



## **Oral presentation**

### **Written submission from the Athabasca Joint Engagement and Environmental Subcommittee (AJES)**

In the Matter of the

**Cameco Corporation, Rabbit Lake  
Operation**

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Application for the renewal of uranium  
mine/mill licence for Rabbit Lake Operation

**Commission Public Hearing**

**June 7-8, 2023**

## **Exposé oral**

### **Mémoire de l’Athabasca Joint Engagement and Environmental Subcommittee (AJES)**

À l’égard de

**Cameco Corporation, établissement de  
Rabbit Lake**

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Demande visant le renouvellement du permis  
d’exploitation de mine et d’usine de  
concentration d’uranium pour l’établissement  
de Rabbit Lake

**Audience publique de la Commission**

**7-8 juin 2023**

April 19, 2023

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Canadian Nuclear Safety Commission  
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Re: Intervention letter for renewal application for Cameco's uranium mines and mills licences for the Rabbit Lake, McArthur River and Key Lake Operations

Dear Senior Tribunal Officer:

On behalf of the Athabasca Joint Engagement and Environmental Subcommittee (AJES), I am providing a letter regarding Cameco's license renewal applications for the Rabbit Lake, McArthur River, and Key Lake Operations. Cameco has requested 20-year terms for each of these licenses, with proposed expiry dates of 31 October 2043.

The seven Athabasca Basin communities (Denesūliné First Nations of Black Lake, Fond du Lac, and Hatchet Lake, and communities of Stony Rapids, Wollaston Lake, Uranium City, and Camsell Portage) signed the Ya'thi Néné Collaboration Agreement<sup>1</sup> (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.

Since the agreement was signed, a total of \$867.7 million has been spent on business development (\$737.2 million), community contributions (\$29.8 million), and workforce development (\$100.7 million).

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.

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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.

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. This mandate is congruent with all pillars of the CA.

Cameco and Orano established and maintained a 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 Executive Director of the Ya'thi Néné Lands and Resource Office (YNLR)

To support AJES, the Community Liaisons and invited guests attend AJES meetings. 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 questions or concerns from community members and/or Leadership about Cameco and Orano's operations so that concerns can be addressed by company representatives. Discussions range from exploration to decommissioning, including the decommissioned sites and environmental performance. As appointed community members, AJES representatives also play an important role for the companies by providing advice on community engagement strategies for planned and future site-based projects. As such, the AJES is the conduit for sharing of information between companies and communities, which is the process defined together under the Agreement. The AJES, with support from the YNLR and the Community Liaisons, work to ensure operational and regulatory updates are provided to the Athabasca Basin communities in an effort to ensure community members are informed and concerns are heard.

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, these programs have routinely demonstrated that samples collected near Athabasca communities are not negatively impacted by active uranium mining and milling operations in the region. The CBEMP continues to show the health benefits of consuming traditional country foods, and that traditional foods and water near these communities remain safe.

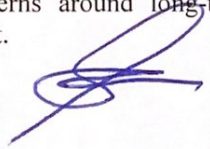
As a result, regular consumption of locally collected fish, meat, and vegetation is encouraged, while respecting the water and fish advisories.

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. Results are expected in 2023 for Uranium City and Camsell Portage, along with a Human Health Risk Assessment conducted for each community using CBEMP data collected over the past several years.

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 Canadian Nuclear Safety Commission (CNSC). Similar to the CBEMP, EARMP has demonstrated that country foods are 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.

The AJES (and its predecessor the AWG) have been engaged with Cameco during the current operating licence terms for the Rabbit Lake, McArthur River, and Key Lake Operations, and have met with Cameco regarding the license renewal requests. In response to early feedback from the subcommittee members, subsequent meetings were focused on providing more understanding around the initial request for an indefinite licence. As northern communities voiced concern with indefinite licensing, Cameco amended its application to a 20-year term. The AJES were supportive of the change. In November 2022, Cameco hosted in-person meetings in the Athabasca Basin communities to engage on its revised licence application with members and responded to questions and concerns around long-term licences and community benefits under the collaboration agreement.

Sincerely,



Georgie McDonald AJES – Fond du Lac Denesųłiné First Nation

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