



Oral presentation

Presentation from the Athabasca Chipewyan First Nation

In the Matter of the

Orano Canada Inc., Cluff Lake Project

Request to Revoke the Current Licence and
Release the Cluff Lake Project to the
Institutional Control Program

Commission Public Hearing

March 1, 2023

Exposé oral

Présentation de la Première Nation des Chipewyan d'Athabasca

À l'égard de

Orano Canada Inc., Projet de Cluff Lake

Demande visant à révoquer le permis pour le
projet de Cluff Lake et à transférer la propriété
au Programme de contrôle institutionnel

Audience publique de la Commission

1^{er} mars 2023

Revocation of Cluff Lake Uranium Mine Lease

ACFN Concerns and Recommendations Prepared for
the CNSC Public Hearing on March 1, 2023



Presented by:
Callie Davies-Flett - Regulatory Advisor



Introduction



ACFN Elders' Declaration on Rights to Land Use

This is our Dené suline territory, our Traditional Lands. We have occupied these lands for the last 10,000 years and maybe longer. Our traditions go on and we have the right to continue our traditional way of life. We agreed only to share our lands and we still consider these lands ours. Clearly we have been here longer than anybody. The Government must recognize that we still have the right to use these lands.

Our Rights to use the lands and water on Traditional Lands have never been extinguished. The Traditional Lands, and our rights to use of the lands, are central to our Dené culture, identity and well-being. They are essential to the well-being of our future generations and their ability to sustain our culture in a changing world.

The meaningful practice of our treaty rights depends on having sufficient lands and resources to exercise those rights. Sufficient refers to not only quantity but quality, including what is required to fulfill our cultural and spiritual needs.

VISION

We are the ACFN K'ai Taile Dene. We are fiercely protective of our Treaty Rights, our traditional land, and our language for future generations.

MISSION

We honour our ancestors' traditional ways of being and knowing, and innovate new ways to protect and preserve our Language, our Land, and our Treaty Rights. We invest in people, programs and infrastructure to empower our Members, strengthen and sustain our Nation, and to benefit our future generations.



ACFN & Orano Canada Inc.



Vegetation

- Low lying vegetation and grasses instead of a rich boreal forest
- Orano has stated its main objective has been to restore the land to: “similar in appearance and land capability as existed prior to mining activities”

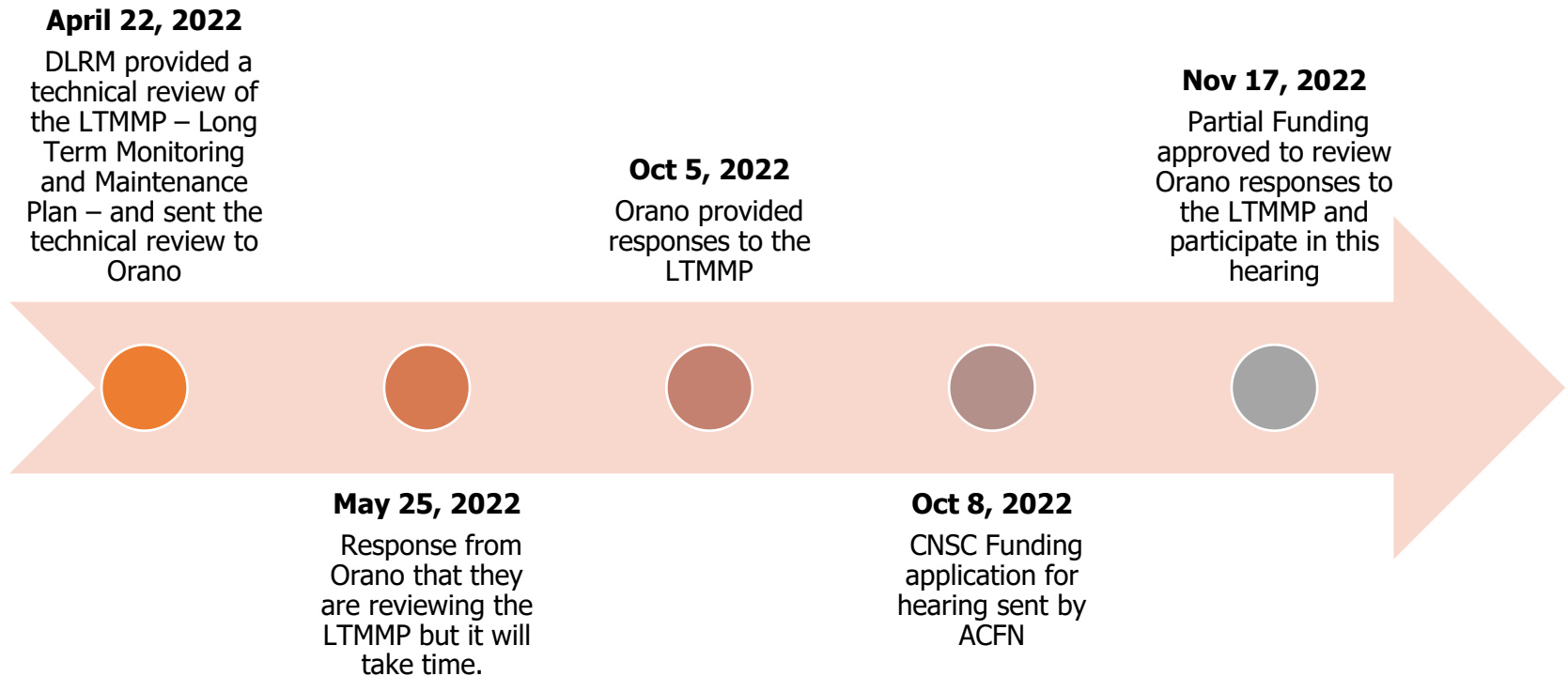




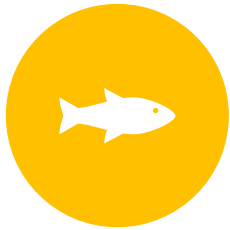
Wildlife

- Crucial for practicing our treaty rights
- No direct wildlife monitoring parameters
- Incidental observations are not enough

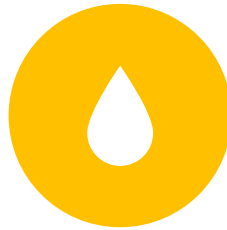
Timeline of LTMMP Review



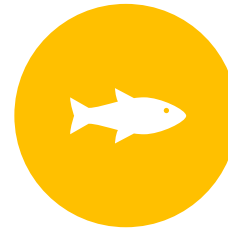
ACFN Requests from Orano



1. APPLY AMBIENT WATER QUALITY OBJECTIVES TO ALL AREAS THAT ARE ACCESSIBLE BY WILDLIFE AND HUMANS AND ARE CONSIDERED OR HYDRAULICALLY CONNECTED TO FISH BEARING WATER BODIES



2. CONSIDER APPLYING HUMAN HEALTH CRITERIA FOR AMBIENT WATER QUALITY



3. EXPAND THE MONITORING TO INCLUDE SEDIMENT AND FISH TISSUE RESIDUES IN THE CORE PROGRAM



4. IDENTIFY AREAS WITH ELEVATED RISK POTENTIAL UNDER CURRENT CONDITIONS AND PROPOSE LAND USE RESTRICTIONS AND REMEDIAL ACTIONS TO DECREASE RISKS TO TRADITIONAL LAND USERS FROM CONSUMPTION OF NATURAL SURFACE WATER, FISH, PLANTS AND WILDLIFE OVER BOTH SHORT- AND LONG-TERM PERIODS.

ACFN Findings

Our findings indicate responses were **inadequate** in:

- Areas of water quality and sediment monitoring
- Related issues with contaminants of potential concern
- The responses did not detail how Orano would address and mitigate concerns related to long-term health risks

ACFN Requests

That Orano Canada implement the requested changes to the Long-Term Monitoring and Maintenance plan offered by ACFN to Orano on April 22, 2022, to ensure effective and more stringent monitoring practices to **protect future generations** before transferring the lease to the ICP program.



Closing Statement