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**Written submission from the
Canadian Nuclear Workers'
Council**

**Mémoire du
Conseil canadien des travailleurs
du nucléaire**

**Regulatory Oversight Report on the
Use of Nuclear Substances in
Canada: 2022**

**Rapport de surveillance réglementaire
sur l'utilisation des substances
nucléaires au Canada : 2022**

Commission Meeting

Réunion de la Commission

November 1-2, 2023

1-2 novembre 2023



Canadian Nuclear Workers' Council

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October 03, 2023

Members of the Commission

c/o Tribunal Officer, Commission Registry
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Reference 2023-M 31

CNSC Staff Regulatory Oversight Report on the Use of Nuclear Substances in Canada: 2022

Dear President Velshi and Members of the Commission,

Please accept this letter as the written submission from the Canadian Nuclear Workers' Council (CNWC) for the Public Meeting scheduled for November 2, 2023 regarding CNSC Staff's Regulatory Oversight Report (ROR) on the Use of Nuclear Substances in Canada: 2022

The Canadian Nuclear Workers' Council

The CNWC was formed in 1993 as an association of Unions with Members employed in Canada's nuclear industry. CNWC Affiliates represent Workers across Canada's nuclear industry, including: uranium mines and mills, nuclear fuel manufacturing, nuclear power plant (NPP) operation and maintenance, NPP construction and refurbishment, engineering, medical isotope production, nuclear research and development, nuclear waste management and decommissioning. In addition, Regional Labour Councils in a number of nuclear host communities are CNWC Affiliates.

To help ensure the perspectives of our Affiliates are heard we prepare policy papers and a regular newsletter, post relevant information on our website <https://cnwc-cctn.ca>, hold annual conferences at the various communities hosting Canada's nuclear facilities, and participate in the regulatory process.

The standards of occupational health and safety and environmental stewardship in Canada's nuclear industry are very high. Safeguarding the continued health and safety of Workers is the highest priority for all CNWC Affiliates. We know that safer workplaces give rise to safer communities. There is nothing more important to any of us.

In preparation for this submission we reviewed the Commission Member Document (CMD) found on the CNSC website, CMD 23-M31 (Regulatory Oversight Report on the Use of Nuclear Substances in Canada: 2022) submitted by CNSC Staff.

We fully support CNSC Staff's assessment and their conclusion that licensees in the medical, industrial, academic and research, and commercial sectors have made adequate provisions to protect the health, safety of people and the environment. We are not as engaged in these sectors as we are in other sectors of Canada's nuclear industry but we have connections and they are growing.

Concluding Remarks

Our comments on this ROR are very brief and will look similar to other CNWC Submissions. That is for a good reason. The standards we push for and our commitment to safety are the same across the nuclear industry

We value the CNSC Staff's Annual Regulatory Oversight Reports. They help maintain confidence and engagement.

Thank-you to the Commission, CNSC Staff and everyone participating in this process. A transparent public process and strong regulatory oversight help maintain the high level of health and safety in our workplaces and our communities.

Respectfully submitted,

RL Walker

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