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

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

**Regulatory Oversight Report for
Uranium Mines and Mills in
Canada: 2021**

**Rapport de surveillance
réglementaire des mines et usines
de concentration d’uranium au
Canada : 2021**

Commission Meeting

Réunion de la Commission

December 15, 2022

Le 15 décembre 2022

November 14, 2022

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General Delivery
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Senior Tribunal Officer, Secretariat
Canadian Nuclear Safety Commission
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Re: Intervention letter on Regulatory Oversight Report (ROR) for Uranium Mines and Mills in Canada: 2021

Dear Senior Tribunal Officer:

On behalf of the Athabasca Joint Engagement and Environmental Subcommittee (AJES), I am pleased to provide a letter regarding the 2021 Regulatory Oversight Report (ROR) for Uranium Mines and Mills in Canada.

The seven Athabasca Basin communities (including the Denesūliné First Nations of Black Lake, Fond du Lac, and Hatchet Lake, along with the communities of Stony Rapids, Wollaston Lake, Uranium City, and Camsell Portage) signed the Ya'thi Néné Collaboration Agreement¹ (CA) in 2016 with Cameco and Orano. The Agreement confirms the partnership between the communities and industry in development of uranium resources in the Athabasca Basin relative to the existing operations. The Agreement also builds on an impact management agreement signed in 1999, and is structured on five pillars of workforce development, business development, community investment, community engagement, and environmental stewardship.

In 2021, the CA Annual Report to communities detailed the investment accomplished by those involved under the Agreement and noted a total of \$107.1 million spent on business development (\$90.9 million), community contributions (\$1.1 million), and workforce development (\$15.1 million).

In addition, under the Agreement the AJES was created and appointed as the primary liaison between Cameco, Orano, and the Athabasca First Nations and Athabasca communities for the sharing of environmental monitoring and other environmental information. AJES serves as the first point of contact for Cameco and Orano with respect to community engagement.

¹ 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.

Cameco and Orano established and maintained relationship with the Athabasca communities prior to the CA. For over two decades, Cameco and Orano have 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.

The AJES representatives are appointed by community leadership and meet at a minimum of four times per year. The community and industry members consist of the following:

- 1 representative from Cameco
- 1 representative from Orano
- 1 representative from Black Lake Denesųliné First Nation
- 1 representative from Hatchet Lake Denesųliné First Nation
- 1 representative from Fond du Lac Denesųliné First Nation
- 1 representative for the Athabasca municipalities (Uranium City, Camsell Portage, Stony Rapids, Wollaston Lake)

The Ya'thi Néné Lands and Resources Office (YNLR) was also created by the seven Athabasca Basin communities at the time of the signing of the Agreement for the benefit of the communities. YNLR has a mandate to protect the land and promote the interests of Basin residents. As this important mandate is congruent with all pillars of the CA, including the AJES, an additional member on the AJES is:

- The Executive Director of the Ya'thi Néné Lands and Resource Office

To support AJES, the Community Liaisons also attend AJES meetings as observers along with any other invited guests. Community Liaisons are community members from the three First Nation communities who are employed by Cameco and Orano. Their role is to support the implementation of the CA within the Athabasca Basin communities.

AJES representatives and attendees are encouraged to bring forward any questions or concerns from community members and/or leadership about Cameco and Orano's operations. Discussions range from exploration to decommissioning, including impacts to the environment. The AJES members are encouraged to raise questions during quarterly meetings so that concerns can be addressed by company representatives. As active community members, the AJES representatives also play an important role for the companies by providing advice on community engagement strategies for planned and future site-based projects.

In 2021, the AJES subcommittee met four times. All four meetings were held virtually to ensure the health and safety of all participants due to the COVID-19 pandemic. During these meetings Cameco and Orano presented mine site updates that include environmental incidents and other events, exploration project updates, decommissioned sites, CBEMP update, and reviewed the AJES Annual Community Engagement Work Plan along with additional agenda items that are added at each meeting based on the representative's interests. The AJES participated in Cameco's Cigar Lake license renewal in April, Orano's JEB Tailing Management Expansion in September, and the CNSC Regulatory Oversight Reports for Uranium Mines and Mills in

December. Cameco received a 10-year operating license and Orano received an approval for its expansion project.

One of the roles of AJES is to review the Community-Based Environmental Monitoring Program (CBEMP). CBEMP conducts environmental monitoring throughout the Athabasca Basin, and is similar in scope to its predecessor, the Athabasca Working Group (AWG) environmental monitoring program. Since 2000, the AWG program has routinely demonstrated that samples collected near Athabasca communities are not negatively impacted by active uranium mining and milling operations in the region. The program continues to show the health benefits of consuming traditional country foods, and that traditional foods and water near these communities remain safe. As a result, regular consumption of locally collected fish, meat and vegetation is encouraged, while acknowledging the water and fish advisories.

Each year, the CBEMP focuses on a single community area to conduct a dietary food survey and associated monitoring. Initiated in 2018, the CBEMP has been successfully completed in Stony Rapids, Black Lake, Fond du Lac, Hatchet Lake, and Wollaston Lake, with results presented to Leadership and community members.

The Hatchet Lake/Wollaston Lake CBEMP report was delayed until 2022 due to the COVID-19 pandemic and is available to community members through leadership and a brochure posted online at www.cameconorth.ca. Uranium City and Camsell Portage began its sampling program in 2021 and the report to the communities is anticipated in 2023. The Ya'thi Nene Lands and Resource Office has taken a more active role in the delivery of this program.

AJES is familiar with the Eastern Athabasca Regional Monitoring Program (EARMP), which also supports environmental monitoring, and that this program is partially funded by the CNSC. Similar to the CBEMP program, EARMP continues to demonstrate that country foods remain safe and do not pose a risk to Athabasca Basin communities. The AJES endeavours to share information regarding areas of interest that have specifically been identified by community members.

In summary, the AJES is the conduit for sharing of information between companies and communities on matters related to the environment, the operations and proposed authorizations, and to address issues raised by community members. The process defined together under the agreement, the AJES, with support from the YNLRO and the community liaisons, work to update the Athabasca Basin communities on operational and regulatory issues in an effort to inform community members, listen to and respond to their concerns.

The AJES has received information about the operations and status, both while in operation and during care and maintenance, included in the 2021 ROR submission.

Sincerely,



Georgie McDonald AJES – Fond du Lac Denesuline First Nation

cc. Jerilyn Benonie, AJES – Hatchet Lake Denesuline First Nation
John Toutsaint, AJES – Black Lake Denesuline First Nation
Louise Bougie-Still, AJES – Athabasca Municipalities
Garrett Schmidt, AJES – Ya'thi Néné Lands and Resource Office
Glenn Lafleur, AJES – Orano
Kristin Cuddington, AJES – Cameco