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Date: 2026-04-16

**Written Submission from the
Hiawatha First Nation**

**Mémoire de la
Première Nation de Hiawatha**

In the matter of the

À l'égard de la

**Mid-term update from BWXT Nuclear
Energy Canada Inc. on licensed activities
at its Toronto and Peterborough facilities**

**Mise à jour de mi-parcours sur les
activités autorisées de BWXT Nuclear
Energy Canada Inc. à ses installations de
Toronto et de Peterborough**

Commission Meeting

Réunion de la Commission

May 2026

Mai 2026



Hiawatha First Nation

Commission Registry and Registrar
Canadian Nuclear Safety Commission
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April 16th, 2026

RE: Hiawatha First Nations submission on the Mid-term update from BWXT Nuclear Energy Canada Inc. on licensed activities at its Toronto and Peterborough facilities

Dear Registrar.

On behalf of Hiawatha First Nation's consultation department please find comments as part of the CNSC's mid-term review of BWXT licenced activities at it's Toronto and Peterborough facilities. These comments reflect Hiawatha First Nation's ongoing review of CNSC and BWXT materials and are intended to support continued regulatory considerations of potential impacts to our Indigenous and Treaty Rights. This submission should be read as part of Hiawatha First Nation's continued engagement with the CNSC, discussions, and our review of BWXT'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 or review but reflects an ongoing relationship with our Traditional Territory and our role as stewards of the land.

Hiawatha First Nation understands that BWXT operates a Class 1B nuclear facility in Peterborough under the oversight of the CNSC. The BWXT Peterborough Facility is located within the Williams Treaty territory, and Hiawatha First Nation continues to review these activities with consideration for our rights and responsibilities within this area.

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 that ensures the continues protection of the environment and the health of our community.

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



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ongoing, and decisions made today must consider the impacts on future generations. These Teachings continue to guide how we review projects and how we engage in regulatory processes. Through our review of BWXT related materials and the broader review of the various Regulatory Oversight Reports, Hiawatha First Nation has identified a number of areas where continued clarity and discussion would be beneficial.

From an engagement perspective, Hiawatha First Nation is happy to be starting to build our relationship with the BWXT team in Peterborough and recognizes that efforts have been made to share information and maintain communication in 2026. While this is a mid-term review and while Hiawatha intervened in 2020; it is 2026 that marks the start again and we hope to sustain this effort into the future.

Opportunities such as a recent facility tour and information sessions have supported a better understanding of BWXT operations and have contributed to ongoing dialogue. Hiawatha First Nation sees value in continuing these types of interactions, particularly those that provide direct or hands on understanding, as they support more informed discussions and help build confidence through experience. At the same time, we continue to see an opportunity to strengthen consistency in engagement, ensuring that communication is ongoing and not limited to regulatory milestones. Early and regular communication supports a better understanding of activities and allows for more meaningful participation over time.

Hiawatha First Nation would be interested in understanding how current engagement approaches are evaluated and whether there are opportunities to further support ongoing relationship-based, responsibilities-based, Rights-based dialogue outside of key regulatory timelines.

In reviewing technical materials Hiawatha First Nation continues to seek clarity on how information is communicated and understood and the community level. While reporting is available, there can be a gap between the information provided and how it is interpreted in relation to impacts on the land, water, and community well-being.

Hiawatha First Nation is interested in how monitoring results and facility information are translated into plain-language or community-facing materials, and how CNSC ensures that this information is accessible and meaningful to those most directly connected to the land.

Environmental monitoring remains an area of ongoing interest for Hiawatha First Nation. Through our ROR reviews, we have focused on understanding how monitoring programs are designed, how results are interpreted, and how they reflect conditions over time. Monitoring is not only about meeting regulatory requirements, but about ensuring that changes to the environment are understood and that the land and water remain protected for future generations.

Hiawatha First Nation recognizes the importance of environmental monitoring programs and appreciates the work that has been undertaken to date. There is a value in exploring opportunities



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to further involve First Nations in monitoring activities in a more direct and collaborative way. From Hiawatha First Nation's perspective, community-based involvement such as participation in sampling, land-based observations and ongoing dialogue around results can support a stronger understanding of environmental conditions and build confidence in monitoring programs.

Hiawatha First Nation is interested in how existing monitoring initiatives could continue to evolve to include:

- Opportunities for community participation
- Incorporation of Indigenous Knowledge along side technical methods.
- More accessible summaries of results that can be shared within the community.

These types of approaches support not only improved understanding but also reflect a more holistic view of environmental stewardship.

Hiawatha First Nation continues to seek clarity on how current monitoring programs are designed to identify long-term trends and cumulative effects, and how monitoring results are used to inform ongoing oversight and decision-making.

Hiawatha First Nation also continues to emphasize the importance of Indigenous perspectives in how impacts are considered. Our understanding of the environment is rooted in lived experiences, intergenerational knowledge, and our relationship with the land. There is value in ensuring that this perspective is reflected alongside technical assessments to support a more complete understanding of potential impacts. This includes consideration of land-based observations, community knowledge and intergenerational perspectives that may not be reflected in technical reporting alone.

Hiawatha First Nation would like to understand how Indigenous Knowledge and perspectives are incorporated into CNSC's oversight processes in practice and how this informs both monitoring and decision-making.

Hiawatha First Nation views this submission as part of an ongoing dialogue and looks forward to continued engagement with the CNSC and BWXT as these matter progress. We trust that the comments provided will be considered as part of the review and that opportunities for continued discussion will be supported.

Miigwech

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