



CMD 26-M3.5

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 for Uranium
Mines and Mills in Canada: 2024**

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

Commission Meeting

Réunion de la Commission

March 2026

Mars 2026



ALDERVILLE FIRST NATION

11696 Second Line Road
 Roseneath, Ontario K0K 2X0
 Phone: (905) 352-2011
 Fax: (905) 352-3242
www.alderville.ca

Chief: Taynar Simpson
 Councillor: Lisa McDonald
 Councillor: Jason Marsden
 Councillor: Amber Crowe
 Councillor: Kassie McKeown
 Councillor: Joanne Smoke

January 28, 2026
 CNSC Commission Registry
Interventions@cnsccsn.gc.ca
 PFP inbox: pfp@cnsccsn.gc.ca

Alderville First Nation's submission on the Canadian Nuclear Safety Commission ("CNSC") CMD 26-M3 - CNSC Staff Submission-Regulatory Oversight Report for Uranium Mines and Mills in Canada: 2024

| Section | Text | Comment |
|------------------------|---|---|
| Plain language summary | In 2024, CNSC staff performed a total of 27 inspections across the 5 operating mines and mills and found 114 non-compliances. All of these were of low safety significance. While the number of non-compliances is higher than some past years, this is largely due to changes to the CNSC's inspection practices, for instance, larger inspection teams. The licensees are required to fix these non-compliances and address all the concerns raised during the inspections. CNSC staff track these items to completion. | <p>What are the criteria for non-compliance to be of low safety significance?</p> <p>What other ranks of significance are there and how do responses by the regulator change?</p> <p>Do timelines to address non-compliance change depending on the nature of it?</p> |



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| 3.2.3 Events | On March 12, approximately 100 m3 of treated effluent was released from the industrial water pipeline underground. Soil and water samples were collected and analyzed. Contaminated materials were deposited in the Key Lake Operation Above Ground Tailing Management Facility (AGTMF). Corrective actions are still being implemented and reviewed by CNSC staff. | What methods were used for soil and water sampling? Are there any updates on the condition of the groundwater and soil in this area? |
| 3.2.3 Events | On December 27, Cameco reported an increase in seepage flow rates from reservoirs #1 and #2 to the underdrain system. This event was reclassified as a reportable discharge due to the potential impacts to surrounding groundwater. Laboratory analysis completed on groundwater samples did not indicate a change in historical water quality. Corrective actions are still underway including ongoing monitoring and a geotechnical review of the reservoir facility. | Are there any updates on the groundwater affected by this spill? What methods were used and what were the testing intervals? |
| Treated Effluent Released to the Environment | Figure 4.9.2 shows the number of reportable spills for uranium mine and mill | Why does the number of spills (specifically Radium- |



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| | <p>facilities during the 2020 to 2024 reporting period. In each case, CNSC staff reviewed and evaluated the licensee's actions to verify effective remediation and prevention and were satisfied with actions taken by the licensee. CNSC staff rated all 2024 spills as low safety significance resulting in no residual impact on the environment.</p> | <p>226 and Molybdenum) increase over time?</p> <p>Since there seems to be a general increase in both spills and releases since 2020, what is being done to bring these numbers back down again?</p> |
| 5.1 Indigenous consultation and engagement | <p>The common-law duty to consult with Indigenous Nations and communities applies when the Crown contemplates actions that may adversely affect potential or established Indigenous and/or treaty rights. The CNSC ensures that all its licensing decisions under the NSCA uphold the honour of the Crown and uphold Indigenous peoples' potential or established Aboriginal and/or treaty rights pursuant to section 35 of the Constitution Act, 1982.</p> | <p>Upon implementation, FPIC and UNDRIP should be mentioned in this section. FPIC is a core principle within UNDRIP that requires consultation with Indigenous peoples to obtain their consent before approving projects affecting their lands, territories, and resources, all of which are directly impacted by the activities mentioned in this ROR.</p> |