



To Candace Salmon
À Commission Registrar, CNSC

Fro Karen Owen-Whitred
De Director General, DNSR, CNSC

Security Classification - Classification de UNCLASSIFIED – NON CLASSIFIÉ
Our File – Notre référence e-Doc 7613127 (Word) e-Doc 7613401 (PDF)
Date: December 17, 2025

Subject CNSC Staff's review of TRIUMF Inc.'s November 17, 2025 Request for Confidentiality for Documents
Objet Related to their Preliminary Decommissioning Plan

PURPOSE

The purpose of this memorandum is to provide CNSC staff's comments and recommendations to the Commission regarding the matter of TRIUMF Inc.'s (TRIUMF)'s request to protect from public disclosure the following documents:

1. *Amended and Restated Fund Contribution Gap Agreement* (e-Doc 6870333)
2. *Amended and Restated CNSC Financial Security and Access Agreement* (e-Doc 6870329)
3. *Preliminary Decommissioning Plan (PDP)*, Document-8810, Release 7, January 02, 2024 (e-Doc 7202466)
4. *PDP Schedule A_Update 2023* (e-Doc 7406977)
5. *TRIUMF – PDP – Appendix B – PDP_Costs (2025 \$)* (e-Doc 7407016)
6. *PDP Appendix B -Maintenance_Costs_Schedule (2025 \$)* (e-Doc 7613070)
7. *PDP Appendix B -Option A (2025 \$)* (e-Doc 7407002)
8. *PDP Appendix B -Option B (2025 \$)* (e-Doc 7407005)
9. *TRIUMF - PDP Appendix C - AM&A TRIUMF Decommissioning 2023 rev 257* (e-Doc 7407075)
10. *Amended and Restated Escrow Agreement* (e-Doc 6870332)

CNSC staff included references to the above documents in CMD 25-H116 *Preliminary Decommissioning Plan and Financial Guarantee for TRIUMF Inc.* TRIUMF was informed that all references would be made available to the public on request, unless they were considered confidential. TRIUMF subsequently submitted Requests for Confidentiality to the Registry on November 28th, 2025 and December 17th, 2025.

The CNSC registry subsequently requested¹ that CNSC staff provide its advice to the Commission on the matter.

1. Email from H. Forester to J. Aro (e-Doc 7613076)

DISCUSSION

TRIUMF has requested that documents related to their preliminary decommissioning plan that contain detailed financial information be considered commercially sensitive and therefore confidential. To the CNSC's knowledge, these documents are not available elsewhere.

CNSC staff met with TRIUMF on November 17th, 2025, to get more information on why they consider these documents to be confidential. TRIUMF informed CNSC staff they have concerns about the sensitive and private nature of the data contained in the PDP, how this might impact future relationships, partnerships, and research security, and the exposure of confidential knowledge to potential competitors.

CNSC staff also noted that the National Research Council posted a summary report of their evaluation of TRIUMF for 2023-2024. While this summary report contains financial information related to TRIUMF's operations, it does not contain the level of specificity of the documents listed above. TRIUMF commented they must adhere to the government's requirements for financial information disclosure, but the specifics on how the funds are allocated are kept private. Not having the documents as part of the public record would be consistent with how other government institutions have handled TRIUMF's detailed financial information.

To meet the need for transparency, TRIUMF has provided summaries for each of the documents, explaining the contents at a sufficiently high level. For the next revision of the PDP, due in 2028, CNSC staff have recommended that TRIUMF prepare a summary version that could be made available to the public.

CONCLUDING STATEMENTS AND RECOMMENDATIONS

CNSC staff have reviewed TRIUMF's request for confidentiality but cannot offer a position on whether the release of the information is likely to lead to commercial disadvantage for TRIUMF – CNSC staff suggest that TRIUMF be contacted if further justification on this aspect is required.

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