



**CMD 25-H6.11A**

Date: 2025-05-21

## **Supplementary Information**

### **Presentation from the Kebaowek First Nation**

In the matter of

**Nordion (Canada) Inc.**

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Application to Renew Licence for the  
Nordion Facility

**Commission Public Hearing**

June 4, 2025

## **Renseignements supplémentaires**

### **Présentation de la Première Nation Kebaowek**

À l'égard de

**Nordion (Canada) Inc.**

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Demande pour le renouvellement de son  
permis pour l'installation de Nordion

**Audience publique de la Commission**

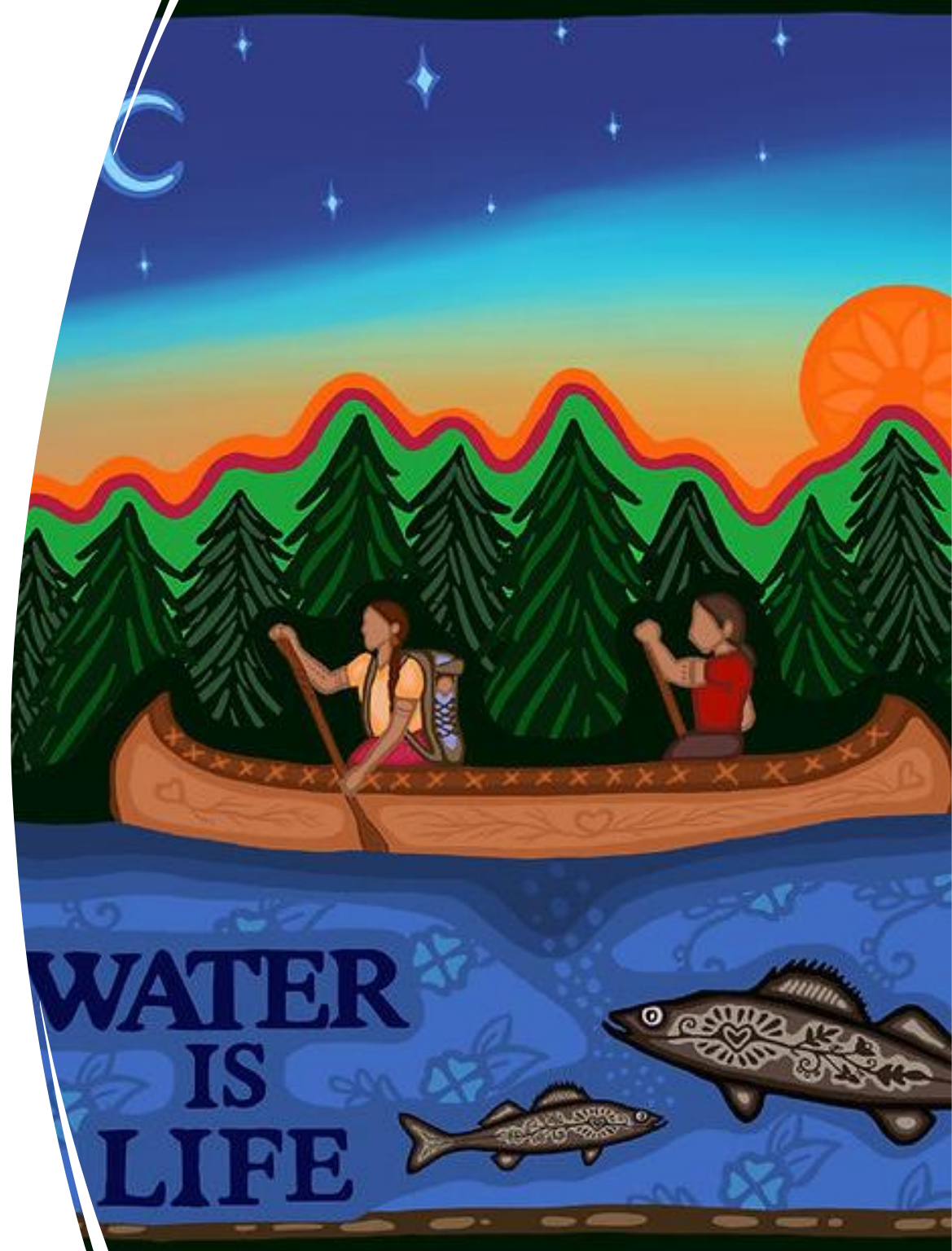
Le 4 juin 2025

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# **Kebaowek First Nation's Presentation to the Canadian Nuclear Safety Commission**

June 2025

*Asserting Indigenous  
Rights, Environmental  
Protection, and  
Regulatory  
Accountability*





## Rights and Scope of Concern

- Kebaowek First Nation (KFN) holds constitutionally protected rights and title over lands affected by Nordion's facility.
- The facility is located within asserted KFN territory.
- Application seeks a **25-year licence** — a decision with **intergenerational consequences**.
- CNSC has **not met** its obligations under the *NSCA*, *UNDA*, or *UNDRIP*.





# Consultation Must Be *UNDRIP* Compliant

- The duty to consult has been triggered and must meet the **FPIC standard** (Free, Prior, and Informed Consent).
- **No direct engagement** on the Application with KFN; Nordion and CNSC have failed to consider Ona'ken'age'win (KFN's Indigenous law).
- The **Federal Court** has affirmed that UNDRIP elevates the consultation standard to one that is robust, consent-based, and tailored to Indigenous laws and knowledge



# The Need for Environmental Justice

- Nordion waste is shipped to Chalk River, located on **Algonquin lands**.
- KFN has not received full disclosure on waste contents, volumes, or environmental risks.
- Cobalt-60 and Mo-99 processing creates long-term radioactive waste — yet KFN communities receive **no benefit, only burden**.
- Granting the licence will inhibit Canada's ability to meet its commitments set out in the *National Strategy Respecting **Environmental Racism and Environmental Justice Act***.



# Gaps in Nuclear Safety and Radiation Protection

- No clear **justification** provided for Nordion's nuclear operations under international safety standards.
- Gaps in safety incident reporting and transparency (e.g. irradiator door malfunction, waste emissions).
- CNSC has not aligned its review with the **radiation protection** principle of **justification**.
  - Justification is among the core radiation safety principles adopted by the IAEA in their Fundamental Safety Principles and International Basic Safety Standards



# **Kebaowek's Position on the 25-Year Licence**

- KFN opposes the 25-year term:
  - Reduces accountability and engagement (consultation is an ongoing obligation)
  - Weakens regulatory oversight and erodes transparency
- KFN urges the Commission to:
  - Deny the requested 25-year licence renewal
  - Recognize FPIC, environmental justice, and Indigenous law in decision-making
  - Establish a nation-to-nation consultation framework with KFN