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Date: 2026-01-28

**Written Submission from the  
Algonquins of Ontario**

**Mémoire des  
Algonquins de l'Ontario**

In the matter of the

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À l'égard du

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**Regulatory Oversight Report for  
Canadian Nuclear Laboratories  
Sites: 2024**

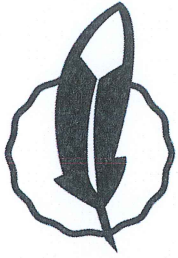
**Rapport de surveillance réglementaire  
des sites des Laboratoires Nucléaires  
Canadiens : 2024**

**Commission Meeting**

**Réunion de la Commission**

March 2026

Mars 2026



# Algonquins of Ontario

January 28<sup>th</sup>, 2026

Canadian Nuclear Safety Commission  
280 Slater St,  
Ottawa, ON  
K1P 5S9

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## **BY EMAIL ONLY**

To whom it may concern,

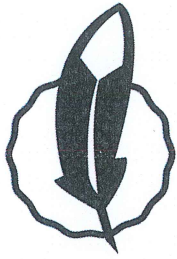
### **2024 CNSC Regulatory Oversight Reports – (AOO File CF 48-39)**

#### **Algonquins of Ontario Brief Background**

The Algonquins lived in present-day Ontario for thousands of years before Europeans arrived. Algonquin territory originally extended from the St. Lawrence River to the French River in the west, south to the Adirondack mountains in New York State, and north above Lake Abitibi. Over the past several hundred years, the description of Algonquin Territory has changed to be the lands and waters on both sides of the Ottawa River watershed from modern Hawkesbury to Lake Nipissing and north past the headwaters of the Ottawa River. Today, ten Algonquin communities comprise the Algonquins of Ontario:

- The Algonquins of Pikwakanagan First Nation
- Antoine
- Kijicho Manito Madaouskarini
- Bonnechere
- Greater Golden Lake
- Mattawa/North Bay
- Ottawa
- Shabot Obaadjiwan
- Snimikobi
- Whitney and Area

Based on a Protocol signed in 2004; these communities are working together to provide a unified approach to negotiate a modern-day Treaty. The Algonquins of Ontario Settlement Area



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includes a territory of nine million acres within the watersheds of the Kichi-Sibi<sup>1</sup> (Ottawa River) and the Mattawa River in Ontario.

This unceded territory encompasses most of eastern Ontario, including the City of Ottawa, and most of Algonquin Provincial Park. More than 1.2 million people live and work within the unceded AOO Settlement Area. There are 84 municipal jurisdictions fully and partially located within the unceded AOO Settlement Area, including 75 lower and single tier municipalities and nine upper tier municipalities.

On October 18, 2016, the AOO and the Governments of Ontario and Canada reached a major milestone in their journey toward reconciliation and renewed relationships with the signing of the Agreement-in-Principle (AIP). The signing of the AIP is a key step toward a Final Agreement, which will clarify the rights of all concerned and open up new economic development opportunities for the benefit of the AOO and their neighbours in the Settlement Area in eastern Ontario.

Furthermore, by signing the AIP, the AOO and the Crown have expressed, in a formal way, their mutual intention and desire for a lasting partnership. This event signaled the beginning of a new relationship between the AOO and the Crown, one in which the mistakes of the past must be supplanted by a new type of mutual respect and cooperation.

The AIP is not a legally binding document. Rather, it opens the way for continued negotiations toward a Final Agreement that will define the ongoing rights of the Algonquins of Ontario to lands and natural resources within the Settlement Area in Eastern Ontario.

The Negotiation Teams are now hard at work to ensure that the next phase of negotiations towards a Final Agreement will succeed. If a Final Agreement is achieved through this next phase, and if it is ratified by Algonquins and by the federal Parliament and provincial Legislature, it will take the form of a modern-day treaty setting out Algonquin Aboriginal and treaty rights protected under Section 35 of the Constitution Act, 1982.

## **Review of the 2024 CNSC Regulatory Oversight Reports (ROR)**

To begin, we would like to thank the Canadian Nuclear Safety Commission (CNSC) for their continued consultation with the Algonquins of Ontario (AOO). We look forward to continuing to work hand in hand with the CNSC in the future on any projects.

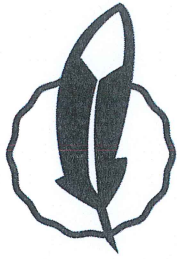
The AOO has reviewed the following 5 RORs:

- *Regulatory Oversight Report for Canadian Nuclear Power Generating Sites: 2024*
- *Regulatory Oversight Report for Uranium and Nuclear Substance Processing Facilities in Canada: 2024*

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<sup>1</sup> The Ottawa River, otherwise known as the Big River or Kichi-Sibi, has also been referred to in the Algonquin language as "Kichisipi", "Kichissippi", "Kitchissippi" and "Kichissippi"





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- *Regulatory Oversight Report for Uranium Mines and Mills in Canada: 2024*
- *Regulatory Oversight Report on the Use of Nuclear Substances in Canada: 2024*
- *Regulatory Oversight Report for Canadian Nuclear Laboratories Sites: 2024*

Upon reviewing the 2024 RORs, the AOO has identified our areas of interest within the 2024 RORs.

## **Regulatory Oversight Report for Canadian Nuclear Laboratories (CNL) Sites: 2024**

### **CYBERSECURITY**

#### **2.1.12**

#### **Security at Chalk River Laboratories (CRL)**

In this section of the report (2.1.12, page 19), there is mention of a cyber-security focus inspection that took place in 2023 at the Chalk River Laboratories CNL site, which is based on the unceded territory of the Algonquin people. The inspection resulted in 13 NNCs (Non-Compliance), which a corrective plan was put in place for these NNCs, and throughout 2024, 11 of the 13 NNCs were closed for CNL's Chalk River Site.

As the working relationship between the CNSC and the AOO strengthens, it's known that we continuously share information with each other via technological means (email, video conference, online funding applications, etc.). Technology is becoming increasingly relevant in terms of work here at the Algonquins of Ontario Consultation office and throughout all our communities.

Data sovereignty is a rapidly growing topic of discussion amongst many Indigenous communities. Data sovereignty is the right for First Nations communities & people to own, control, access and steward information collection about their people, lands, culture and traditional knowledge.

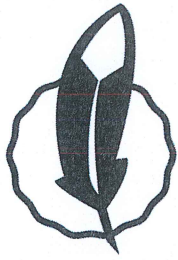
Having data sovereignty for First Nations communities helps protect their information from being altered by colonial perspectives, protects indigenous information from non-consensual sharing to third parties and gives First Nations governments, communities and organization less restricted access to their own information to better serve their community's needs.

#### **The AOO would like to ask this of the CNSC:**

If it's reasonable in terms of security reasons for the CNSC, CNL and the AOO, we would like to know more regarding the 2023 cyber security focused inspection, the 13 related NNCs, CNSC's points of interest during an inspection and an update on the 2 open NNC's.

Additionally, the AOO believes that it would be beneficial for the AOO and CNSC to have discussions about what data sovereignty means to us, the AOO and to the CNSC. As we





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continue to work more closely together on projects and other initiatives, more sensitive information will inevitably be shared between us digitally.

We want to ensure that the information shared between the CNSC and AOO, from both parties, is protected. We would like to propose that the 2026 AOO/CNSC workplan, have included that the AOO and CNSC will begin to discuss the topic of cybersecurity, data sovereignty and information sharing throughout the year and create areas of interest for cybersecurity to continue to discuss in the 2027 AOO/CNSC workplan.

## **CNL SITES FIRE PROTECTION & EMERGENCY MANAGEMENT**

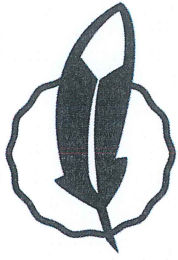
### **2.1.10**

#### **Emergency management and fire protection at Chalk River Laboratories (CRL)**

In this section of the ROR, it goes over the inspections done for the emergency management and fire protection safety control area (SCA) for the Chalk River Laboratories CNL site.

During the course of the 12 inspections, the CNSC issued 21 NNCs to CNL. The key themes for the inspection results (pulled from the CNL sites ROR) are:

- fire response equipment not being properly accounted for in the inventory and inspected, inventory list not being maintained
- inadequate levels of training for fire brigade members
- fire response crews not participating on the minimum number of fire response drills
- inadequate maintenance of qualification records for workers performing facility condition inspections
- undefined qualification requirements for workers who perform fire prevention inspections
- inconsistencies and inaccuracies in equipment inspection records
- lack of adequate sealing to maintain the integrity of the fire separation of fire compartments
- absence of functional latching hardware for some designated closures
- improper securing of compressed gas cylinders
- inadequate housekeeping procedure to minimize the probability and consequences of fires



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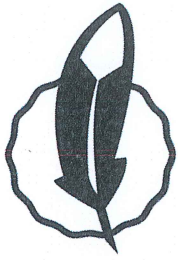
- instances where transient materials (combustible waste, compressed gas cylinders, and use of extension cords) were not appropriately minimized or controlled
- inappropriate materials stored in flammable cabinets
- obstructions in hallways reducing the width of the means of egress significantly
- missing signage for emergency exits and where to locate fire extinguishers
- out of date pre-incident plan and emergency procedure
- Exit Doors not in good working condition
- improper installation of a portable fire extinguisher
- target time for sustained intervention through the implementation of fire attack plans not being met
- ineffective communication between members of the industrial fire brigade during an emergency exercise
- inappropriate use of personnel protective equipment
- fire hazard assessments not maintained in accordance with requirements

## 2.2.10

### **Emergency management & fire protection at Whiteshell Laboratories (WL)**

The CNSC performed 4 inspections at Whiteshell Laboratories and issued 7 NNCs. The NNC's are related to:

- non-compliance with fire protection program audit requirements
- standard operating procedures for fire fighting lacking additional brigade members standing by to provide assistance or rescue
- absence of fire hazard assessment for the storage of nuclear substances within the Concrete Cannister Storage Facility
- lack of necessary oversight to monitor the implementation of procedures during impairments
- emergency response plans not being maintained as required



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- housekeeping practices not being effectively implemented to minimize the probability and consequences of fires
- non-compliance with pre-fire planning requirements

## 2.4.7

### Emergency management & Fire Protection at Douglas Point Waste Facility (DPWF)

One Inspection led to four NNCs. The NNC's are related to:

- inconsistencies in emergency equipment being properly inventoried, inspected, tested, and maintained in state of readiness at all times
- discrepancies between the building pre-incident plans and the location of equipment in the building, egress aisle obstruction, and missing updates of pre-incident plans to account for temporarily shuttered entrances
- absence of records for drills or exercises demonstrating that all emergency measures outlined in DPWF's emergency procedures have been tested
- no secondary means of communication for emergency notifications in the event of a radio failure

Directly below it states:

*"CNSC staff determined that the corrective actions taken by CNL to address these NNCs were acceptable and that the impact on the overall effectiveness of related programs was **negligible.**"*

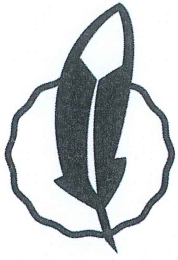
#### The AOO would like to ask this of the CNSC:

While the performance ratings for the three sections were satisfactory, we would like CNSC to elaborate on the inspections done and the corrective actions taken for the NNCs.

The AOO would like to learn more about the emergency management and fire protection SCA as the CRL site sits within the traditional unceded territory of the Algonquin. We want to ensure that the AOO's understanding of this SCA is as complete and comprehensive as possible to ensure the protection of our people, environment and related resources in the event of an incident.

The AOO would like to request either a brief timeline or document explaining the NNCs of higher importance given out during these inspections and the corrective actions taken.





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## **Moving Forward**

As the AOO and CNSC moves forward into the 2026 working year, we look forward to working with the CNSC and the CNSC indigenous engagement team on future projects. We appreciate the opportunity to consult on the 2024 RORs.

The AOO intends to continue to review the CNSC regulatory oversight reports every year from this point forward. Please find our contact information below.

Throughout the past year and some time, the AOO has developed a positive working relationship with the CNSC and the indigenous engagement team and would like to extend our thanks for everyone's hard work this year. We look forward to what the future has to bring.

Migweetch,

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Cultural & Nuclear Liaison

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