



CMD 26-M13.34

Date: 2026-04-17

**Written Submission from
James Wilkes**

**Mémoire de
James Wilkes**

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

Intervention by James Wilkes regarding BWXT Nuclear Energy Canada's mid-term review in Peterborough (Meeting Ref. CMD 26-M13.17)

April 17, 2026

Attn: Canadian Nuclear Safety Commission

To begin, I would like to acknowledge that the lands where I live and work, on which these proceedings are taking place and which will be affected by the actions of the CNSC and BWXT, is the traditional and present Territory of the Michi Saagiig Nishnaabeg (Mississauga People), who are the original caretakers and knowledge holders. I offer my thanksgiving to all First Peoples for their care for, and teachings about, the Earth and All Our Relations. As a guest in the Territory, I have responsibilities to listen to the people and protocols of this place, to support the care and continuation of the Life that is this land, and to recognize the culture and language of this land as guides for my work in the region. May we all honour those teachings, relationships, and responsibilities. Miigwech, Thank you.

In addition to these responsibilities, the Canadian Nuclear Safety Commission must also be reminded of the inherent, international, and constitutional rights of Indigenous and Aboriginal Peoples. First Nations closest to Nogojiwanong (Peterborough) include Hiawatha First Nation, downstream of the BWXT factory. Please refer to Section 35 of Canada's Constitution Act (1982) regarding Aboriginal and Treaty Rights. Please also refer to the United Nations Declaration on the Rights of Indigenous Peoples, of which Canada is a signatory, as well as the recommendations of Canada's Truth and Reconciliation Commission (2015).

My interest in BWXT's licence to produce nuclear fuel pellets in Peterborough arises from a long-term study of uranium mining and the nuclear fuel chain. As a university instructor with a background in environmental science, ecosystem management, environmental assessment, resource extraction and mining impacts, Indigenous rights and responsibilities, Crown fiduciary responsibilities, and environmental decision-making generally, I was alarmed to hear that the company, BWXT, is permitted to produce nuclear fuel pellets in the City of Peterborough. Not only is it unconscionable to work with this material so closely to a public school and a local residential neighbourhood, but it also troubles me to learn that some of the airborne emissions and liquid effluent from these industrial processes contain radioactive material, including uranium dioxide. The CNSC and any other regulating bodies must conduct a full environmental assessment before renewing this licence.

Some people may argue that this issue is simply a NIMBY (not-in-my-backyard) concern. As a former resident, I am not writing for the sake of my own health. However, any link in the nuclear fuel chain – from uranium exploration and extraction (mining), to uranium processing and fuel production, to military uses and nuclear waste storage (disposal) – should never take place in anyone's backyard (nor front-yard), including First Nation lands and communities. Too often, uranium is taken from Indigenous lands without consent and at the risk of their wellbeing (and the health of entire ecosystems), and then later disposed of in another Indigenous territory with limited consultation and zero consent.

As a Treaty partner and a Canadian citizen, I expect more of the Canadian Nuclear Safety Commission. To allow nuclear fuel pellet manufacturing at the Peterborough BWXT facility is irresponsible and a full environmental assessment must take place first and foremost. I request that the CNSC deny granting any new licences for BWXT's Peterborough facility and deny any existing licence that would allow pelleting in Nogojiwanong/Peterborough.

Thank you for taking the time to consider this intervention.

Sincerely,

James Wilkes