



Oral presentation

Exposé oral

**Written submission from
Orano Canada Inc.**

**Mémoire d'
Orano Canada Inc.**

In the Matter of the

À l'égard de

**Cameco Corporation, McArthur River
Operation and Key Lake Operation**

**Cameco Corporation, établissements de
McArthur River et de Key Lake**

Application for the renewal of uranium
mine/mill licences for McArthur River
Operation and Key Lake Operation

Demande visant le renouvellement des permis
d'exploitation de mines et d'usines de
concentration d'uranium pour les
établissements de McArthur River et de
Key Lake

Commission Public Hearing

Audience publique de la Commission

June 7-8, 2023

7-8 juin 2023

Orano Canada Inc.

Written Intervention for Cameco Corporation Request to Renew the Rabbit Lake, Key Lake & McArthur River Operations Licences

CNSC Public Hearing June 7 & 8, 2023

April 2023

Orano Canada Inc.

Introduction

Please accept this correspondence as Orano Canada Inc's (Orano) intervention for Cameco Corporation's (Cameco) request to renew the licences issued to the Rabbit Lake, Key Lake and McArthur River Operations for 20-year terms.

Orano has been operating in Saskatchewan for over 55 years in the areas of uranium mining and milling and exploration. Orano is joint-venture partner with Cameco, in both the Key Lake and McArthur River Operations, which are operated by Cameco. Orano and Cameco have a long history of working together to manage safety and environmental aspects of operations in northern Saskatchewan, as well as engaging with Indigenous communities, members of the public and interested stakeholders.

While in care and maintenance, Cameco continues to successfully focus on key functions at the Rabbit Lake Operation, including maintaining the safety of the public, workers and the protection of the environment; meeting commitments to stakeholders and maintenance of critical infrastructure. With respect to the Key Lake and McArthur River operations, Cameco has successfully transitioned the tandem operations from operating status, to safe care and maintenance and through a recent restart maintaining exemplary worker health and safety results, protecting the environment and ensuring operational performance targets were met.

Orano is confident Cameco can and will continue to safely operate each of the facilities, while protecting its staff, the environment and engaging with interested Indigenous communities, members of the public, and stakeholders.

Engagement

For each of the operations, Cameco continues to engage with the public as described in the facility's Public Information Programs (PIP) and applicable Collaboration Agreements (CA), including engagement with rights-bearing Indigenous communities located within the Athbasca Basin.

The tandem operations of the Key Lake mill and McArthur River mine have a significant socio-economic impact on northern Saskatchewan, not only through direct employment but the generation of economic activity through commitments to northern vendors. In accordance with the PIP, Cameco provides regular updates to committees established under the various Collaboration Agreements they have signed, and community meetings which provide the opportunity for engagement with various community members and leadership. Through our close collaboration with Cameco and Oranos' own activity in Saskatchewan's north, Orano is well-informed on the measures and efforts Cameco puts forth to build and maintain support from local communities, focusing on workforce and business development, community investment, engagement and environmental stewardship.

Orano agrees that a 20-year licence term is appropriate for these facilities as they are each subject to a standardized licence effective for regulatory oversight, annual performance reporting and regular regulatory inspections to verify compliance. A robust program for routine and meaningful engagement has been

established, enhanced by annual Regulatory Oversight Report proceedings, at which interested parties may intervene and directly address the proponents and CNSC.

Community-Based Environmental Monitoring

In addition to the environmental stewardship pillar created with the CAs, Cameco, in partnership with Orano, the Government of Saskatchewan and the CNSC established the Eastern Athabasca Regional Monitoring Program (EARMP) in 2011. The program assesses the ecological integrity of Saskatchewan's northern watersheds in order to address potential environmental concerns, to review potential environmental effects from uranium mining and milling and to identify sustainable management practices in the region.

The goal of the EARMP study design is to monitor for potential effects on the water, fish, berries, and wildlife in the Athabasca region downstream of uranium mining operations. The EARMP community program was developed to address potential concerns about the safety of traditional country foods. EARMP's community sampling program collects traditional country foods, which are tested by CanNorth Environmental Services, a 100% Indigenous-owned company, which then publishes an annual report. To date, the EARMP's community reports have consistently concluded that traditional country foods are safe for consumption.

In 2022, a 10-year summary report was prepared and published, demonstrating that water and traditional foods remain safe for consumption.

Additionally, a Community Based Environmental Monitoring Program was created to gain an understanding of traditional food use by community members and to assess that the food is safe for consumption. In 2018 the program was enhanced to allow community members greater involvement and input into monitoring individual communities in the Athabasca Basin. Community members provide information on quantity, type and harvest locations of the traditional foods that they use and consume. The studies continue to conclude that regular consumption of local traditional foods (fish, meat, berries, and plants) is not a cause for concern.

Clean Energy

Nuclear power plants produce no greenhouse gas emissions during operation, and over the course of its life-cycle, nuclear produces about the same amount of carbon dioxide-equivalent emissions per unit of electricity as wind, and one-third of the emissions per unit of electricity when compared with solar (source: Intergovernmental Panel on Climate Change¹). Utilities around the world rely on front end nuclear fuel products to generate power in safe, reliable, low-carbon energy source.

¹ A study conducted on the mining and milling of uranium, concluded that these activities on the front end of the nuclear fuel cycle produce fewer greenhouse gases than other energy sources (Life Cycle Greenhouse Gas Emissions from Uranium Mining and Milling in Canada, University of Saskatchewan, 2016), contributing only 1.1 g CO₂e/kWh to total life cycle GHG emissions from the nuclear fuel cycle, compared to the approximately 800 CO₂e/kWh produced by coal and 500 CO₂e/kWh by gas generated electricity (2014 UN Panel on Climate Change).

Conclusion

Through our close collaboration with Cameco over decades of shared operations and experiences, Orano is well-informed and confident in Cameco's competence as a reliable operator and the company's established measures, along with demonstrating performance for engaging northern communities, protecting the health and safety of workers and the public as well as the environment. Orano fully supports Cameco's application to renew the Rabbit Lake, Key Lake and McArthur River Operations licences for 20-year terms.