

REQUEST FOR CONFIDENTIALITY

OF MATERIAL SUBMITTED IN RELATION TO CMD # [TO BE ASSIGNED]

IMPORTANT NOTE:

The purpose of the confidentiality request process is to seek a decision from the Commission as to whether specific information being presented to a Commission proceeding can be protected. Generally, material received as part of a matter before the Commission is made available to the public by default. The rule of confidentiality (i.e., Section 12 of the [CNSC Rules of Procedure](#)) is applied only if the Commission decides in favour of a request for confidentiality.

Restricted access to proceedings and related material is exceptional, proportional, and minimal, and is not imposed lightly. Therefore, and to minimize the possibility of a challenge to a confidentiality ruling, the Commission weighs any request for confidentiality against the criteria set out in Section 12 to confirm that:

- the importance of protecting the information outweighs the public interest in public hearings and disclosure of evidence; and
- the confidentiality measures would affect the public nature of the proceeding only to the extent necessary to adequately protect the given information.

In the interest of enabling a timely decision, any request for confidentiality must be accompanied by redacted versions of all documents named in the request, and/or adequately informative summaries that can be made available to participants and the public. **Please provide the appropriate versions, as applicable.**

It is the responsibility of the person making the request to provide an adequately detailed explanation as to how and why subrule 12(1) applies.

In the matter of:

License renewal of Nordion's facility at 447 March Road, Ottawa, Ontario

This request has been prepared in Canada, in the province of Ontario, in the matter of license renewal of Nordion's facility, scheduled for consideration in a Type of Proceeding: Commission hearing, scheduled for a time around June, 2025.

I, Richard Wassenaar, of 447 March Road, Ottawa, Ontario K2K 1X8, am an authorized representative of Nordion (Canada) Inc.. I understand that:

- documents and information (“the material”) provided to the Canadian Nuclear Safety Commission (“the Commission”) as part of a public proceeding may be made publicly available;
- the material is considered confidential only if it is prescribed information under the [Nuclear Safety and Control Act](#) (NSCA), as defined in section 21 of the [General Nuclear Safety and Control Regulations](#), or if the Commission takes measures to protect the information; and
- regardless of any request for confidentiality or approval of same, the material may be disclosed if the Commission is required by law to disclose it (for example, after a request under [Access to Information Act](#)).

I hereby request that the Commission take measures to protection the following information, pursuant to rule 12 of the [Canadian Nuclear Safety Commission Rules of Procedure](#):

Note: Where the request for confidentiality applies only to part of the submission, the portions to be deemed confidential must be clearly identified to distinguish them from any content that is non-sensitive.

TABLE 1: MATERIAL TO BE DEEMED CONFIDENTIAL			
	Item Name	Portion(s) to be Deemed Confidential	Reason for Request (details to be provided below)
1.	All documents referenced in Appendix A “List of Supporting Documentation” with the exception of “Corporate Profile Report.pdf”	<input checked="" type="checkbox"/> Entire content <input type="checkbox"/> Redacted content as shown	<input type="checkbox"/> The information is a matter of national or nuclear security <input type="checkbox"/> Disclosure of the information would likely endanger the life, liberty, or security of a person or person(s) The information is of a:

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	Item Name	Portion(s) to be Deemed Confidential	Reason for Request (details to be provided below)
			<input checked="" type="checkbox"/> financial, <input checked="" type="checkbox"/> commercial, <input type="checkbox"/> scientific, <input checked="" type="checkbox"/> technical, <input type="checkbox"/> personal (and the person has not consented to disclosure), or <input checked="" type="checkbox"/> other nature (processes), and is consistently treated as confidential.

This request is made pursuant to the following paragraph(s) of rule 12 of the [CNSC Rules of Procedure](#):

- 12(1) (b) the information is confidential information of a financial, commercial, scientific, technical, personal or other nature that is treated consistently as confidential and the person affected has not consented to the disclosure;

Further,

1. The above-noted material should be protected for the following reasons:

Nordion’s operating procedures and documents, listed in Appendix A of the renewal application and submitted in support of the renewal application, contain proprietary information and data that would result in an unfair competitive advantage by our competitors if released publicly. The information is treated as commercial confidential by Nordion. Nordion is a world leader in sealed source manufacturing and has spent significant time and money developing these procedures and documents. Release of the procedures to the public could allow third-party competitors to enhance their respective programs in direct competition with Nordion. The procedures and material are not available through any public sources.

“Corporate Profile Report.pdf” is a publicly available document and maybe released to the public with the renewal application.

- I have included a **summary** or **redacted** version of the material that provides adequate detail to satisfy the public interest in public hearings and disclosure of evidence. This is provided as Attachment 3 of the renewal application.
- I understand that if this request is not approved by the Commission, I may withdraw the associated material within five business days of receiving written notice of the Commission’s decision from the Commission Registrar (except as noted in items 5 and 6, below).
- Notwithstanding item 4, above, I understand that if submission of the material is required pursuant to reporting requirements under the [NSCA](#) or the regulations under the NSCA, or pursuant to a licence issued under the NSCA, or if the material is specifically requested by the Commission, it may **not** be withdrawn.
- I understand that upon receipt of this request, the Commission Registrar will treat the material that is subject to this request as confidential unless and until the Commission makes a ruling to deny this request.

Attachments:

- Appendix A, 'List of Supporting Documentation'

Authorized signature:

Richard Wassenaar, Director EHS & Regulatory

May 15, 2024

Date