



**Oral presentation**

**Exposé oral**

**Written submission from  
Canada North Environmental  
Services (CanNorth)**

**Mémoire de  
Canada North Environmental  
Services (CanNorth)**

In the Matter of the

À l'égard de

**Cameco Corporation, Rabbit Lake  
Operation**

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**Cameco Corporation, établissement de  
Rabbit Lake**

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

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

**Commission Public Hearing**

**Audience publique de la Commission**

**June 7-8, 2023**

**7-8 juin 2023**



# CanNorth

**Canada North Environmental Services Limited Partnership**

*A First Nation Environmental Services Company*

April 24<sup>th</sup>, 2023

Senior Tribunal Officer, Commission Registry  
Canadian Nuclear Safety Commission  
280 Slater St.  
PO Box 1046 Stn B  
Ottawa ON K1P 5S9  
Email: [interventions@cnsccsn.gc.ca](mailto:interventions@cnsccsn.gc.ca)

**RE: Intervention letter on renewal application for Cameco's uranium mine license for the Rabbit Lake Operation, the Key Lake Operation, and the McArthur River Operation.**

Thank you for the opportunity to submit this intervention letter on behalf of Canada North Environmental Services (CanNorth). We also request the opportunity to provide an oral presentation to the Commission.

CanNorth is a 100% Indigenous-owned firm that has been providing a wide range of environmental consulting services to industry, government agencies, First Nations, and other client types for over 35 years. Our office locations include Saskatoon, Saskatchewan and Markham, Ontario.

Since 2001, the Lac La Ronge Indian Band (LLRIB) has been the sole owner of CanNorth; thus, in addition to directly providing employment opportunities, our profits also benefit Indigenous people. As an Indigenous-owned company, our corporate objectives include maximizing Indigenous involvement by providing employment, training, engagement, and knowledge gathering opportunities. One of our specialty services, both nationally and internationally, is facilitating communication and trust building between stakeholders/rights-holders and developments. CanNorth is a Certified Aboriginal Business through the Canadian Council for Aboriginal Business.

CanNorth manages a number of long-term community-based environmental monitoring programs and traditional foods studies. This includes the Eastern Athabasca Regional Monitoring Program (EARMP; 2011-ongoing). The EARMP was established in 2011 under the Province of Saskatchewan's Boreal Watershed Initiative. The program is a government-industry partnership and is supported by contributions from several stakeholders including the Saskatchewan Ministry of Environment, the Canadian Nuclear Safety Commission, Cameco Corporation (Cameco), and Orano Canada Inc. (Orano). Cameco's continued support of the EARMP community program has resulted in a long-term community-based monitoring data set that extends over 10 years.



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Canadian Council for  
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One of the primary objectives of the EARMP is to monitor potential cumulative effects to environments located downstream of mining and milling operations in the Athabasca region. This is done by comparing data to baseline conditions and examining the data, both spatially and temporally, for changes over the long-term. The community program was developed to address potential concerns about the safety of traditionally harvested foods that community members routinely consume by collecting and testing water, fish, berry, mammal, and bird tissue samples in partnership with community members. The EARMP community program objectives are to:

- Determine the safety of traditionally harvested food for local consumption.
- Establish long-term monitoring at community harvesting areas to assess any changes over time.
- Foster confidence in the consumption of traditional foods and engage and involve community members in the gathering of information.
- Communicate monitoring results to community members and other stakeholders.

A key objective of the EARMP is to provide the public full access to all data and reports online at [www.earmp.ca](http://www.earmp.ca).

The program relies on the participation of community members for the selection of sampling locations and for sample collection. The selected representatives from each community have been provided training in sample collection, storage, and shipping procedures for the EARMP community sampling program. Yearly the community members determine the locations for sampling fish, berries, mammal, and birds and focus on areas where community members routinely fish, hunt, and gather. Results from the last ten years of EARMP have shown that water and traditionally harvested foods are safe to consume, and community members can continue to enjoy traditional foods.

With support from the funding partners, the success of this program has really stemmed from involving and engaging the community from the start, with a focus on developing sampling objectives driven by the community. The program contains a core consistent program that has been prioritized for funding over the long term and contains a component that is adaptable to adjust to changing community concerns. Over the years, more than 70 samples have been submitted outside of the routine sampling program. This has allowed the program to address additional community concerns while also maintaining consistency with the core program. Having a core program that is consistent has been key for evaluating the data for long-term trends. Finally, it is important that the data are put into meaningful context for the community members. EARMP has done this through the development of a regional reference range, the use of guidelines, and the completion of human health risk assessments that have confirmed traditional foods are safe to consume. Program results are shared each year with communities in a clear language report. A 10-year summary booklet was also released in early 2023 which included an overview of EARMP results since 2011.



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I trust that this letter provides sufficient background on the EARMP community program and the contribution Cameco has provided to ensure the success of this community-based monitoring program over the long-term.

Sincerely,



Cassandra Rees, B.Sc., P.Biol.  
Environmental Manager/Senior Aquatic Ecologist

**Canada North Environmental Services**



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