter of

À l'égard de

Cameco Corporation

Application to renew the Class IB nuclear
fuel facility operating licence for the Port
Hope Conversion Facility for a period of
20 years

Cameco Corporation

Demande visant à renouveler, pour une
période de 20 ans, le permis d'exploitation
d'une installation de combustible nucléaire
de catégorie IB pour l'installation de
conversion de Port Hope

Commission Public Hearing

Audience publique de la Commission

November 2026

Novembre 2026

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October 7, 2026
(Submitted by Email)

RE: Curve Lake First Nation's (CLFN) submission on the Cameco Corporation (Cameco) Application to renew the Class IB nuclear fuel facility operating licence for the Port Hope Conversion Facility for a period of 20 years (CMD 26-H3, CMD 26-H3-REF1, CMD 26-H3.1)

Dear Registrar,

On behalf of the Consultation Department at Curve Lake First Nation, we are providing this written intervention pertaining to the Cameco Corporation Application to renew the Class IB nuclear fuel facility operating licence for the Port Hope Conversion Facility for a period of 20 years. Please refer to **Appendix A: Corporate Guided Interactions and Relationship Building, Appendix B: Community Connections to the Project Area, Appendix C: Technical Review of CMDs and Appendix D: Associated Documents AI Generated Executive Summaries for Appendix A, B, C** of this letter for details. We are looking forward to our ongoing and upcoming meetings in 2026 and beyond continuing to discuss Cameco Corporation licence activities.

We do this work to uphold our responsibilities to care for the earth and waters, for our people, our Nation, and for all our Relations. Our foundational belief is balance; our values and principles are built upon the respect, care, and nurturing of all life as part of an interconnected whole and necessary for the balance and harmony required for Mino-Bimaadiziwin now and for future generations.

Yours sincerely,

Delaney Jacobs
Director of Lands, Environment & Consultation
Curve Lake First Nation

CC:
Chief Hockaday, Curve Lake First Nation
Paige Williams, Manager of Consultation, CLFN
Lily Boggs, Consultation Energy Lead, CLFN
Francis Chua, Supporting Curve Lake First Nation, Director – Francis Chua Consulting Inc.
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Appendix A

Corporate Guided Interactions and Relationship Building

Background

Cameco Corporation's (Cameco) nuclear fuel conversion facility and Port Hope operations exist along the north shore of Gchi Nibi (Lake Ontario) and within the Ganaraska watershed, both of which form central facets of the homelands and traditional territories of the Michi Saagiig Anishinaabeg¹, including Curve Lake First Nation (CLFN). These areas are covered by several pre-Confederation Treaties, the Williams Treaties of 1923, as well as the Williams Treaties First Nations Settlement Agreement of 2018.

CLFN would like to acknowledge the Canadian Nuclear Safety Commission (CNSC) staff in their dialogue and work with our Consultation Department since 2020. As everyone can appreciate, meaningfully consulting on and addressing each topic or project takes time, commitment, and focus. As demonstrated from 2021 to 2025, we continue to be optimistic that our Terms of Reference and Work Plan will result in progress and improvements in 2026 and beyond.

We acknowledge that the CNSC has provided funding for this hearing, as well as additional capacity support through CNSC's Indigenous and Stakeholder Capacity Fund; this is under implementation and in concept will help in the numerous nuclear sector topics and projects, because it provides stable, consistent and predictable funding.

CLFN would also like to acknowledge and express our appreciation to Cameco staff for their ongoing dialogue and engagement with the CLFN Consultation Department since 2022. Over this period, we have had opportunities to exchange information, raise questions and concerns, better understand one another's perspectives, and work collaboratively through matters of mutual interest.

CLFN recognizes these interactions as important steps in building a respectful, constructive, and transparent relationship. While there will inevitably be challenging issues and differing perspectives as we continue to engage on projects and activities, we value the willingness to maintain open dialogue and work toward understanding and addressing concerns in a meaningful way.

¹ Within this document, we speak of ourselves as Michi Saagiig Anishinaabeg, as a community which is part of the Mississauga and Anishinaabeg Nations, as an individual sovereign First Nation with Inherent Rights, as a First Nation communities recognized under the *Indian Act*, and as Rights-holding member First Nation of the Williams Treaties First Nations. Within this document we speak only on behalf of CLFN, and our perspectives should not be construed as speaking for the broader Michi Saagiig Anishinaabeg, the Mississauga Nations, or the Williams Treaties First Nations. While we have chosen to speak of ourselves as Michi Saagiig Anishinaabeg, and about Michi Saagiig Anishinaabeg worldviews, we also recognize that each individual member of our community holds personal views about their own cultural identity and may carry their own teachings and memories regarding the identity, history and relationships of our broader community and that we wish to honour that. Our characterization here should not replace or detract from individually held views, teachings or memories.



We look forward to continuing to strengthen this relationship as our engagement evolves, including working collaboratively to address challenges, identify opportunities for improved environmental and Rights protection, and pursue opportunities that may provide mutual benefits. CLFN appreciates the relationships that have been established to date and looks forward to continuing this dialogue in a manner that supports trust, respect, accountability, reciprocity, and meaningful engagement between CLFN and Cameco.

CLFN trusts that, like us, CNSC Staff, CNSC Commission Members, Cameco Staff, and Cameco Leadership remain committed to this path of reconciliation we have embarked upon and recognize there is still much to do.

CLFN's Consultation Department is progressively building capacity to match the various consultation needs in the nuclear sector. We view this submission process as a formal check-in point and we look forward to continuing dialogue and consultation beyond the confines of this process, and we look forward to the future when the CNSC decisions are made in conjunction with the CLFN.

Routine Interactions

CLFN recognizes Cameco for the engagement efforts undertaken to date and sees value in establishing a more consistent and collaborative approach moving forward; even if slowly. Our Environmental Working Group and Oversight Committee meetings help support continuity, transparency, and trust, while creating space for meaningful dialogue on operations. CLFN also appreciates the Public Disclosures that are shared via email and subsequently discussed at our routine meetings – this level of disclosure allows for increased transparency on any human or mechanical errors during daily operations. CLFN believes that given the various demands on all of our time, Cameco and CLFN have made space for each other to maintain contact.

Initiatives and Programs

CLFN appreciates Cameco's community contributions to the annual CLFN Pow Wow over the years, and to land based initiatives. We have also made good progress on the development of a scholarship program that links youth and education, with potential careers in Cameco. We look forward to enhancing our relationship as we navigate developing a Harvest Food Study aligned with cultural and community information. These initiatives and programs are approached in a Nation-to-Nation relationship, to ensure that CLFN perspectives are reflected throughout Cameco processes and decision making.

Community Visits

CLFN appreciates Cameco's efforts to learn more about community by visiting Curve Lake. Cameco has joined CLFN on the water and on the land to tour the community. Cameco has also spent the day in a team building environment in community. These in-community interactions represent important steps toward building mutual understanding and respect, providing Cameco with valuable insight into CLFN's culture, values, and connection to the land and water. Taking the time to engage in this setting supports more informed and culturally aware decision-making and reflects a positive commitment to relationship-



building. CLFN encourages the continuation and expansion of these in-community engagements as an important foundation for ongoing collaboration.

Facility Tours

CLFN also appreciates Cameco's invitation to participate in facility tours, which provide opportunity to better understand site operations in a direct and experiential way. CLFN acknowledges that past Chiefs have participated in tours of the facility and found the experience informative, particularly in gaining insight into the Port Hope operations. Beyond the standard tour, Cameco has customized an environmentally focused tour for CLFN in 2026. Opportunities such as these support greater awareness, build confidence through first-hand observation, and contribute to open and constructive dialogue. CLFN encourages the continuation of these tours, including opportunities for broader community participation, as a means of strengthening understanding and ongoing engagement.

While we have attempted to bring in Chief & Council to tour the Port Hope Conversation Facility in 2026, we have been unsuccessful in coordinating calendars. At the time of this writing, we are still exploring possibilities in October and November.

Environmental compliance versus Rights protection

CNSC staff conclude that Cameco's environmental protection program meets regulatory requirements and expectations. CLFN would like to emphasize that compliance with regulatory limits should not be treated as the sole measure of adequate environmental or Rights protection. Environmental protection must also consider the exercise of Rights, areas and species of specific cultural concern or interest, cumulative effects, and the broader and ongoing direct and indirect relationships between CLFN and the lands, waters and other Relatives affected by the Facility. Given this complex relationship, CLFN has outlined in **Appendix B**, but not limited to, some of our connections with Port Hope area.

CLFN requests (as also document in **Appendix B**) that Cameco acknowledge that all historic and cumulative impacts have yet to be recognized, offset or compensated; Therefore, even though current Cameco operation impacts are within western acceptable limits to keep the environment healthy, the baseline is distorted. The Ganaraska watershed is already degraded and impacted in ways that have resulted in real impacts to CLFN. Cameco could work with CLFN when offsetting of impacts to understand an appropriate baseline from which to improve the watershed conditions, especially the conditions of the lower reaches of the Ganaraska River. This could look like restoring some of the ecological functions the mouth river has lost from the loss of wetland habitat. Another specific actions could be to undertake actions that would better connect tributaries that should be better connected to the Ganaraska River. The ecological benefit from it besides connectivity is the cold-water inputs that they could bring and with that better for supporting all cold/cool water aquatic species, such as Brook Trout, which has been heavily impacted.



Public vs. First Nation's Rights Holders

Cameco describes its Public Information and Disclosure Program as serving local residents, municipalities, businesses, NGOs, media and Indigenous communities. Public information should distinguish First Nation consultation from general public engagement. CLFN is signatory to a number of pre and post Confederation Treaties as well as the Williams Treaties First Nations Settlement Agreement of 2018. Treaty First Nations have a legally distinct relationship with the lands, waters and relatives. CLFN has constitutionally protected Rights, and the Crown, as a fiduciary, has increased responsibility to CLFN.

The Duty to Consult and Accommodate

CLFN should not be categorized or treated similarly to an Indigenous community, stakeholder or member of the public. The Crown has a legal obligation to consult CLFN where its actions have the potential to adversely impact CLFN's Rights. A renewal application does not automatically equate to no potential new adverse impacts; it's a rebuttable presumption requiring a full scoping analysis.

The Duty to Consult and Accommodate is the current western framework for addressing new potential adverse impacts and harms. The *Sparrow* test on the other hand, requires the Crown to consult CLFN to ensure any infringement of Rights are justified.² CLFN requires consultation that is distinct from public outreach or engagement with interested stakeholders, or Indigenous communities, and that provides meaningful opportunities to influence environmental monitoring, regulatory oversight and decision-making, including upholding the Articles in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP, the Declaration).

UNDRIP, FPIC, TRC

CLFN supports UNDRIP, and its implementing Act (UNDA), and recent Court decisions requiring the CNSC's implementation of the UNDA³, particularly the principle of Free, Prior, and Informed Consent (FPIC), in assessing Crown consultation activities, along with a string of other relevant court decisions upholding UNDRIP. Canada's commitment to aligning its laws with the Declaration, as outlined in UNDA, was further reinforced by the Supreme Court in 2024, which held that UNDRIP is incorporated into domestic law and binding on Canada⁴.

These rulings clarified the legal force of UNDRIP, emphasizing that it is more than aspirational and must inform the interpretation and application of Canadian law, including regulatory processes like those of the CNSC under the *Nuclear Safety and Control Act*. Key principles of UNDRIP, such as FPIC and the Rights of Indigenous peoples to make decisions about their territories, and to maintain their means of subsistence, development, and economic activities, as well as the obligation to provide redress for harm caused without FPIC, underscore the importance of meaningful consultation with CLFN.

² *R. v. Sparrow*, 1990 CanLII 104 (SCC) (1990), AZ

³ *Kebaowek First Nation v. Canadian Nuclear Laboratories*, 2025 FC 319

⁴ *Reference re An Act respecting First Nations, Inuit and Metis children, youth and families*, 2024 SCC 5.



CLFN recognizes UNDRIP as an important framework for understanding and advancing the Rights of Indigenous Peoples within Canada's regulatory processes. CLFN expects that the principles of UNDRIP be meaningfully reflected in the CNSC's approach to consultation, assessment, licensing, and decision-making, rather than being treated solely as a statement of intent. As a Rights-holder and First Nation, CLFN's participation in nuclear regulatory processes is grounded in our Inherent Rights, responsibilities, and relationships with our lands and waters, and further underscored by our Aboriginal and Treaty Rights. Regulatory processes should therefore provide meaningful opportunities for CLFN to influence decisions that may affect our Rights, interests, responsibilities, and future generations. CLFN encourages the CNSC to continue examining how UNDRIP can be operationalized within its regulatory framework, including through meaningful recognition of First Nation governance, Knowledge, participation, and decision-making throughout the lifecycle of nuclear projects and activities.

CLFN views FPIC as an important principle for strengthening relationships between First Nations, proponents, the Crown, and regulatory bodies. Meaningful consent requires that First Nations have access to timely, complete, and understandable information and sufficient opportunity and capacity to consider potential impacts before decisions are made. Engagement must occur early enough that First Nation perspectives can meaningfully influence project design, regulatory decisions, mitigation, monitoring, and other measures intended to protect Rights.

CLFN also recognizes that nuclear projects and activities can involve long-term environmental, cultural, and intergenerational considerations. Accordingly, engagement should not be viewed as a one-time exercise associated with a particular licence or regulatory decision. CLFN encourages the CNSC and proponents to maintain ongoing, transparent, and respectful relationships with the Nation throughout the lifecycle of nuclear activities, including opportunities to revisit concerns as new information, impacts, or circumstances arise. For CLFN, meaningful implementation of FPIC should support an approach that seeks to understand and address the Nation's concerns in a manner that respects our Rights, governance, and responsibilities.

CLFN recognizes the Truth and Reconciliation Commission of Canada's (TRC) Calls to Action as an important foundation for transforming relationships between Indigenous peoples, governments, and Canadian institutions. Within the nuclear regulatory context, reconciliation should extend beyond acknowledgement or commitments and be reflected through meaningful changes in how First Nations are engaged and how their Rights and perspectives are considered in regulatory decision-making. CLFN expects reconciliation to be demonstrated through respectful relationships, transparency, accountability, capacity support, and meaningful consideration of Michi Saagiig Anishinaabeg Knowledge and perspectives. In particular, CLFN encourages the CNSC to consider how its regulatory processes can better recognize First Nations as Rights-holders and governments, rather than limiting participation to the role of stakeholder or intervenor. Building trust requires consistent action over time and a willingness to identify and address barriers within existing processes. CLFN views reconciliation as an ongoing responsibility that requires continued relationship-building between the CNSC and First Nations throughout the lifecycle of nuclear projects and activities.



First Nation Governance Systems

CLFN would also like to reiterate the importance of First Nations' unique governance systems. CLFN's participation in CNSC processes is grounded in our own governance and decision-making structures, where Leadership, Staff, and Community Members each have an important role. Council has a responsibility to represent and advance the interests, Rights, and responsibilities of the Nation, while recognizing that our Community Members are the Rights-holders and that their knowledge, experiences, concerns, and aspirations must inform the positions CLFN brings forward. Meaningful decision-making requires sufficient time, information, capacity, and access to independent expertise so that CLFN can understand potential impacts, engage our community, and determine how projects may affect our Rights and responsibilities. It also requires opportunities for our people to participate directly in regulatory processes and, where appropriate, for hearings and discussions to take place within our community.

CLFN's approach recognizes that impacts cannot be considered on a project-by-project basis alone. Our lands, waters, wildlife, harvesting, and cultural and spiritual relationships are interconnected, and decisions must therefore consider cumulative and long-term impacts, including responsibilities to future generations. This is particularly important in the nuclear sector, where past decisions were made with limited involvement from our Nation and where we must now consider both existing realities and the consequences of future decisions. Ultimately, CLFN's governance process seeks to ensure that community voices meaningfully inform our positions and that decisions reflect our responsibility to protect our Rights, lands, waters, relationships, and future generations.

20-year Licence Term

CLFN is concerned that a 20-year licence term will reduce opportunities for meaningful regulatory review and accountability during a period in which environmental conditions, scientific understanding, CLFN community knowledge, cumulative effects, regulatory requirements, and community concerns may change. CLFN requests that the Commission establish mandatory opportunities for periodic review of the licence and environmental protection measures throughout the licence term, with meaningful participation by CLFN.

CLFN is requesting:

- annual reviews with Cameco in conjunction with our Environmental Working Group and Oversight Committee routine meetings;
- 5-year periodic reviews with the CNSC;
- a mid-term comprehensive review by the CNSC at the 10-year mark.

Closing

CLFN appreciates the opportunity to participate in this hearing and to bring forward the perspectives, concerns, Knowledge, and direction of our Nation. We recognize the efforts made by CNSC Staff and Cameco to build relationships with CLFN and acknowledge that meaningful relationships take time, consistency, transparency, and continued effort. At the same time, CLFN emphasizes that relationship-

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building must be accompanied by meaningful opportunities for our Nation to influence decisions that may affect our Rights, lands, waters, and future generations.

As the CNSC considers Cameco's proposed 20-year licence renewal, CLFN encourages the Commission to consider not only regulatory compliance, but also the broader context of cumulative effects, First Nation Rights, environmental protection, Knowledge, intergenerational responsibilities, and CLFN's own governance and decision-making processes. CLFN looks forward to continuing dialogue with CNSC Staff and Cameco beyond this hearing and to strengthening processes that support transparency, accountability, meaningful participation, ongoing oversight and upholding UNDRIP. Our expectation is that the relationships developed through this process will continue to evolve into meaningful Nation-to-Nation engagement where CLFN's Knowledge, concerns, and community direction are considered throughout the lifecycle of the Facility.

CLFN remains committed to working constructively with the CNSC and Cameco to identify practical opportunities to protect our Rights, improve environmental conditions, strengthen trust, and ensure that decisions made today are informed by our responsibilities to the lands, waters, and generations that will follow. This will help ensure that environmental stewardship aligns with CLFN's familial relationship to the land, water and All Our Relations.



Appendix B

Community Connections to the Project Area

The following narrative has been prepared based on a small selection of community Knowledge, as well as historical and archival research. The Oshkiigmong Knowledge Study intends to gather additional Knowledge, stories and memories to enrich the documentation and protection of our intergenerational cultural and spiritual relationships with the Lands, Waters and Relatives in our territories.

Relationship with the Lands, Waters and Relatives within and surrounding Port Hope

CLFN has long known and remembered our presence at the mouths and along the tributaries of Gchi Nibi (Lake Ontario), through oral history, lived memory, stories, and Knowledge carried across generations. These accounts speak to longstanding relationships with the Lands and Waters within the Ganaraska watershed, including places that continue to hold deep relational, spiritual, cultural, and economic significance for CLFN. These are not simply locations on a landscape; they are part of the living geography through which our identity, responsibilities, histories, and relationships are understood. For generations, members and Ancestors of CLFN have lived as part of these Lands and Waters; These places support our ways of life, including the harvesting of foods and medicines, social and community gatherings, ceremony and spiritual practice, and the burial and ongoing care of our Ancestors.

Long before the arrival of settlers, the Ganaraska River and the associated Rice Lake Carrying Place formed part of an established transportation and trade network used by generations past. These routes connected the interior lakes with Gchi Nibi and formed part of a much broader network linking Lake Ontario with Georgian Bay. During the eighteenth and nineteenth centuries, settlers increasingly relied upon these existing routes to facilitate colonial settlement, commerce, and the movement of people and goods. Roads, railways, and other transportation infrastructure were frequently developed along or in relation to routes already known, maintained, and travelled by our people (Guillet, 1933). For example, old Highway 28 heading north out of Port Hope, followed a pre-existing trail that was used by the Michi Saagiig Anishinaabeg. The transportation systems that later supported settler economies therefore did not emerge upon an empty landscape; they were layered onto longstanding First Nation pathways, relationships, and systems of movement.

The early development of Port Hope was similarly grounded in economies and networks that our people had already established. Peter Smith, often identified as the first European settler of Port Hope, established his trading post within our village of Pametashwetiag⁵ (The Port Hope Evening Guide, 1894; Reeve, 1967). Several settlements were recorded, including one on the east bank of the Ganaraska River (The Port Hope Evening Guide, 1984). The trading post and the harbour at the mouth of the Ganaraska

⁵ CLFN understands place through relationships with the landscape. We understand Pametashwetiag to be a phonetic representation of Anishinaabemowin, which we believe indicates the nearby portage or carrying route between the mouth of the Ganaraska River and Pemaadeshkodeyong (Rice Lake). Settlers often recorded our seasonal settlement and labeled it as Pamadusgodayong, Pemetashwetiag Landing, as well as Pamegahwaysing. The seasonal settlement was associated with the terminus of the portage route along Gchi Nibi.



River, located near a seasonal settlement for the Michi Saagiig Anishinaabeg, subsequently became part of what was regarded as one of the most successful ports between Kingston and Queenston during the late eighteenth and early nineteenth centuries (The Port Hope Evening Guide, 1894). The Ganaraska-Rice Lake Carrying Place included at least three other Michi Saagiig Anishinaabeg seasonal settlements (The Port Hope Evening Guide, 1984).

The presence of the Michi Saagiig Anishinaabeg and the centrality of the area was recognized by early European settlers and colonial governments. When European settlers began establishing Hope Township in the late eighteenth century, their written accounts recorded what the Michi Saagiig Anishinaabeg already knew and lived. Settlers documented a seasonal settlement that earlier generations gathered at, understood by settlers to be Pametashwetiang. In 1901, local historian W. Arnot Craick recorded,

On June 7, 1793, there were more than 50 native families encamped at Pemetescoutiang [a village near the foot of the Ganaraska] for the fishing. Native families had lived seasonally on the banks of the Ganaraska for hundreds of years (Craick, 1901).

Other records similarly reflect the presence of smaller encampments and gathering places along the north shore of Gchi Nibi. For example, the 1878 Illustrated Historical Atlas of Northumberland, Hastings and Durham records over two hundred Michi Saagiig Anishinaabeg as present in 1778 (Belden, H., & Co., 1878). Further,

In March 1779, Walter Butler traversed the north shore of Lake Ontario, stopping at Ganaraska River and reporting that Mississaugas were fishing there. The Mississauga band at Chemong Lake used Chemong and Ganaraska Portages every year to travel to fish runs at the mouth of the Ganaraska River. According to [John] Collins (1792), the Mississaugas preferred to move between Lake Ontario and Rice Lake in July by way of the Ganaraska Portage rather than the trails at Trent River (Karcich, G., 2017).

Indeed, British officials selected Port Hope as the place to negotiate and sign Treaty 20 of 1818 (Muskraite Simpson, 1953).

Throughout the nineteenth century, the rapid expansion of settler populations, development, and industry increasingly displaced our people from the area and profoundly altered our cultural landscapes, transportation routes, economies, and relationships with our Relatives. Colonial laws and policies, together with racism, discrimination, and other forms of oppression, further constrained our ability to maintain our relationships with these lands and waters. Within only a few decades after the arrival of settlers, trading posts expanded, forests began to be cleared, agriculture expanded, mills were constructed, roads were established, and Port Hope rapidly developed. By the early 1800s the village had sawmills, grist mills, blacksmiths, tanneries, distilleries, stores, and docks. This marks the beginning of intensive modification to Michi Saagiig Anishinaabeg landscapes, as well as impacts to relationships with the lands, waters and Relatives. As shared by Gidigaa Migizi-ban (Doug Williams-ban), “Many things were happening. The Salmon were disappearing. The food sources were disappearing. Settlement was moving in and displacing our people” (Williams-ban, D., 2018).



These impacts have continued over many generations into today, where the Ganaraska River, shoreline of Gchi Nibi and landscapes of Port Hope have been heavily modified and impacted, creating changes in the relationships held between CLFN and these areas overtime. Impacts to direct and indirect relationships causes generational harm, changes to our wellbeing and cultural continuity. Despite these disruptions, CLFN continues to maintain relationships with our Relatives and with these lands and waters, and to carry out cultural, spiritual, and community practices that affirm our enduring connection to this place.

The Ganaraska River & Its Mouth

CLFN's intergenerational memories and stories highlight the mouth of the Ganaraska River as part of Michi Saagiig Anishinaabeg summer grounds; these are connected to the winter grounds near the tri-lakes area (Balsam, Pigeon, Chemong Lakes) through larger familial migratory routes that made use of the watershed and the Ganaraska-Rice Lake Carrying Place. Previous generations gathered, and members of CLFN continue to gather in this area in the spring and fall for the salmon run, to harvest our medicines and other foods, hold ceremony, and engage in gathering and sharing Knowledge, as well as social, cultural, and economic exchange.

The Ganaraska River was originally a highly connected watershed that supported travel, settlement, harvesting, and trade since long, long ago. The watershed was densely forested, with diverse forest communities, rolling hills, many valleys, tributaries, and continuous forest cover. According to *The Ganaraska Watershed: A Study in Land Use with Recommendations for the Rehabilitation of the Area in the Post-War Period*,

At the time of the coming of the white man to the Ganaraska, the Mississaugas then inhabiting the area lived principally by fishing and hunting, and the settlement was in the heart of a cedar wood, while in the surrounding country there was a great abundance of deer, bear, hares and grouse (Richardson, A.H., 1944).

The Ganaraska historically depended on the moraine, forests, wetlands, springs and groundwater to store water and maintain summer flow. The lower river had substantial natural hydraulic energy, with a swift current and a drop of more than twelve feet, as it flowed toward the narrow outlet near the mouth. Before harbour development, the mouth of the Ganaraska was a large marshy area, with a large, shallow natural harbour, with islands that divided the river into two channels, two river arms that rejoined near the lake, a narrow natural outlet into Gchi Nibi (Richardson, A.H., 1944; *The Port Hope Evening Guide*, 1984). The mouth of the River has been heavily altered, with no trace of the original islands, mere, or wetlands present, and the remaining watercourse severely impacted by the development of the harbour, the damming of the river, and modern industry.

Extensive forest clearing, agriculture and settlement reduced infiltration, caused some springs and headwater streams to disappear or retreat downslope, increased muddy surface runoff and made flood conditions more acute. At the same time, dozens of dams fragmented the river and altered its flow, while bridges, mills and urban development constrained the floodplain and intensified damage in Port Hope (Richardson, A.H., 1944).



Displaced Relatives

CLFN's relationships with Relatives throughout the Lands and Waters in and around Port Hope, including those surrounding the Cameco facility, have been profoundly disrupted over generations. These disruptions are rooted in colonization, the assertion of Crown jurisdiction, and the transfer of Lands and shorelines into private ownership in ways that displaced CLFN from places with which our people have longstanding relationships and responsibilities. CLFN lives in familial harmony with the Relatives who live within, or visit, our homelands and Treaty Territories. We value all Relatives and have an obligation to continue to steadfastly maintain responsibilities to care for and ensure the health and integrity of our Relatives and communities, for generations to come.

For example, CLFN has relied on the abundance of Salmon in our territory for as long as we can remember – indeed, the Michi Saagiig Anishinaabeg are known as the Salmon People, as well as the People of the River Mouths. As shared by Michi Saagiig Anishinaabe Elder Gidigaa Migizi-ban (Doug Williams-ban),

What was so attractive for Lake Ontario was the fish coming up from the Atlantic and just overflowing Lake Ontario itself. Any river that flowed into Lake Ontario had huge Salmon runs. Writers of history describe how you could literally walk across these rivers at certain times of the year because of the number of salmon. This was attractive to us.

The cultural landscapes, areas, and Relatives protected by our Treaties have been largely destroyed, altered, or degraded over the past several hundred years. They have been largely rendered inaccessible to CLFN by the taking up of the lands into Crown and private ownership. This was further exacerbated in 1923, by the unilateral imposition of the 'Basket Clause' within the Williams Treaties by the Canada and Ontario. The 'Basket Clause' illegally denied our Rights to harvest, within the Williams Treaties Territories, including the Ganaraska Watershed and surrounding areas, thereby truncating our economy, culture, spirituality and ways of life.

As shared by Michi Saagiig Anishinaabe Elder Gidigaa Migizi-ban (Doug Williams-ban):

The 1923 Williams Treaty was devastating to my people. I witnessed the trauma and the fear that was put on my people that were trying to live on the land. They lived daily watching over their backs and trying to maintain their lifestyle as Michi Saagiig Nishnaabeg. The government with the implementation of the "basket clause" was a sneaky way to get rid of us as people who enjoyed this part of our great land. These old men I hung around with such as Madden and Jimkoons lived a life where they had to live by sneaking around and feeling like they were "poachers." They resorted to catching other animals and harvesting those things that the government did not feel were part of those things they need to "protect" from us. These things included small animals, such as the groundhog and the porcupine, the muskrat for meat and other things were also eaten because we were forbidden from hunting game like deer (which was our staple) and we were also prohibited from fishing from October 15 to July 1 every year under provincial



statutes. This process was devastating to people that lived on the land. They faced starvation. But you know, I witnessed where they would circumvent some of these things brought by the government. Such as posting of permanent Game Wardens on our tri-Lakes here – Buckhorn, Chemong and Pigeon. That way we were able to survive somehow but I see where it was an undignified way of living on the land, an adjustment that didn't need to be made. It was particularly difficult to obtain food in the winter time and since fishing was prohibited it became a time of great suffering. People had to run up an account at the Whetung General Store to tie them over until the muskrat season opened in April. So it was November to April that was quite difficult. Some people still had to fish and would do it at odd hours and would have to sneak around and not be seen. This is a very difficult thing to do in the winter time. As you know, anyone standing on the ice can be seen for miles and this is what the Game Warden would look out for and go out and chase my people. There were many stories told of how my people escaped the Game Warden. There were many stories of our people being caught, and going to court in Peterborough to be given fines for fishing out of season. Imagine the indignity on our people when they came in front of the Canadian courts (Williams-ban, 2018).

Fish were always abundant in the tributaries of Gchi Nibi, including the Ganaraska River. Many early settler accounts recorded what the Michi Saagiig Anishinaabeg already knew, for example, the Port Hope Evening Guide recorded "The River teamed with trout and salmon and the heavily forested country surrounding the river abounded with birds and small game" (The Port Hope Evening Guide, 1984). At the time of European Settlement, there were several accounts of abundance of Salmon, Lake Sturgeon and Speckled Trout, among others, including a sturgeon fishery at the mouth of the Ganaraska River. Indeed, at the time of European arrival to our homelands, most of the shore of Gchi Nibi was comprised of continuous First Nation fisheries (Telford, 2000). By the 1940s the sturgeon fishery at the mouth was described as insignificant (Richardson, A.H., 1944). It is generally accepted that, with the shrinkage of streams themselves, trout become restricted to fewer and fewer areas and the sizes to which they grow smaller and smaller.

Examples of Relatives that once were abundant in the Ganaraska Watershed but have since become extinct, displaced or not sustainably available include the Passenger Pigeon, the American Eel, Manoomin (wild rice), Lake Sturgeon, Speckled Trout, Brook Trout, Ruffed Grouse, Spruce Grouse, migrant Plovers, Snipe and Woodcock, Bobwhite, and Eastern Timber Wolf.

Enduring Relationships

Despite the limitations on CLFN's ability to freely access the Cameco facility and surrounding area, our connections, relationships, and responsibilities to these Lands, Waters, and all Relatives have not ceased. This area has long provided, and continues to provide, place, belonging, and cultural meaning to our people and to the human and non-human Beings who inhabit it. These Relatives are integral to our cultural and spiritual fabric, identity, and ways of life. Our relationships with them do not depend upon continuous physical presence on the landscape or upon the exercise of any single activity, such as harvesting. They are enduring relationships that persist despite restrictions on access and will continue in perpetuity.



CLFN's connection to Port Hope, the Ganaraska River, and the surrounding watershed therefore remains active and ongoing. Our people continue to gather, share Knowledge, maintain relationships with one another and with our Relatives, and carry responsibilities grounded in reciprocity, respect, and care. Although private ownership, infrastructure development, and the permanent alteration of the landscape have constrained our ability to maintain these relationships in the ways our ancestors once did, they have not displaced CLFN's presence or responsibilities. That presence continues through our relationships with the Lands, Waters, and the human and non-human Beings who call these places home.

Members of our communities continue to live, work, harvest, and maintain relationships throughout our homelands and Treaty Territories, including within the Ganaraska watershed and in areas near the Cameco facility. CLFN community members continue to exercise harvesting Rights within Gchi Nibi and its tributaries, including the Ganaraska River and surrounding Lands and Waters. At the same time, our communities remain committed to protecting, preserving, and improving the conditions of these places so that future generations are able to strengthen and renew their own direct relationships with this part of our homelands.

The cumulative effects of development throughout our homelands and Treaty Territories, enabled through successive Crown decisions, have significantly affected our ability to sustain cultural, spiritual, social, and economic practices and have contributed to broader impacts on community well-being, identity, and ways of life. Nevertheless, CLFN continues to uphold its relationships and responsibilities to the Relatives of the Ganaraska watershed and surrounding area. We fully intend to protect these relationships and work toward restoring balance for future generations. CLFN remains open to working with Cameco and Canada toward that restoration in a manner consistent with our responsibilities, Treaties, and ways of knowing and being.

A facility may operate within established regulatory limits while environmental changes nevertheless affect CLFN's Rights, particularly where cumulative effects, species of specific cultural interest or concern, harvesting practices, historical contamination or changes in environmental conditions are involved. CLFN therefore asks the Commission to ensure that its decision considers not only whether Cameco has demonstrated regulatory compliance, but also whether the proposed licence and associated monitoring and engagement framework provide an appropriate mechanism for identifying and responding to impacts on CLFN's Rights throughout the licence term.

Requests

CLFN requests that Cameco acknowledge that all historic and cumulative impacts have yet to be recognized, offset or compensated; Therefore, even though current Cameco operation impacts are within western acceptable limits to keep the environment healthy, the baseline is distorted. The Ganaraska watershed is already degraded and impacted in ways that have resulted in real impacts to CLFN. Cameco could work with CLFN when offsetting of impacts to understand an appropriate baseline from which to improve the watershed conditions, especially the conditions of the lower reaches of the Ganaraska River. This could look like restoring some of the ecological functions the mouth river has lost from the loss of wetland habitat. Another specific actions could be to undertake actions that would better connect tributaries that should be better connected to the Ganaraska River. The ecological benefit from it besides



connectivity is the cold-water inputs that they could bring and with that better for supporting all cold/cool water aquatic species, such as Brook Trout, which has been heavily impacted.

Closing

CLFN's relationship with the Lands, Waters, and Relatives within and surrounding Port Hope is longstanding, ongoing, and not diminished by the changes that have occurred across our homelands. The history and Knowledge shared throughout this section demonstrate that the Ganaraska watershed and the shores of Gchi Nibi are not simply the location of a regulated facility; they are part of a living cultural landscape in which CLFN continues to hold Rights, relationships, and responsibilities. The cumulative effects of settlement, industrial development, environmental degradation, and restrictions on access have changed these relationships and affected our ability to exercise our Rights, but they have not ended our responsibilities to these places or the Relatives with whom we share them. CLFN therefore asks that the CNSC and Cameco consider the Facility within this broader historical and cumulative context and recognize that regulatory compliance alone does not fully capture impacts to CLFN's Rights and relationships. CLFN remains committed to working with Cameco to identify practical opportunities to improve environmental conditions, restore ecological function, support the recovery and protection of species of specific cultural interest or concern, and strengthen CLFN's ability to maintain and renew its relationships with these Lands and Waters. Meaningful environmental protection must ultimately support the continued health of the Ganaraska watershed and Gchi Nibi and create conditions in which our community and future generations can continue to exercise our Rights, maintain our relationships, and fulfill our responsibilities to the Lands, Waters, and Relatives of our homelands.

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Appendix C

Technical Review of CMDs and Associated Documents

CLFN's staff interactions with Cameco are generally constructive as articulated in the previous pages. There are staff level questions for clarification and further discussion identified below. These are to be discussed with CNSC and Cameco at routine meetings. Preliminary answers to these items would be appreciated as part of this licencing process and these preliminary answers can set the stage for those future routine meetings.

While not completely and comprehensively reviewed, the items below would form specific themes important to CLFN that can be progressively transformed from a western, technical, scientific worldview to one that is influenced by CLFN's worldview; including future governance, protocols, standards, and requirement frameworks that are more aligned with CLFN.

Emerging themes are:

- Long-term stewardship, intergenerational responsibility, and future generations
- Meaningful participation and co-development by CLFN
- Defining meaningful restoration and end-state conditions
- Climate change, extreme weather, and future environmental conditions
- Groundwater contamination and contaminant migration
- Environmental monitoring, transparency, and adaptive management
- Aquatic ecosystem health and Lake Ontario protection
- Adequacy and updating of Environmental Risk Assessment (ERA)
- Knowledge, cultural values, and traditional land relationships of CLFN
- Waste management and long-term disposal strategies

These questions and themes are not simply technical requests for clarification. They are organized around four overarching areas of interest:

- Long-term environmental protection and stewardship beyond regulatory and corporate planning horizons.
- Meaningful participation of CLFN and incorporation of CLFN's Knowledge throughout monitoring, assessment, restoration, and decision-making.
- Climate resilience and future uncertainty, including extreme weather, contaminant migration, and changing ecological conditions.
- Holistic restoration and protection of Rights, recognizing that impacts extend beyond environmental parameters to cultural, spiritual, social, and intergenerational wellbeing.

The overall perspective is that environmental assessment, monitoring, and decommissioning should move beyond a compliance-based approach and instead support long-term ecological integrity, CLFN Rights, cultural continuity, and responsibility to future generations.



Questions from Cameco Preliminary Decommissioning Plan (PDP)

1. How will Cameco ensure monitoring remains effective after institutional control ends, given the PDP states monitoring is required “in perpetuity”? What will the opportunities be for CLFN to participate and contribute to the monitoring efforts? Is there collaboration with First Nations to consider long-term (future generations) sustainability?
2. It is mentioned that the Blind River Facility would be the selected location for the long-term waste management facility as it has “available land, excellent operating record and strong community support”.
 - a. Have the hydrogeological conditions at the site been adequately studied and confirmed to be suitable for hosting a long-term waste management facility? In particular, has groundwater modelling been completed to assess groundwater flow and potential contaminant transport over the long-term?
3. Within Cameco’s updated PDP, the end state objectives reference restoring the lands to conditions that existed prior to the processing and storage of radioactive materials.
 - a. What baseline conditions are Cameco using to define this end state? The PDP appears to rely on a baseline tied to the period immediately before nuclear operations began. However, this is an incomplete reference point. Cameco should consider a more appropriate and ecologically meaningful baseline: the condition of the lands prior to industrial and urban development, reflecting the natural state of the territory and the relationships First Nations maintained with these lands.
4. How will the CNSC ensure that the eventual decommissioning of the Port Hope Conversion Facility (PHCF) does not transfer environmental liabilities or long-term risks to future generations, including First Nations exercising Rights in the area?

Comment related to Cameco Preliminary Decommissioning Plan

Restoration should not be limited to biophysical parameters alone. A comprehensive end state must incorporate cultural, spiritual, social, psychological, and intergenerational consequences of impact, recognizing that land disturbance affects more than soil, water, and vegetation. It affects identity, cultural continuity, harvesting practices, ceremonial use, and long-term community wellbeing.

Grounding restoration in Michi Saagiig Anishinaabeg Knowledge systems, which reflect generations of relationships with the land through historical land-use practices and an understanding of pre-development ecological conditions, ensures that restoration extends beyond a technical exercise to support ecosystem integrity, cultural resurgence, and the Rights of future generations.

Questions from Cameco 2025 Application For Renewal Of Licence For Port Hope Conversion Facility (FFOL-3631.00/2027) (September 29, 2025)



1. Table 1 shows an elevated maximum total effective radiation dose in 2023, compared to other years (p. 24):
 - a. Was the higher dose in 2023 related to the change in cooling system?
2. The document states “the sanitary sewer uranium loadings action level was exceeded 38 times” (p. 25):
 - a. It is noted that the action level has now been changed from a daily to a monthly assessment period. Given that heavy rainfall events may result in short-duration pulses of contaminants and potentially represent the period of greatest concern for an exceedance, does Cameco continue to review and assess monitoring data on a more immediate basis following significant rainfall events? In particular, how are short-term, elevated concentrations following storm events considered under the monthly averaging approach, as compared with the typical gradual releases of contaminants during that time?
3. The document states that the surface water monitoring program is currently inactive due to remedial activities in the harbour (p.52).
 - a. During the period when the surface water monitoring program is inactive, how are potential spills, releases, or exceedances in the harbour area detected and flagged? Are there other monitoring programs or measures in place during the remedial activities that would identify and respond to changes in surface-water quality or contaminant concentrations?
4. The document states that following the completion of the Port Hope Area Initiative (PHAI) and Vision in Motion (VIM) projects, Cameco has committed to developing a new soil monitoring program for Port Hope (p. 52)
 - a. What will the opportunities be for CLFN to participate and contribute to the development of the monitoring program and efforts? Early and meaningful engagement with First Nations is essential to ensure knowledge, perspectives, and concerns are incorporated into the planning and decision-making process from the outset, rather than addressed after key decisions have already been made.
5. What strategies are taken to reduce waste through recycling and re-using? We are interested to learn more about Cameco’s long-term waste strategies.

Questions from Cameco Written Submission (CMD26-H3-1-Cameco-Sub)

1. What type of flood hazard modelling was completed to determine the location and characteristics of the flood barrier placed along east side of building? (p. 21). Was the flood hazard modelling completed recently and what were the climate change inputs to the model?



Questions from CNSC Submission (CMD 26-H3, CMD 26-H3-REF1)

1. The document notes that the transition to a closed-loop cooling system for both the UO2 and UF6 plants, substantially reduces both the potential for contaminant discharge and thermal loading to Port Hope Harbour (p. 70).
 - a. Is Cameco doing any studies on how the reduced thermal loading affects fish species and any potential chain reactions on the aquatic ecosystem?
2. Did monitoring efforts show any correlated fish mortality or harmful outcomes to the aquatic ecosystem from the elevated maximum uranium in 2021, 2022, and 2023 (shown in Table 3.3.3 in Appendix E)?

Questions related to Environmental Risk Assessment

1. The Cameco Renewal application document states that “Cameco has determined there is no impact to the conclusions of the Environmental Risk Assessment (ERA) and the licensed activities will not results in either new impacts to the environment or the potential for new adverse impacts to Indigenous communities or treaty Rights”. (p.21).
 - a. Given that the ERA was completed in 2016, it is not clear how the ERA was updated or reviewed to account for changes in environmental conditions since that time, including the observed increase in the frequency and/or intensity of heavy rainfall events over the past decade?
 - b. How were climate change projections and cumulative impacts considered in determining that there are no new or adverse impacts? In particular, what baseline conditions were used for the reassessment, and how was the potential for ‘shifting baseline syndrome’ addressed (where environmental conditions that have already degraded or changed over time becoming the new acceptable baseline)?
2. Can Cameco provide more information on why beavers and muskrats as indicator species were not identified within the 2016 ERA assessment? Were First Nations involved in determining the indicator species for the 2016 ERA assessment, and if not, will they be for the upcoming ERA?
3. It is stated that consideration of traditional hunting/gathering territory land use consumption by First Nations was not considered in the 2016 ERA, but that collaboration and inclusion will be incorporated into future ERAs.
 - a. Has Cameco initiated engagement and discussions with First Nations to understand current and traditional land-use activities in the area in advance of the next ERA, which is anticipated within the next two years?
 - b. How will CLFN’s harvesting practices and aquatic species of specific cultural interest or concern be considered in the selection of receptors and exposure pathways used in the next ERA?



4. What is the long-term trajectory of groundwater contamination, and what are the contingency measures if contamination migrates beyond the current containment/treatment system?
5. How does CNSC assess the potential for contaminants associated with the PHCF to interact with Lake Ontario and aquatic ecosystems over the proposed 20-year licence period?
6. What environmental monitoring will be required to establish a meaningful baseline for Port Hope Harbour and Lake Ontario following completion of the ongoing remediation activities, and how will that baseline account for both historical contamination and future PHCF operations?
7. The Site-Wide Environmental Investigation Report (SWEIR) identifies the long industrial history of the PHCF, including uranium processing activities predating modern environmental controls. Its purpose was to characterize the nature and extent of legacy subsurface contamination and understand how contaminants may move through the environment. The SWEIR identifies groundwater as an important contaminant migration pathway and specifically considers potential migration toward Port Hope Harbour and Lake Ontario.
 - a. What mechanisms are in place to ensure that legacy contamination does not migrate beyond the currently understood boundaries over the proposed 20-year licence period?



Appendix D

AI Generated Executive Summaries for Appendix A, B, C

Appendix A provides an overview of the evolving relationship between Curve Lake First Nation (CLFN), Cameco, and the Canadian Nuclear Safety Commission (CNSC), highlighting progress made through ongoing dialogue, routine engagement, community visits, facility tours, capacity-building initiatives, and collaborative programs. While acknowledging Cameco's regulatory compliance and positive efforts to build trust and transparency, CLFN emphasizes that environmental protection must extend beyond regulatory standards to include the protection of its Rights, consideration of cumulative and historic impacts, and recognition of Michi Saagiig Anishinaabeg relationships with the lands and waters. The appendix calls for strengthened Nation-to-Nation engagement, meaningful implementation of UNDRIP, FPIC, and reconciliation principles, greater recognition of First Nations as Rights-holders rather than stakeholders, periodic reviews throughout the proposed 20-year licence term, and increased opportunities for First Nation participation in environmental oversight and decision-making. Overall, the appendix expresses cautious optimism regarding the relationship with Cameco while advocating for continued improvements in consultation, accountability, environmental stewardship, and shared decision-making.

Appendix B describes CLFN's enduring historical, cultural, spiritual, and Treaty-based relationships with the lands, waters, and Relatives within the Ganaraska watershed and Port Hope area. It outlines the long-standing presence of the Michi Saagiig Anishinaabeg in the region, the importance of the Ganaraska River and Lake Ontario for travel, trade, harvesting, settlement, and ceremony, and the significant disruption caused by colonization, industrial development, habitat loss, environmental degradation, and restrictions that have impacted direct relationships and CLFN's Rights. The appendix emphasizes that despite generations of displacement and cumulative impacts, CLFN maintains active relationships and responsibilities to the lands, waters, and Relatives within the watershed. It argues that current environmental conditions reflect a degraded baseline shaped by historic and cumulative impacts, and therefore regulatory compliance alone is insufficient to assess impacts on CLFN's Rights. The appendix calls for recognition of these historical and ongoing effects, restoration of ecological functions within the Ganaraska watershed, particularly the lower river and its wetlands, and a regulatory approach that meaningfully considers CLFN's Rights, cumulative effects, cultural relationships, and responsibilities to future generations.



Appendix C provides CLFN’s high-level technical review of Cameco’s licence renewal, decommissioning planning, environmental risk assessment, and related CNSC documentation. The appendix identifies key areas requiring further clarification and ongoing discussion, including long-term environmental stewardship, First Nation participation in monitoring and decision-making, restoration objectives, climate change resilience, groundwater contamination, environmental monitoring, aquatic ecosystem health, waste management, and the adequacy of existing environmental risk assessments. While framed as technical questions, the appendix emphasizes that these issues extend beyond regulatory compliance and should be considered through the lens of First Nation Rights, Knowledge, cumulative effects, cultural continuity, and responsibilities to future generations. Overall, the appendix advocates for a more holistic and collaborative approach to environmental assessment, monitoring, decommissioning, and stewardship that integrates CLFN’s worldview and supports long-term ecological integrity, Rights protection, and intergenerational wellbeing.