



**Written submission from the
Saskatchewan Mining Association**

**Mémoire de l'Association minière de
la Saskatchewan**

In the Matter of the

À l'égard de

Beaverlodge Project

Site Beaverlodge

Application to amend the Waste Facility
Operating Licence to allow for the removal
of 20 properties at the Beaverlodge Project
from its licence

Demande pour modifier le permis
d'exploitation d'une installation de gestion
des déchets pour permettre le retrait de
20 propriétés du site Beaverlodge de son permis

Commission Public Hearing

Audience publique de la Commission

October 2, 2019

Le 2 octobre 2019

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laissée en blanc*

August 12, 2019

Senior Tribunal Officer, Secretariat
Canadian Nuclear Safety Commission
280 Slater Street
P.O. Box 1046, Station B
Ottawa, Ontario K1P 5S9

via e-mail: cncs.interventions.ccsn@canada.ca

RE: SMA Written Intervention - Amend the Beaverlodge Waste Facility Operating Licence to allow removal of 20 properties from CNSC licensing

The Saskatchewan Mining Association (SMA) is the voice of the mining industry in Saskatchewan and has the role of liaison and consultant with government and public to ensure the safe, profitable and orderly development of the mineral resources of the province. Environmental protection and stewardship are important to the members of the SMA as shown by their commitment to environmental planning, monitoring, compliance and reclamation. Our members are also among the largest industrial employers of Indigenous people in Canada. The SMA represents over 35 member companies including producers and exploration companies. Our mission is to advance a safe, sustainable and globally competitive exploration and mining industry in Saskatchewan that benefits all residents of the province.

The SMA is providing this intervention in support of the federal and provincial regulatory process that recognizes decommissioning has an end-state, founded on the importance of agreed closure and post-closure commitments, that provides proponent and stakeholder certainty. There are requirements and expectations on the mining industry to plan, design, communicate, complete, and verify that decommissioning works will provide long-term ecosystem integrity. It is important that the regulatory framework, within which decommissioning takes place, provides certainty for proponents and stakeholders.

Cameco Corporation (Cameco) has demonstrated that the current condition of the 20 properties requested for licence release have met the established performance objectives of being safe, secure, stable/improving and have shown that these properties pose minimal risk to public safety or to the local environment. The SMA therefore supports the request to release these properties from licensing by the Canadian Nuclear Safety Commission (CNSC). We understand that Cameco intends to apply to transfer responsibility for 19 of these properties to the Province of Saskatchewan under the Institutional Control (IC) program established by Saskatchewan's *The Reclaimed Industrial Sites Act* and free-release the remaining property based on the presence of historical mining/milling activities.

The SMA is supportive of the IC program as well as the criteria to free-release properties based on the presence of historical mining/milling activities. We believe that provincial IC is reliable, robust, and provides greater certainty to current and future generations and industry, and that mining in Saskatchewan can be safe, sustainable, and globally competitive.

The SMA encourages the continued collaboration of the CNSC and the Saskatchewan Ministries of Environment and Energy and Resources as Saskatchewan uranium mining projects advance towards and achieve final closure, including future requests for CNSC de-licensing and transfer to IC.

We would like to thank you for the opportunity to share our views on and indicate our support for Cameco's application.

Yours Sincerely,



Brad Sigurdson
Vice President – Environment, Safety and Regulatory Affairs

cc Liam Mooney - Vice-President, Safety, Health, Environment & Quality and Regulatory Relations (Cameco)
Kevin Nagy - Director, Compliance and Licensing (Cameco)
Kent England - Manager, Environment and Licensing (Cameco)
Mike Webster – Senior Specialist, Reclamation (Cameco)
Richard Snider - Senior Project Officer (CNSC)
Pam Schwann – President (SMA)