



CMD 26-H3.73

Date: 2026-10-08

**Written Submission from the
Hiawatha First Nation**

**Mémoire de la
Première Nation de Hiawatha**

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



Hiawatha First Nation

Commission Registry and Registrar
Canadian Nuclear Safety Commission
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October 7, 2026

Re: Hiawatha First Nations Submission on Cameco Corporation's application to renew the Class 1B Nuclear Fuel Facility Operating Licence for the Port Hope Conversion Facility for a period of 20 years.

Dear Registrar,

On behalf of Hiawatha First Nation's Consultation department, please accept these comments as part of the CNSC's review of Cameco Corporations application to renew its Class 1B Nuclear Fuel Facility Operating Licence for the Port Hope Conversion Facility for a period of 20 years.

These comments reflect Hiawatha First Nation's ongoing review on CNSC and Cameco Corporation materials and are intended to support continued regulatory considerations of potential impacts to our inherent and Treaty Rights. This submission should be read as part of Hiawatha First Nation's continued engagement with the CNSC, discussions with Cameco Corporation, and our review of Cameco's licensed activities.

Hiawatha First Nation's participation in this process is grounded in our responsibility to protect the environment, our cultural values, and the exercise of our rights for present and future generations. Our involvement is not limited to a single project of review but reflects an ongoing relationship with our Traditional and Treat Territory and our role as steward of the land.

Hiawatha understands that Cameco Corporation operates the Port Hope Conversion Facility within our Treaty Territory under the oversight of the Canadian Nuclear Safety Commission. Hiawatha First Nation continues to review these activities with consideration for our rights and responsibilities within the area.



Hiawatha First Nation

Our participation reflects our continued commitment to ensuring that nuclear activities are carried out in a manner that protects the environment while respecting First Nations Indigenous rights and perspectives.

While we are not opposed to development, it remains important to Hiawatha First Nation that activities within our Treaty Territory are carried out in a manner than ensures the continued protection of the environment and the health of our community and all living relatives.

Our approach to reviewing these materials is informed by the understanding that the land, water and all living things are interconnected. Our relationship with Shka-ki-mi-kwe (Mother Earth) is ongoing, and decisions made today must consider the impacts on the future generations. These teaching continue to guild how we review projects, consider impacts, and engage in regulatory processes.

Through our review of Cameco Corporation's application to renew the Class 1B Nuclear Fuel Facility, Hiawatha First Nation has identified several areas where continued oversight and dialogue would be beneficial. As the Commission considers Cameco's application, Hiawatha First Nation encourages continued regulatory oversight that maintains high standards of safety, environmental protection and accountability throughout the next licensing period.

Hiawatha First Nation recognizes that Cameco is seeking a 20-year renewal of its operating license. A licence term of this length reinforces the importance of maintaining meaningful engagement with Hiawatha First Nation, transparent regulatory oversight and opportunities for Hiawatha First Nation's participation throughout the entire licensing period. Hiawatha First Nation does not view licence renewal as the end of engagement. Opportunities for dialogue, information sharing and participation should continue as regulatory activities, monitoring results and as other matters arise throughout the term of the licence.

Hiawatha First Nation notes CNSC staff's recommendation that Cameco provide a comprehensive performance update to the Commission at the mid point of the proposed licence term (i.e. at the 10-year mark) including an opportunity for Hiawatha First Nation to provide input directly to the Commission in the years in between (e.g. at the 5 year and 15-year mark). Hiawatha supports maintaining a formal opportunity for participation during a licence term of this length (i.e. in a 5-year cycle). We encourage the CNSC to engage with Hiawatha in advance of that update and throughout the licence period so that concerns, observations and community perspectives can inform the review rather than being limited to a single point midway through the licence.



Hiawatha First Nation

Over the past year Hiawatha First Nation has begun re-establishing a working relationship with Cameco. Hiawatha appreciates the effort Cameco has made to include our community in opportunities to learn more directly about its operations and broader nuclear fuel manufacturing. Tours have provided staff a valuable opportunity to see operations firsthand, ask questions directly of Cameco staff and develop a greater understanding than can be achieved through written regulatory materials alone.

Hiawatha First Nation also appreciated Cameco's responsiveness when questions or concerns have been raised. Firsthand discussions have allowed concerns to be addressed and additional information to be provided when needed. These interactions have contributed positively to re-establishing the relationship between Cameco and Hiawatha First Nation.

Of value have been opportunities to meet Indigenous community members working within Cameco's mining operations and to learn about Cameco's relationships and partnerships with Indigenous Nation's and communities in the other area's where it operates. Hearing directly from other First Nation members with experience working within the industry and learning how these relationships and partnerships have developed provides an important perspective for Hiawatha as we continue to build our own knowledge and capacity within the nuclear sector.

As the Commission considers a 20-year licence renewal, Hiawatha First Nation encourages Cameco to continue building on this relationship. We would like to see continued opportunities for direct learning, site visits, open dialogue and relationship building continue throughout the licence term and not be limited to periods surrounding regulatory proceedings.

Hiawatha First Nation is fortunate that our Consultation team is made up of citizens and members from the Williams Treaty First Nations. We are not coming into these conversations only as staff working within a regulatory process. These are our communities, our lands, our waters and our families.

At the end of the day, we do not close our computers and walk away from these issues. We go home to the communities affected by the activities we spend our days discussing. For us, this work is personal.

That connection brings an important perspective to our work, but engagement with our Consultation team should not be considered the same as engagement with our



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community. This process cannot stop with us. Our citizens also need opportunities to understand the information, ask questions, raise concerns, share their knowledge and experiences and form their own informed views.

Hiawatha First Nation continues to seek greater clarity and meaningful involvement in how the CNSC approaches the Crown's Duty to Consult and accommodate within its regulatory processes. While opportunities to review materials submit written interventions and participate in Commission proceeding are important, being provided a document and an opportunity to comment on is not on its own consultation. Consultation requires more than the exchange of information. It requires dialogue, an opportunity for Hiawatha's concerns and perspectives to influence the process, and a clear understanding of those concerns were considered and addressed.

If regulatory timelines provide enough time to review a document and prepare a submission, but not enough time to engage our citizens and bring what we hear back into the process before decisions are made, then that is not sufficient consultation. Engagement should occur early enough to allow Hiawatha's perspectives and concerns to inform the process and should continue throughout the regulatory lifecycle rather than being concentrated around licensing decisions.

Hiawatha First Nation encourages the CNSC to continue to examine how its approach can move beyond information sharing and opportunities to participate/join in CNSC staff conducting compliance verification activities at the Port Hope Conversion Facility where appropriate. Opportunities to participate in inspections, environmental monitoring and other regulatory oversight activities firsthand would strengthen transparency, build trust in the regulatory process, and enhance our understanding of how compliance with licence conditions is assessed through a licence term.

Hiawatha sees this as an opportunity to build on the value we have experienced through direct learning and site visits with Cameco. Tours and technical discussions provide important opportunities to understand facility operations. However, observing regulatory oversight in practice would provide another level of understanding. Accompanying CNSC staff during appropriate compliance verification activities and inspections would allow Hiawatha to better understand how information provided by the licensee is independently verified, how environmental and safety requirements are assessed, and how matter identified through regulatory oversight are addressed.



Hiawatha First Nation

Participation in regulatory oversight would also contribute to capacity building within our community and support more informed participation in future CNSC proceedings.

Environmental monitoring remains an area of ongoing interest for Hiawatha First Nation. Throughout the proposed licence period, we are interested in understanding how monitoring results are assessed over time, how changes or emerging trends are identified, and how this information informs CNSC regulatory oversight and decision-making.

Monitoring should provide more than confirmation that regulatory limits are being met. It should also contribute to an understanding of long-term environmental conditions and provide assurance that the land and water continue to be protected for future generations.

Hiawatha First Nation would welcome opportunities for greater participation in environmental monitoring associated with the facility. This could include opportunities to observe monitoring activities, participate in sampling where appropriate, and discuss monitoring results directly with Cameco and CNSC staff. Greater involvement would support a shared understanding of environmental conditions and provide opportunities for Hiawatha First Nation Knowledge and land-based observations to contribute to discussions regarding environmental protection.

Hiawatha First Nation notes that First Nations have participated in previous CNSC Independent Environmental Monitoring Program (IEMP) sampling around the Port Hope Conversion Facility, including providing input into sampling plans. Hiawatha would welcome the opportunity to participate directly in future IEMP sampling associated with the facility, including discussions regarding sampling locations and environmental components of importance to our community.

Hiawatha First Nation also encourages monitoring information to be communicated in accessible and meaningful ways. Technical reporting is important, but there can be a gap between information being publicly available and that information being understandable and accessible at a community level. Plain language summaries and opportunities to discuss results would support more informed community understanding. Providing technical information is only one part of the process. Hiawatha also require sufficient time and capacity to review that information, seek technical expertise where needed, bring it back to our citizens in an accessible way, hear their questions and concerns and carry those perspectives back into regulatory discussions. Regulatory timelines and engagement opportunities should reflect that full process.



Hiawatha First Nation

Hiawatha First Nation knowledge should not be treated as supplementary information or considered only after technical conclusions have been reached. It can help inform how environmental change is understood, how risks are identified, how monitoring results are interpreted and how environmental decisions are made.

But the existence of that knowledge does not mean it is freely available or that governments, regulators or proponents are entitled to receive it. Hiawatha First Nation knowledge belongs to the people and communities who hold it. Sharing that knowledge requires relationships, trust and time, and there may be knowledge that community chooses not to share,

Creating opportunities for Hiawatha First Nations Knowledge to inform regulatory processes therefore requires more than simply asking for it. It requires building the relationships and conditions in which a Elder, Knowledge Holder's, Leadership, Chief & Council, and community citizens on and off reserve feel comfortable determining what can be shared, how it can be shared, how it will be protected and how it will be used.

Access to Hiawatha First Nation Knowledge should never be treated as an expectation or entitlement simply because a regulatory process is underway.

There is value in ensuring these Responsibilities-based, value-based, Cultural-Based, Rights-based, Knowledge, insights, information, guidance, and perspectives are considered alongside technical and scientific information to support a more complete understanding of environmental conditions and potential impacts. This includes consideration of land-based observations, community, knowledge, and changes observed over time that may not be fully reflected through technical reporting alone.

Hiawatha First Nation would like continued discussion with Cameco and the CNSC regarding how Hiawatha First Nation Knowledge and community observations can meaningfully inform environmental monitoring, regulatory oversight and decision-making throughout the licence period.

Hiawatha First Nation also notes that a new environmental risk assessment is expected following completion of remediation activities. We would welcome early involvement in the development of this assessment, particularly where traditional land use, exposure pathways, cumulative effects, climate change and Hiawatha First Nation Knowledge are being considered.





Hiawatha First Nation

Hiawatha First Nation sees value in engagement that occurs outside of formal licensing proceedings. Regular communication provides opportunities to develop a better understanding of facility activities, discuss environmental monitoring and compliance information, and raise questions or concerns before the next major regulatory milestone.

A 20-year licence represents a significant period. Continued relationship-based engagement with both Cameco and the CNSC will be important to ensuring Hiawatha First Nation remains informed and has meaningful opportunities to participate as circumstances, information, and regulatory matters evolve.

As the Commission considers Cameco's application, Hiawatha First Nation asks that considerations be given not only to the proposed licence term, but also to how Hiawatha First Nation participation can continue to evolve throughout that period. Hiawatha would welcome opportunities to participate in CNSC compliance verification and inspection activities, become more directly involved in environmental monitoring and compliance results, and maintain regular dialogue with Cameco and the CNSC. Additionally, Hiawatha First Nation remains welcoming of CNSC staff, CNSC leadership, Commission Members, Cameco staff, Cameco leadership to be with us in person at Hiawatha First Nation for routine relationship building activities.

Hiawatha views this submission as part of an ongoing dialogue and looks forward to continued engagement with Cameco and the CNSC as this matter progresses. We trust that the comments and requests provided will be considered as part of the Commission's review and that opportunities for continued discussion and meaningful participation will be supported.

Miigwech,

Tamara Whitby
Consultation – Energy Lead
Hiawatha First Nation