



CMD 26-M7.1

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
and Nuclear Substance Processing
Facilities in Canada: 2024**

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

Commission Meeting

Réunion de la Commission

March 2026

Mars 2026



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January 28, 2026

CNSC Commission Registry

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Alderville First Nation's submission on the Canadian Nuclear Safety Commission ("CNSC") CMD 26-M7 - CNSC Staff Submission-Regulatory Oversight Report for Uranium and Nuclear Substance Processing Facilities in Canada: 2024

Section	Text	Comment
2.1 Cameco Blind River Refinery	The facility is located within the Robinson-Huron and Robinson-Superior Treaties territory and the traditional territory of the Anishinabek, Métis and Odawa peoples, in particular the Mississauga First Nation.	This sentence implies that the Blind River Refinery is located on Metis traditional and treaty territory. The Metis have no such treaties or land rights in Ontario and suggesting so undermines rights-holding First Nations.
5.9 Environmental Protection	Licensees conduct internal audits of their programs at least once a year. As part of regular compliance verification, CNSC staff review and assess these objectives, goals, and targets.	Does any other party conduct these audits if environmental issues persist (releases of radioactive and hazardous substances exceeding regulations)? How does the CNSC prevent conflict of interest other than reviewing their environmental programs?
Environmental risk assessment	Facility ERAs are to be reviewed on a 5-year cycle or more frequently if major facility changes are	5 years is an incredibly long time to not monitor a facility's ERA given the frequency of NNCs that are



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	proposed that would trigger a predictive assessment.	warranted in this report and the dangerous properties of radioactive materials. If a facility continuously gets NNCs, does it trigger more frequent ERA reviews?
Action levels	Licensee performance is not evaluated on the number of action level exceedances in a given period, but rather on how the licensee responds and implements corrective actions to enhance program performance and prevent reoccurrence. Licensees are required to periodically review their action levels to validate their effectiveness.	To clarify, the only consequences for repeated exceedances are an internal review? What occurs if licensees exceed action levels significantly before addressing the issue?