



Supplementary Information

Presentation from the Ya'thi Néné Land and Resource Office

In the Matter of the

Orano Canada Inc. – Cluff Lake Project

Application for the renewal of the Uranium
Mine Decommissioning Licence for the
Cluff Lake Project

Commission Public Hearing

May 15, 2019

Renseignements supplémentaires

Présentation de Ya'thi Néné Land and Resource Office

À l'égard d'

Orano Canada Inc. – Projet de Cluff Lake

Demande de renouvellement du permis
de déclassement de la mine d'uranium de
Cluff Lake

Audience publique de la Commission

Le 15 mai 2019

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Yá thi Néné Land and Resource Office

In the Matter of;

Application for the renewal of the Uranium
Mine Decommissioning Licence for the
Cluff Lake Project

May 15th, 2019

Yá thi Néné Land and Resource Office

- Yá thi Néné has reviewed submissions from both Orano and the CNSC regarding Orano Canada's Cluff Lake Project; *Application for the renewal of the Uranium Mine Decommissioning Licence for the Cluff Lake Project.*
- Yá thi Néné offers the following recommendations to the Commission in response to the *Application*;



Recommendations;

1. Accept the proposal to renew the licence issued to Orano Canada, with a conditions period of five years, with the intention to transfer the Cluff Lake site to the Province of Saskatchewan under the Institutional Control Program (IPC)
2. Accept the proposed Detailed Post-Decommissioning Plan, and associated details of the Detailed Decommissioning Plan
3. Accept the new licensed area
4. Accept the revised financial guarantee of C\$3.5 million for the Cluff Lake Project



Accept the proposal to renew the licence issued to Orano Canada Inc.

- Ya'thi Néné believes the ultimate goal of decommissioning is the successful transition of land back to its natural state, supporting all traditional land practices
- Ya'thi Néné acknowledges the Cluff Lake project is a decommissioned site and Orano has met the objectives identified in the Detailed Decommissioning Plan
- Ya'thi Néné supports Orano's request to eventually transfer the Cluff Lake site to the Provincial Institutional Control Program



Accept the proposed Detailed Post-Decommissioning Plan

- With the Detailed Decommissioning Plan (DDP) objectives completed throughout 2017/2018, it would make sense for the Cluff Lake project to transition into a state of post-decommissioning
- Orano must continue to monitor and inspect the Cluff Lake site, and report results to the CNSC and the Province of Saskatchewan as agreed to under their management system



Accept the proposed new licence area

- Ya'thi Néné supports Orano's proposal that areas of land with completed decommissioning planned for future transfer to the Provincial ICP are proposed to remain within the CNSC licence
- Ya'thi Néné also supports Orano's proposed parcels of land to be removed from the future licence, as interest in these parcels of land have been reduced over time



Accept the revised financial guarantee of \$C3.5 million for the Cluff Lake project

- Ya'thi Néné supports the proposed 5-year time frame for Orano to prepare to transfer the Cluff Lake site into Provincial ICP
- The proposed C\$3.5 million financial guarantee appears to be sufficient to support long-term monitoring and maintenance of the Cluff Lake site. Adequate financing is critical to ensure a satisfactory level of protection and sustainability



Additional points for consideration;

1. Document review and submission process
2. Tailings Management Area (TMA)
3. Indigenous Engagement



Document review and submission process

- The timeline to create and submit a report to the Commission regarding the Application for a Licence renewal allowed only 30 days for review and submission
- This timeframe does not permit Ya'thi Néné an adequate amount of time to collaborate with stakeholders throughout Northern Saskatchewan



Tailings Management Area (TMA)

- The Tailings Management Area (TMA) has long been a point of discussion in regards to the Cluff Lake site
- Based on information provided from Orano and CNSC staff, Ya'thi Néné is aware that measures have been taken to decommission the TMA and it's associated infrastructure



Indigenous engagement

- It is important to be engaged on the topic of decommissioning as it directly relates to restoring natural process and traditional ways of life to the land, water, air, and ecosystems
- The Athabasca Denesuline have other historical experiences in Northern Saskatchewan where decommissioning hasn't been sufficient
- Ya'thi Néné is of the opinion that the successful decommissioning of the Cluff Lake site was achieved through a collaborative approach that saw industry and community working together with the shared goal of returning the land back to a pre-development state
- The importance of meaningful consultation is critical, and Ya'thi Néné expects that meaningful consultation will continue into the future



Closing Remarks

- Yá thi Néné is satisfied with the level of communication between the CNSC and our office
- This transfer of knowledge is critical in ensuring all people of the Athabasca Basin are meaningfully informed with regards to the ongoing operations within the region

