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**Written submission from the
Athabasca Joint Engagement and
Environmental Subcommittee**

**Mémoire du
Athabasca Joint Engagement and
Environmental Subcommittee**

In the Matter of the

À l'égard de

Orano Canada Inc., Cluff Lake Project

Orano Canada Inc., Projet de Cluff Lake

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

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

Commission Public Hearing

Audience publique de la Commission

March 1, 2023

1^{er} mars 2023

January 5, 2023

Georgie McDonald
General Delivery
Fond du Lac, Saskatchewan
S0J 0W0

Senior Tribunal Officer, Secretariat
Canadian Nuclear Safety Commission
280 Slater Street
Ottawa, Ontario
Email: cns.interventions.ccsn@canada.ca

Re: Intervention letter on Orano Canada Inc's Application for revocation of the Orano Canada Inc.'s (Orano) decommissioned Cluff Lake Project Mine Licence

Dear Senior Tribunal Officer:

On behalf of the Athabasca Joint Engagement and Environmental Subcommittee (AJES), I am pleased to provide a letter regarding the application from Orano Canada Inc. to revoke the uranium mine and mill license for the decommissioned Cluff Lake Project to facilitate the transfer of the property to the Province of Saskatchewan under the Institutional Control (IC) Program. I am a member of the committee and represent my community, Fond du Lac Denesuliné First Nation.

Orano has presented to the AJES twice regarding the decommissioned Cluff Lake project since 2020, including the verification that the site is safe for traditional land use with no restrictions. AJES members asked questions regarding on-going monitoring and safety of the site for traditional use. The AJES is confident that the Cluff Lake site is well understood, safe for traditional use and will be adequately oversee by the Province of Saskatchewan and there fore supports the revocation of the licence and the transfer of the property to the Province of Saskatchewan for long-term monitoring under the IC Program.

The seven Athabasca Basin communities (including the Denesuliné First Nations of Black Lake, Fond du Lac, and Hatchet Lake, along with the communities of Stony Rapids, Wollaston Lake, Uranium City, and Camsell Portage) signed the Ya'thi Néné Collaboration Agreement¹ (CA) in 2016 with Orano and Cameco. The Agreement confirms the partnership between the communities and industry in development of uranium resources in the Athabasca Basin relative to the existing operations. Under the Agreement, the AJES was created and appointed as the primary liaison between Orano, and the Athabasca First Nations and Athabasca communities

¹ 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.

for the sharing of environmental monitoring and other environmental information. AJES serves as the first point of contact for community engagement.

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 Denesūliné First Nation
- 1 representative from Hatchet Lake Denesūliné First Nation
- 1 representative from Fond du Lac Denesūliné First Nation
- 1 representative for the Athabasca municipalities (Uranium City, Camsell Portage, Stony Rapids, 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. As this important mandate is congruent with all pillars of the CA, including the AJES, an additional member on the AJES is:

- The Executive Director of the Ya'thi Néné Lands and Resource Office

To support AJES, the Community Liaisons also attend AJES meetings as observers along with any other invited guests. 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 any questions or concerns from community members and/or leadership. Discussions range from exploration to decommissioning, including the decommissioned sites and impacts to the environment. The AJES endeavours to share information regarding areas of interest that have specifically been identified by community members.

In summary, the AJES is the conduit for sharing of information between companies and communities on matters related to the environment, the operations and proposed authorizations, and to address issues raised by community members. The process defined together under the agreement, the AJES, with support from the YNLRO and the community liaisons, work to ensure operational and regulatory updates are reaching the Athabasca Basin communities in an effort to ensure community members are informed and concerns are heard.

Sincerely,



Georgie McDonald AJES – Fond du Lac Denesuliné First Nation

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