



File / dossier : 6.01.07

Date: 2019-08-30

Edocs: 5984430

**Written submission from the  
Athabasca Joint Engagement and  
Environmental Subcommittee**

**Mémoire de l’Athabasca Joint  
Engagement and Environmental  
Subcommittee**

In the Matter of the

À l’égard de

**Beaverlodge Project**

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

**Site Beaverlodge**

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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 28, 2019

Jerilyn Benonie  
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Re: Intervention letter on amending the Beaverlodge Waste Facility Operating Licence to allow removal of 20 properties from CNSC licensing

Senior Tribunal Officer:

On behalf of the Athabasca Joint Engagement and Environmental Subcommittee (AJES), I am pleased to provide a written intervention for the upcoming hearing (October 2, 2019) regarding proposed amendments to the Beaverlodge Waste Facility Operating Licence that will allow for the removal of 20 properties from CNSC licensing.

The AJES is a subcommittee that flows from the Ya'thi Néné Collaboration Agreement<sup>1</sup> (CA). AJES members are the primary liaisons between Cameco Corporation (Cameco), Orano Canada (Orano), the Athabasca First Nations and Athabasca communities for the sharing of environmental monitoring and other environmental information and act as the first point of contact for Cameco and Orano with respect to community engagement matters. As the local experts, the community AJES representatives play an important role for the companies by providing advice, based on interest and need, regarding community engagement strategies. As a representative of the Athabasca communities, I have been an active member of the AJES since inception in 2016 when the Agreement was signed and I continue to be an active member of the AJES.

The AJES meets at a minimum of four times per year and consists of the following members:

- 1 representative from Cameco
- 1 representative from Orano
- 1 representative from the Athabasca First Nation of Black Lake
- 1 representative from the Athabasca First Nation of Hatchet Lake
- 1 representative from the Athabasca First Nation of Fond du Lac

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<sup>1</sup> The Parties to the Ya'thi Nene Collaboration Agreement are: Cameco Corporation, Orano Canada Inc., Black Lake First Nation, Hatchet Lake First Nation, Fond du Lac First Nation, the community of Stony Rapids, the community of Uranium City, the community of Camsell Portage, and the community of Wollaston Lake.

- 1 representative from each of the Athabasca municipalities (Uranium City, Camsell Portage, Stony Rapids, Wollaston Lake)

The Ya'thi Néné Lands and Resource Office was also created at the time of the Agreement for the benefit of the Athabasca Basin communities. This office has a broad mandate, which also includes the promotion and enhancement of the environmental health of the Athabasca Region. As this important environmental mandate is congruent with the AJES, one of the other members on the AJES is:

- The executive director of the Ya'thi Néné Lands and Resource Office

Prior to the implementation of the CA, Cameco maintained a long standing relationship with the Athabasca communities. For over two decades, Cameco has engaged with Athabasca residents through subcommittees such as the Athabasca Working Group, the Environmental Quality Committee and through direct communication with community members and leadership.

A key role of the AJES is to review the Community-Based Environmental Monitoring Program (CBEMP). This independent monitoring program was formerly known as the Athabasca Working Group (AWG) environmental monitoring program, which conducted monitoring throughout the Athabasca Basin. The AWG program was a big success, and since its initiation in 2000, routinely demonstrating that samples collected near the Athabasca communities, including Uranium City, are not influenced by the active uranium mining and milling activities conducted in the region.

Moving forward, the AJES has agreed with a change to the previous AWG monitoring program study design. Initiated in the winter of 2018, the CBEMP focuses on a single community area per year to conduct a dietary food survey and associated monitoring. The benefit of the CBEMP is that the communities will have a specific, focused study that reflects what they eat, how much they eat, and the general location of the food. Accompanying the dietary food survey will be a sampling program which will collect and test water, fish and wildlife samples from areas identified by community members.

Also recognised by the AJES is the Eastern Athabasca Regional Monitoring Program (EARMP). AJES is aware that EARMP data has been used to inform a Country Food Study that assessed potential human health risks associated with the consumption of country foods gathered in the Uranium City/Beaverlodge area by local residents. The study encouraged community engagement through interviews as well as through voluntary sample submission of wildlife or plants collected by community members. Results of this study also found that traditional harvesting of country foods do not present health risks to residents of Uranium City.

Community members are encouraged to bring forward any questions or concerns about the active or historic uranium operations and the environment to their community AJES representatives. The AJES members are regularly invited to Uranium City public meetings where any such questions and concerns can be brought forth and discussed. The Beaverlodge public meetings have been informative regarding ongoing or completed activities as well as the Institutional Control program and regulatory processes. Discussions are encouraged throughout the meetings and subsequent property tours. During these public meetings, Cameco has also presented information regarding

the 20 properties, subject to the upcoming hearing, and demonstrated that they have met the established performance objectives of safe, secure and stable/improving as well as pose minimal risk to public safety or to the local environment. It is understood that Cameco intends to transfer 19 of these 20 properties to the Institutional Control program and free-release one based on the presence of historical mining/milling activities and we are in support of this application.

Sincerely,



Jerilyn Benonie, AJES - Hatchet Lake Denesuline First Nation

cc. Georgie McDonald AJES - Fond du Lac Denesuline First Nation  
John Toutsaint, AJES - Black Lake Denesuline First Nation  
Denise Bougie, AJES – Athabasca Municipalities  
Garrett Schmidt, AJES - Ya'thi Néné Lands and Resource Office  
Glenn Lafleur, AJES – Orano  
Kristin Cuddington, AJES - Cameco