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Oral presentation

Exposé oral

Written submission from the Birch Narrows Dene Nation

Mémoire de la Nation des Dénés de Birch Narrows

In the Matter of the

À l'égard de

Cameco Corporation, Rabbit Lake Operation

Cameco Corporation, établissement de Rabbit Lake

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





Cameco Corporation Request to Renew the License for the Rabbit Lake Mine

Technical Review

May 1st, 2023

Submitted by:

Birch Narrows Dene Nation



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1.0 Introduction

Birch Narrows Dene Nation (BNDN) has prepared this report as our written submission for the Canadian Nuclear Safety Commission's (CNSC) hearings on Cameco Corporation's application for the renewal of its uranium mine and mill operating license for the Rabbit Lake Mine. In this submission, we have prepared a series of technical comments and recommendations on the license renewal application with a focus on the implications and potential impacts on our Treaty and Aboriginal rights and interests. These technical comments and recommendations were directly informed by input from our members during the week of April 24 to 28. These comments and recommendations have been reviewed, revised and approved by BNDN leadership. In addition to this written submission, BNDN intends to send representatives from our Nation to intervene at the Commission hearings scheduled for June 7-8, 2023.

Overall, BNDN does not oppose the renewal of the license to operate the Rabbit Lake Mine. Our primary request from our written and oral intervention is to have more regular and ongoing dialogue with Cameco and the CNSC related to this Project and all other uranium mining operations throughout the Athabasca Basin. The Rabbit Lake Mine is on our Ancestral and Treaty Lands. Many of our members have worked at the Rabbit Lake Mine and we have ties to the land around the Project. We see ongoing and regular dialogue with Cameco and the CNSC as an important vehicle for our members to understand Cameco's operations and for Cameco to understand our Nation's rights, interests and worldview.

1.1 Birch Narrows Dene Nation

Birch Narrows Dene Nation is a Denesyliné First Nation band within the meaning of the Indian Act (Canada) and an Aboriginal people within the meaning of Section 35(1) of the Constitution Act, 1982 (Canada). BNDN members have occupied the lands of Dene Nene or "Land of the People" in northern Saskatchewan since time immemorial according to our own laws and system of government. Today, BNDN is a diverse and vibrant community of Dene, Cree and Métis citizens with 812 registered members. BNDN has 3 reserves, one at Turnor Lake (IR 193B) adjoins the village of Turnor Lake Saskatchewan and is the main reserve for BNDN. Churchill Lake (IR 193A) is at the junction of Churchill Lake and Frobisher Lake, and Turnor Lake (IR 194) is on Peter Pond Lake east of Dillon, SK. BNDN's vision is a healthy, self-reliant, educated, and united community. BNDN mission is to provide good governance and create opportunities for the wellbeing of all members.

As a signatory of Treaty 10, BNDN asserts that Treaty 10 was not an agreement to surrender lands and resources. As such BNDN laws, customs and jurisdiction still apply to our Ancestral Lands. There are cultural sites and artifacts left throughout the region that are significant for our members. Our community members continue to hunt, fish, gather and trap on the lands throughout our Ancestral Lands. Any direct or cumulative impacts from development could negatively affect our ability to exercise Aboriginal and Treaty rights, including the livelihoods of those who live off the land. The lands, waters and resources throughout our Territory are essential to the well-being and survival of our First Nation.

The BNDN Traditional Use Study Specific to Nexgen's Proposed Rook 1 Project (Firelight Research Inc., 2019) reports the following BNDN historical context:

Chief Raphael Redshilldkze signed Treaty 10 on behalf of the Clear Lake Band on August 28, 1906. Treaty 10 was based on other numbered treaties, and included the following standard hunting, trapping, and fishing rights clause:

And His Majesty the King hereby agrees with the said Indians that they shall have the right to pursue their usual vocations of hunting, trapping and fishing throughout the territory surrendered as heretofore described, subject to such regulations as may from time to time be made by the government of the country acting under the authority of His Majesty and saving and excepting such tracts as may be required or as may be taken up from time to time for settlement, mining, lumbering, trading or other purposes. (Indian Claims Commission 1995, p.56)

The Clear Lake Band later came to be known as the Peter Pond Band. This Band was separated in 1972 into the Buffalo River Band and Turnor Lake Band; today, they are known as the Buffalo River Dene Nation and the Birch Narrows Dene Nation (Indian Claims Commission 1995).

BNDN members continue to exercise our Treaty and Aboriginal rights including hunting, trapping, fishing, plant gathering and cultural/spiritual practices in the immediate area of the and throughout our Ancestral Lands.

BNDN has constitutionally protected Treaty rights, inherent Aboriginal rights, Aboriginal title and interests in and to Dene Nene. BNDN must be consulted and accommodated by the Crown with respect to potential impacts on our rights.

2.0 Cameco Corporation's Rabbit Lake Mine

The Rabbit Lake Mine (Rabbit Lake; the Mine) is the longest operating uranium mine and mill in Canada. Uranium was first processed at Rabbit Lake in 1975. The Rabbit Lake Mine is in Treaty 10 territory, on the west shore of Wollaston Lake between Hidden Bay and Collins Bay. The is accessible by road via Saskatchewan Highway 905 as well as by airstrip. According to Cameco's most recent reporting, the Rabbit Lake Mine contains a total reserve of 72.3 million pounds of uranium (U_3O_8). With ore grades between 0.62% and 0.95%, the ore is high grade by global standards but relatively low grade by Athabasca Basin standards. The Rabbit Lake Mine is regulated under the *Nuclear Safety Control Act*, which is administered by the Canadian Nuclear Safety Commission (CNSC).

Operations have been suspended several times during the life of the mine due to the uranium market conditions. Operations at Rabbit Lake have been suspended since 2016 when Cameco put the Mine into a state of care and maintenance and at this time Cameco has not announced any plans to resume operations at Rabbit Lake. The current license for the mine is valid until October 31, 2023. Cameco has

submitted to renew their license to operate the Rabbit Lake mine despite having no immediate plans to restart operations at the Mine. In their license renewal application, Cameco originally requested a lifetime license for the mine, but due to feedback from Indigenous communities Cameco modified the license renewal application to be for 20 years.

Uranium has been mined at Rabbit Lake from a number of ore bodies within the site throughout the life of mine. The first ore body discovered and mined was the Rabbit Lake ore body which was mined as an open pit until 1984. The Collins Bay A-Zone, B-Zone and D-Zone were later discovered and mined as smaller open pits. The Eagle Point deposit is an underground uranium deposit at the site and is the only ore body with mineral reserves available to be mined. All of the open pits on site are now closed and were reclaimed by backfilling them with waste rock and a till cover and then flooding them from Collins Bay. The exception is the Rabbit Lake pit, which is used as the tailings management facility for the tailings from the Rabbit Lake mill and is referred to as the Rabbit Lake In-Pit Tailings Management Facility (RLITMF). There is also an above ground tailings management facility called (AGTMF) which is no longer used for depositing tailings and is partially reclaimed and partially used for depositing waste from the site.



Figure 1: Image of the RLITMF (CNSC CMD H7-1, 2023)

All of the processing and contact water on site that is contaminated by the operations is collected and treated prior to discharge to Horseshoe Creek to the south of the Mine. Horseshoe Creek eventually discharges into Hidden Bay in Wollaston Lake. In their most recent Environmental Protection Review Report (EPR) for the Rabbit Lake Mine, the CNSC reported that there have been no known exceedances of any of the regulated contaminants in the treated wastewater released to Horseshoe Creek since 2013.

MAP OF SASKATCHEWAN Athabasca Basin McArthur Riv a Ronge Prince Albert Saskatoon 125km SASKATCHEWAN

Figure 2: Location of Rabbit Lake Mine (from CNSC EPR, 2023)

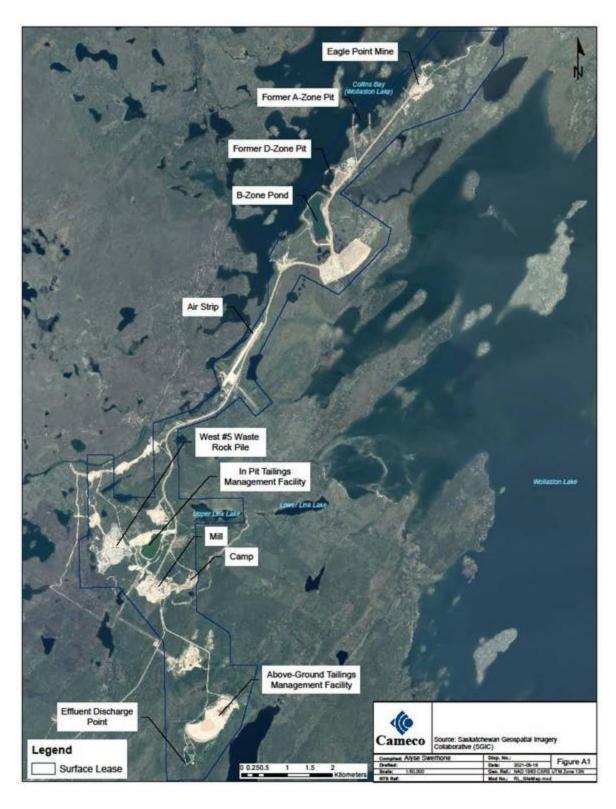


Figure 3: Satellite Image of the Rabbit Lake Operation (From CNSC EPR, 2023)



Figure 4: Aerial View of the Mill at Rabbit Lake (CNSC CMD H7-1, 2023)

3.0 Community Engagement on the License Renewal Request

BNDN, with the support of Tamarack Environmental Associates, engaged our membership through interviews and focus sessions during the week of April 24th to 28th. BNDN members and leadership provided input into our members traditional knowledge, land use, occupancy and history in the area around the Rabbit Lake Mine and the Key Lake and McArthur River Operations. BNDN members also documented their concerns with the license renewal applications, including both environmental concerns and concerns based on our members' first-hand experiences working at the Rabbit Lake Mine and the Key Lake and McArthur River Operations. A total of 11 of our members were interviewed and 2 focus sessions were held during the week.

3.1 Summary of Input from BNDN Members

The following is a summary of input on the Rabbit Lake Mine provided by our members and leadership during the interviews and focus sessions:

1. Lack of recognition of BNDN's ties to the Project area

BNDN members have deep historical ties to the Project area. Many members spoke of
the familial connections to the Project area and having ancestors who came from the
Project area. Our members also hold traditional knowledge and land use information
near to the Rabbit Lake Mine. The Rabbit Lake Mine is also on BNDN Treaty Lands.

2. Lack of open communication from Cameco

- BNDN has had extremely limited interaction with Cameco during the life of the Rabbit
 Lake Mine, despite our historical ties to the area and the fact that many of our members
 have worked at the mine.
- Cameco has been unwilling to provide BNDN with information we have requested on the Project such as their decommissioning plan. Cameco has argued that the decommissioning plan is confidential, which is highly unacceptable to BNDN. Our members expect Cameco to share project details with us much more openly.

3. Concerns around the length of the licensing period

 BNDN members expressed concern with the relatively long licensing period requested by Cameco, which limits our members ability to provide input into the project, especially considering that Cameco is not openly engaging with our Nation.

4. Concerns with the long history of the operation and cumulative impacts to the environment

BNDN members noted that the Rabbit Lake Mine has been operating for a long time.
 Our members perceive there to be contamination from early in the mine life that has been either poorly documented or is unavailable to our members.

4.0 Technical Review of the License Renewal Application

BNDN has undertaken a technical review of the license renewal application for the Project and has considered information available in the 2023 EPR for the Rabbit Lake Mine. This technical review is focused on information gaps, deficiencies in data, underrepresentation of potential effects, inadequate monitoring, and lack of involvement of BNDN. All of these priorities for BNDN comments are discussed through the lens of potential impacts of the Project on BNDN Treaty and Aboriginal rights, interests and claims.

Documents reviewed by BNDN:

- 1. Cameco Corporation Rabbit Lake Operation Commission Public Hearing (CNSC CMD 23-H7)
- 2. Written submission from Cameco Corporation In the Matter of the Cameco Corporation, Rabbit Lake Operation (CNSC CMD 23-H7.1)
- 3. Supplementary Information; Written submission from Cameco Corporation In the Matter of the Cameco Corporation, Rabbit Lake Operation (CNSC CMD 23-H7.1A)
- Environmental Protection Review Report: Rabbit Lake Operation (https://nuclearsafety.gc.ca/eng/resources/publications/reports/eprrabbitlake23)

Table 1. Comments and recommendations on the Rabbit Lake Mine License Renewal Application

#	Document Reference	Comment	Recommendation
1.	General Comment	BNDN notes that Cameco has had limited to no interaction with our Nation regarding their activities at the Rabbit Lake Mine. While BNDN recognizes that the Rabbit Lake Mine is in the primary land use area of other Indigenous Nations and is further from our core current land use area, the Rabbit Lake Mine is on our Treaty and Ancestral Lands. A number of our members have worked at the Rabbit Lake Mine over the life of the operation and our members have deep connections to the land in and around the Rabbit Lake Mine.	 a. BNDN requests that Cameco work with our Nation to develop a long-term relationship agreement to facilitate our engagement and participation on all Cameco projects in the Athabasca Basin. The scope of this long-term relationship agreement would include operating mines, mines on care and maintenance, development projects, closed mines and exploration properties. b. BNDN notes that all our comments and recommendations on this license renewal application should be understood within the context of our desire for a meaningful, positive, long-
		BNDN asserts that all development in the Athabasca Basin has impacts on our Treaty and Aboriginal rights, and	term relationship between Cameco and our Nation that fosters mutual understanding and collaboration.

		as such it is important for proponents operating in the Athabascan Basin such as Cameco to engage with our Nation to understand the impacts of their operations on our Treaty and Aboriginal rights and for our members to have a better understanding of Projects on our Ancestral Lands.		
2.	General Comment	BNDN members who worked on site at Rabbit Lake when the mine most recently went into care and maintenance noted that a liner was placed at the base of the ore stockpile after all of the ore was removed from the stockpile. BNDN notes that the liner was placed to minimize	a.	BNDN requests that Cameco clarify what work has been done to assess the extent to which soils and groundwater beneath and downgradient the ore stockpile have been contaminated by the presence of ore during the life of the Rabbit Lake Mine.
		contamination beneath the ore stockpile, and it is unclear the extent to which Cameco has assessed the existing soil and/or groundwater contamination beneath the ore stockpile and whether any remediation of the soils and groundwater have been completed.	b.	BNDN requests that Cameco provide our Nation with documentation and other appropriate information on the
		Given the fact that the Rabbit Lake Mine has been operating for nearly half a century, it is possible that contaminants from the ore stockpile have accumulated and dispersed to a significant degree downgradient.		
3.	General Comment	In email correspondence between our Nation and Cameco we have requested a copy of the Preliminary Decommissioning Plan, Environmental Risk Assessment and program documents for the Rabbit Lake Mine. Cameco informed our Nation that these documents are considered	a.	BNDN requests that Cameco share the detailed versions of their Preliminary Decommissioning Plan, Environmental Risk Assessment and other program documents with our Nation so that we can provide meaningful input and commentary on the documents
		confidential and we can ask questions on the documents or review the 2 page summary available online. BNDN questions the logic behind	b.	BNDN requests that engagement and consultation on the requested documents occurs through a long-term relationship agreement with our Nation.
		these documents being considered confidential. These documents are		

		consequential for our ability to assess the current and future impacts of the Rabbit Lake Mine on our Treaty and Aboriginal rights. Without the ability to provide rigorous and detailed commentary on the Preliminary Decommissioning Plan, Environmental Risk Assessment and program documents we cannot provide meaningful input into project operations and closure in a way that mitigates impacts to our Treaty and Aboriginal rights and maximizes our ability to exercise our rights post closure.	
4.	General Comment	In our review of the 2023 Environmental Protection Review Report: Rabbit Lake Operation from the CNSC, BNDN notes that the water quality data provided in the document only goes back to 2013. In fact, none of the information provided in the report spans the entire life of the Rabbit Lake Operation since it opened in 1975. While a more detailed report of environmental monitoring at Rabbit Lake since the mine opened is not within scope of this license renewal application, it is important to our Nation and our interests in relation to the mine to have much more information available to us from the mine than just 2013 to present.	BNDN requests that Cameco work with our Nation to provide detailed information of operations, progressive reclamation, environmental monitoring, past environmental incidents and how past incidents have been cleaned up, in addition to any other information our members request on the history of the mine. The format and specific content of the requested detailed information package should be determined through engagement with our Nation via a long-term relationship agreement.
5.	General Comment	BNDN notes that the Rabbit Lake operation is amongst a relatively small group of mining operations in Canada that have been in continuous operations for more than 40 years. BNDN also notes that Provincial and Federal standards have evolved dramatically since the Rabbit Lake Operation opened. For example the Rabbit Lake Mine opened prior to the closure of the Eldorado Uranium Mine on Lake Athabasca which has very significant environmental	BNDN requests that Cameco, the CNSC and Saskatchewan provide information to our Nation on how the operations of the mine has evolved during the life of mine to operate in accordance with the changes in environmental protection standards that have occurred since the mine opened. The exact format of the requested information from Cameco should be provided via a long-term relationship agreement. The information from the CNSC and Saskatchewan will go through a separate

		contamination issues from the poor closure practices at the time. Given the dramatic evolution of environmental protection standards since the Rabbit Lake Mine opened, BNDN requires information that explains how the operations and environmental protections at the mine have evolved given the changes in the regulatory landscape throughout the life of the operations. This information will be very important for developing trust with our members around the condition of the environment around the mine.	processes between BNDN and the respective agencies.
6.	General Comment	Many of the documents BNDN has reviewed for this license renewal discuss the modernization activities that Cameco has been undertaking at the Rabbit Lake site while under care and maintenance. BNDN is generally supportive of the intention of modernizing the operation to ensure that Rabbit Lake operates in accordance with current best practices. BNDN also notes that some aspects of the operation are more complex and costly to modernize than others, and that Cameco may not be prioritizing modernization activities that our Nation would consider to be highly important. BNDN also notes the limited information available to our Nation in regard to the aspects of the operation Cameco is considering modernizing and how they are prioritizing these aspects. BNDN wishes to have substantially more information on this.	BNDN requests that Cameco provide BNDN with available reporting on all potential modernization activities on site and engage with our Nation to discuss what modernization activities are a priority to pursue for Cameco and for our Nation. The format and specific content of the requested information and engagement should be determined through engagement with our Nation via a long-term relationship agreement.
7.	Environmental Protection Review Report Table 3.10	Table 3.10 of the Environmental Protection Review Report shows that sediments in Horseshoe pond have concentrations of a number of metals above the lowest effects level, including arsenic, copper, molybdenum, nickel, selenium and	BNDN requests that Cameco provide information on how they intend to manage the elevated concentrations of metals in the sediments of Horseshoe Pond. The format and specific content of the requested detailed information package should be determined through engagement with our

		uranium. These elevated concentrations of metals present a risk to aquatic life and potentially wildlife. BNDN notes that while metals concentrations in the sediments are expected to gradually decline over time, the time frame for metals concentrations to return to baseline will likely be many generations. It is also possible that the numerous metals are having synergistic effects that can be challenging to quantify.	Nation via a long-term relationship agreement.
8.	General comment	BNDN cannot meaningfully comment on the current and future impacts of the Rabbit Lake Mine on the terrestrial environment and on our Treaty and Aboriginal rights based on the available Environmental Protection Review Reports. The summary report provided does not contain the details required to fully understand the impacts of the operation to the terrestrial environment.	BNDN requests that Cameco share the detailed version of the Environmental Risk Assessment (2020) with our Nation so that we can provide meaningful input and commentary on impacts to the terrestrial environment and our Treaty and Aboriginal rights.
9.	Environmental Protection Review Report - 3.2.2.2 Terrestrial habitat and species	Based on the Environmental Protection Review Report, 5 terrestrial species at risk (SAR) are potentially present in the terrestrial study area (a 10 km radius centered around the site). All 5 were observed. The report does not include any details related to SAR surveys (e.g. search effort, survey methods etc.). For this reason, BNDN cannot comment on whether any additional SAR should have been assessed in the ERA. Many SAR are cryptic and require substantial survey effort and/or specific survey protocols to deem absent from the site.	BNDN requests that Cameco share the detailed version of the 2020 Environmental Risk Assessment (2020) as well as all details on terrestrial SAR surveys including survey effort, survey methodology, survey conditions etc. so we can comment on the effectiveness of the surveys, and whether SAR included in the ERA assessment is appropriate.
10.	Environmental Protection Review Report - 3.2.2.2 Terrestrial habitat and species -	Based on the Environmental Protection Review Report, receptors with an aquatic diet (e.g., beaver, mallard, merganser, mink, muskrat, and scaup) have a potential risk of exposure to hazardous substances. Specifically, muskrat was found to be	BNDN requests that Cameco share the detailed version of the Environmental Risk Assessment (2020) so we can more fully understand, and comment on this exposure of semi-aquatic wildlife to molybdenum.

	Exposure to hazardous substances	exposed to molybdenum in Horseshoe Creek. CNSC staff decided that no mitigation measures are required at this time. This is a concern to BNDN community members as some of these terrestrial receptors are part of our traditional diet.	
11.	Environmental Protection Review Report - 3.2.2.1 Soil quality	Terrestrial monitoring at nearby uranium mines, Key Lake Operation and McArthur River Operation, have undergone more intensive terrestrial environment monitoring than Rabbit Lake including monitoring vegetation (e.g., lichen, and blueberries) to assess the potential effects of atmospheric emissions of COPCs. In addition, soil sampling has taken place most recently in 2021 at both sites. Terrestrial environment monitoring at the Rabbit Lake operation has not been as intensive or recent. No soil sampling has taken place during the current licensing term. The soil monitoring data provided is 15 years old (2008), and results of lichen monitoring are excluded from the report. It is important for BNDN to be informed about the current and ongoing impacts of the Rabbit Lake Operation to the terrestrial environment, as the health of the environment impacts our Treaty and Aboriginal rights.	BNDN requests that Cameco and the CNSC provide justification for not conducting any soil monitoring at the Rabbit Lake Operation since 2008, and not including any vegetation monitoring results in the publicly available Environmental Protection Review Report. We also request details of Cameco's plans for future terrestrial monitoring that will occur if/when Rabbit Lake becomes an operational mine again.
12.	CMD23-H7	Results from lichen monitoring in 2019 show that Station 11 had higher levels of arsenic, nickel, and uranium than the reference station over the course of the monitoring program. It was concluded by CNSC staff that the level of airborne particulate contaminants produced by the Rabbit Lake Operation at Station 11 is acceptable and does not pose a risk to lichen consumers such as caribou.	BNDN requests that Cameco provide the level of arsenic, nickel, and uranium detected at lichen Station 11. In addition, BNDN requests explanation for why the elevated level of airborne particulate contaminants detected does not pose a risk to caribou. With this information, we can comment on the impact of this exceedance on our Treaty and Aboriginal Rights.

		These elevated levels of arsenic, nickel, and uranium concern BNDN as caribou are a traditional part of our diet. More information is required to understand, and comment on this potential impact on the safety of our food supply.	
13.	CMD23-H7-1	BNDN noted that terrestrial monitoring at Rabbit Lake Operation is currently conducted every 10 years.	BNDN requests justification for only conducting terrestrial monitoring on a 10-year cycle. Cameco must provide whether frequency of terrestrial monitoring will increase when/if operation begins again.
14.	CMD-H7-1 Figure 3.10-1	Figure 3.10-1 of CMD23 H7-1 shows that ambient radon concentrations at the Rabbit Lake Mine have been increasing since 2019 when ambient concentrations were 6.2 Bq/m³ to 2022 when concentrations were reported at 19 Bq/m³. While the 2022 concentrations are not an immediate environmental concern, the results are puzzling as the concentrations were lower during operations of the mine than during the most recent years of care and maintenance. BNDN wishes to understand the reason for the increasing ambient concentrations of radon at the Rabbit Lake Mine.	BNDN requests that Cameco provide us with a discussion that explains the reasons why ambient radon concentrations appear to be increasing at the Rabbit Lake Mine despite the mine being in a state of care and maintenance. The format and specific content of the requested detailed information package should be determined through engagement with our Nation via a long-term relationship agreement.
15.	Environmental Protection Review Report 3.2.3 Aquatic environment	Water management at the Rabbit Lake Mine is a complex system that has evolved over decades. Through mining of successive ore bodies, there is now a vast complex of mine rock, open pits, underground shafts, and tailings distributed on the site. This has resulted in mine-impacted water being discharged at several sites, all draining to Wollaston Lake. Each of these has a unique water quality fingerprint with the associated challenges. Some of the existing areas of concern include: • The flooded B-Zone in Collins Bay continues to have	Given the complex and dynamic nature of water quality in the area, it would be valuable for Cameco to provide regular updates to community members. This should include: • general background context and interpretation on the water management at site • description of monitoring activities • highlights of areas of concern where exceedances of applicable guidelines have occurred • discussion of ongoing activities for water management and treatment • results of fish tissue sampling

- exceedances of arsenic and nickel.
- The Link Lakes drainage have exceedances of uranium and radium-226.
- Horseshoe creek and horseshoe pond which receive discharge of the WTP, continue to show exceedances for selenium, uranium and others.

These water quality parameters continue to change through time as the systems involved age, with most (but not all) parameters generally staying static or improving.

results of aquatic organism toxicity testing

The frequency and timing of community updates can be decided in conjunction with representatives of BNDN. An appropriate schedule may be once every 2-5 years, which should be determined through engagement with our Nation via a long-term relationship agreement.

Conclusion 5.0

Birch Narrows Dene Nation looks forward to intervening at the Commission hearing for the license Renewal application. We expect that our comments and recommendations will be meaningfully considered by the Crown prior to a decision being made on Cameco's application. We are confident that identified issues can be resolved through ongoing engagement with the CNSC, Saskatchewan Ministry of Environment and Cameco Corporation. Birch Narrows Dene Nation also looks forward to the continued engagement with Cameco Corporation for their ongoing and future activities on our Ancestral Lands.