



Supplementary Information

Written submission from the Athabasca Chipewyan First Nation on the Request for Ruling filed by the Ya'thi Néné Land and Resource Office

In the Matter of the

Cameco Corporation, Beaverlodge Project

Application to amend its licence to allow release of 18 Beaverlodge Project properties from CNSC licensing

Commission Public Hearing

March 24, 2022

Renseignements supplémentaires

Mémoire de la Première Nation des Chipewyan d'Athabasca au sujet de la demande de décision déposée par le Bureau des terres et des ressources de Ya'thi Néné

À l'égard de

Cameco Corporation, Projet Beaverlodge

Demande de modification du permis de Cameco visant à retirer 18 propriétés du projet Beaverlodge du contrôle de la CCSN

Audience publique de la Commission

24 mars 2022



March 9th, 2022

Canadian Nuclear Safety Committee

Request for Ruling - March 24, 2022 Public Hearing on Cameco Beaverlodge

On February 23rd Ya'thi Néné Land and Resource Office submitted a Request for Ruling on the application by Cameco for a licensing amendment for 18 of its Beaverlodge properties. On February 28th ACFN received the Request to Rule and have reviewed the document in full. The main concern for the Commission that we have been asked to weigh in on, is the decision to adjourn the public hearing for 12 months or indefinitely, to allow "for the Duty to Consult and Accommodate to be fulfilled". ACFN strongly encourages the Commission affirm the request and delay the decision indefinitely until consultation has been thoroughly carried out. Anything short of that is unthinkable and the Commission must not repeat history by bulldozing over the legitimate concerns being raised by all Nations involved. Moreover, the determination of whether consultation has been adequate must include (and prioritize) the perspective of all First Nations involved in the process whose rights have the potential to be adversely affected by the Commission's decision. The settler state of Canada has begun using the language of truth and reconciliation to explain its desire to rectify the harms caused by colonialism. By failing to meaningfully give nations the time, funding and liberty to make well informed decisions you will be repeating the mistakes of the generation(s) before you.

Decommissioning these properties and deeming them safe ignores the legitimate concerns that ACFN and its members have raised. Choosing to move the properties into the ICP would leave the properties unregulated and not subject to the same safety, monitoring, and regulatory requirements it has now; this would effectively close the door to remediating the impacts on land users. ACFN members who desire to continue practicing their traditional way of life will be unable to sustainably continue relating with the land and there is no dollar amount that will restore the Traditional Knowledge that will potentially be lost. The commission must be proactive in its protection of the constitutional rights of ACFN, one way you can demonstrate that is by deferring the decision indefinitely until the Duty to Consult or Accommodate has been fulfilled.

ACFN met with CNSC on March 8th, 2022, and in that meeting their failure to meaningfully engage with ACFN during the consultation process was raised. CNSC's response was that correspondence in the form of emails were sent to their contact at ACFN and there was no response on ACFN's part. As a regulatory body that has been charged with the Duty to Consult, failing to gather the necessary information to inform their decision on the matter is not acceptable. The CNSC has been unable to accommodate ACFN and other nations as we struggle to find the capacity to address

the imminent threat to ACFN's Treaty Rights. By delaying the decision indefinitely, the issues raised can be meaningfully addressed and the spirit of reconciliation will be honored. For a case such as this, dealing with an entire generation who has been watched their lands be encroached upon and destroyed by development it is unacceptable that a hearing be called when the full breath of Traditional Knowledge and technical information from ACFN (and other Nations who will be adversely impacted) has not been gathered or used to inform the decision. Additionally, the information that was provided in the past (2018/19) was not reflected in the recent submission aside from mentioning that Cameco attempted engagement with ACFN. The results of that engagement were not shared, and CNSC doubled down on its conclusion that "living a traditional lifestyle and consuming country foods can be done safely". What are country foods? ACFN members are interested in continuing the traditional way of life that has been stripped away from them through settler colonial practices that still today downplay the devastating impacts of development. The life that ACFN and its members once knew has been destroyed systematically through inaccurate reports that fail to meaningfully incorporate indigenous knowledge **in every aspect of the process.**

ACFN is in support of the request to rule, we know that in order to meaningfully consult on the submission there must be an indefinite delay for the hearing.

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ACFN – DLRM is proud to serve Athabasca Chipewyan First Nation for twenty years

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