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Safety Commission

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Date: 2026-01-28

**Written Submission from the
Kebaowek First Nation**

In the matter of the

**Regulatory Oversight Report for Uranium
and Nuclear Substance Processing
Facilities in Canada: 2024**

Commission Meeting

March 2026

**Mémoire de la
Première Nation Kebaowek**

À l'égard du

**Rapport de surveillance réglementaire
des installations de traitement de
l'uranium et des substances nucléaires
au Canada : 2024**

Réunion de la Commission

Mars 2026

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

January 28, 2026

Sent via email to: interventions@cnsc-ccsn.gc.ca

Re: Comments from Kebaowek First Nation on the Regulatory Oversight Report (“ROR”) for Uranium and Nuclear Substance Processing Facilities in Canada: 2024

Kebaowek First Nation (KFN) welcomes the opportunity to provide its views and recommendations to the Canadian Nuclear Safety Commission (CNSC) in response to CNSC Staff’s “Regulatory Oversight Report for Uranium and Nuclear Substance Processing Facilities in Canada: 2024” (ROR).

For the record, we wish to address procedural concerns regarding the conduct of this engagement. Regrettably, this review has been hindered by the CNSC’s reductionist actions, such as short notice periods, inadequate funding, and limited time for Indigenous communities like ours to adequately prepare and present our comments. We are deeply concerned that the CNSC ‘efficiency’ measures being implemented, including combining all yearly ROR reviews into one meeting session, may undermine Indigenous consultation and the protection of our lands. This cumulative approach to RORs is not something we have been consulted on.

In providing these written comments, we also request the opportunity to address the Commission at the upcoming ROR meeting scheduled for the week of March 23, 2026.¹

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 Sìbì (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

¹ CNSC, “Participant funding for the regulatory oversight reports for the 2024 calendar year,” 2025-07-09.

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. UNDRIP, FPIC & KFN'S RIGHTS & RESPONSIBILITIES ASSESSMENT LAW

UNDRIP sets the minimum standards for the survival, dignity, and well-being of Indigenous peoples.²

Through the *United Nations Declaration on the Rights of Indigenous Peoples Act*, SC 2021, c 14 (“UNDA”), Canada affirmed the Declaration as a universal international human rights instrument with application in Canadian law and that should be implemented without delay.³

The Supreme Court of Canada confirmed that UNDRIP has been incorporated into Canada’s domestic positive law.⁴ The Federal Court and appellate courts have further confirmed that UNDRIP acts as an interpretative lens through which federal and provincial laws must be viewed and the minimum standards against which they are to be measured.⁵

Courts have held that UNDRIP must be given the same weight as a binding international instrument and applies when section 35 rights are engaged.⁶ The federal government, through the UNDA, has endorsed UNDRIP and bound itself to applying UNDRIP and acting in conformity with it. UNDRIP must inform all actions taken under statute, as well as the execution of the duty to consult and accommodate. 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.”⁷ The Government of Canada is legally required under section 5 of UNDA to “take all measures necessary to ensure that the laws of Canada are consistent with the Declaration.”

² *United Nations Declaration on the Rights of Indigenous Peoples*, Art 43 [UNDRIP].

³ *United Nations Declaration on the Rights of Indigenous Peoples Act*, SC 2021, c 14, ss 2(3), 4(a).

⁴ *Reference re An Act respecting First Nations, Inuit and Metis children, youth and families*, 2024 SCC 5 at 15.

⁵ *Gitxaala v BC (Chief Gold Commissioner)*, 2025 BCCA 430 at 7; *KFN v Canadian Nuclear Laboratories*, 2025 FC 319 at 76; see also *R v Montour*, 2023 QCCS 4154.

⁶ *R c Montour*, 2023 QCCS 4154 at para 1201.

⁷ UNDA, s 4.

UNDRIP informs the scope of the Crown's obligations under section 35 of the *Constitution Act*, and requires the Crown to obtain the Free, Prior, and Informed Consent ("FPIC") of Indigenous Peoples whenever the state propose to store or dispose of hazardous materials on the lands and territories of Indigenous peoples.⁸ UNDRIP further requires states to cooperate in good faith with Indigenous peoples through their own representative institutions and to respect their laws, traditions, and customs.⁹

In November 2025, KFN ratified a Rights & Responsibilities Assessment Law which provides a structured process through which the Crown and proponents may obtain KFN's FPIC for physical projects and legislative proposals. The Rights & Responsibilities Law incorporates the standards of UNDRIP and is grounded in Anishinaabe laws, knowledge, and processes.

We require CNSC and the proponents it regulates to adhere to the Rights & Responsibilities Assessment Law and to meet or exceed the standards set out in UNDRIP. Section 5.2(a) of the Rights & Responsibilities Assessment Law affirms that FPIC is not a one-time event, but a process that occurs through the implementation of a project. Under section 20, KFN retains jurisdiction to amend or withdraw its FPIC where a proponent fails to diligently implement FPIC conditions or proposes fundamental changes to the project, or where new adverse effects arise, including where a spill, accident, or malfunction occurs.

As a preliminary matter, KFN has never granted its FPIC for the nuclear substance facilities, activities and projects under review. Our participation in reviewing and providing comments on Regulatory Oversight Reports is an expression of our right of self-government and jurisdiction to ensure that all projects respect our inherent rights and uphold our responsibilities to all of our relations, as stewards and caretaker of the lands.

CNSC must collaborate with KFN respect to its oversight activities and work to achieve consensus on the following matters:

- the assessment of whether licensees have met applicable requirements under the *Nuclear Safety Control Act*, KFN's Rights & Responsibilities Assessment Law, and Canada's international obligations, including UNDRIP; and
- the determination of whether licences should be renewed, suspended in whole or in part, amended, revoked, or replaced based on the proponent's adherence to the licence conditions or the FPIC conditions specified by KFN.¹⁰

⁸ UNDRIP, Art 29.

⁹ UNDRIP, Arts 32(2); see also UNDRIP, Arts 11, 12, 27.

¹⁰ *Nuclear Safety Control Act*, SC 1997, c 9, ss 25, 35(3), 37(2)(d) [these sections specify when the CNSC or its delegates may renew, suspend, amend, revoke, or replace licences]

As was made clear in *Kebaowek First Nation v Canadian Nuclear Laboratories*, 2025 FC 319, the CNSC must consider UNDRIP and the free, prior, and informed consent standard when assessing whether its duty to consult has been met and must align its processes to reflect KFN's laws, knowledge, and processes, and to work toward achieving agreement.

The UNDA Action Plan commitment #34 sets out the federal government's commitment to support Indigenous participation in decision-making and enable them to exercise federal regulatory authority. KFN has raised with the CNSC many opportunities to meet this commitment. The CNSC must ensure KFN can fully participate in decision-making in matters affecting its rights in accordance with KFN's own procedures and based on the principle of free, prior and informed consent.

KFN underscores the importance of meaningful consultation and engagement with its community, emphasizing the need for improved transparency, communication, and collaboration to align industry activities with the laws, knowledge, processes, rights, values, and interests of KFN. CNSC must work with KFN to enhance regulatory oversight while addressing both realized and perceived impacts of the CNSC's operations on communities and the environment.

2. OUTSTANDING AND UNRESOLVED ISSUES

Many of the concerns raised by KFN in relation to last year's ROR remain materially outstanding – despite being marked as 'responded to' by CNSC Staff.¹¹ KFN requests that the gaps we highlight below be clearly acknowledged on the record and addressed through concrete direction from the Commission during this year's ROR meeting.

For clarity, KFN does not accept any characterization in the ROR that implies all issues have been concluded or satisfied through CNSC Staff commentary. Where CNSC Staff state that prior comments have been "addressed" or "incorporated," KFN reiterates that this language risks overstating progress and minimizing the outstanding matters that continue to affect KFN's rights, responsibilities, and ability to participate in the regulatory process in a meaningful and informed manner.¹² KFN emphasizes that a response does not constitute a resolution, particularly where the underlying information, study or engagement deficiency remains.

¹¹ CNSC Staff, "Regulatory Oversight Report for Uranium and Nuclear Substance Processing Facilities in Canada: 2024," p 116 [Regulatory Oversight Report]

¹² Regulatory Oversight Report, p 116 - 117

The following concerns are among those previously raised that remain unresolved, and continue to be directly relevant to this year's ROR:

- **Cumulative Effects and Systems-Level Oversight¹³:** KFN previously urged the Commission to require CNSC Staff to undertake a cumulative effects assessment of nuclear substance processing facilities, noting environmental sustainability is central to Ona'ken'age'win (our system of customary law and governance). This recommendation remains outstanding.
- **Climate Review¹⁴:** KFN previously requested 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 *Nuclear Safety and Control Act (NSCA)*, and the adequacy of measures in place to adapt to and mitigate climate impacts. This recommendation remains outstanding and we again recommend climate change be explicitly reported in the ROR.
- **Tracking and Disclosure of Waste Streams and Transfers – Intersections with KFN Territory¹⁵:** KFN has repeatedly called for clearer disclosure regarding waste movements and the pathways through which nuclear substances and wastes packaging, transportation and management - particularly where these intersect with KFN's asserted territory - among the nuclear substance processing facilities included within this ROR.

The ROR remains insufficiently transparent on these linkages, including the extent and nature of transfers associated with sites such as Chalk River. This information gap continues to prevent informed assessment of risks, impacts, and cumulative burdens and we again request the following information:

- 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

¹³ Kebaowek First Nation Review of the Regulatory Oversight Report ("ROR") for Uranium and Nuclear Substance Processing Facilities, Research Reactors and Class IB Accelerators in Canada: 2023,"p 3 and 6 [KFN ROR Comments]

¹⁴ *Ibid*, p 6, 9 and 10

¹⁵ *Ibid*, p 10

- Percentage change in quantity from previous years
- **Compliance with Recent Legal and Policy Changes:** KFN reiterates its concern that the ROR does not transparently demonstrate how CNSC oversight is being carried out in alignment with recent legal and policy developments that directly inform the Crown's obligations and the Commission's approach to reconciliation, accountability, and environmental protection. While CNSC Staff may reference evolving commitments or principles in general terms, the ROR does not clearly set out how such changes are being operationalized in regulatory oversight, including whether and how licensees are assessed against these developments, what standards are being applied, and what consequences follow where gaps are identified. In the absence of this clarity, the ROR remains insufficient as a public accountability instrument, and KFN's recommendation that compliance with recent legal and policy changes be expressly reported remains outstanding and unresolved.¹⁶
- **Financial Guarantees:** A primary concern is adequacy of funding for consultation and engagement with licensees operating on Algonquin lands as well as environmental accidents and decommissioning.
- **Licence Duration:** Kebaowek is concerned about long licensing periods that grant excessive authority to licensees, leading to an oversight process that lacks rigorous First Nation community engagement.

3. RECORD CLARIFICATION: “KFN–CNSC Long-term Relationship Arrangement and Project Terms of Reference”

KFN wishes to clarify the record in relation to the section of the ROR titled “Kebaowek First Nation (KFN)-CNSC Long-term Relationship Arrangement and Project Terms of Reference.”¹⁷ In that section, CNSC Staff cite ‘funding and capacity constraints’ as preventing KFN from reviewing the text within the designated review window, while also stating that KFN reiterated its commitment to good faith engagement with the CNSC.

¹⁶ For clarity, “recent legal and policy changes” includes: (i) Canada’s *United Nations Declaration on the Rights of Indigenous Peoples Act*, SC 2021, c 14 (“UNDA”) and Canada’s UNDA Action Plan; (ii) the *United Nations Declaration on the Rights of Indigenous Peoples* (“UNDRIP”), including the standard of free, prior and informed consent (“FPIC”); (iii) the Government of Canada’s *Kunming–Montreal Global Biodiversity Framework*; and (iv) the *National Strategy Respecting Environmental Racism and Environmental Justice Act*, SC 2024, c 11

¹⁷ Regulatory Oversight Report, p 107

KFN does not dispute that capacity constraints have limited our ability to engage within compressed timelines (see Parts 1 and 4 of this submission for additional detail). However, KFN is concerned that the framing of this section creates an overly positive impression that is incomplete and potentially misleading, and risks being interpreted as KFN endorsing the adequacy of the current process or long-term engagement arrangement.

To ensure the Commission is reviewing KFN's remarks based on a fair and accurate record, KFN advises that we explicitly requested CNSC Staff include corrective language in the ROR—with attribution to KFN—so that the record would reflect KFN's position as communicated. CNSC Staff chose not to include that requested text.

KFN therefore provides this language to the Commission, again asking it be adopted as representing KFN's position:

While Kebaowek (KFN) continues to engage in good faith with the CNSC, we do not endorse nor support any statement by the CNSC that would imply otherwise. KFN has been vocal in seeking sufficient funding and capacity support to enable our participation and yet, these ROR reports and the accompanying long term engagements referenced therein, remain deficient. At this time, the CNSC has not enabled our ability to fully and fairly participate in line with Crown consultation obligations.¹⁸

KFN requests that Commission members rely on the above statement as the accurate reflection of KFN's position when assessing any conclusions or summaries offered by CNSC Staff regarding KFN's engagement, the sufficiency of funding and the fairness of this process.

4. ENGAGEMENT WITH KFN'S RIGHTS, VALUES AND NEEDS

Kebaowek notes Nordion received a "Satisfactory" or "SA" rating in all fourteen Safety and Control Areas reviewed in the ROR.¹⁹ However, we do not believe this is an accurate representation of the licensee's performance in regards to meaningful engagement with Kebaowek.

As the ROR makes reference to the "continuing engagement with interested Nations and communities regarding the 2024 Class 1B renewal application for Nordion Canada Inc,"²⁰ it is

¹⁸ Email from KFN to Kirsten Sellers (CNSC) sent Nov 24, 2025

¹⁹ Regulatory Oversight Report, p 58

²⁰ Regulatory Oversight Report, p 27

appropriate for the Commission to recall the information, concerns and recommendations KFN shared at this hearing event on June 24, 2025.

As we shared in our remarks²¹:

- KFN was not provided a right to participate in this decision-making process in keeping with its own Algonquin legal traditions, as required by Article 18 of UNDRIP
- KFN was not consulted in good faith, such that free prior and informed consent could be acquired *before* the CNSC imposed its rules and procedures, per Article 19 of UNDRIP
- KFN has not been provided any confirmation that this licence will not result in the storage or disposal of wastes on their lands and territory, as required by Article 29.2 of UNDRIP
- A twenty-five year license was granted to Nordion in 2025 despite Kebaowek's objections and recommendation for a shorter period

Since the hearing event in June 2025 and the CNSC's granting of a 25-year licence to Nordion in August 2025, KFN has continued to reach out to Nordion's Director of Regulatory Affairs, Richard Wassenaar, and there remains a lack of response and engagement.

The CNSC, as the Crown authority and Canada's public interest regulator, must require all licensees to commit to working with KFN, and Indigenous Peoples, to ensure our ability to contribute to the oversight of activities impacting our rights and territory, and to have an avenue to raise concerns and relay information requests. Kebaowek remains open to engagement but the lack of correspondence from the licensee has meant information requests made in May 2025 remain outstanding, and our ability to be informed - severely prejudiced.

Kebaowek has also communicated these concerns to CNSC Staff but no resolution nor timely action has been taken to ensure compliance by Nordion, with even minimum consultation obligations.

We believe this fundamental lack of engagement by the proponent - and CNSC Staff's reticence to remedy this lack of engagement - requires the Commission to be proactive and call for follow-through, specifically as it relates to communication and meaningful engagement with KFN.

²¹ [CMD 25-H6.11](#) - Submission from Kebaowek First Nation - Application to Renew Licence for the Nordion Facility

Kebaowek recommends that for all licensees reviewed within this ROR:

- the rankings given to licensees ought to reflect their willingness to participate in and undertake meaningful consultation and engagement
- CNSC Staff should actively report on whether licensees have the requisite policies and meaningful procedures in place necessary to engage with Kebaowek and other First Nations
- The Commission ought to be proactive and ensure follow-through on commitments to engage

5. LICENSEE SPECIFIC CONCERNS

a. Nordion & Reportable Events

Kebaowek notes that in “Appendix N: Reportable Events,”²² six reportable events are noted but per “Table 7-6: Reportable Events at Nordion in 2024,”²³ only three are discussed.

Kebaowek **requests** information about all six reportable events and recommends the text be clarified to ensure all information is articulated clearly.

b. Nordion’s Annual Compliance Report

As the ROR makes repeated reference to licensee annual compliance reports and relies on these reports as of compliance verification, Kebaowek seeks the following information - unredacted - to aid in our review. It is critical for procedural fairness, trust and accountability in the CNSC’s decision and the understanding of impacts to our rights, that any information relied on by the Commission in reaching compliance determinations be accessible and disclosed alongside the ROR report.

We therefore **request** the following data from Nordion’s Annual Compliance Report as referenced within the ROR:

²² Regulatory Oversight Report, Appendix C, p 49

²³ Regulatory Oversight Report, p 39

- All data from Table 3 “Sealed Source Manufacturing” which currently appears as:

Table 3
Sealed Source Manufacturing
Activity in PBq (kCi)

<u>Radioisotope</u>	<u>Total Processed in 2024</u>	<u>Total Shipped in 2024</u>
Co-60	[REDACTED]	[REDACTED]

- Full text of provisions 2.3.6.2 - 2.3.6.4 which currently appears as:

2.3.6.2 Processing >1 Petabecquerel (PBq)

Nordion has processed and shipped quantities of activity greater than 1 PBq of Co-60. In 2024, the quantities of Co-60 processed and shipped was [REDACTED] and [REDACTED] respectively.

2.3.6.3 Acquisitions of Finished Sealed Radioactive Sources

Sealed radioactive sources acquired by Nordion in 2024 included Co-60 double encapsulated sources that have been returned from customers.

[REDACTED]

- All text regarding waste shipments in provision 2.11.3 and Table 16 which currently appears as:

2.11.3 Waste Shipments

Table 16 provides a summary of solid waste material shipped to [REDACTED]. In 2024, there were no shipments to [REDACTED] of radioactive liquid waste from Nordion's Class 1B Facility.

Table 17 provides a summary of solid waste, shipped to [REDACTED] in 2024. Solid waste sent to [REDACTED] is not compacted, as compacted wastes are unfavourable for this disposal route, and the waste volumes shown in Table 17 represent uncompacted waste volumes.

Spent Co-60 sealed sources may be returned to Nordion from customers where [REDACTED] or included with other product material for disposal. In 2024, 1 low activity source was disposed at [REDACTED] in routine waste shipments (included in the values shown in Table 16).

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Spent Co-60 sealed sources may be returned to Nordion from customers where [REDACTED] or included with other product material for disposal. In 2024, 1 low activity source was disposed at [REDACTED] in routine waste shipments (included in the values shown in Table 16).

Table 16
Radioactive Solid Waste Shipments to [REDACTED] for 2024

Isotope	Volume (m ³)	Bq	Ci
Co-60	[REDACTED]	[REDACTED]	[REDACTED]

Table 17
Radioactive Solid and Low-level Liquid Waste Shipments to [REDACTED] for 2024

Isotope	Weight (kg)	Volume (m ³)	Bq	Ci
Co-60	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

c. Nordion & Cobalt-60

As Kebaowek has repeatedly raised with CNSC Staff, Nordion and the Commission, we wish to know more about the management of Cobalt-60 (Co60) waste and its transport across or storage within our territory.

Nordion has informed us that “Nordion ships all of its waste to Canadian waste vendors who are licensed by the CNSC,” however, it has not confirmed amounts currently sent to Chalk River. Nordion has also shared that it is “not aware of plans to send its waste to the NSDF.”²⁴ Therefore, in light of this information, we seek the Commission to confirm the amount of Co60 waste that arrives to Chalk River from Nordion.

The continued transfer of dangerous waste to the Chalk River site - which has economic benefit to CNL and Nordion - comes as a burden to the Kebaowek, to accept this waste on Algonquin lands without any benefits, creating a continuous cultural and environmental liability for future generations not supported by the *UNDRIP* where:

²⁴ Email from Richard Wassenaar (Nordion) dated May 30, 2025 to Rosanne Van Schie (KFN).

- Article 32 provides Kebaowek with the right to determine and develop priorities and strategies for the development or use of our territory and other resources, and it requires the Commission to consult and cooperate in good faith with us in order to obtain our Free, Prior and Informed Consent (FPIC).
- Article 29 specifically requires FPIC regarding the storage and disposal of nuclear waste.

d. Best Theratronics Compliance Ratings

Overall, CNSC staff concluded that all nuclear substance processing facilities operated safely in 2024, with satisfactory ratings in all SCAs except for Best Theratronics Ltd., which received "below expectations" (BE) ratings in two SCAs for 2024:

1. Emergency Management and Fire Protection:

- Best Theratronics was rated as "below expectations" in this SCA due to issues identified during inspections, including deficiencies in emergency response equipment and fire protection measures. A CNSC inspector issued an order in November 2024 requiring the licensee to implement additional security and emergency preparedness measures. The issues were classified as having medium safety significance, leading to the BE rating.

2. Security:

- Best Theratronics also received a "below expectations" rating in the Security SCA due to non-compliances identified during a June 2024 inspection and enforcement actions stemming from the Inspector's Order issued in November 2024. The findings were generally of medium safety significance, and corrective actions were required to address the issues.

3. Non-Compliance with Financial Guarantee Requirements: It is Kebaowek's understanding that:

- On **November 6, 2024**, a CNSC Designated Officer issued an order to Best Theratronics Ltd. for non-compliance with its licence condition to maintain an acceptable financial guarantee for decommissioning. This financial guarantee is required to ensure sufficient resources are available to fund all approved decommissioning activities.
- On **February 14, 2025**, the Commission amended the order to clarify the requirements for the financial guarantee. The amended order remains in place until Best Theratronics satisfies the requirements.

- On **May 21, 2025**, the CNSC issued a request under subsection 12(2) of the *General Nuclear Safety and Control Regulations* regarding the status of Best Theratronics' efforts to comply with the Commission's order. In its reply on **June 21, 2025**, Best Theratronics indicated that it had not re-established its financial guarantee.

Commission Redetermination:

- On **October 22, 2025**, the Commission amended the order to allow Best Theratronics to focus on reducing its onsite inventory of radioactive sources and other regulated materials. This step was intended to mitigate risks to the environment and public health, lower the estimated cost of decommissioning, and reduce the required financial guarantee, potentially making it easier for Best Theratronics to comply.

Kebaowek disagrees with the Commission's redetermination because it appears to lower the standard for compliance by allowing Best Theratronics to prioritize reducing onsite inventory over meeting its financial guarantee obligations. This is a red flag as it does not ensure the company has adequate resources to fund decommissioning activities, potentially undermining accountability and long-term safety.

CLOSING REMARKS

As we have consistently stated, the Commission is responsible for the Honour of the Crown - which means being able to demonstrate that there will be no inequitable, unjust or disproportionate impacts to KFN, our rights and interests. The substantial gaps in information, our involvement and respect for laws and principles remain fundamentally lacking must be remedied.

FPIC is a decision-shaping requirement, not a procedural objective or an outcome left to the discretion of the Crown. FPIC means that a project cannot proceed where Indigenous consent has not been given. It also means that Indigenous law and knowledge must guide assessment methodologies, impact determinations, risk evaluations, and long-term stewardship decisions.

Kebaowek remains committed to constructive, good-faith, justification based engagement with the nuclear substance processing facility licensees reviewed herein and the Commission to advance nuclear oversight that respects our Indigenous jurisdiction, law, and governance.