



CMD 25-H6.8A

Date: 2025-05-28

Supplementary Information

Presentation from the Algonquins of Pikwàkanagàn First Nation

In the matter of

Nordion (Canada) Inc.

Application to Renew Licence for the
Nordion Facility

Commission Public Hearing

June 4, 2025

Renseignements supplémentaires

Présentation de la Première Nation des Algonquins de Pikwàkanagàn

À l'égard de

Nordion (Canada) Inc.

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

Audience publique de la Commission

Le 4 juin 2025



Algonquins of Pikwakanagan



First Nation

Review of Nordion's Licence Renewal Application

June 4th, 2025

Aakode'enwin (Courage)

In the Anishinaabe language, this word literally means "state of having a fearless heart." To do what is right even when the consequences are unpleasant.

Zaagi'idiwin (Love)

To know Love is to know peace. Love must be unconditional. When people are weak, they need love the most. In the Anishinaabe language, this word with the reciprocal theme indicates that this form of love is mutual.

Gwayakwaadiziwin (Honesty)

Honesty in facing a situation is to be brave. Always be honest in words and actions. Be honest first with yourself, and you will more easily be able to be honest with others. In the Anishinaabe language, this word can also mean "righteousness."

Nibwaakaawin (Wisdom)

To cherish knowledge is to know Wisdom. Wisdom is given by the Creator to be used for the good of the people. In the Anishinaabe language, this word expresses not only "wisdom," but also means "prudence," "intelligence", or "knowledge".

Debwewin (Truth)

Truth is to know all these things. Speak the truth. Do not deceive yourself or others.

Minaadendamiwin (Respect)

To honour all creation is to have Respect. All of creation should be treated with respect. You must give respect if you wish to be respected.

Dabaadendiziwin (Humility)

Humility is to know yourself as a sacred part of Creation. In the Anishinaabe language, this word can also mean "compassion." You are equal to others, but you are not better. In addition to "humility", this word can also be translated to "calmness," "meekness," "gentility" or "patience."

PRESENTATION OVERVIEW

Introduction to AOPFN's submission

About the Licence and Facility

Topics Addressed in Our Review

Key Concerns and Findings

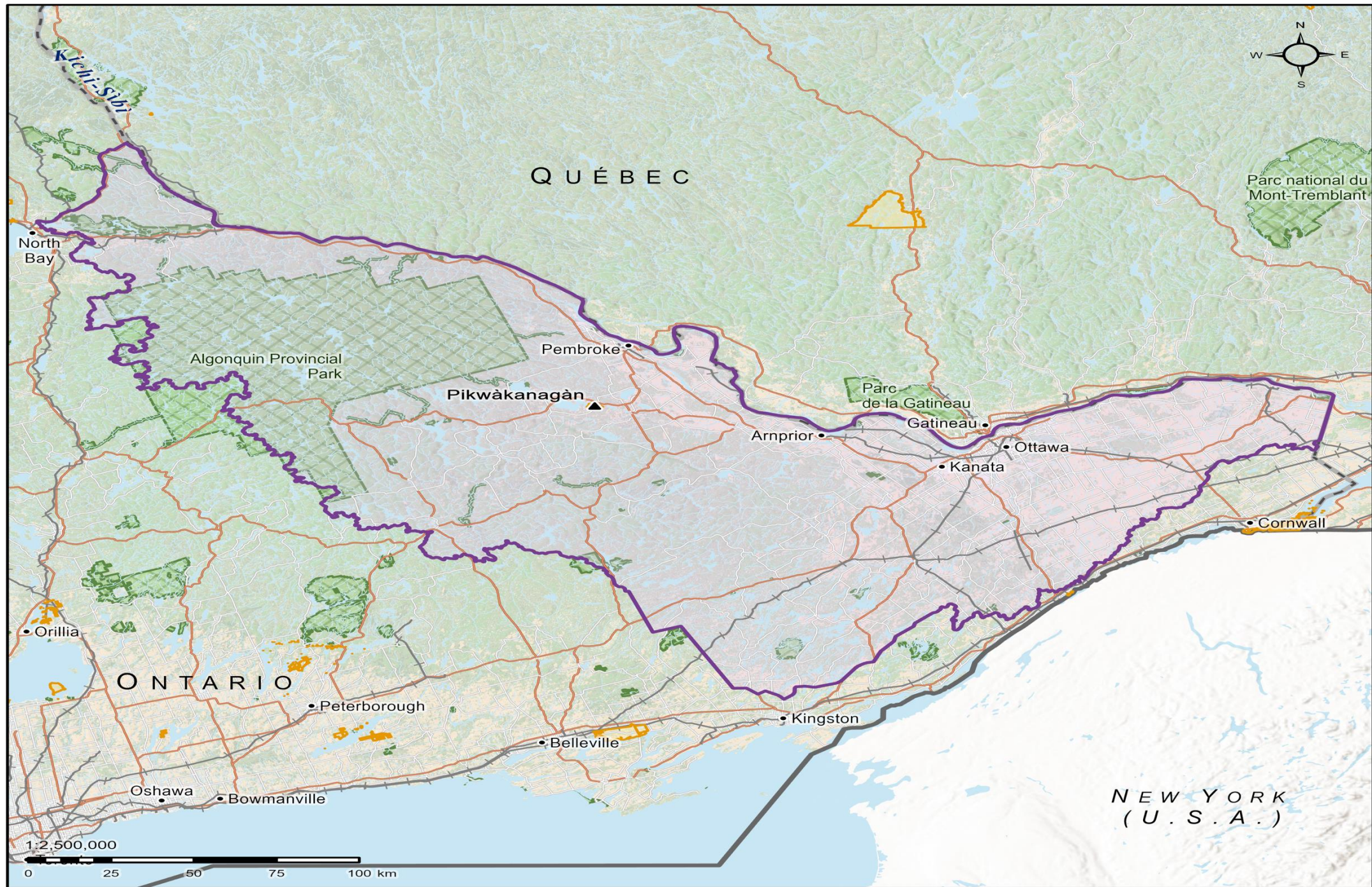
Final Remarks and Questions for Nordion

INTRODUCTION TO THE SUBMISSION

- Submission developed in response to Nordion's application for 25-year licence renewal
- Based on:
 - Nordion's submission (CMD 25-H6.1)
 - CNSC staff recommendation (CMD 25-H6)
 - AOPFN's Advisory Committee engagement
 - Prior AOPFN regulatory submissions

ABOUT THE FACILITY AND APPLICATION

- **Location:** Kanata, Ontario – within unceded Algonquin territory
- **Proponent:** Nordion Canada Inc.
- **Licence Requested:** 25 years (2025-2050)
- **Facility Type:** Class 1 B Nuclear Substance Processing Facility
- **Purpose:** Production of medical isotopes (e.g., Cobalt-60)



FOCUS AREAS OF AOPFN'S SUBMISSION

Indigenous Consultation, Engagement and Relationships

Oversight and Licence Duration

Emergency Planning and Risk Communication

Transportation of Radioactive Materials

Environmental Monitoring and Cumulative Effects

Access to Safety Information

Indigenous Economic Inclusion

Decommissioning Planning

Social Licence and Cultural Recognition

Indigenous Consultation and ARSCAs

- In AOPFN's submission regarding the 2021 ROR, AOPFN and Sagkeeng Anicinabe First Nation proposed a set of eight safety and control areas (SCAs) to be added to CNSC's existing 14 SCAs to promote and protect Aboriginal Rights and address Indigenous determinants of health and safety. Proposed SCA's are as follows:
 - Recognition of, protection and promotion of Aboriginal rights
 - Risk communication with Indigenous peoples and management of public concern
 - Integration of Indigenous Knowledge into site monitoring and management
 - Engagement of Indigenous peoples in site planning, monitoring and management
 - Contribution to reconciliation with Indigenous peoples
 - Level of knowledge and support for site waste management by Indigenous peoples.
 - Engagement adequacy with Indigenous peoples
 - Communication and management of reportable incidents

Indigenous Consultation and ARSCAs

- AOPFN's Aboriginal Rights Safety and Control Areas (ARSCAs) not included in CNSC staff review
- No formalized relationship between Nordion and AOPFN
- Engagement remains insufficient and late (first meeting of Nordion with our Advisory Committee only days before submission deadline)
- Social licence to operate is not in place

Key Ask:

- **CNSC to** Integrate ARSCAs into future CNSC review

Oversight and Licence Duration

- 25-year licence term risks insufficient oversight
- Only 2 formal review check-ins proposed (Year 8 and 16)
- AOPFN requests 5-year formal performance reviews with Indigenous engagement metrics

Key Ask:

- CNSC to include “every 5-years” formal performance reviews in licence terms

Emergency Planning and Transportation

- No AOPFN input on transport routing or risk of radioactive materials
- Past site incidents show shared risk profile
- AOPFN not included in emergency drills

Key Asks:

- Nordion to conduct joint transportation risk assessment
- Nordion to include AOPFN in emergency response planning and drills

Environmental Risk and Monitoring

- Environmental Risk Assessment (ERA) was not co-developed or reviewed with AOPFN
- No Cumulative Effects Assessment despite Nordion and BWXT sharing the site
- AOPFN's Neyagada Wabandangaki Guardian Program not included in site monitoring

Key Ask:

- CNSC to require Nordion to co-develop future ERA plans with AOPFN and integrate Guardian Program into site monitoring plans

Economic Inclusion and Opportunities

- No Strategy for Indigenous employment, training, or procurement
- No partnership for youth or community capacity-building

Key Asks:

- CNSC to require Nordion to develop and report on an Indigenous inclusion strategy with defined targets and accountability
- Nordion to Initiate training, employment, and sponsorship opportunities

Decommissioning Planning

- AOPFN not consulted on 2022 plan revision
- No process in place for future involvement

Key Ask:

- CNSC to require public disclosure of the current decommissioning plan.
- CNSC to require Nordion to co-developed consultation process with AOPFN for future revision.

Questions for Nordion

1. Who holds chain-of-custody for radioactive materials in transit?
2. What direct benefits does Nordion offer to AOPFN to offset operations on unceded territory?

Final Remarks

1. The CNSC has a responsibility to uphold the Honour of the Crown, respect Indigenous rights affirmed in Section 35, and align with International Human Rights Standards, including full implementation of UNDRIP.
2. Granting 25-year licence without meaningful Indigenous participation in environmental, health, and safety governance fall short of these obligations.
3. AOPFN has consistently offered constructive and principled guidance through our ARSCAs
4. We call on the Commission to recognize and integrate ARSCAs into regulatory practices going forward, and to ensure that any decision on this licence reflects both the legal and normal imperative to include Indigenous governance in nuclear oversight.



MEEGWETCH / THANK YOU