



Oral Presentation

Exposé oral

**Written submission from the
Ya'thi Néné Land and
Resource Office**

**Mémoire de
Ya'thi Néné Land and
Resource Office**

In the Matter of the

À l'égard de

**Cameco Corporation,
Cigar Lake Operation**

**Cameco Corporation,
établissement de Cigar Lake**

Application for the renewal of Cameco's
uranium mine licence for the Cigar Lake
Operation

Demande de renouvellement du permis de mine
d'uranium de Cameco pour l'établissement de
Cigar Lake

Commission Public Hearing

Audience publique de la Commission

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MARCH 29, 2021



YA'THI NÉNÉ LAND AND
RESOURCE OFFICE INTERVENTION
APPLICATION FOR THE RENEWAL OF COMECON'S URANIUM
MINE LICENSE FOR THE CIGAR LAKE OPERATION

YA'THI NÉNÉ LAND AND RESOURCE OFFICE

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1.0 Introduction

The Ya'thi Néné Land and Resource Office (YNLR) have a participant funding agreement with the Canadian Nuclear Safety Commission (CNSC) to provide an intervention on Cameco's Cigar Lake Mine Relicensing Submission (the "License Renewal Submission"). The Cigar Lake License Renewal is a significant undertaking that impacts the rights of Athabasca Basin members.

1.1 Document Timeline and Submission

YNLR received confirmation on January 15th, 2021 that they would receive funding from the Participant Funding Program (PFP) Contribution Agreement through the CNSC. YNLR received the Commission Meeting Documents (CMD) on Friday February 5th, 2021. Following this, YNLR did the following:

- began a technical review of the License Renewal Submission;
- reviewed past intervention submissions regarding Cigar Lake;
- conducted a desktop analysis of the site around Cigar Lake Mine (Cigar Lake);
- conducted a legal review;
- completed a limited number of impacted land user interviews, and conducted virtual engagement sessions with community leadership, YNLR Board of Directors, and the Athabasca Land Protection Committee (ALPC); and
- had CNSC provide a summary of the license review that allowed time for any questions and concerns to be voiced.

YNLR is providing this submission on behalf of its member communities. The deadline for submission was extended for YNLR to March 29th, 2021, with a subsequent submission to be made prior to April 14th, 2021 to provide additional time to incorporate the views of Fond du Lac Denesūliné First Nation following the current Chief and Council election for that First Nation.

As a preliminary issue, YNLR submits that the timeframe of approximately three months (without extensions) allotted for the intervention submission process does not provide enough time for adequate consultation to take place with the affected rights holders. This is exacerbated by the ongoing COVID-19 pandemic and the timing of the request in relation to election cycles for the First Nations.

1.2 Intervention Outline

Our intervention provides an overview of YNLR and the Athabasca Denesūliné including the culture, history, way of life and their dependence on the barren-ground caribou herds, other wildlife, and the lands and waters within Nuhenéné (traditional territory). The intervention will then outline the key issues voiced by Nuhenéné leadership and members, including a legal review of the adequacy of the CNSC consultation process. Finally, we identify our initial recommendations to the Commission. A subsequent submission will be filed on or before April 14, 2021.

2.0 Ya'thi Néné Land and Resource Office

YNLR works to protect the lands and waters of the Athabasca Basin for the long-term benefits of its member Denesų́liné First Nations and Athabasca communities, guided by their knowledge, traditions, and ambitions, while being a respected partner in relations with industries, governments, and organizations who seek to develop the Athabasca Basin's resources. YNLR has an independent board of directors that are appointed by the elected community leaders and operate four offices (Saskatoon, Fond du Lac, Black Lake and Hatchet Lake) with 12 staff. YNLR supports the implementation of the Collaboration Agreement (CA) with Cameco and Orano on behalf of the seven Athabasca Basin communities among other land and resource related initiatives. YNLR works to protect the land and promote the interests of the people in the Athabasca Basin and is the sole organization who represents the collective views and concerns of Denesų́liné First Nations and Athabasca communities within Nuhenéné in Saskatchewan.

YNLR participates as either a member or observer on several committees established through the CA including the Joint Implementation Committee (JIC), Business Advisory Committee (BAC) and the Athabasca Joint Environmental Subcommittee (AJES). Community representatives are also appointed to each respective committee. As a member of AJES, YNLR participates in quarterly meetings and various activities throughout the year from exploration to decommissioning with respect to Cameco and Orano sites. The operation of these committees is currently under review through a 5-year review process under the CA.

3.0 The Athabasca Denesų́liné and Nuhenéné

The Black Lake, Hatchet Lake, and Fond du Lac Denesų́liné First Nations are collectively termed the Athabasca Denesų́liné. Fur traders originally referred to the Denesų́liné as the Northern Indians and later as the Caribou Eaters or Ethen-eldèli.¹ They have also been called Chipewyan; a name they find offensive since it was given to them by their traditional enemies the Cree. In recent times they have moved away from both terminologies, preferring the term Denesų́liné meaning “the Real or Genuine People”, a term their ancestors used to define themselves. They belong to the Athapaskan language family.

The Athabasca Denesų́liné signed either Treaties #8 or #10 with the Crown in the late 19th and early 20th century. The Cigar Lake Mine Operation is within Treaty 10 and is near the boundaries of Treaty 8.

3.1 Nuhenéné

Athabasca Denesų́liné culture, history and way of life are interwoven with the movements and health of the Beverly, Ahiak, Bathurst and Qamanirjuaq barren-ground caribou herds. They are so intrinsically tied that is often stated that Caribou are Dene; Dene are Caribou, with ancient stories that explain and reinforce this belief.²

¹ Smith, J.G.E. 1981. Chipewyan in the handbook of North American Indians Volume 6 Subarctic. June Helm, Editor. Smithsonian

² Kasstan, S.C. 2016. Caribou is Life: An Ethnoarchaeology of Ethen-Eldèli Denesų́liné Respect for Caribou. Simon Fraser University

Every year, the barren-ground caribou migrate down into Nuhenéné, the traditional territory of the Athabasca Denesų́liné, for shelter and food. During this time, the communities begin their yearly harvest. The communities start harvesting caribou in December when they enter the boreal forest, and the hunt continues until the caribou migrate back north to the calving grounds in the barren lands above the treeline. The migration north begins in March and continues until mid-May.

Where there are barren-ground caribou, there are Athabasca Denesų́liné. This has been true for at least 2600 years. The attached map produced by the Beverly-Qamanirjaq Caribou Management Board (BQCMB) (Appendix A: Figure 1) shows the range of the barren-ground caribou. Since the range is large, portions of their traditional territory are shared with other Indigenous Peoples. The range of the barren-ground caribou fluctuates due to natural cycles, and impacts due to climate changes, forest fires, development, and other reasons.

While we talk about caribou being the lifeblood of the Athabasca Denesų́liné, it must be remembered that the range of the caribou defines the extent of their territory and it is within that area their members have or assert Aboriginal or treaty Rights and conduct many on-the-land activities beyond the harvest of caribou.

3.2 Existing Athabasca Denesų́liné Traditional Knowledge, Land use and Occupancy Studies

YNLR possesses a database that summarizes the traditional land use and occupancy from various studies dating back to 2002. The data from these studies show the extensive pattern of known travel routes, burial sites, and overnight sites around which hunting, fishing, trapping, gathering, and cultural activities occur. This data is compiled in a traditional land use and occupancy database with over 50,000 points of information for Nuhenéné within the province provided by more than 450 community members. It is important to note that this is not a complete description of Athabasca Denesų́liné land use, but it reflects the uses and values of the individuals who participated. Naturally, the traditional land use that Basin residents have shared is just a sample of the actual land use of the Athabasca Denesų́liné.

3.3 Nuhenéné and Uranium Industry

Athabasca Basin communities have had a long relationship with the uranium industry throughout Nuhenéné. The relationship has evolved from no participation and significant impacts to treaty rights to the current day Collaboration Agreement (CA). Committees and programs have been implemented through the CA, including the Community Based Environmental Monitoring Program (CBEMP) and the Eastern Athabasca Regional Monitoring Program (EARMP) that monitor country foods to see that they are safe to consume and water quality meets regulatory requirements.

The CA has brought some certainty and defined benefits to the Athabasca Basin communities. The CA provides for the express support of the Athabasca Basin Communities for the continued operation of Cameco and Orano's mines, mills, and exploration sites throughout portions of Nuhenéné all in return for benefits to the communities. The Athabasca Basin communities appreciate the benefits that have flowed from the CA including community investment, workforce

development and business contracts, and expressly support the renewal of Cameco's license for Cigar Lake.

However, it's important to acknowledge and for the commission to understand that impacts have occurred and continue to occur and that there are still concerns among community members and leaders.

4.0 Issues of Concern

Throughout this consultation process, and from past YNLR interventions to the CNSC, there are common concerns that have been voiced and have yet to be addressed. Based on past experiences with the CNSC, many people in the Athabasca Basin communities believe that the CNSC does not fully understand or appreciate the impacts that have occurred and continue to occur as a consequence of uranium mining in the Basin.

As well, community leadership and members continually voice their concern over the engagement and consultation process in respect of the Cigar Lake Mine Operation. There is support for the relicensing application, but there is also a desire to see the CNSC play a more active role in engaging with community members, and for both Cameco and the CNSC to more fully involve Elders, land users and other groups in this work.

4.1 Impacts

Throughout the review of the License Renewal Submission, YNLR has conducted discussions with land user, Elders, and held meetings with Community Leadership, YNLR Board of Directors, and the Athabasca Land Protection Committee (ALPC).

In our desktop analysis of a 60-kilometer radius around the Cigar Lake Mine Operation, there were 143 community members that provided information about 6,395 traditional knowledge, land use and occupancy features. These land use activities consist of harvesting of barren-ground caribou, black bear, woodland caribou, moose, ducks, muskrat, geese, wild chicken, collected eggs, fishing, trapping of rabbit and beaver, collecting of wild berries, clay, soil, rocks, food plants, special plants, and special woods.

Impacts attributed from our discussions concerning the Cigar Lake Mine Operation were voiced, and direct quotations or summaries of their concerns are provided below:

1. Concerns over water quality and the downstream impacts from the multiple mining operations, including Cigar Lake Mine Operation. These concerns are so great for some community members that they have switched to store bought water.
2. Concerns of health impacts on residents from the mines in the region associated with cancer rates.
3. Concerns about the off-site related impacts that are connected to Cigar Lake including but not limited to, impacts from roads and exploration activities on wildlife (e.g., Barren-Ground Caribou), increased land disturbance, and risk to water quality.
4. "The land will be demolished and not the same ever again. They will not replace what is broken. They will have destroyed the landscape and they cannot get that back."
5. "I do not know if it is the radiation, even the wolf had attacked human, and they do not usually attack people."

- a. In reference to, the wolf attack at Cigar Lake and concerns of the impact that the operation has on wildlife.
6. “The environment will not be the same in a good way.”
7. “Even if we voice our concern they don’t listen.”
8. “There is a lot of exploration that is affecting my trapline now, where we go there is a lot of exploration going different places, North, East, West, and our trapline is all around Cigar lake... my traplines are affected by cutlines.”
9. “It is that road they built is probably the reason why the animals and fur trapping area is declining. We do not get to the amount we used to get; things are so different.”

These issues concern Cigar Lake Mine Operation, but extend to other site operations (Rabbit Lake, McClean Lake, Beaverlodge) and their cumulative impact on the treaty rights to the land and water of the Athabasca Denesųliné. While some of these issues and impacts may not be new, they are still very present and remain unresolved.

The concerns and quotes identified are sincere and deep-seated beliefs and perspectives from many community members and leaders. These issues need to be addressed through deeper more meaningful communication and consultation as well as more active participation by community members in studies and environmental monitoring.

While there have been discussions and information sharing between Athabasca Denesųliné and Cameco over the course of many years in relation to Cigar Lake, it is clear that there is much more work to be done.

Community members continue to express concerns about ongoing impacts. This illustrates the need for all parties to continue addressing these concerns and mitigating these impacts. For Cameco, there are processes in place under the CA to advance those discussions. These processes are currently subject to review, and may be revised through the 5-year review process under the CA.

A key outstanding issue for the communities and the YNLR is how the CNSC should be engaging on these issues. YNLR believes that the CNSC – as the regulatory body responsible for ensuring adequate consultation and accommodation on the part of the Crown - must also play a more active and supportive role in addressing community concerns and mitigating the cumulative impacts of development.

4.2 The Duty to Consult and Accommodate

YNLR notes that the Duty to Consult and Accommodate (“DTCA”) is an essential feature of the protection of Aboriginal and treaty rights provided in section 35 of the Constitution Act, 1982. The purpose of section 35 is Crown-Aboriginal reconciliation. The DTCA is intended to advance that purpose. This has been set out by the Supreme Court on a number of occasions.³ When the Crown is aware of proven or asserted Aboriginal or treaty rights, and contemplates conduct that

³ See e.g.: *Haida Nation v. British Columbia (Minister of Forests)*, [2004] 3 S.C.R. 511 and *Mikisew Cree v. Canada*, [2005] 3 S.C.R. 388.

may affect those rights, the Crown has a constitutional duty to consult affected Aboriginal peoples and reasonably accommodate them to address their concerns.

The content of the DTCA continues to evolve through the courts and under policies adopted by Crown governments. The Supreme Court recently confirmed that appropriately empowered regulatory bodies (such as the CNSC) that exercise final decision-making play a significant role in ensuring that the DTCA owed to Indigenous rights-holders is honourably discharged.⁴

The content of the DTCA will also be informed by changes in federal and provincial laws. On December 3, 2020, the federal government tabled Bill C-15. Bill C-15 is the federal government's mechanism for fulfilling Canada's commitment to implement the United Nations Declaration on the Rights of Indigenous Peoples ("UNDRIP" or the "Declaration") as a framework for reconciliation in Canada. Bill C-15 is intended to provide a framework for the Government of Canada's implementation of the Declaration, including mechanisms to ensure that the rights of Indigenous peoples that the Declaration affirms are protected and promoted.

YNLR notes that the Declaration contains a number of provisions relevant to the development and use of lands and resources and the responsibilities of the CNSC as a Crown entity, including Article 32:

Article 32

1. Indigenous peoples have the right to determine and develop priorities and strategies for the development or use of their lands or territories and other resources.

2. States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources.

3. States shall provide effective mechanisms for just and fair redress for any such activities, and appropriate measures shall be taken to mitigate adverse environmental, economic, social, cultural or spiritual impact.

YNLR notes with concern the CNSC's conclusions with respect to the relicensing application:

CNSC staff noted in their review of Cameco's application (Page 72 – Section 4.1.2), that "As Cameco is currently not proposing any changes to its Cigar Lake facility and operations, CNSC staff conclude that a licence renewal for the CLO will not cause any adverse impacts to any potential or established Indigenous and/or treaty rights."

Such an approach ignores the evidence. CNSC is assuming that the mere fact of an existing license means that there is no possibility that continued operations will not result in "any adverse impacts." The CNSC is pre-determining that only "changes" to the facilities and operations could result in

⁴ *Clyde River (Hamlet) v. Petroleum Geo-Services Inc.*, 2017 SCC 40.

impacts. CNSC is assuming that any issues have been resolved, and that the terms and conditions, mitigation measures, or other promises to the Athabasca Denesų́liné (or Basin Communities) associated with previous mine licences are meeting their intended goals. Yet, the Athabasca Denesų́liné have continued concerns.

In the face of the evidence of reasonable concerns identified by the Athabasca Denesų́liné, the CNSC’s conclusion regarding the DTCA cannot be sustained. DTCA is clearly triggered by the Crown’s consideration of Cameco’s application to renew its license for the Cigar Lake mine.

While the Athabasca Denesų́liné and the Athabasca Basin communities support the renewal of the license without delay, YNLR notes that the Project and the anticipated activities under the renewed licence will continue to have significant adverse impacts on the Athabasca Denesų́liné’s Aboriginal and treaty rights. The Crown must honourably discharge its DTCA obligations in respect of the licensing renewal decision. This is not something that is only done in the context of the hearing—these duties are ongoing over the life of the license. Consultation and accommodation are ongoing obligations with respect to the activities contemplated under the license renewal.

The DTCA is the Crown’s duty, though aspects of it can be delegated to third parties – such as Cameco. However, ultimately it is the Crown’s duty, so CNSC (as the Crown body responsible for the licensing process) plays an important role in ensuring the DTCA is met.

The issue before the CNSC is how the DTCA will be discharged. The CNSC plays two roles important for the Crown’s consultation efforts:

- 1) the role of a body that can carry out consultation activities in respect of the licence renewal application, and thereafter in respect of ongoing activities, monitoring, and reporting; and
- 2) as the decision-making body that determines whether or not the DTCA has been sufficiently met prior to granting the license.

We address these roles in the section below, and make specific recommendations on how the CNSC may discharge its DTCA obligations.

4.2.1. Best Practices for Carrying Out Consultation

Consultation and accommodation are a tool for protecting the meaningful exercise of rights, and demonstrating that it has been adequately done is a necessary step for the Crown if it is going to do anything that could potentially affect or infringe on section 35 rights. If consultation and accommodation is not adequate, any infringement on those rights cannot be justified, and the offending decision should be suspended or quashed.⁵

Best practices for consultation where there is potential for significant impacts on the First Nations’ rights (which is the case here) is for the affected First Nations to formally participate in the decision-making process,⁶ and for that participation to be on a “level playing field.” The affected First Nations must be able to adequately participate in a process where they have the opportunity

⁵ *Tsilhqot’in v British Columbia*, [2014] 2 SCR 256, 2014 SCC 44 (CanLII), at paras 77-79.

⁶ *Haida Nation*, *supra* at para. 44.

to identify their concerns and participate in discussions about mitigation or avoidance of impacts.⁷ First Nation concerns must be seriously considered by the decision maker.⁸

In the case of renewing Cameco's licence, there needs to be "deep" consultation with the Athabasca Denesūliné. Best practices, according to Canadian law, to satisfy the duty at the 'deep' level of consultation includes at least the following⁹:

- Meaningful and accessible information about the project: Information about a project should come in a form that is useful and digestible to the Athabasca Denesūliné. For instance, translation may be required, and also in-community meetings are very important.
- Formal participation in the decision-making process: This will usually include the opportunity to submit evidence and make submissions about the impacts of the project.
- Funding to enable the participation of the Indigenous community in the decision-making process: Without adequate funding, it can be difficult for a community to participate meaningfully in the decision-making process.
- Written reasons to show how Aboriginal concerns were considered and the impact they had on the decision: This should include a specific assessment of the impact of the project on the asserted right, not just a consideration of the environmental impacts of a project generally.

In *Building Common Ground: A New Vision for Impact Assessment in Canada*,¹⁰ the federally appointed expert panel offered insights on best practices for Indigenous engagement when undertaking federal impact assessments. Many of those recommendations echo the requirements of 'deep' consultation. Those summarized below inform best practices for consultation by the CNSC in involving the Athabasca Denesūliné in assessing impacts of Cameco's application to renew its license:

- ensure that the affected First Nations are included in decision making in accordance with their own laws and customs at all stages of impact assessment;
- require the assessment of impacts to asserted or established Aboriginal and treaty rights be meaningful at the outset of the assessment, and must continue at all stages of impact assessments. Assessment of impacts to rights should be examined directly and as separate studies, and completed by the affected First Nations themselves;
- include the affected First Nations in a collaborative way in creating a framework for fulfillment of the duty to consult, and ensure sufficient capacity to meaningfully engage

⁷ *Haida Nation, supra* at para 42-45, *Mikisew Cree First Nation v Canada (Minister of Canadian Heritage)*, [2005] 3 SCR 388, 2005 SCC 69 (CanLII) at paras 54-55, *West Moberly First Nations v British Columbia (Chief Inspector of Mines)*, 2011 BCCA 247 (CanLII), 333 DLR (4th) 31 at para. 141, *Dene Tha' First Nation v. Canada (Minister of Environment)*, 2006 FC 1354 (CanLII), [2006] FCJ No 1677 (QL) ["Dene Tha' First Nation"] at paras 107-110, *Ka'a'Gee Tu First Nation, supra* at paras. 116-120.

⁸ *Dene Tha' First Nation v. Canada (Minister of Environment)*, 2006 FC 1354 at paras 3, and 107; *West Moberly First Nations v British Columbia (Chief Inspector of Mines)*, 2011 BCCA 247 at para 144.

⁹ See, generally, *Hamlet of Clyde River v Petroleum Geo-Services Inc*, 2017 SCC 40 at paras 47-52.

¹⁰ Canada, *Building Common Ground: A New Vision for Impact Assessment in Canada* <https://www.canada.ca/en/services/environment/conservation/assessments/environmental-reviews/environmental-assessment-processes/building-common-ground.html>

with affected First Nations, by improving knowledge of Indigenous peoples, their rights, history and culture;

- provide sufficient funding to ensure ongoing capacity of affected First Nations to participate in impact assessment; and
- incorporate Indigenous knowledge into all phases of impact assessment, in collaboration with and with the permission and oversight of Indigenous peoples.

As noted above, the timeline for these intervention submissions is inadequate to allow for a comprehensive process that would satisfy the duty to consult, particularly given the ongoing COVID-19 pandemic. It does not allow for a structured process that includes community meetings, sharing of information, and incorporating information about impacts on rights into the impact assessment.

In other CNSC processes, YNLR has repeatedly emphasised the importance of a structured consultation process, that includes and incorporates many of the above best practices.

For example, it is crucial for any process to include in-community meetings, and (in as much as possible) face-to-face meetings. Information must be shared with members of affected First Nations in a timely manner, and on a regular basis. There needs to be transparency about processes for monitoring and reports, and how CNSC and Cameco set thresholds for monitoring and reporting. Those thresholds need to be set in consultation and collaboration with the affected First Nations, and in consideration of the impacts on their Aboriginal and treaty rights.

We have insisted on measures to make mitigation efforts and plans public, such as including members and Elders on occasional inspection tours and developing joint monitoring initiatives that incorporates the affected First Nations' standards and values.

Finally, YNLR has called for more information and education about impacts on traditional use areas throughout the life of the license.

We emphasize again that these are all features that we wish to see incorporated in the CNSC processes and reflected in the terms of the Cigar Lake license. The Athabasca Denesūḡiné and Athabasca Basin communities support the renewal of Cameco's license without delay, and believe that our requests are consistent with our support for the project. The additional consultation and accommodation provisions that we are proposing in our recommendations below reflect our existing understandings and arrangements with Cameco, but will require additional support and engagement from the CNSC as the regulator.

4.2.2 Role of a Decision-Maker: Is the Duty Met?

The CNSC has a dual role in meeting the duty to consult in this proceeding. As a Crown-empowered decision-maker, it must ensure that it fulfills the DTCA, but also has an equally important role in deciding whether the DTCA was met in determining whether to grant the license renewal.

In that latter role – that is, deciding whether the license renewal should be granted – the CNSC also has the opportunity to ensure that its decision reflects terms and conditions that can also ensure

that consultation with and accommodation of the First Nations is met and continues to be met throughout the life of the license.

In their presentation to YNLR, the CNSC noted that the standard term for relicensing is 10 years and that any ongoing concerns can be met through the annual Regulatory Oversight Report (ROR).

We believe the ROR process to be inadequate. YNLR has been providing interventions to the CNSC Regulatory Oversight Report (ROR) since 2017. In the three interventions that have been submitted, none of the recommendations have been adequately addressed. Past recommendations have been focused on enhanced communication from the CNSC to the communities in Nuhenéné. For example, a more informed understanding by the communities of the health and safety risks associated to the mines. There has been limited information on how these recommendations are implemented and integrated into the regulatory process.

YNLR is not confident that the ROR process is adequate to fulfill the CNSC's DTCA obligations. YNLR makes specific recommendations below on how the CNSC can address this critical gap.

5.0 Preliminary Recommendations

Following our consultation and review of the Cigar Lake License Renewal, YNLR provides the following preliminary recommendations. These recommendations will be supplemented through an additional submission prior to April 14, 2021.

1. CNSC to enhance YNLR, leadership and community member participation in studies, monitoring and inspection initiatives that incorporate community's standards and values with sufficient funding to ensure capacity. This could include:
 - i. Joint environmental monitoring and inspections.
 - ii. Joint studies to assess cumulative impacts from site and regional development.
2. CNSC to establish more robust processes for both itself and the license holders for effective engagement with Nuhenéné communities on reporting and monitoring. The intent is to ensure that all parties are working within an accountability framework that requires consideration of adverse impacts on the land and treaty rights. This would include requirements to:
 - i. Increase communication and reporting to community members and leadership through in-community meetings and other methods.
 - ii. Incorporate traditional knowledge and land use into all phases of assessing impacts.
 - iii. Provide sufficient funding to develop and maintain community capacity for effective engagement.

Appendix A: Caribou Range

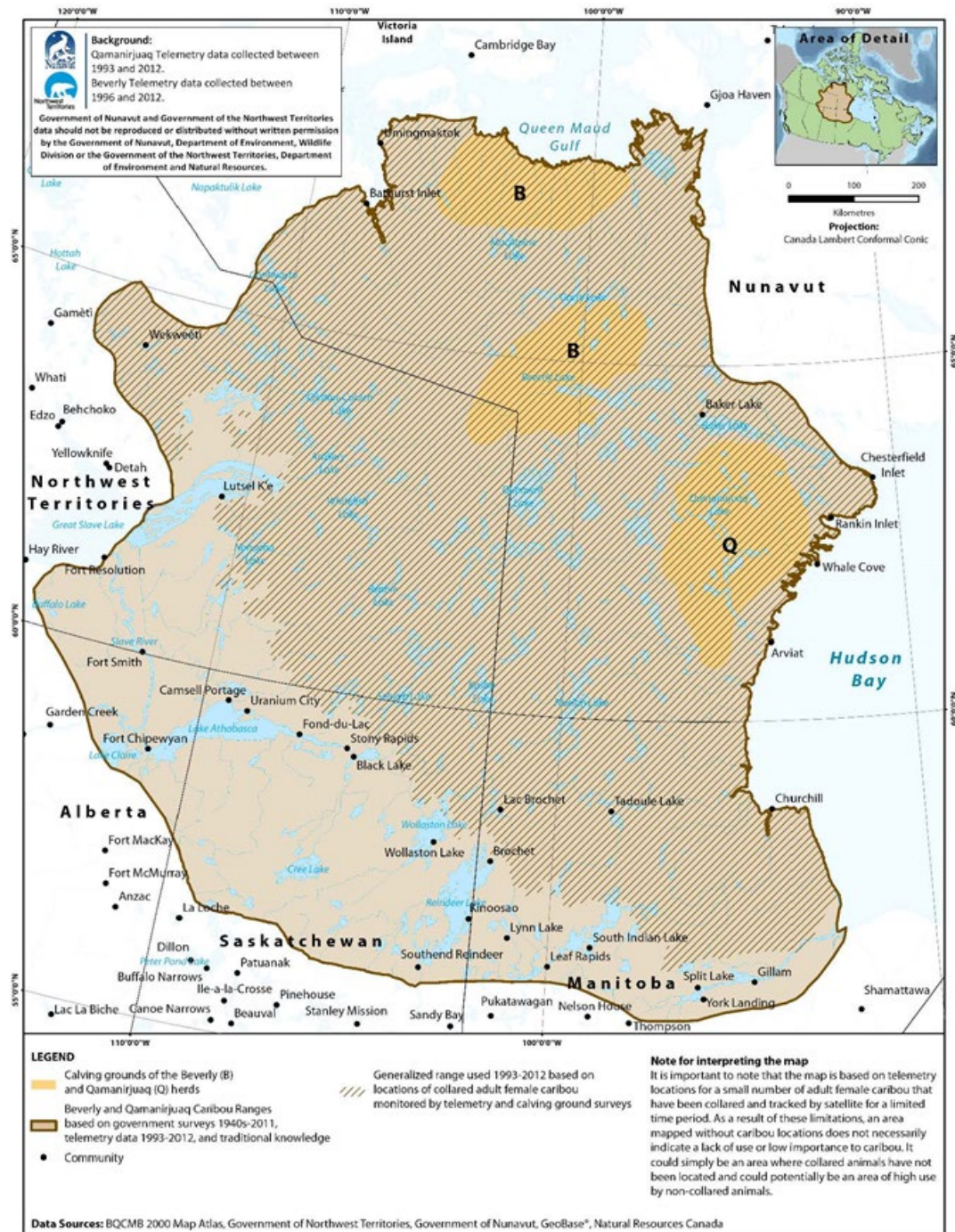


Figure 1. Beverly and Qamanirjuaq caribou ranges based on government surveys, tracking collared cows by telemetry and traditional and local knowledge of caribou harvesters.¹¹

¹¹ Beverley and Qamanirjuaq Caribou Management Board (BQCMB), 2000. Maps of Caribou Ranges. Accessed November 20, 2020 from <https://arctic-caribou.com/resources/#maps>.