



CMD 26-M6.2

Date: 2026-01-27

**Written Submission from the
Alderville First Nation**

**Mémoire de la
Première Nation Alderville**

In the matter of the

À l'égard du

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

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

Commission Meeting

Réunion de la Commission

March 2026

Mars 2026



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January 28, 2026

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Alderville First Nation's submission on the Canadian Nuclear Safety Commission ("CNSC") CMD 26-M6 - CNSC Staff Submission-Regulatory Oversight Report on the Use of Nuclear Substances in Canada: 2024

Section	Text	Comment
Plain Language summary	Each year, CNSC inspectors conduct inspections at uranium mines and mills. The number and focus of inspections depends on the performance and operating status of the mine or mill.	Can more information be provided as to how performance and status determines the kind/frequency of inspections at each mine or mill?
5.3.1 Radiation protection SCA in the medical sector	Overall, the medical sector once again saw low ratings with 56% of inspections being given a satisfactory rating in this SCA. In 2024, 92% of inspections performed in the radiation therapy subsector achieved satisfactory ratings. Although no veterinary nuclear medicine licensees achieved a satisfactory rating in this SCA, due to the small number of inspections (only 2 in 2024),	<p>Why are these ratings so low and how long have they been this low for?</p> <p>Will veterinary nuclear medicine licensees have more inspections in the future given that the CNSC cannot draw conclusions about the sector at this time?</p> <p>What is being done to increase the number of satisfactory inspections?</p>



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	it is difficult to draw any conclusions about the subsector overall. The nuclear medicine subsector however only achieved a satisfactory rating in 51% of inspections in 2024.	
Future changes to rating and communicating license performance in the radiation protection SCA	The result is that the performance ratings presented in past RORs have inaccurately overstated the safety significance of non-compliances. To correct this miscommunication, CNSC staff have reviewed the risk-ranking of all line items (regulatory requirements) in the radiation protection SCA and have revised the rankings to more accurately reflect the risk.	It is stated that this action is not a “moving of the goal post”, but in the example, an unlabelled container of nuclear material warranting a citation that would cause the entire SCA to be below expectations is framed as unfair and not a high-risk situation. How is a mislabelled/unlabeled radioactive container not high risk in any case? All radioactive material has the potential to contaminate/cause harm, particularly in a medical situation. If this is not the case, please justify the reasoning.
5.6.1 Waste nuclear substance licensees	WNSLs are required to have specific programs in place to identify, control and monitor all releases of radioactive and hazardous substances and their effects on the environment.	This is very vague. What kinds of programs are required? Do the kinds of programs vary widely depending on what the licensee uses nuclear products for?
8 Reportable events	CNSC staff also have the authority to use escalated enforcement actions if an	At what point does the CNSC take legal action or fine licensees for not taking



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	event is deemed to pose an immediate risk to health and safety or the environment and the licensee does not appear to be taking appropriate corrective actions. CNSC staff may also consider enforcement actions or increased regulatory oversight when there are repeated events by the same licensee.	adequate action to correct issues? This seems ineffective given the high rates of non-compliance in this ROR where, even with adjusted regulations, around 20% of licensees would be below expectations for radiation protection.
8.1 Reportable events related to transport	Table 1: Summary of events related to the packaging and transport of nuclear substances Number of reports related to packages showing damage, tampering of leakage of its contents - 11	Can improvements be made to packaging and transport of nuclear substances to reduce this number? What would the improvements be?