



Canadian Nuclear  
Safety Commission

Commission canadienne  
de sûreté nucléaire

CMD 25-M10.2A

Date: 2025-02-04

File / dossier : 6.02.04

Edocs pdf : 7466583

## **Supplementary Information**

**Presentation from the  
Algonquins of Pikwàkanagàn  
First Nation**

## **Renseignements Supplémentaires**

**Présentation de la Première Nation  
des Algonquins de Pikwàkanagàn**

**Regulatory Oversight Report  
for Uranium and Nuclear  
Substance Processing  
Facilities, Research Reactors,  
and Class 1B Accelerators in  
Canada: 2023**

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**Rapport de surveillance  
réglementaire des installations de  
traitement de l'uranium et des  
substances nucléaires, les  
accélérateurs de particules de  
catégorie IB au Canada: 2023**

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Commission Meeting

Réunion de la Commission

**February 26, 2025**

**Le 26 février 2025**

# **Review of the Regulatory Oversight Report for Uranium and Nuclear Substance Processing Facilities in Canada: 2023**

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February 26, 2025

## **Algonquins of Pikwakanagan First Nation**



### Aakode'enwin (Courage)

Bravery is to face the foe with integrity. 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 OUTLINE

1

Introduction to AOPFN's submission

2

Comments on the ROR

3

AOPFN's review of UNSPF's Operations

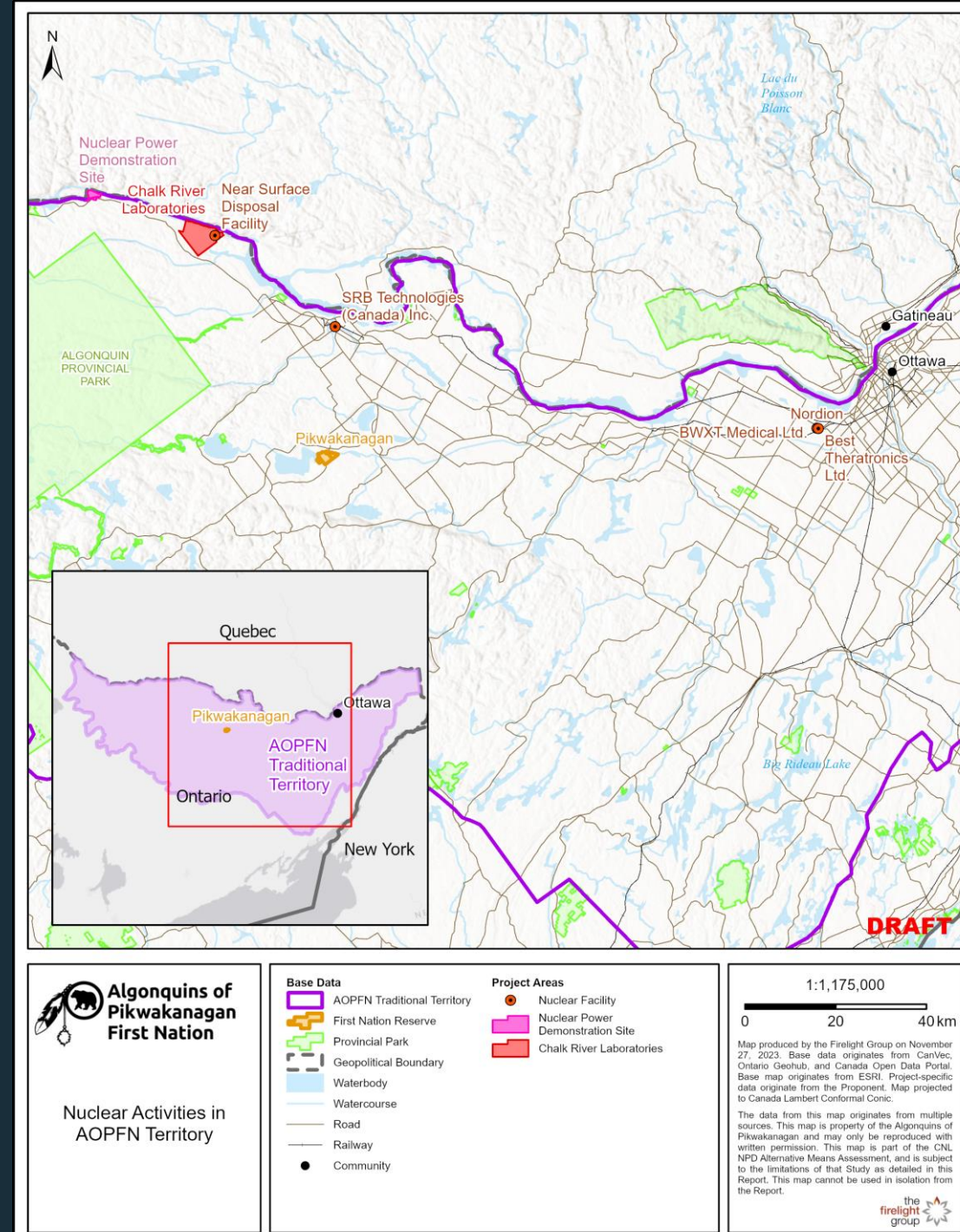
# INTRODUCTION TO THE SUBMISSION

- AOPFN is participating in this hearing by providing a written submission to the CNSC, and giving this presentation, based on our review of the Regulatory Oversight Report (ROR) for Uranium and Nuclear Substance Processing Facilities (UNSPFs).
- Our written submission provides 18 recommendations to improve the quality and consideration for Algonquin rights in the ROR and in day-to-day operations of the UNSPFs
- As part of our review, we are also sharing our experiences working with the four UNSPF facilities on AOPFN territory in 2023.

# UNSPFs in AOPFN Territory

AOPFN's submission focused on UNSPFs operating on AOPFN territory:

- SRB Technologies (Canada) Inc. (SRBT) - Pembroke
- BWXT Medical Ltd. (BWXT) – Ottawa
- Best Theratronics Ltd. (BTL) - Ottawa
- Nordion (Canada) Inc. (Nordion) - Ottawa



# TOPICS ADDRESSED IN OUR ROR REVIEW

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Engagement and issues tracking between the CNSC and AOPFN

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Engagement with UNSPFs and funding for evaluations by Indigenous parties

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AOPFN rights and Aboriginal Rights Safety and Control Areas (ARSCAs)

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Algonquin Knowledge and Indigenous perspectives on health, wellbeing, risk, and trust

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Accessibility and plain language in the ROR

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Risk communication

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Independent Environmental Monitoring Program

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Cultural Awareness Training

## Engagement and issues tracking between the CNSC and AOPFN

- AOPFN has previously requested that future RORs contain information on how our concerns about the regulatory oversight of the UNSPFs are being addressed by CNSC
  - 2022 the CNSC made an issues tracking table, and we have been meeting more frequently, but these are platforms to improve, and not improvements themselves
  - The RORs still lack concrete examples of our wide-ranging concerns, and plans for how they will be addressed



## Engagement with UNSPFs and funding for evaluations by Indigenous parties

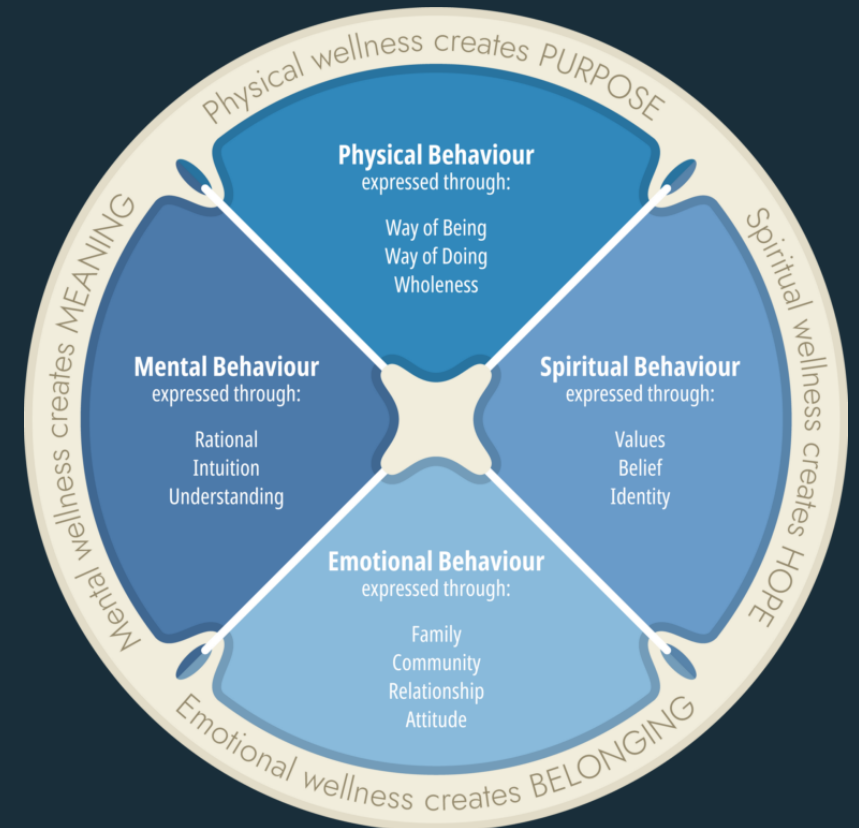
- We acknowledge that the ROR describes the CNSC's efforts with the UNSPFs to improve Indigenous engagement, but there is not enough details on the actual changes and improvements expected of the UNSPFs
- The CNSC's commitments are also vague, saying that they will “encourage” licensees to develop relationships, and will “discuss concerns” provided by Indigenous groups
- Funding of engagement has improved, however AOPFN is often having to push the CNSC for more funding to be able to assess in the way we need to.

## **AOPFN rights and Aboriginal Rights Safety and Control Areas (ARSCAs)**

- The CNSC states that it upholds the honor of the Crown and considers Indigenous treaty rights, but the ROR does not have details on how this has been done, and how AOPFN's specific concerns on impacts to our rights has been considered
- AOPFN worked to provide the CNSC with the Aboriginal Rights Safety and Control Areas (ARSCAs) in 2021 to holistically measure potential impacts to our rights and values. These have not been integrated in the RORs, and so we have limited trust regarding how our rights are being protected.

# Algonquin Knowledge and Indigenous perspectives on health, wellbeing, risk, and trust

- The RORs still rely on western science to set thresholds and make decisions on health impacts. This does not consider Indigenous perspectives on health and wellbeing, and the ROR does not contain enough detail for us to assess impacts ourselves.
- We have requested that the CNSC contribute funding to our Algonquin Foods Program so our members can trust the food they harvest in our traditional territory.



## Accessibility and plain language in the ROR

- The ROR is a highly technical document that is difficult for non-experts to understand. Most of the sections do not share information in an accessible manner, and often important information is simply not included in favor of the CNSC's blanket conclusions.
  - For example, the plain language summary simply states that "all facilities operated safely" and that "people and the environment remained protected" without providing any explanation, nuance, or reasoning.
- AOPFN would like to see more information being provided in a way that is meaningful to us and easier to understand.



## Risk Communication

- The ROR does not include information on how, or whether, reportable events were communicated with AOPFN in a timely manner. We have stated to the CNSC directly that we need to know about any events, notices, and issues that occur on our traditional territory as soon as they know, so we may draw our own conclusions and levels of risk to our members.
- We would recommend that the CNSC works with us to develop a communications protocol that reflects our needs and priorities for communications.

# Independent Environmental Monitoring Program

- Communication and involvement of AOPFN in site monitoring and sampling activities through the IEMP have improved, we were involved in sampling at the BWXT site in 2023, and the SRBT site in 2024
- But the IEMP is still a western science focused system, and the inclusion of Indigenous Knowledge, values, and objectives in sampling plans has not happened in a meaningful way
- Also, there is no mention of a monitoring role for AOPFN's Neyagada Wabandangaki Guardian Program, which would be a big step in working towards AOPFN integration

## Cultural Awareness Training

- AOPFN has requested that all CNSC and UNSPF employees working in AOPFN's unceded Algonquin territory to undergo our available cultural awareness training, but this has not been committed to yet. Some employees have taken this training, but it needs to be expanded.
- AOPFN acknowledges that a member of the Commission has previously participated in our Cultural Awareness Training and encourages the entire Commission to do so as well.

# OVERALL REVIEW OF UNSPFs

## BWXT

Neutral. Slow, incremental improvement in 2023.

- Financial support for AOPFN annual pow wow and round dance
- AOPFN send expectations for relationships in Nov 2023, no reply yet
- To improve further: progress in the relationship agreement to support communication, knowledge integration, and impacts to AOPFN rights

## SRBT

Neutral. Noticeable improvements in 2023.

- Regular communication and improved relationship building
- Willingness to integrate Indigenous Knowledge in monitoring and management
- To improve further: SRBT to integrate AOPFN input to site planning and monitoring, and commit to a relationship and communication agreement

## Nordion

Below Expectation. Improvements in 2023.

- Improvement in communications and relationship building
- Working on a formal engagement agreement, interest in a relationship agreement
- Commitment to CAT
- To improve further: Engagement Plan needs work, increased integration of Algonquin Knowledge, regular communications

## BTL

Far Below Expectation for 2023

- 1 meeting with no follow-up for a year
- No efforts for meaningful communication, recognition of our rights, CAT training, sampling
- Neither BTL nor the CNSC reached out to advise that the site was out of compliance for decommissioning funds
- Stated that they would not fund engagement with AOPFN





MEEGWETCH / THANK YOU