Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire

CMD 26-M3.8
CMD 26-M4.4
CMD 26-M5.12
CMD 26-M6.4
CMD 26-M7.3

Date: 2026-01-28

Written Submission from the Hiawatha First Nation

Mémoire de la Première Nation de Hiawatha

In the matter of the

À l'égard du

Regulatory Oversight Report for Uranium Mines and Mills in Canada: 2024

Regulatory Oversight Report for Canadian Nuclear Laboratories Sites: 2024

Regulatory Oversight Report for Canadian Nuclear Power Generating Sites for 2024

Regulatory Oversight Report on the Use of Nuclear Substances in Canada: 2024

Regulatory Oversight Report for Uranium and Nuclear Substance Processing Facilities in Canada: 2024

Rapport de surveillance réglementaire des mines et usines de concentration d'uranium au Canada : 2024

Rapport de surveillance réglementaire des sites des Laboratoires Nucléaires Canadiens : 2024

Rapport de surveillance réglementaire des sites de centrales nucléaires au Canada : 2024

Rapport de surveillance réglementaire sur l'utilisation des substances nucléaires au Canada : 2024

Rapport de surveillance réglementaire des installations de traitement de l'uranium et des substances nucléaires au Canada : 2024

Commission Meeting

March 2026

Réunion de la Commission

Mars 2026

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Canada

Hiawatha First Nation

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January 28, 2026

RE: Hiawatha First Nation Review of the five Regulatory Oversight Reports for the 2024 Calendar year.

Dear Registrar,

On behalf of the Consultation Department at Hiawatha First Nation (HFN), please accept the attached ROR materials for submission to the Canadian Nuclear Safety Commission.

These materials reflect Hiawatha First Nation's review of the relevant CNSC and proponent submissions and are intended to support on going regulatory consideration of potential impacts to the lands, waters, and inherent Indigenous and Treaty Rights. The attached document should be read as a part of HFN's continued engagement with the CNSC, informed by prior submissions, meetings and discussions.

HFN's Consultation department was established to address the Crown's duty to consult and accommodate and to engage with regulators and proponents on land and resource matters within our Traditional Territory. Our participation in this process is grounded in our responsibility to protect the environment, cultural values, and the exercise of our Rights for present and future generations.

Hiawatha FN's Core Consultation and Land Resource Development office was established to address the Crown's (Federal and Provincial Governments) "Duty to Consult." This is in response to the Supreme Court of Canada decision relating to the Crown's "Duty to Consult" aboriginal communities regarding proposed land development when their treaty and traditional lands are impacted.

Our mandate is to engage with governments and private sector proponents on land and resource matters that may affect the Treaty and inherent rights of our First Nation. Hiawatha First Nation's traditional territory has been affected by numerous and various developments, which have impacted our traditional territory, way of life, and sustainability of Hiawatha. Our traditional ways are derived from the land. Hiawatha is not opposed to development. We would like to be reassured that wildlife, habitat, air, and water tributaries would be adequately protected from contamination for 7 generations without upsetting the balanced eco-system/relationship we have with our Mother Shka-ki-mi-kwe (Mother Earth).

Our values grow from the culture from which we are born into and live with and our beliefs and attitudes emerge from our values. As Mississaugi people from the Mississauga Nation, we try to live a healthy way of life.

"Mino Bimaadiziwin" through the teachings passed down from ancestors. These teachings include Seven Grandfathers teaching that was given to us by the Creator. This story has been passed down many generations. These foundational teachings include; wisdom, love, respect, bravery, honesty, humility, and truth.

"All of the above combined create a balance of spiritual, emotional, physical and mental being. They are the cornerstones of our belief system and the formula for maintaining the delicate balance between Shka-ki-mi-kwe (Mother Earth) and all her inhabitants. We have a strong connection to Shka-ki-mi-kwe and only use what is necessary from her. We believe that all things are connected and are taught that if we look after our Mother she will look after us. With all decisions made we always consider the effects our choices will make on the next seven generations just as our ancestors have done for us. We often turn to our Elders who hold great knowledge of Shka-ki-mi-kwe that no one else possesses. Their knowledge is held in their hearts and minds to be passed by oral tradition for the next generations."

The attached materials found in the appendices identify outstanding concerns and gaps, related to environmental protections, regulatory process, and the consideration of Indigenous and Treaty Rights. These comments are provided to support a more complete understanding of potential impacts and to encourage regulatory approaches that align with current legal, policy, and reconciliation frameworks.

The RORs were reviewed from the lens of Hiawatha FN consultation staff who ultimately has a responsibility to communicate to leadership and to citizens. Staff kept in mind what leadership and citizens questions would come up naturally. Therefore, the approach of the review is one that asks for clarity and seeks to have a better understanding of how things work in the regulatory framework so that frequently asked questions by leadership and citizens could be addressed in future interactions with CNSC staff and with the nuclear proponents.

- CMD 26-M3 - CNSC Staff Submission - Regulatory Oversight Report for Uranium Mines and Mills in Canada: 2024
- CMD 26-M4 - CNSC Staff Submission - Regulatory Oversight Report for Canadian Nuclear Laboratories Sites: 2024
- CMD 26-M5 - CNSC Staff Submission - Regulatory Oversight Report for Canadian Nuclear Power Generating Sites for 2024
- CMD 26-M6 - CNSC Staff Submission - Regulatory Oversight Report on the Use of Nuclear Substances in Canada: 2024
- CMD 26-M7 - CNSC Staff Submission - Regulatory Oversight Report for Uranium and Nuclear Substance Processing Facilities in Canada: 2024

HFN views this submission as part of an ongoing dialogue and looks forward to continued engagement with CNSC as these matters progress. We trust that the attached materials will be reviewed in detail and that responses will be provided in due course.

Miigwech

Tamara Whitby
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Supported by : Francis Chua

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Chief Laurie Carr - Hiawatha First Nation
Trisha Shearer, Director of Operations, Hiawatha First Nation
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Appendix A

CMD 26-M3 – Regulatory Oversite Report for Uranium Mines and Mills in Canada:2024

Reviewed By Tamara Whitby

Overall safety – pages 2-3; conclusion – page 73 (PDF pages 8-9; 79)

CNSC staff concluded that all five uranium mine and mills operated safely in 2024 and that there were no releases that could have farmed human health or the environment.

- How does CNSC define "operated safely" when 114 non-compliances were identified in a single year?
- How are repeated non-compliances reconciled with the conclusion that there were no broader safety concerns?
- Does CNSC consider trends over multiple years or is this conclusion based on 2024 performance only?

Increase in Non-compliance – pages 8-9; pages 12-13; table 2.1.1 (pdf pages 14-15; 18-19)

The report notes that non-compliances have increased overtime and attributes this to changes in inspection practices.

- How does CNSC distinguish between increased detection and actual performance issues?
- At what point does an increasing number of non-compliances warrant additional regulatory concern, regardless of inspection methodology?
- How does CNSC ensure that changes in inspection practices do not mask emerging systemic issues?

"Low safety significance" – pages 8-9 – section 3 (PDF pages 14-15)

All non-compliances identified in 2024 are described as being of "low safety significance."

- How does CNSC determine safety significance, and are cumulative effects considered?
- Can repeated low-significance findings across multiple safety areas indicate a broader program weakness?
- Is there a threshold where repeated "low significance" issues would trigger escalation?

Safety and Control Area Ratings – pages 16-18; appendix B (PDF pages 22-24)

All operating mines and mills received "satisfactory" ratings across all SCAs.

- What specific thresholds distinguish "satisfactory" from "below expectations"?
- Can facilities receive a "satisfactory" rating while continuing to have repeated non-compliances in the same safety areas?
- How does CNSC ensure consistency in rating across different facilities and operators?

Radiation Protection – pages 8-9; sections 4.7; pages 46-49 (PDF pages 14-15; 52-55)

The report states that worker doses remained below regulatory limits, with a maximum individual dose of 18% of the annual limit.

- How does CNSC assess radiation protection program effectiveness, beyond compliance with dose limits?
- How are procedural errors, such as those leading to action level exceedances, factored into overall radiation protection performance?
- How does CNSC ensure lessons learned from radiation incidents are consistently applied across all sites?

Environmental Protection and Spills – pages 8-9; section 4.9; pages 51-61 (PDF pages 14-15; pages 57-66)

The report indicated that 11 unauthorized releases ("spills") occurred in 2024 and were within the normal range.

- How does CNSC define what constitutes a "normal range" for spills?
- How are repeated spills evaluated in terms of long-term environmental risk, even when remediated?
- Were First Nation Communities notified or engaged regarding spills occurring?

Environmental Action Level Exceedances – facility-specific sections – pages 20-22;27-28;33-34 (PDF pages – 26-28;33-34;39-40)

Several facilities experienced environmental or radiological action level exceedances.

- How does CNSC assess whether action level exceedances indicated emerging issues with operational controls?
- At what point would repeat exceedances trigger additional regulatory requirements?
- How are communities informed when action levels are exceeded, even if regulatory limits are not?

Conventional Health and Safety – Pages 8-9 – sections 4.8; pages 50-51 (PDF Pages 14-15; 57-58)

This report notes several lost-time injuries, including some more serious incidents, but concludes there are no broader health and safety issues.

- How does CNSC determine when workplace injuries indicate a systemic issue rather than isolated events?
- How are contractor injuries assessed and tracked in relation to overall safety culture?
- How are lessons learned from serious injuries shared across facilities?

Indigenous Consultation and Engagement – pages 65-69; appendix D-F (PDF pages 71-75)

This report outlines meetings and engagement activities with First Nations.

- How does CNSC assess whether engagement is meaningful rather than procedural?
- How are Indigenous concerns reflected in regulatory decisions, inspections or enforcement actions?
- When the report refers to limited "expressed interest" how does CNSC distinguish between interest and capacity constraints, including time, resourcing and technical complexity?

PFP – page 70 (PDF page 76)

Participant funding is noted as being available for Indigenous and public participation.

- How does CNSC ensure participant funding is sufficient to support review of lengthy and technical oversight reports?
- How are issues raised through funded participation reflected in regulatory outcomes?

Conclusion – page 73 (PDF page 79)

The report concludes that uranium mines and mills operated safely and that regulatory oversight was effective.

- How does CNSC measure the effectiveness of regulatory oversight beyond compliance tracking?
- How are recurring ensure incorporated into continuous improvements of oversight practices?
- How does CNSC ensure transparency when conclusion rely heavily on professional judgment.

Appendix B

CMD 26-M4 - Regulatory Oversight Report for Canadian Nuclear Laboratories Sites

Reviewed by Tamara Whitby

Pages 2-3, 9-10 (pdf pages 9-10, 16-17)

CNSC repeatedly concludes that non-compliances "did not pose a risk to health, safety, or the environment"

- How does CNSC determine in practical terms, that something poses "no risk" especially when multiple non-compliances are identified within the same safety area?
- Does CNSC look at cumulative or recurring issues over time, or are non-compliances assessed only as individual events?

High number of NNCs at Chalk River

Page 6 (table 2) (pdf page 14)

CRL shows 171 inspections and 58 NCCs, exceeding other CNL sites

- Why does Chalk River continue to have a much higher number of non-compliances compared to other sites?
- Have any repeat themes been identified year-over-year?
- How does CNSC distinguish between minor administrative issues and systemic program weaknesses?

Radiation Protection Chalk River

Pages 15-16 (pdf pages 22-23)

Issues include missing labels, unclear processes, unavailable PPE, and emergency power gaps.

- How does CNSC reconcile repeated procedural radiation protection gaps with a "satisfactory" rating?
- Were any of these deficiencies previously identified in earlier RORs?
- Were First Nations notified of any radiation protection non-compliance that occurred near or within traditional land-use areas?

NNC List

Pages 18-19 (pdf pages 25-26)

The list of non-compliance includes issues related to:

- Fire response training
- Egress obstructions
- Equipment maintenance
- Emergency communications

- What threshold distinguishes a rating of "below expectation" vs "satisfactory" when 21 non-compliance are identified in a single safety area?
- Were worst-case fire or emergency scenarios re-evaluated following these findings?
- How are nearby communities and First Nations assured that emergency response capacity is reliable, given the number and nature of these deficiencies?

ERA- Chalk River (pdf pages 20-21)

Pages 13-14

- ERA expected in January 2024
- Extension granted in January 2025
- Further revisions are expected in October 2025

- What safeguards were in place during the ERA gap period?
- Why were follow up studies not completed on schedule?
- Were First Nations consulted regarding the ERA delay and extension approval?
- How does CNSC ensure precautions are applied when baseline risk assessments are outdated?

Public and Environmental Monitoring

Page 14 (table 5) (pdf pages 20 - 21)

- How is the "hypothetical member of the public" defined (location, lifestyle, land use)?
- Does this scenario reflect actual Indigenous land use, including hunting, fishing, or ceremonial use?
- Are cumulative exposures from multiple facilities considered?

Emergency Management & Fire Protection – Whiteshell

Page 22 (table 6) (pdf page 29)

- Given past self-identified deficiencies (2023) why do CNSC continue to accept compensatory measures rather than requiring full program correction?
- What independent verification exists that staffing and training levels are now adequate?

Indigenous Consultation & Engagement

Pages 67-73 (section 3) (pdf pages 74-80)

- How does CNSC measure the effectiveness of Indigenous engagement, not just whether engagement occurred?
- Were Indigenous concerns linked directly to licensing decisions, ERA extensions, or non-compliance outcomes?
- How is Indigenous Knowledge and land use data incorporated into environmental protection and risk assessments?

SCA Ratings

Appendix A and throughout section 2

- What quantitative or qualitative thresholds trigger a downgrade to "below expectations?"
- Can Multiple non-compliances across multiple years remain "satisfactory" indefinitely?
- How does CNSC ensure rating consistency across different sites and safety areas?

Appendix C

Regulatory Oversight Report for CMD 26-M5 - CNSC Staff Submission Regulatory Oversight Report for Canadian Nuclear Power Generating Sites for 2024

Reviewed by Tamara Whitby

Overall safety

Pages 7-9; page 21 (PDF pages 8-10, 22)

CNSC staff conclude that all nuclear power generating sites and waste management facilities operated safely in 2024, with all Safety and control areas rated "satisfactory"

- How does CNSC define "safe operation?" in practical terms when hundreds of findings are identified across sites?
- What distinguishes a "satisfactory" rating from "below expectations" when non-compliance continues to occur?
- Are patterns and trends over multiple years considered when assigning overall ratings?

Risk-informed approach

Pages 14-17 (PDF pages 15-18)

The report states that CNSC applies a risk-informed approach to compliance and enforcement

- How does CNSC assess cumulative risk as opposed to evaluating each non-compliance individually?
- At what point do repeat low-significance findings indicate a systemic issue rather than isolated events?
- How is consistency ensure across sites when applying risk informed judgment?

Inspections

Pages 17-21; table 3 (PDF pages 18 – 22)

The repost identifies 1592 findings across all sites in 2024

- How does the CNSC interpret high volume of findings while still concluding that performance is satisfactory?
- Is there a threshold for the number of findings that would trigger a change in rating or enforcement response?
- Are recurring findings tracked across inspection cycles and reflected in regulatory decisions?

Emergency management and fire protection

Multiple site sections (pages 36-37 for Darlington) (PDF pages 37-38)

Emergency management and fire protection safety compliance are consistently rated "satisfactory"

- How does CNSC assess emergency preparedness beyond procedural compliance?
- Were worst-case emergency or fire scenarios reassessed following inspection findings?
- How are surrounding communities and first nation assured that emergency response would be effective during an actual event.

Radiation Protection and Public Dose

Pages 34-35; Environmental protection sections (PDF pages 35 - 36)

The report confirms radiation doses to workers and the public were below regulatory limits.

- How is the assumed member of the public defined for dose calculations (location, lifestyle, land use)?

- Does dose assessment reflect Indigenous land use, such as fishing, hunting, or extended time on the land?
- Are cumulative exposures from multiple facilities considered?

Environmental Protection and Action Level exceedance

Pages 36-37 (PDF Pages 37-38)

Environmental action level exceedances are described as controlled and do not represent loss of control

- How does CNSC determine when repeated action level exceedances become a concern?
- Were First Nations notified or consulted regarding action level exceedances or temporary action level exemption?
- How does CNSC ensure transparency when exemptions are used to manage planned maintenance activities?

Event Reporting and Trends

Pages 19-21; Table 4 (PDF pages 20-22)

The report shows an increase in reported events at several sites over the last 3 years

- How does CNSC interpret increasing event trends when assigning safety ratings?
- Are increases in events considered normal variability, or do they trigger additional regulatory scrutiny?

Appendix D

26-M6 - CNSC Staff Submission Regulatory Oversight Report on the Use of Nuclear Substances in Canada: 2024

Reviewed by Tamara Whitby

Summary – Pages 2-3, page 32 (PDF pages 9-10, 37)

CNSC staff concluded that licensees made "adequate provisions" to protect health, safety, security, and the environment, and nuclear substances continue to be used safely.

- How does CNSC define "adequate provisions" in practical terms when unacceptable rating and escalated enforcement action still occurred in 2024?
- What Criteria does CNSC use to determine that overall use remains "safe" despite recurring non-compliance in certain sectors?
- How are patterns over time factored into this conclusion, rather than look at 2024 in isolation?

Report and Excluded safety areas – Pages 11-12; Pages 20-21 (PDF pages 16-17; pages 25-26) (environmental protection)

The report focuses on selected safety and control areas (SCAs) and excludes environmental protection for most licensees.

- How does CNSC ensure environmental protection is adequately considered when it is not routinely reported for most nuclear substance licensees?
- What assurance can communities and First Nations rely on if environmental protection performance is assessed but not transparently reported?
- Why is the approach sufficient from a public confidence perspective?

Licensing Decisions & Delegated Authority – Pages 8-9; Appendix B (PDF pages 13-14)

Designated Officers are authorized to make most licensing and amendment decisions due to the volume of licenses and perceived low risk.

- How does CNSC ensure accountability and transparency when licensing decisions are delegated to staff rather than the Commission?
- Were Indigenous Communities informed or consulted when delegated licensing decisions affected licensed activities?

- How does the CNSC verify that "low risk" assumptions remain valid over time?

Inspection Program & Frequency – Page 9-11 (PDF pages 14-15)

The report states that inspections are risk-informed and that some licensees are inspected every 3-5 years.

- How does CNSC ensure compliance is maintained between inspections, especially for licensees inspected infrequently?
- How does CNSC assess trends when inspection timing varied so much between licensees?
- How are communities assured that declining performance will be detected early?

Compliance Results & "Point- in – time" Ratings – Pages 12-14 (PDF pages 17-19)

Inspection ratings are described at "point-in-time" and may not reflect improvements or deterioration between inspections.

- How does CNSC ensure that point-in-time ratings do not understate long-term compliance issues?
- How are repeat non-compliance across inspections cycles tracked and addressed?
- How does CNSC prevent repeated corrective-action cycles from becoming normalized?

Safety and Control Area Rating – Pages 12-15 (PDF pages 17 – 20) Appendix E

Only 5 unacceptable ratings were issued in 2024, and most SCAs are rated satisfactory.

- What thresholds distinguish "below expectations" from "unacceptable" in practice?
- Can multiple below expectations or marginal findings persist without escalating regulatory response?
- How does CNSC ensure rating consistency across sectors with very different risk profiles?

Radiation Protection – Pages 13-15; 17-19 (PDF pages 18-20; 22-24)

CNSC acknowledges that the previous radiation protection ratings overstated risk and describes changes to risk ratings.

- Why were licensees rated under a methodology that CNSC now acknowledges overstated safety significance?

- How were First Nation Communities informed that prior ratings may not have accurately reflected risk?
- How does CNSC ensure transparency when rating methodologies change after years of reporting?

Medical Sector – Pages 17 -19 (PDF pages 22-24)

The nuclear medicine subsector continues to have low satisfactory ratings, though CNSC states substances are used safely.

- How does CNSC reconcile consistently low radiation protection ratings with conclusions of safe operation?
- Why were these issues allowed to persist over multiple years before adjusting the rating approach?
- How does CNSC distinguish administrative non-compliance from programmatic weakness?

Enforcement Actions – Pages 22-23 (PDF pages 27-28) Appendix H

Nine orders and four administrative monetary penalties were issued in 2024

- What factors determine when CNSC issues an order versus continued oversight?
- How does CNSC ensure enforcement actions lead to lasting compliance, not temporary fixes?
- How are First Nations informed when enforcement actions involve repeated or prolonged non-compliance?

Doses to workers - Pages 23-25 (PDF pages 28-30)

Several non-news received doses above the public limit, including unplanned exposures over multiple years.

- How does CNSC ensure non-NEW exposures are promptly detected when dosimeters are not or improperly stored?
- Why did some unplanned exposures occur over multiple years before being identified?
- How are affected workers and nearby communities affected when these exposures occur?

Reportable Events & Trends – pages 25-28 (PDF pages 30-33)

The report notes a slight increase in reportable events and frames this as a positive safety culture.

- How does CNSC distinguish between a strong reporting culture and emerging systemic issues?
- At what point would increasing event trends trigger heightened regulatory concern?
- How are lessons learned from events communicated beyond licensees to affected communities?

Transport of Nuclear Substances – pages 27-28 (pdf pages 33-34)

The report highlights the high number of shipments and low number of consequential events.

- How does CNSC ensure public confidence when thefts of portable gauges continue to occur?
- What additional measures are in place when radioactive sources remain unrecovered?
- How are First Nations notified when transport incidents occur within or close to communities?

Indigenous Consultation and Engagement - pages 28-30 (PDF pages 34-36)

The report noted limited expressed interest from Indigenous Communities outside prior interventions.

- How does CNSC assess whether lack of engagement reflects lack of interest or lack of awareness?
    - That reference in the report to a lack of "expressed interest" should not be taken as lack of concern. In many cases, the issue is a lack of capacity, not a lack of concern.
- How does CNSC measure the effectiveness of engagement beyond documenting outreach activities?

Participant Funding Program – page 30 – (PDF page 36)

How are concerns raised through funded participation reflected in regulatory decisions?

Appendix E
CMD 26-M7: Regulatory Oversight Report for Uranium and Nuclear Substance Processing Facilities in Canada: 2024
Reviewed by Tamara Whitby

Some of the questions raised below reflect recurring themes that also appear in other CNSC regulatory oversight reports submitted to the commission.
There is overlap as it reflects system wide regulatory approaches and language used across CNSC programs.

Summary – pages 2-3; conclusion – page 44 (PDF pages 10-11;62)

CNSC staff conclude that uranium and nuclear substance processing facilities operated safely in 2024 and that people and environment were protected.

- How does CNSC define "operated safely" when multiple non compliances were identified across several facilities?
- How are repeated non-compliances reconciled with conclusions of satisfactory overall performance?
- Are trends over multiple years considered when reaching this conclusion, or is it based only on the reporting year?

Risk characterization and "low safety significance" – pages 7-8; section 4.3 (PDF pages 35-26)

Most inspection finding are described as being of "low safety significance"

- How does CNSC determine safety significance, and are cumulative or recurring issues considered in that assessment?
- At what point do repeat low significance finding indicate a larger problem or oversight concern?
- How does CNSC ensure consistent application of safety significance across all facilities?

Inspections and Non-compliances – Specific sections; appendix D

The report outlines inspections and resulting notices of non-compliance for each facility.

- How does CNSC assess whether repeated non-compliance indicates a systemic issue or an isolated event?
- Are recurring themes tracked across inspections and reporting years?
- Is there a threshold where the number or type of non-compliance trigger escalation beyond corrective actions?

Safety and Control Area Ratings – section 5; appendix H (PDF page 76)

Most facilities received "Satisfactory" Ratings across SCA's

- What thresholds distinguish between "Satisfactory" and "Below Expectations"?
- Can a facility continue to receive "satisfactory" rating while repeatedly receiving non- compliance in the same SCA?
- How does CNSC ensure rating consistency across different licensees and facility types?

Facility Specific Issues – Best Theratronics Ltd – pages 22-23; sections 5.10 and 5.12 (PDF pages 39-40)

Best Theratronics received a "below expectations" rating in emergency management and fire protection, and in security.

- What specific deficiencies led to these ratings and how long had they been present?
- Why was continued operation considered acceptable while these SCAs remained below expectation?
- What criteria will CNSC use to determine when performance has improved sufficiently to restore a "satisfactory" rating?

Radiation Protection and Action Level Exceedances – pages 13-16; appendix L (PDF pages 31-34)

The report identifies multiple radiation protection action level exceedances, many related to dosimeter use or storage.

- How does CNSC assess program reliability when exceedances result from procedural or behavioral issues?
- Why were some exceedances identified only after subsequent inspections?
- How does CNSC ensure lessons learned are applied consistently across facilities?

Environmental Protection and Releases – pages 18-20; appendices I-K (PDF pages 36-38)

Environmental action level exceedances and releases are described as being below regulatory limits and with impact.

- How does CNSC assess long-term or cumulative environmental effects, particularly near First Nation communities?
- Are First Nation communities notified or engaged when environmental action levels are exceeded?

- How does CNSC ensure transparency when exceedances are later determined to "not authentic"?

Emergency Management and Fire Protection – section 5.0

Emergency management and fire protection non-compliances were identified at some facilities

- How does CNSC evaluate emergency readiness beyond documentation and procedures?
- Were worst case emergency scenarios reassessed following identified deficiencies?
- How are nearby communities and First Nations assured that emergency response capacity is reliable?

Conventional Health and Safety – pages 16-18; Appendix M

The report documents lost-time injuries and conventional health and safety non compliances.

- How does CNSC determine when workplace injuries indicate systemic health and safety issues?
- How are contractor injuries factored in overall safety assessments?
- How are lessons learned shared across licensees?

Indigenous Consultation and Engagement – pages 26-31; appendices O-Q (PDS pages 44-49)

The report outlines engagement activities and refers to limited "expressed interest" is some cases.

- How does CNSC assess whether the absence of expressed interest reflects capacity constraints, rather than lack of concern?
- How are Indigenous concerns reflected in inspection focused, enforcement actions and or licensing decisions?
- How does CNSC measure the effectiveness of Indigenous engagement beyond documenting activities?

Participant Funding Program – page 32 (PDF page 50)

Participant funding is noted as being available.

- How does CNSC ensure participant funding is sufficient to support review of large technical oversight reports?
- How are issues raised through funded participation reflected in regulatory outcomes?