



Oral presentation

Exposé oral

**Written submission from the
Saskatchewan Mining Association**

**Mémoire de la
Saskatchewan Mining Association**

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

April 21, 2023

Senior Tribunal Officer, Commission Registry
Canadian Nuclear Safety Commission
280 Slater St.
PO Box 1046 Stn B
Ottawa ON K1P 5S9
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RE: SMA Oral Intervention – Cameco Corporation - Application for renewal of uranium mine/mill licence for Rabbit Lake Operation

The SMA is the voice of the exploration and mining industry that operates in Saskatchewan and has the role of liaison and advocacy agent with provincial and federal governments and the public to advance the sustainable development of the mineral resources of the province. Environmental, Social and Governance performance are integral to the activities of SMA members and for decades our members have been Canadian and international leaders in including Indigenous peoples, businesses, and communities in their operations.

The SMA represents over 35 member companies including producers and exploration companies. Our mission is to advance a safe, sustainable, and globally competitive exploration and mining industry in Saskatchewan that benefits all residents of the province.

The SMA is providing this intervention in support of Cameco Corporation's application for the renewal of uranium mine/mill licences for their Rabbit Lake Operation. This renewal is necessary as their current licence expires on October 31, 2023. The SMA understands that Cameco's original licencing request was for an indefinite term but in response to concerns raised during engagement sessions, they have now requested a 20-year term. The SMA believes this to be a reasonable and responsible licencing period.

Cameco continues to maintain strong and mature management systems, particularly in the areas of conventional and radiological safety, protection of the environment, and health of their employees. Cameco's ability to safely maintain the Rabbit Lake operation in care and maintenance is a testament to the strength and efficacy of these systems.

Cameco continues to be a leading global producer of one of Canada's Critical Minerals, that being uranium.¹ Ensuring a secure and responsibly sourced supply of uranium has never been more important, when one considers the illegal invasion of Ukraine by Russia, the political tension between Canada and China, and the need to provide low-carbon energy and electrification to help reduce the impact of climate change. Clean electricity, including that provided by nuclear power, will be a cornerstone in ensuring that Canada can achieve a green economy and be net-zero by 2050.

One way that Canada can support the growth and sustainability of the nuclear industry is to provide regulatory certainty through the provision of the 20-year licence that has been requested by Cameco for their Rabbit Lake Operation. Although there are currently no plans to resume operations at Rabbit Lake, Cameco has made considerable efforts and investments to maintain flexibility should the need to re-initiate operations at this mine arise. A 20-year licence term would also help locally to ensure continued benefits as outlined in Cameco's collaboration agreements as even though the mill is not currently operating, employees and service providers continue to keep the site in a safe care and maintenance status.

¹ <https://www.canada.ca/en/campaign/critical-minerals-in-canada/canadian-critical-minerals-strategy.html>

The SMA understands that Cameco is not proposing any new activities as part of this licensing renewal request, and as such, will continue to operate Rabbit Lake in the same safe and responsible manner that they have under their current licence.

Cameco also has a long history of effectively engaging with communities in northern Saskatchewan, which includes Indigenous communities. They have continued to foster strong relationships in northern Saskatchewan, which is reflected in their ongoing work with northern people, communities, and businesses. Their Collaboration Agreement speaks to mutual beneficial partnerships and formalizes commitments under 5 pillars (workforce development, business development, community investment, community engagement and environmental stewardship).

Further, Cameco continues to be a leader in the public engagement space through their Public Information Programs and Public Disclosure Protocol. The SMA understands that Cameco will continue public engagement through this protocol, regardless of the licence term. In addition to these engagement activities, the annual CNSC regulatory oversight report will also continue to provide a yearly opportunity for Indigenous groups and interested stakeholders to submit interventions to the CNSC and engage in Commission meetings.

Cameco's ongoing commitment to environmental monitoring and support for community-based monitoring programs such as the Eastern Athabasca Regional Monitoring Program and the Community-Based Environmental Monitoring Program that are conducted in northern Saskatchewan, continue to highlight that water and country foods are not being impacted and that they are safe to drink and eat. Cameco's transparency regarding safety and environmental performance for Rabbit Lake are clearly seen by the easily accessible information on their website.²

We would like to thank you for the opportunity to share our views in this oral intervention to indicate our support for Cameco Corporation's application for renewal of uranium mine/mill licence for their Rabbit Lake Operation for a 20-year period.

Yours sincerely,



Brad Sigurdson
Vice President – Environment, Safety and Regulatory Affairs

cc Liam Mooney – Vice President, Safety, Health, Environment & Quality and Regulatory Relations (Cameco)
Kevin Nagy – Director, Compliance and Licensing - Safety, Health, Environment, Quality and Regulatory Relations (Cameco)
Pam Schwann – President (SMA)

² <https://www.cameco.com/businesses/uranium-operations/suspended/rabbit-lake/environment-safety>